

Address:	West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5		1
Application Number:	2025/2667/P	Officer: Christopher Smith	
Ward:	Haverstock		
Date Received:	19/06/2025		
Proposal: Hybrid Planning Application for Part Full and Part Outline Planning Permission comprising: Detailed planning permission for Development Plots A1 and D1 including demolition of any above ground structures, and erection of new buildings for use as residential dwellings (Class C3) and flexible commercial, business and service space (Class E), together with landscaping, public realm, cycle parking, highway works, infrastructure and other works associated with those Development Plots; Detailed planning permission for a scheme of temporary hard and soft landscaping adjacent to Development Plots A1 and D1 and associated works; and, Outline planning permission for a phased, development with all matters reserved for Development Plots A2, A3, B1, C1, D2, D3, E1, E2, F1, F2 and G1 including demolition of all existing above ground structures within those Plots and erection of new buildings to provide residential dwellings (Class C3) and flexible commercial, business and service space (Class E) together with new pathways, play space, cycle and disabled parking, hard and soft landscaping, highway works, infrastructure, and other works associated with those Development Plots in accordance with the Development Specification.			
Background Papers, Supporting Documents and Drawing Numbers: The development hereby permitted shall be carried out in accordance with the following approved plans: ***See Conditions List***			
RECOMMENDATION SUMMARY: Grant conditional Full Planning Permission and Outline Planning Permission following: (i) referral to Mayor of London for his direction, (ii) finalisation of detailed wording for conditions following consultation with the Mayor, and (iii) completion of Shadow s106 Agreement.			
Applicant:		Agent:	

Community Investment Programme LB of Camden 5 Pancras Square London N1C 4AG	Newmark One Fitzroy 6 Mortimer Street London W1T 3JJ
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ANALYSIS INFORMATION

Detailed element – Proposed housing numbers

Plot	Market homes	Affordable homes	Total homes
A1	0	30	30
D1	4	18	22
TOTAL	4 (8%)	48 (92%)	52

Detailed element – Proposed floorspace

Plot	Commercial (GIA)	Market Residential (GIA)	Affordable Residential (GIA)	Total Area (GIA)
A1	58sqm (2%)	0 (0%)	3,768sqm (98%)	3,826sqm
D1	0 (0%)	435sqm (15%)	2,472sqm (85%)	2,905sqm
TOTAL	58sqm (1%)	435sqm (6%)	6,240sqm (93%)	6,731sqm

Detailed element - Proposed housing mix and tenure

Tenure	1 bed	2 bed	3 bed	4 bed	Total
Market	0	1	3	0	4
Social-affordable rent	2	20	21	5	48
Intermediate rent	0	0	0	0	0
Total homes	2	21	24	5	52

Outline Proposals – Floorspace (Maximum Areas)

Plot	Commercial (GIA)	Residential (GIA)	Total Area (GIA)
A2	100sqm	8,300sqm	8,400sqm
A3	0	2,970sqm	2,970sqm
B1	100sqm	12,350sqm	12,350sqm
C1	0	14,510sqm	14,510sqm
D2	0	4,600sqm	4,600sqm
D3	0	4,200sqm	4,200sqm
E1	0	3,300sqm	3,300sqm
E2	0	11,100sqm	11,100sqm
F1	50sqm	2,850sqm	2,850sqm
F2	100sqm	5,500sqm	5,500sqm
G1	0	6,740sqm	6,740sqm
TOTAL	200sqm	76,420sqm	76,520sqm

Notes: A maximum of 200sqm of commercial space would be provided within the outline proposals and the total floorspace for the outline proposals would not exceed 76,520sqm.

Outline Proposals – Illustrative Unit Mix

Tenure	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Market (%)	212 (40%)	239 (46%)	75 (14%)	0 (0%)	0 (0%)	526 (65%)
Social-affordable rent (%)	45 (16%)	128 (46%)	92 (33%)	11 (4%)	2 (1%)	278 (35%)
Intermediate rent (%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
Total homes (%)	257 (32%)	367 (46%)	167 (20%)	11 (1%)	2 (0.2%)	804 (100%)

Indicative Masterplan (Detailed + Outline Scheme) - Unit Schedule

Plot	Market homes	Affordable homes	Total homes
Detailed (Phase 1)	4	48	52
Outline (indicative)	526	278	804
TOTAL	530 (62%)	326 (38%)	856

EXECUTIVE SUMMARY

The Application Site is known as ‘West Kentish Town Estate’ and comprises a 3.83 hectare area bounded by Queen’s Crescent, Grafton Road, Athlone Street, Rhyl Street, Weedington Road, City Road, Warden Road, Bassett Street and Allcroft Road), London, NW5, referred as the “Site”.

The proposed development comprises 13 Development Plots. Development Plots A1 and D1 and associated infrastructure and public realm are submitted in detail (“Detailed Proposals”). Full details are also submitted for areas of temporary hard and soft landscaping that will be provided in proximity to Development Plots A1 and D1. Development Plots A2, A3, B1, C1, D2, D3, E1, E2, F1, F2 and G1 and the remaining areas of the Site are submitted in outline (“Outline Proposals”).

The 13 Development Plots would be delivered across 8 indicative phases over a 20 year construction period, with the ambition to decant and rehouse existing residents as soon as practically possible.

The existing Estate, which was built in the 1960s, suffers from overcrowding, poor thermal performance, dampness, antisocial behaviour, and a lack of amenity and open space.

In 2015, following a series of complaints about living conditions and disrepair, the Applicant asked residents of the West Kentish Town Estate to participate in a survey to determine what they liked and disliked about their homes and the Estate. In total, 249 residents were engaged, 80% of the people who live in the Estate. Having reflected on the feedback from the survey, the Applicant agreed to progress with several potential development options to regenerate the Site.

The redevelopment concept seeks to revitalise the current West Kentish Town Estate by achieving several key goals: replacing current housing with modern standards; increasing the supply of larger homes to alleviate overcrowding and meet broader housing needs in Camden; integrating the Estate with its surroundings; improving visibility for safer neighbourhoods; and creating an exemplary landscape setting with high-quality buildings.

The proposals comprise the complete demolition of all existing buildings on the Site, comprising 316 dwellings, and their replacement with new housing designed to meet contemporary standards and demands. This has significant health benefits and helps to address housing inequality.

This landscape-led regeneration scheme would deliver a diverse mix of housing tenures, commercial spaces, and high-quality open spaces and public realm, all integrated within a coherent masterplan. As well as the reprovion of the current homes on the estate, there would be an additional c. 540 new homes making a significant contribution to the borough’s housing. Given the Housing Delivery Test, The NPPF makes clear this should be given significant weight in decision making. Overall, the masterplan would deliver 40% affordable housing.

The new homes would have excellent operational energy efficiency providing warm energy efficient homes with lower energy bills.

Officers have identified less than substantial harm to heritage assets, at the lower end of the scale, and that this should be given considerable weight and importance in decision making. However, the level and nature of the harm has been carefully considered and viewed in the context of the fact that this Estate is expected to come forward for development with an increased density and which would secure social, environmental and economic benefits including replacement and new social housing.

The scale of the scheme also harms amenity of some nearby homes through major adverse light impacts exceeding what would normally be expected in this urban context. However, most of these are as a result of outline plots on Grafton Road and so further mitigation may be possible through refined massing and articulation. The impact on other properties is considered acceptable.

The development would be car free, with good quality cycle parking provided in all new blocks. Significant financial contributions exceeding £1.6m would secure improvements to the transport, pedestrian and cycling environment in the local area, mitigating impact on the transport infrastructure. The impact from demolition and construction would be carefully managed throughout the development with continuous engagement.

The scale of the scheme would generate notable economic benefits including employment, and planning obligations ensure some of these employment and training benefits are directed to local residents and businesses.

The scheme directly addresses local health inequalities, particularly for low-income households, older people, and disabled people, as well as their families and carers. Directing the economic benefits to local residents will also have a positive impact on long term health, along with the public spaces and placemaking which will support physical activity, mental wellbeing, and social cohesion, with young people co-designing spaces.

Officers believe there are considerable and compelling public benefits that outweigh harm and negatives identified with the scheme.

The scheme complies with the development plan as a whole, and the recommendation is to grant permission.

OFFICER REPORT

Reason for Referral to Committee:

Residential development involving the construction of a building, resulting in provision of 10 or more new dwellings (including flats) [Clause 3(i)]

Referral to the Mayor:

The application would provide more than 150 residential units and buildings over 30m in height and is therefore referable to the Mayor under the Mayor of London Order 2008. The Mayor has the power to direct the local authority to refuse the application or call in the application for determination.

Environmental Impact Assessment (EIA):

The development is EIA development. In November 2022, a formal request for a Scoping Opinion was submitted to the Council in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the EIA Regulations') (Ref. 2022/5281/P).

The Environmental Scoping Opinion was issued by Camden Council on 3rd March 2023 and concluded that the environmental topics recommended to be included within the Environmental Statement ("ES") would meet the statutory requirements set out in Section 15(2)(a) of the EIA Regulations. An updated EIA Scoping Opinion (Ref. 2024/4887/P) was issued by the Council on 14th May 2025 following design, tenure and phasing amendments to the proposals. It was also considered appropriate to do undertake a further scoping because of the time that had elapsed since the initial scoping opinion had been issued.

This application is supported by an Environmental Statement ("ES"), prepared by Trium Environmental Consulting. Following a review by the Council's appointed consultants, Buro Happold, additional information and clarification has been provided through an Addendum ES, Non-Technical Summary and standalone ES Chapter 11 (Daylight, Sunlight, Overshadowing and Solar Glare) documents. Both sets of documents were subject to further consultation. The addendum ES has also been independently reviewed to Buro Happold's satisfaction.

1. THE SITE

- 1.1 The site, known as 'West Kentish Town Estate', is bounded by Queen's Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road.
- 1.2 The site covers a total area of approximately 3.83 hectares. It comprises residential flats, a commercial unit, associated hardstanding for car parking, three former garage sites that have been demolished, green areas, and play spaces.
- 1.3 The existing estate was constructed in 1964 and comprises 316 homes in total. There are eight existing residential buildings: Wedmore, Milverton, Durston, Chelwood, Ashington and Beckington, Langridge, Cannington and

Edington. Within the Wedmore block at 104a Queen's Crescent, there is a small commercial unit.

- 1.4 All existing buildings within the estate range between three and four storeys in height, with variation to ground datums due to the site topography.
- 1.5 There are currently 263 social rented homes that Camden manages, and 53 privately owned leasehold properties - a mix of owner-occupied and privately rented properties - which were purchased under the Right to Buy. Ten of the existing leaseholder dwellings are currently being used as emergency accommodation to house displaced individuals temporarily.
- 1.6 The key floorspace areas for the existing site are set out in the table below.

Use Class	Floorspace (sqm GIA)	Number of dwellings
Existing Social Rented Housing	17,397 (82.7%)	263 (82.2%)
Existing Market Housing (Leaseholders)	3,637 (17.3%)	53 (16.8%)
Existing Total Housing C3	21,034	316
Existing Commercial, Business and Service (Class E)	110	n/a
Total	21,144	316

Table 1 - Key existing floor spaces in the site

- 1.7 The table below also provides the existing floor spaces by building, and Figure 1 provides a plan showing the location of the existing buildings.

Address / Name	Existing Area (sqm GIA)
Wedmore	863 (includes 110sqm of commercial)
Ashington and Beckington	2,612
Milverton	1,959
Durstun	3,932
Chelwood	3,927
Cannington	1,956
Langdridge	1,962
Edington	3,933
Total	21,144

Table 2 - Existing Floorspace by building



Figure 1 - Site plan showing location of the existing buildings

- 1.8 The site has an emerging allocation in the Submission Draft Camden Local Plan. The site is located within proposed allocation C13, which is designated for a housing-led mixed-use development with an indicative capacity of 885 permanent, self-contained homes (Use Class C3) (569 additional homes).
- 1.9 Vehicular access is provided by all roads that surround the site, with Weedington Road running through the centre of the site north/south.
- 1.10 There are existing areas of landscaping between the residential buildings. There is a hard-surfaced ball court in the centre of the site (just north of Hawkridge House) which is enclosed by a wire fence. There is no other formal play space provided on the site. There are also 141 existing trees across the site.

- 1.11 The site is in a Controlled Parking Zone (“CPZ”) CA-L Inner. Currently, 85 existing estate residents hold CA-L Parking Permits, which allow them to park on-street. Additionally, there are 52 off-street surface parking spaces reserved for residents only, accessible with valid permits. It is understood that 13 existing residents hold valid permits for these spaces.
- 1.12 There are no dedicated resident cycle parking spaces within the existing buildings. There are Sheffield stands and docks located throughout the site.
- 1.13 The site is well connected and has a Public Transport Access Level (PTAL) ranging between 2 and 5 on a scale of 0 to 6b, where 6b is the highest. The southeast portion of the site has a higher PTAL rating, with Kentish Town station located approximately 500 metres to the east (served by Northern Line and Thameslink rail services) and Kentish Town West station 300 metres to the southeast (Overground services). Additionally, Gospel Oak station is situated approximately 700 metres from Queens Crescent.
- 1.14 The site is not located within a Conservation Area, and none of the buildings on the site are statutorily or locally listed. Part of the eastern side of the site, along Grafton Road, lies within the London Viewing Management Framework Landmark Viewing Corridor View 2B.1 (Parliament Hill to the Palace of Westminster). The image below shows the view running across the site.

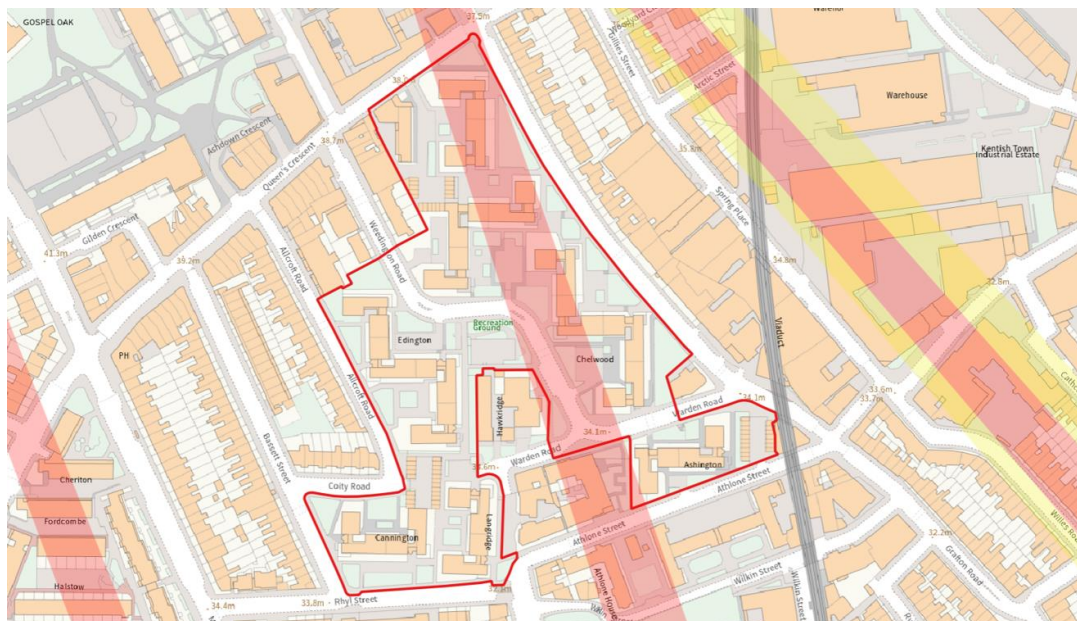


Figure 2 - LVMF View 2B.1 Parliament Hill to Palace of Westminster

- 1.15 The site is located within Flood Zone 1, defined as land and property assessed as having less than 0.1% (1 in 1,000) annual probability of river or sea flooding in any given year. The site is located within a Local Critical Drainage Area however it does not lie within a designated Flood Risk Area. There is some minor localised risk of surface water flooding.

- 1.16 The development area has some areas of medium or high surface water risk and is located in the Counters Creek catchment area and adjacent to Maitland Park Local Flood Risk Zone.



1.17

Figure 3 – EA Flood Map showing areas at risk of surface water flooding once in every 100 years.

- 1.18 A Metropolitan Walk cuts through the southwestern corner of the site.

Surrounding Area

- 1.19 The site is bounded to the north by Queen's Crescent, which is characterised by retail and commercial units with residential above, to the west is Weedington Road, which is primarily residential, along with the Baitul Aman Mosque. To the east, the site is bounded by Grafton Road, commercial units, residential properties and a railway serving the London Overground line. To the south, it is bounded by Warden Road and Athlone Street, and to the west by Allcroft Road and Bassett Street, which are lined with terraced residential properties.
- 1.20 The surrounding buildings range between one and five storeys tall, to the west and the north along Allcroft Road and Queen's Crescent, respectively. Buildings immediately to the east of Grafton Road are characterised by three-storey high residential houses and 4-storey industrial/commercial units, whilst to the south, and immediately outside of the site boundary,

stands Hawkridge House at approximately 15 storeys, the tallest existing building close to the existing estate.

- 1.21 Queen's Crescent to the north is a shopping street and Neighbourhood Centre providing services for local people.
- 1.22 There are several listed and locally listed buildings close to the site, including Rhyl Primary School (Grade II Listed), which is opposite the south-western corner of the site on Rhyl Street.
- 1.23 To the west, the West Kentish Town Conservation Area extends from Prince of Wales Road to Queen's Crescent and to the southeast, on the other side of the rail viaduct that runs north/south on the eastern edge of the site, is the Inkerman Conservation Area.
- 1.24 The largest green spaces are Parliament Hill, at approximately 1km distance (15 mins walk); Lismore Circus at approximately 600m (9 mins walk); Talacre Gardens at approximately 260m (4 mins walk). All of these include playgrounds of various types. There are also MUGAs in Talacre Gardens and in a smaller park along Malden Road, along with larger playing pitches and landscaped seating spaces.

2. THE PROPOSAL

- 2.1 The application is a hybrid application which comprises a masterplan for:
 - Detailed planning permission for Development Plots A1 and D1 (in blue on the plan below).
 - Detailed planning permission for a scheme of temporary hard and soft landscaping adjacent to Development Plots A1 and D1.
 - Outline planning permission for a phased development, with all matters reserved, for the remaining Development Plots A2, A3, B1, C1, D2, D3, E1, E2, F1, F2 and G1.

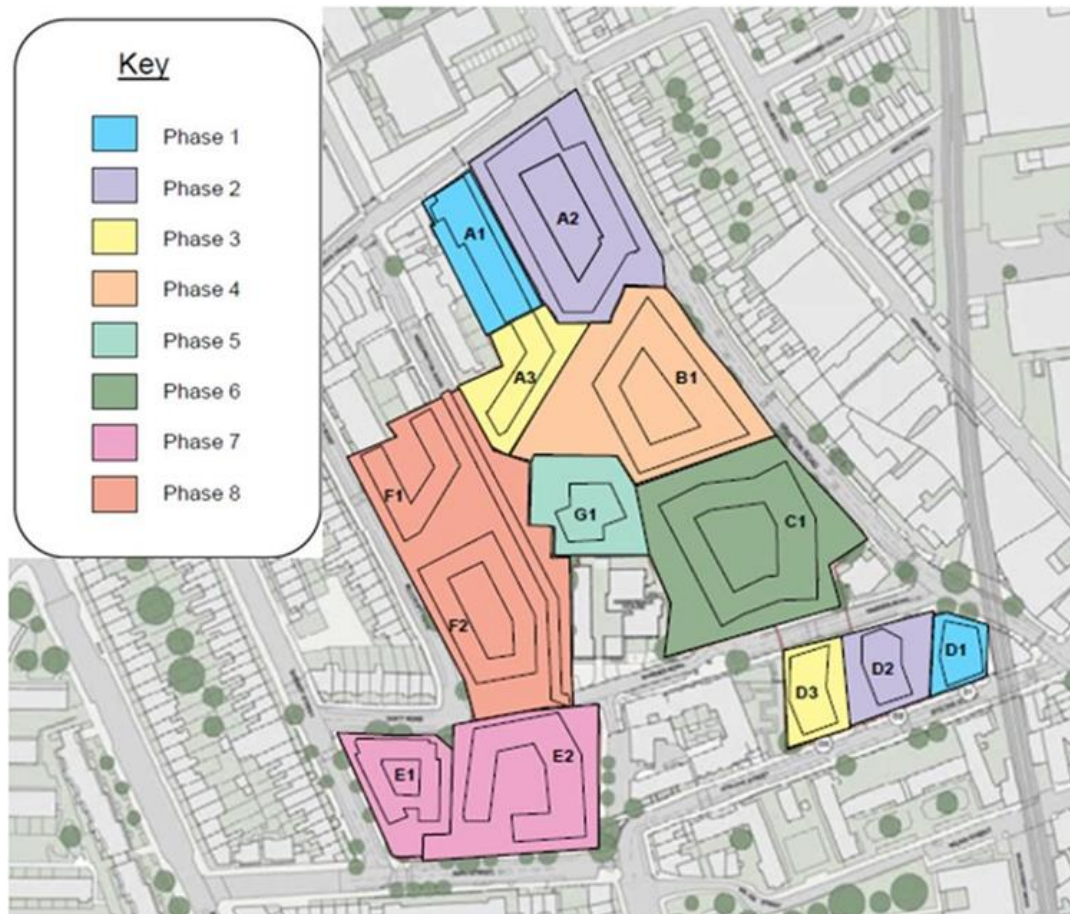


Figure 4 - Proposed masterplan showing phases and development plots

- 2.2 The proposed development comprises demolition of all the buildings and structures on-site and the comprehensive redevelopment of the site to deliver a residential-led mixed-use development providing up to 856 homes, and non-residential floorspace comprising retail and commercial uses with associated infrastructure.
- 2.3 Overall, the masterplan would deliver 40% affordable housing by floor area. The affordable housing would be provided as 100% social rent.
- 2.4 The detailed proposals would deliver 93% affordable housing by floorspace (92% by units). The outline proposals would deliver 35% affordable housing by floorspace (35% by units).
- 2.5 Some development plots are proposed to be delivered as 100% affordable, and some as 100% market and some are mixed in tenure. This is due to the decant strategy. An appropriate mechanism for addressing this would be secured through shadow s106 obligations and planning conditions, which would control the timing of delivery of affordable and market homes.
- 2.6 The commercial uses are proposed to be located on Queen's Crescent and around the Central Public Space Character Areas. The Detailed Proposals

include 58sq.m (GIA) of Commercial, Business and Service (Use Class E) within Plot A1.

- 2.7 The Outline Proposals would provide up to 200sq.m (GIA) of Commercial, Business and Service (Class E) use. Restaurants would not be included within the proposed Use Class E floorspace due to ducting and ventilation requirements, and it is possible to control this via condition.

3. FORM OF APPLICATION

Hybrid application (part Detailed, part Outline)

- 3.1 The Application is a hybrid application - part Full Planning Permission (detailed) and part Outline Permission (outline or masterplan). The proposed development comprises 13 Development Plots in total.
- 3.2 The detailed proposals for Full Planning Permission are for Phase 1 and include Development Plots A1 and D1 (shown in blue in Figure 4 above). Phase 1 also includes the associated infrastructure and public realm for Plots A1 and D1. The masterplan proposals for the Outline Permission are for the remaining phases, and include Development Plots A2, A3, B1, C1, D2, D3, E1, E2, F1, F2 and G1, as well as and the remaining areas of the site.
- 3.3 Full details are also submitted for areas of temporary landscaping that will be provided close to Development Plots A1 and D1. The temporary landscaping scheme is show on the Interim Landscaping Plans. These areas are within the Outline Plots but require temporary landscaping treatment to form a good quality setting to Plots A1 and D2 which will be completed in Phase 1 and occupied as one of the first parts of the development. The permanent treatment of this area will come forward under the future Reserved Matters application for Plots A2, A3 and D2.
- 3.4 The detailed proposals show the level of information required for Full Planning Permission. The Outline Proposals have a more limited amount of information provided and seek to provide a framework for details to come forward in the future in line with the masterplan. Unlike the Detailed Proposals, the Outline Proposals do not seek approval of matters such as access, appearance, landscaping, layout, and scale.
- 3.5 The outline proposals for which permission is sought include a framework for the general principles of the development, such as the proposed land uses, the general parameters for the scale of development, and setting rules for how the site can be developed. These general principles are set out in three core documents:
- **The Parameter Plans** - these set out in plan form the maximum, and sometimes minimum, parameters that the fully designed development

must conform with (for example, in terms of heights, building footprints, amount of open public realm etc).

- **The Design Code** - this provides a detailed guide to the design principles that the fully designed development must incorporate or have regard to. Some of these are mandatory and therefore “rules” and some guidelines.
- **The Development Specification** – this specifies the parameters, principles, constraints and restrictions within which the “flexible” elements of the scheme are contained. It also provides written parameters, including the maximum quantum of development in terms of floorspace and land uses for the outline Proposals, but also provides limitations for the permission as a whole to ensure that the environmental effects of what will be built have been assessed.

- 3.6 The Development Specification, Parameter Plans, and Design Codes are referred to as the “Outline Application Framework”.
- 3.7 Outline Permission would be granted subject to conditions requiring the subsequent submission and approval of one or more Reserved Matter Applications (RMAs). The subsequent RMAs would contain the full details of the scheme’s detailed access, appearance, landscaping, layout and scale, which are not included in the Outline Proposals. The RMAs would be submitted to the Council in the coming years.
- 3.8 This approach is often used on large schemes, where development would occur over a number of years, to allow some flexibility in the design and exact mix of uses. However, the Outline Permission defines the maximum parameters for scale of development, maximum heights, maximum amount of different types of use, and it will also control important aspects such as the minimum amount of open space and the location of key routes.
- 3.9 The footprint, massing and detailed design of the buildings would be addressed through the submission of RMAs following the grant of the Outline Permission.
- 3.10 An Illustrative Masterplan has been developed to demonstrate how the Outline Proposals could come forward as a fully designed scheme within the parameters of the Outline Application Framework. This is just one interpretation of the Outline Application Framework. At the Reserved Matters stage, the scheme may appear different, but it would conform to the general principles outlined in the Outline Application Framework.
- 3.11 For the basis of this application and noting the layout, separation and demarcation of the plots/phases on the phasing plan, the plots and phases indicated could adequately be replaced by appropriate separate stand-alone planning applications if so required, subject to an appropriate and robust planning assessment at the time of submission of any future application, considering the cumulative effect across the overall masterplan.

Decant and Phasing Strategy

- 3.12 There are eight existing residential buildings across the site with an element of the Wedmore block at 104a Queen's Crescent containing a small commercial unit. The existing residential blocks include Wedmore, Milverton, Durston, Chelwood, Ashington & Beckington, Langridge, Cannington and Edington.
- 3.13 The re-provision of homes across the site has been informed by the decant strategy for existing residents at the site. The decant strategy has been devised to minimise households moving more than once throughout the build-out of the proposals.
- 3.14 The 13 Development Plots sit within 8 indicative phases, which would be constructed over a 20-year construction period. These phases are in many cases broken down into sub-phases to fully explain the anticipated order of demolition, construction and landscaping activity, and this is set out in the table below which related to the phases shown in Figure 4.

Phase	Activity	Planning
Phase 1a	Demolition of Wedmore and all structures in Development Plots A1 and D1.	Full Planning Permission
Phase 1b	Construction of Development Plots A1 and D1.	Full Planning Permission
Phase 1c	Construction of temporary hard and soft landscaping adjacent to Development Plots A1 and D1.	Full Planning Permission (temporary)
Phase 2a	Demolition of Milverton, Ashington & Beckington and associated structures.	Reserved Matters 1
Phase 2b	Construction of Development Plots A2 and D2 and associated access and landscaping (including final landscaping for A1 and D1).	Reserved Matters 1
Phase 3a	Demolition of Durston and associated structures.	Reserved Matters 2
Phase 3b	Construction of Development Plots A3 and D3 and associated access and landscaping.	Reserved Matters 2
Phase 4a	Demolition of Chelwood and associated structures.	Reserved Matters 3
Phase 4b	Construction of Development Plot B1.	Reserved Matters 3
Phase 5a	Demolition of the central MUGA and adjustments to Weedington Road.	Reserved Matters 4
Phase 5b	Construction of Development Plot G1 and associated access and landscaping.	Reserved Matters 4
Phase 6a	Construction of Development Plot C1 and associated access and landscaping.	Reserved Matters 5

Phase 7a	Demolition of Langridge and Cannington and associated structures.	Reserved Matters 6
Phase 7b	Construction of Development Plots E1 and E2 and associated access and landscaping.	Reserved Matters 6
Phase 8a	Demolition of Edington and associated structures.	Reserved Matters 7
Phase 8b	Construction of Developments Plot F1 and F2 and associated access road linking Weedington Road to Warden Road and landscaping.	Reserved Matters 7
Phase 8c	Construction of final landscaping scheme and MUGA.	Reserved Matter 7

Table 3 -Proposed phasing strategy

- 3.15 Detailed permission is also sought for an interim, temporary landscaping scheme for areas next to Development Plots A1 and D1 (which will be replaced with a permanent treatment during works for Plots A2, A3 and D2).

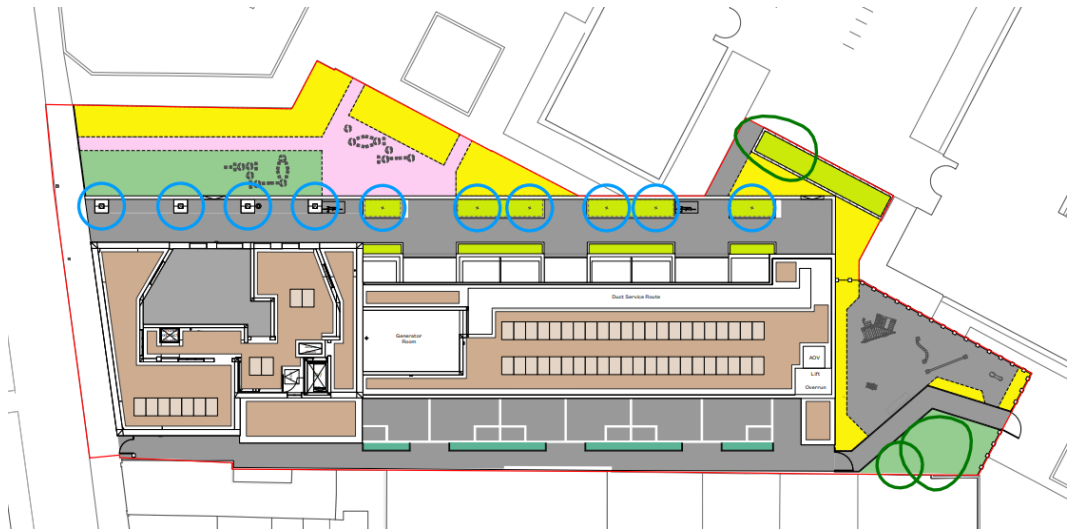


Figure 5 - Interim landscaping for Plot A1

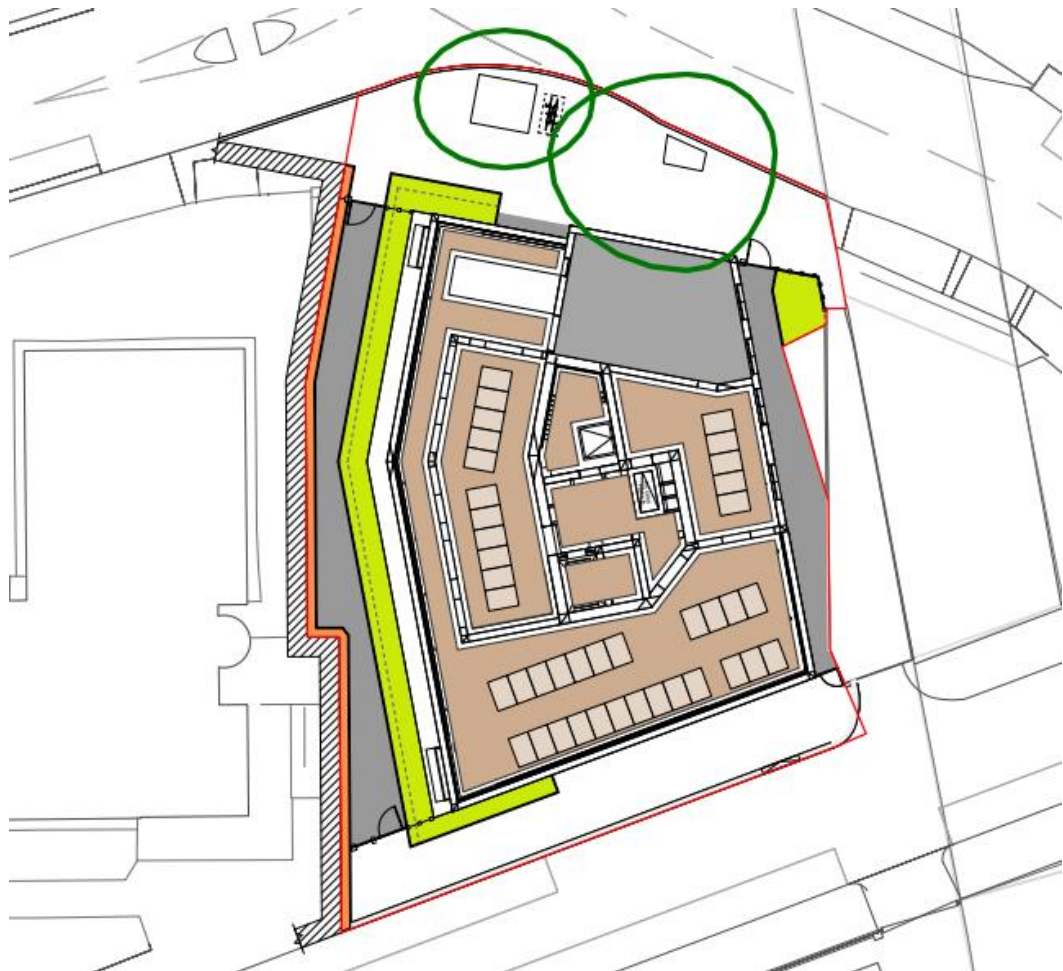


Figure 6 - Interim landscaping for Plot D1

- 3.16 These areas intersect with the Outline Plots but require temporary landscaping treatment to form a good quality setting for Plots A1 and D2, which would be completed in Phase 1 and occupied early in the development of the overall masterplan. The permanent treatment of this area will come

forward under the future Reserved Matters application for Plots A2, A3 and D2 and undertaken in phases 2 and 3.

4. ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

4.1 A scoping opinion was initially issued by the Local Planning Authority (LPA) in 2023. An updated scoping opinion for the proposal was provided by the Council in May 2025 (reference 2024/4887/P) following design, tenure and phasing amendments to the proposals and which set out the scope of the Environmental Statement (ES) to be prepared under the EIA Regulations 2017. An ES was submitted with the application covering the agreed scope and includes the following sections. The ES includes the following key sections:

- Alternatives and Design Evolution
- Demolition and Construction
- Socio-Economics
- Climate Change and Greenhouse Gases
- Traffic and Movement
- Air Quality
- Noise and Vibration
- Daylight, Sunlight, Overshadowing and Solar Glare
- Wind Microclimate
- Heritage, Townscape and Visual Impact
- Environmental Management
- Effect Interactions

4.2 The ES considers the impact of the development, both during construction and once completed, along with the cumulative impact of other recent or future schemes in the area, as well as allocated sites. The cumulative schemes considered in the ES includes:

- Camden Collection (Bacton Estate) – 2020/1019/P
- C3 - Murphy's Yard – Draft allocated site - 2021/3225/P (withdrawn application)
- C2 – Regis Road and Holmes Road Depot – Allocated Site
- C10 – Juniper Crescent – Draft Allocated Site
- C12 – Gilbey's Yard – Draft Allocated Site
- C15 – Wending Estate and St Stephens Close – Draft Allocated Site
- C18 – UCL Camden Campus – Draft Allocated Site
- Morrison's Supermarket – 2017/3847/P, 2020/3116/P
- The O2 Masterplan Finchley Road – 2022/0528/P
- Highgate Studios – 2023/1804/P
- 100 and 100a Chalk Farm Road – 2024/0479/P
- The Charlie Ratchford Centre – 2020/5063/P

- 5-17 Haverstock Hill – 2016/3975/P, 2021/3268/P
 - 155 and 157 Regent's Park Road London NW1 8BB – 2021/0877/P
 - 11-12 Ingestre Road (assisted living) – 2018/4449/P
- 4.3 Additional information and clarification has been provided through an Addendum ES, Non-Technical Summary and standalone ES Chapter 11 (Daylight, Sunlight, Overshadowing and Solar Glare) documents. Following submission of this information a public re-consultation took place.

5. SHADOW SECTION 106 AGREEMENT

- 5.1 The recommendations are based on certain planning requirements (“Heads of Terms”) being secured in the event of approval. These Heads of Terms would usually be incorporated in a s106 agreement. However, in this case the applicant is the council and as a matter of law the council cannot enter into a s106 agreement with itself.
- 5.2 Nevertheless, it is still imperative that this application is dealt with in a way that is consistent with the way the council would deal with non-council applications. Therefore, the Heads of Term will be embodied in a “shadow s106 agreement”. This will be in the same form as a “standard” s106 agreement, incorporating the usual legal clauses and is being negotiated by separate lawyers within the Borough Solicitor’s Department representing the interests of the council as landowner or applicant (the CIP team), and the council as local planning authority (the planning team).
- 5.3 The shadow s106 agreement will include, among other things, a provision requiring (i) that in the event of any disposal of the relevant land the shadow s106 agreement terms will be included in the terms of the sale transfer and (ii) the purchaser will be formally required to enter into a shadow s106 agreement as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site).
- 5.4 Once the shadow s106 agreement has been finalised, the Executive Director or the Director of Development (the applicant department) will sign a letter formally undertaking on behalf of the department that its provisions will be complied with during the course of the development and its subsequent operation.
- 5.5 The shadow s106 agreement and the Executive Director or Director’s Undertaking of Compliance will be noted on the Planning Register (so the agreement is put on the record in the same way as a “standard” s106 agreement) and compliance with the shadow s106 agreement will be tracked and monitored by the Planning Obligations Monitoring Officers in the Planning Service in the same way as a standard agreement.

6. RELEVANT PLANNING HISTORY

- 6.1 The following sets out the most relevant planning history for the site and the surrounding area.

The application site

- 6.2 In February 1984, planning permission (Ref. PE9800263) was granted for new external cladding and staircase enclosures.
- 6.3 In March 2001, planning permission (Ref. PE9800785) was granted for the retention of refurbishment work to an existing playground to create a multi-sports area, including provision for new perimeter fencing and two self-closing gates, a shelter, retaining wall terracing for seating, and soft landscaping.
- 6.4 In June 2004, planning permission was granted for the change of use of part of the ground floor (Use Class D2) as ancillary office space.
- 6.5 An EIA scoping opinion was issued by the Local Planning Authority (LPA) in 2023 which set out the scope of the Environmental Statement (ES) to be prepared under the EIA Regulations 2017 (Ref. 2022/5281/P). The scheme which was scoped out was for 13 buildings of between 4 and 14 storeys in height and 898 homes.
- 6.6 A planning application was submitted by the Applicant in January 2024 (Ref. 2024/0285/P) for Phase 0, which comprises the Enabling Demolition Works required across the Site. The Enabling Demolition Works comprised the demolition of three groups of single storey garages adjacent to Edington, Cannington and Landridge to create spaces for construction logistics compounds. Planning permission was granted in March 2024.
- 6.7 An updated EIA scoping opinion was provided by the Council in May 2025 (Ref. 2024/4887/P). The scheme which was scoped out was also for 13 buildings of between 4 and 14 storeys in height and 898 homes plus commercial floorspace.

The surrounding area

Bacton Estate Redevelopment

- 6.8 The most notable large major development in the local area is Camden Council's redevelopment of Gospel Oak District Housing Office (Phase 1) and the Bacton Low Rise Estate (Phase 2) granted in March 2013 (Ref. 2012/6338/P, and as subsequently amended by permissions 2014/3633/P, 2015/1189/P, 2016/5358/P and 2020/1019/P). The permission was granted to deliver a total of 314 residential units. Phase 1 is complete, delivering 46 new residential units. This development is situated approximately 250m to the northeast of the site.

- 6.9 In December 2024, a Scoping Opinion (Ref. 2024/5383/P) was submitted to the Council in respect of a proposal for circa 460 residential units in buildings ranging in height from circa 4 storeys up to between 23 and 26 storeys (across multiple blocks) (Phase 2). A response was issued on 1st May 2025.

7. CONSULTATION SUMMARY

Regeneration Ballot

- 7.1 In July 2019, proposals were taken to Camden's Cabinet to recommend that a preferred option be taken to a ballot. Cabinet approved the recommendation on 17 July 2019. The resident ballot on redevelopment closed on 17 March 2020 and 93% of eligible voting residents voted in favour of redevelopment of the Estate.

Statutory Consultees

Greater London Authority (GLA) Stage 1

- Land use principles: The principle of the comprehensive estate regeneration is supported.
- Affordable housing: 326 affordable housing units (38% by unit) would be delivered all in social rent tenure. Development viability is to be robustly reviewed separately by specialist GLA officers. Early, mid and late-stage reviews may be required.
- Urban design/heritage: Layout principles are supported. Provision of buildings up to 15 storeys in this area not identified as suitable for tall buildings is acceptable in principle. Low level of less than substantial harm is identified to the Grade II Listed Rhyl Primary School which must be outweighed by the benefits of the proposal. More information is required regarding View 17 to ensure its potential impacts on the setting of Westminster WHS and LVMF View 2B.1 are fully assessed.
- Transport: Proposed public realm strategies and active travel improvements should be secured by the Council along with cycle parking in accordance with the LCDS and London Plan Policy T5. Further clarity is required on cyclist movements, Blue Badge parking and construction.
- Sustainable development and environmental: Further information is required on energy, whole life carbon, circular economy, green infrastructure, water and air quality.

Officer response: Further commentary on these points will be provided in the relevant sections below.

GLA Viability Team

- GLA considers the proposed offer of 38.1% affordable housing to represent the maximum viable (on an ungrown basis). However, this position may be subject to change pending further cost analysis.

- On a grown basis, with sales values assumed to increase by 4% per annum and build costs by 3.5% per annum, the appraisal produces a profit outturn above the benchmark target. Further adaptations result in even greater surplus. Accordingly, under growth assumptions, the scheme has capacity to deliver higher level of affordable housing than currently proposed.
- As such, the applicant should revise their viability position based on the recommendations of the GLAVT. Additional details and clarifications are also required.

GLA Viability Team – Follow-up response

- The GLA maintains that a 4% return on GDV for the affordable housing component is appropriate.

Officer response: See 'Affordable housing and viability' section.

Historic England

- Concerns over the impact of proposals on views of the Palace of Westminster from Parliament Hill, particularly with respect to Protected Vista 2B.1 of the LVMF.
- Proposals appear to have the potential to obscure the Victoria Tower and/or provide prominent development that may draw attention away from the visible skyline associated with the Houses of Parliament. This view forms part of the setting of the Grade I Listed Palace of Westminster and the surrounding Westminster World Heritage Site.
- Further clarity is requested on the impact of proposals in Protected Vista 2B.1 and on the Outstanding Universal Value of the World Heritage Site.
- A Heritage Impact Assessment is also recommended.
- Following receipt of this information re-consultation is requested, when further advice will be given.
- Any impacts on the Westminster World Heritage Site would need to be considered in light of relevant policies set out in the London Plan and the NPPF.
- We recommend that you seek the advice of your specialist conservation advisors in relation to the impact of the proposals on the setting and significance of heritage assets in the local area, including neighbouring conservation areas, listed buildings and non-designated heritage assets.

Historic England - Follow-up response

- We are in receipt of additional information (specifically the Built Heritage, Townscape and Visual Clarification Note by Turley dated October 2025).
- This document seeks to address previous comments in relation to the potential impacts on the Palace of Westminster in London View Management Framework view 2B.1 and confirms that there would be no adverse effect on the visibility of the Palace of Westminster in that view.

- Therefore, no objection is raised to the proposals.

Officer response: See 'Heritage' section.

Historic England (GLAAS)

- No archaeological requirement.

Health and Safety Executive (HSE) (Fire Safety – Gateway 1)

- Content with fire safety design of the proposals, to the extent it affects land use planning considerations.
- Conditions are recommended to secure appropriate fire statements and to ensure HSE are consulted through all reserved matters applications

Officer response: The scheme complies with fire safety principles and detailed applications for later phases will also be required to consult the HSE where they involve "relevant buildings". See 'Fire safety' section.

Transport for London (TfL)

- No capacity mitigation measures are required for public transport modes.
- Final cycle parking arrangements should be secured by condition, including the provision of electric bike charging facilities.
- Confirmation on the exact proportion of Blue Badge spaces made available from the outset.
- All new residents to be excluded from applying for local CPZ parking permits via s106.
- A Parking Design and Management Plan to be secured as part of any planning permission.
- The public realm strategy to be secured by Camden Council by condition or agreement as appropriate.
- Potential improvements identified in the ATZ assessment to be secured by the Council.
- A Women's Safety Audit to be carried out, assessing the public realm proposals in relation to experiences of women, girls and gender-diverse people.
- Further detail to be provided which demonstrates a safe and legible active travel experience on surrounding streets.
- Final Travel Plan to be secured and monitored via s106.
- Final DSP to be approved and secured by the Council, including the locations of proposed loading bays.
- Final CLP to be secured by the Council, including clarification on any proposed pit lane or holding area and tracked vehicle analysis for HGV access.

Transport for London (TfL) - Follow-up response

- Existing on-street Blue Badge spaces would be retained

- It is agreed that Blue Badge parking can be provided on request through conversion of regular parking spaces on-street.
- No new residents will be eligible for parking permits within the local CPZ
- Public realm strategy is welcomed and TfL supports Camden's request for PCE improvements based on the ATZ assessment
- Concerns regarding movement within the site have been addressed.
- TfL also welcomes the securing of a travel plan, DPS, CLP at every phase alongside cycle parking details for each block
- As such, TfL have no objections.

Officer's response: See 'Transport' section for discussion. Section 106 obligations and conditions are attached to secure the above items, where appropriate.

Thames Water

- No objections subject to conditions and informatives on piling, waste and water management.

Officer response: Noted and conditions and informatives have been added.

Metropolitan Police (Designing Out Crime)

- Happy to make recommendations for this development through further consultation with the applicant.
- Recommend that conditions be placed upon this application to attain secured by design accreditation to silver award and to maintain this standard through the life of the development.

Officer's response: See 'Safety and security'. Active frontages and natural surveillance are proposed across the scheme, with sightlines kept open and potential hiding spaces minimised.

Natural England – No objection.

Environment Agency – No comments to make.

Cadent Gas – No objections, informative recommended.

National Amenity Societies – No comments received.

Non-statutory consultees

Design Review Panel

- 7.2 The emerging master plan was first presented to the Design Review Panel ("DRP") on September 10, 2021. The Panel feedback is summarised as follows:

- The panel were pleased by the level of design aspiration for the redevelopment of the West Kentish Town Estate, and supported the overall approach taken by the masterplan. The Panel offered comments intended to provide greater clarity in areas including routes and connections, heights, public space and response to the wider context.
- Further thought was suggested for the way blocks address Grafton Road, and corners open up to provide views into the Site from outside its boundaries. The panel suggested that taller blocks should be accommodated on Queen's Crescent and Grafton Road to respond to a busier context.
- The Panel were broadly supportive of the proposed heights in principle.
- The Panel felt that the central space would benefit from further thinking to provide it with greater activation, in consultation with residents.
- The Panel encouraged the design team to make the hierarchy of routes and spaces across the Estate even clearer by analysing connections beyond the site boundary and mapping desire lines to nearby destinations.
- Public space should be as multi-functional as possible, to serve the needs of the increased density of residents of the redeveloped Estate.

The second DRP and updated masterplan were presented on 2 December 2022. The Panel feedback for DRP 2 is summarised as follows:

- The Panel commended the design team for its positive response to comments made at the last review. They considered that the project had progressed well and supported the overall approach to the strategic master plan, architecture, street layout, and phasing.
- The panel supported the overall height and massing, but suggested potential adjustments, reducing the height of Blocks A1, A2 and B1 to avoid overwhelming Queen's Crescent and Grafton Road, and potentially increasing the height of Block F1. The proximity of Block A1 to the existing Milverton block needed careful assessment as part of the phasing strategy.
- Detail to be included in the Design Code on public realm details to ensure high standards are set.
- Further thinking is needed on the different character of streets, and how public realm design will reflect these.
- Community spaces could be included in the scheme to create a legacy from the project's exemplar engagement work.

A third and final DRP took place on 28 April 2023 to present the Phase 1 design, which at the time included Plots A1, D1, and G1. The Panel feedback is summarised as follows:

- The Panel considered that the proposals progressed well, and that only relatively minor changes were needed to ensure the level of quality required can be delivered.
- Further thought to be given to the ground floors of all three plots, A1, D1 and G1, to ensure as much active frontage as possible, especially in key locations, clear commercial presence on Queen's Crescent and adequate privacy for ground floor flats.
- A1 should step back to avoid dominating its three-storey neighbours on Queen's Crescent, and a softer material palette considered for the northern block.
- G1 could be stepped to improve its relationship with Hawkridge House.
- The design of D1 required rationalisation, including the relationship between darker and lighter materials, and the south-east elevation should contribute a more joyful presence at a key location for the conservation area and the development.

Local groups

Queens Crescent Neighbourhood Forum (Emerging) – Objection

Design and Heritage

- Masterplan is out of scale with local character and context
- Excessive density
- Poor design, layout and placemaking
- Negative impact on safety and security
- Causes harm to local heritage assets
- Inclusion of tall buildings is inappropriate

Infrastructure

- Lack of community space provision
- Local schools would close

Environment and sustainability

- Disturbance from construction works
- Loss of trees
- Biodiversity net gain not achieved
- Excessive demolition of the estate
- Climate change will not be adequately mitigated

Affordable housing

- Development would not meet local housing need

Other matters

- Insufficient engagement with local people
- Fails to consider all relevant planning policy

- Submitted documents are inaccurate and misleading
- Insufficient information submitted with the application

Officer's response: See all sections of the report below which respond to most of these matters. As regards 'other matters' above, the applicant has undertaken an extensive public consultation as outlined in the submitted Statement of Community Involvement and has also balloted residents on the existing estate. The Council has also consulted locally as part of the application assessment process in line with its statutory requirements and its own SCI. The Council has reviewed the documentation submitted with the application and considers it sufficient to enable an appropriate assessment of the development proposals. Additional indicative plans that further describe the development have also been requested by officers and provided by the applicant and these have been published on the Council's website.

West Kentish Town Conservation Area Advisory Committee – Objection

Design and Heritage

- Masterplan is out of scale with local character and context
- Excessive density
- Poor design, layout and placemaking
- Negative impact on safety and security
- Excessive loss of light to neighbouring properties

Environment and sustainability

- Disturbance from construction works
- Loss of trees
- Lack of landscaping
- Excessive demolition of the estate

Housing and Land Use

- Excessive amount of private homes
- Excessively small homes
- Lack of commercial and community space

Other matters

- Insufficient engagement with local people
- Insufficient information submitted with the application

Officer's response: See all sections of the report below which respond to most of these matters. As regards 'other matters' above, the applicant has undertaken an extensive public consultation as outlined in the submitted Statement of Community Involvement and has also balloted residents on the existing estate. The Council has also consulted locally as part of the application assessment process in line with its statutory requirements and its

own SCI. The Council has reviewed the documentation submitted with the application and considers it sufficient to enable an appropriate assessment of the development proposals. Additional indicative plans that further describe the development have also been requested by officers and provided by the applicant and these have been published on the Council's website.

Kentish Town Neighbourhood Forum – Objection

Design

- Excessive density

Environment and sustainability

- Loss of trees
- Lack of landscaping

Housing and Land Use

- Excessive amount of private homes
- Excessively small homes
- Lack of new community space and services

Transport

- Lack of contribution towards local transport infrastructure

Other matters

- Insufficient financing is in place for the proposals

Officer's response: Sections 'Design', 'Heritage', 'Landscape and public open space', 'Trees, greening and biodiversity', 'Tenure and unit mix', 'Land use' and 'Transport' within the report below will include responses on these matters. The exact means of development financing, including whether all funds are in place at the time of applying for planning permission, is not a material planning consideration.

The Heath & Hampstead Society – Objection

Design & Heritage

- Negative impact on protected views.
- Excessive scale and density.
- Poor urban design and residential quality.

Housing

- Insufficient family-sized units and affordable housing.
- Existing residents would be displaced.

Landscaping

- Excessive loss of soft landscaping and trees.

Officer's response: Sections 'Design', 'Heritage', 'Landscape and public open space', 'Trees, greening and biodiversity', 'Tenure and unit mix' and 'Land use' within the report below will include responses on these matters.

Friends of Queens Crescent – Objection

Design

- Excessive height and scale.
- Poor urban design.
- Poor quality homes.

Amenity & Safety

- Loss of light, outlook and privacy to neighbouring properties.
- Excessive street lighting.

Commercial Impact

- Negative impact on market traders.
- Insufficient provision of local services.

Transport

- Increased traffic and loss of parking.
- Disturbance from construction works.

Other Matters

- Lack of public consultation.
- Plans are inaccurate.
- Ongoing issues related to management of regeneration process.

Officer's response: Sections 'Design', 'Impact on neighbouring amenity', 'Land use', 'Transport', 'Safety and security', 'Quality of proposed housing' within the report below will include responses on these matters. As regards 'other matters' above, the applicant has undertaken an extensive public consultation as outlined in the submitted Statement of Community Involvement and has also balloted residents on the existing estate. The Council has also consulted locally as part of the application assessment process in line with its statutory requirements and its own SCI. The Council has reviewed the documentation submitted with the application and considers it sufficient to enable an appropriate assessment of the development proposals. Additional indicative plans that further describe the development have also been requested by officers and provided by the applicant and these have been published on the Council's website. Matters relating to the management of regeneration impacts in the local area over recent years is not a material planning consideration that is taken into account in the assessment of this proposal.

West Kentish Town Estate TRA – Objection

Public Consultation

- Lack of notice of public consultation.
- Request for extension to consultation period.

Officer's response: The applicant has undertaken an extensive public consultation as outlined in the submitted Statement of Community Involvement and has also balloted residents on the existing estate. The Council has also consulted locally as part of the application assessment process in line with its statutory requirements and its own SCI. In practice consultation responses can be submitted at any time and will typically be accepted throughout the assessment process. Furthermore, a re-consultation was actioned in late October which sought further comments from the local community.

Rhyl Primary School – Objection

Pollution

- Long construction programme: noise, dust, vibration, and safety risks.
- Air pollution at school gates.
- Lack of family-sized housing units.

Other matters

- Increased school vacancy rates.

Officer's response: Sections 'Impact on neighbouring amenity', 'Air quality', 'Transport' and 'Quality of proposed housing' within the report below will include responses on these matters. The proposed increase in family-sized homes would lead to an increase in children on the estate which would be expected to attend local schools.

Camden Nature Corridor Consortium – Objection and advice

Impact on nature conservation and biodiversity

- Significant reduction of existing habitat on site.
- Statutory Biodiversity Net Gain credits offset the impact but not Locally (outside London).
- Provided detailed follow-up advice on how the landscaping can be designed to improve support for Camden Nature Corridor.

Officer's response: The applicant will be required to submit a Biodiversity Gain Plan (BGP) for the overall masterplan, and for each phase. Where Credits are purchased off site, the distance from the site is reflected in the number of credits that are needed to offset the loss (more credits further

away). The submission of detailed landscaping for the phases will reflect up to date guidance on nature conservation.

Bacton Towers Action - Objection

Housing and Land Use

- Insufficient affordable housing and too much market housing.
- Families will be priced out.

Design and local character

- Excessive height, scale and density.
- Harm to views from Hampstead Heath.
- Should propose a smaller scheme focused on refurbishing and expanding the existing estate.

Loss of Green Space and Trees

- Felling of trees and impact on greenspace, climate and biodiversity.

Daylight and privacy

- Loss of light and privacy to neighbouring properties.

Impact on Local Schools

- Construction traffic over a 20-years is a health and safety risk for pupils
- Families reduced meaning fewer children and school closures.

Loss of car parking

- Reduced car parking will increase parking stress.

Cumulative Impact

- Combined effects of Bacton Low Rise, West Kentish Town, and Wendling.

Officer's response: Sections 'Tenure and unit mix of proposed housing', 'Design', 'Heritage', 'Impact on neighbouring amenity', 'Trees, greening and biodiversity', 'Air quality', 'Sustainable design and construction' and 'Transport' within the report below will include responses on these matters. The proposed increase in family-sized homes would lead to an increase in children on the estate which would be expected to attend local schools. Cumulative impacts of this and other developments in the local area have been assessed through the Environmental Statement.

Publicity

- 7.3 Site notices were displayed from 4th July 2025, expiring on 28th July 2025. A press advertisement was placed on 10th July 2025 in the Ham and High. Re-consultation took place with site notices and press notices on 20th October 2025 and 6th November 2025 respectively.

Representations summary

7.4 The following paragraphs summarise in more detail the key issues raised in representations. The charts below show the proportion of responses that raise a particular issue (whether in support or objection), as far as officers can judge from the content of individual responses. Many responses raise multiple issues, and others simply state that they support or object to the proposal.

7.5 Officers have tried to report the numbers below without counting multiple representations from the same source, but these cannot always be identified so number are indicative of levels of objection and support. At the time of writing, the public responses (excluding groups which are reported separately above) totalled around 380. They can be broken down as follows:

- Objection: 233
- Neutral: 41
- Support: 107

7.6 The representations in **objection** are dominated by concerns over:

- excessive scale and density including light impact
- construction impact and 20-year construction duration
- affordable housing mix or tenure and prioritising private homes
- loss of trees and green space
- infrastructure pressure on health and education services.

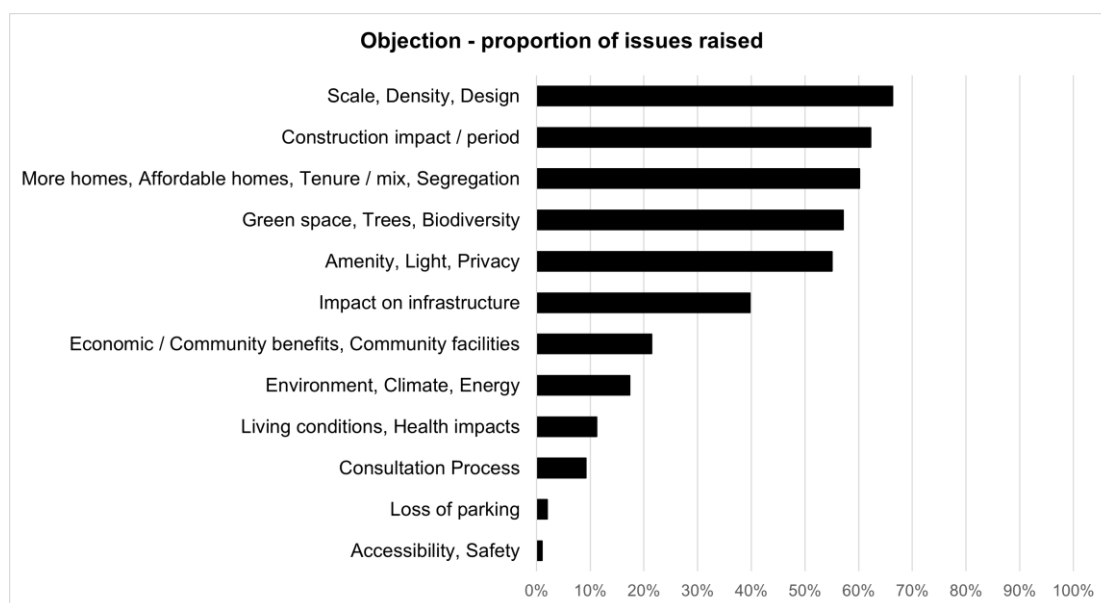


Figure 7 - Proportion of letters in objection that mention a key issue

7.7 The representations in **support** strongly emphasise:

- existing poor housing conditions like damp and mould

- health impacts, particularly for children, elderly, and disabled people
- overcrowding and cramped conditions
- the urgent need for regeneration and energy-efficient family homes
- accessibility and safety.

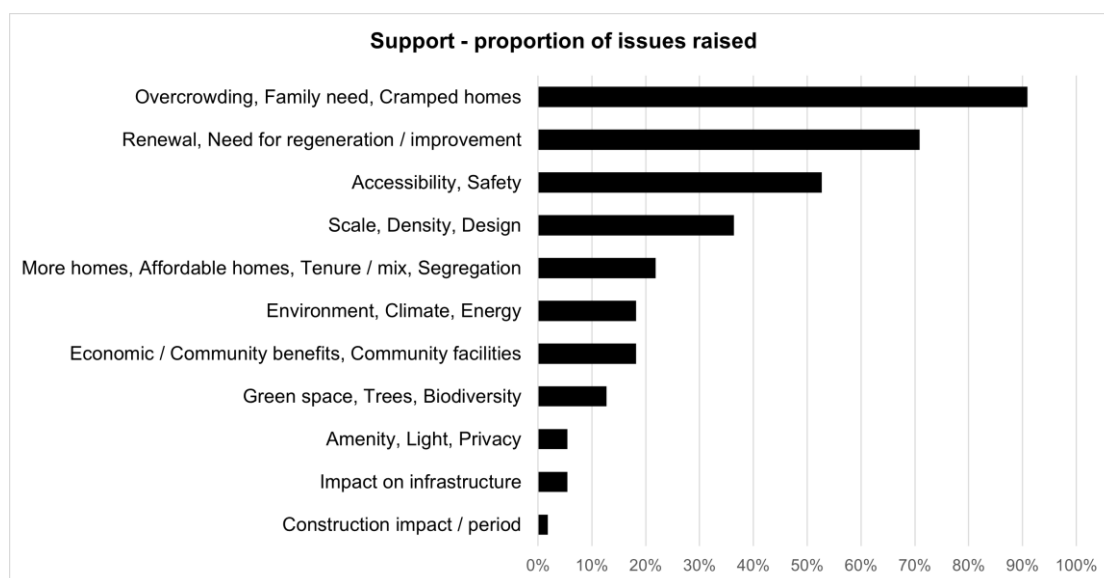


Figure 8 - Proportion of letters in support that mention a key issue

Objections - Issues raised

Scale, Density, Design

- Development is too large, dense, and out of character with the area.
- Cumulative impact from other dense development in the area.
- Building heights are excessive and out of character.
- Poor design quality, inadequate space standards, and negative visual impact.
- Development will harm views from homes and public viewing points.

Officer response: Building size (including height), density, character and design quality matters are assessed in the 'Design' section. Space standards are assessed in the 'Quality of proposed housing' section. While impact on protected strategic views is considered in the 'Heritage' section, private views from individual homes are not a material planning consideration and therefore are not assessed below. Cumulative impacts have been considered in the EIA as have general impacts in the area.

Construction impact / period

- The 20-year construction will cause dust, air quality issues (emissions), noise, vibration and disruption.
- Construction traffic causing disturbance, safety concerns near schools, and property damage.

- Local streets, including Coity Road, Bassett Street, and Rhyl Street, have impact for a long period.
- Requests for alternative access routes and shorter build timelines.
- Health risks, particularly from heavy vehicles and poor air-quality, especially for children, elderly, and vulnerable residents.

Officer response: The matters referenced above are considered in the 'Impact on neighbouring amenity', 'Transport', 'Air quality', 'Managing phasing' and 'Health impact' sections below. Disturbance from construction works is an unavoidable element of development and the Council's aims to minimise disturbances and risks to residents through a comprehensive suite of management measures including demolition and construction management plans, monitoring of works and a construction working group which are secured through appropriate conditions and shadow s106 legal clauses.

Affordable homes, Tenure / mix, Segregation

- The scheme prioritises private homes for profit over affordable housing.
- Insufficient affordable housing and no key-worker housing.
- Concerns about social segregation and "ghettoisation" of social tenants.
- Insufficient family-sized homes, and failure to meet local need.
- Fears of gentrification and displacement of local residents.
- Lack of demand or affordability for market homes in the area.

Officer response: The matters referenced above are considered in the 'Land use', 'Affordable housing and viability' and 'Housing mix' sections. The redevelopment of the Estate is necessary and is supported by residents on the Estate. All social housing tenants will have the right to return to the Estate once it is redeveloped. The amount of affordable housing has been shown to be the maximum viable amount after a robust financial viability analysis. The provision of both market and social housing at the site would create a mixed and balanced community.

Green space, Trees, Biodiversity

- Loss of mature trees and green spaces, with negative effects on character, biodiversity and wellbeing.
- Courtyards will be dark and overshadowed, with little sunlight for play.
- Concerns of heat-island effect.

Officer response: The matters referenced above are considered in the 'Landscape and public open space', 'Trees, greening and biodiversity' and 'Microclimate' sections below. The urban heat island effect will be countered through provision of green/blue roofs, maximising planting and minimising road surfacing.

Amenity, Light, Privacy

- Loss of daylight, sunlight, and views for existing homes.
- Poor amenity for both new and existing residents.
- Overlooking and reduced privacy due to new building massing and density.

Officer response: The matters referenced above are considered in the 'Quality of proposed housing' and 'Impact on neighbouring amenity' sections below.

Impact on infrastructure

- Infrastructure upgrades are not planned to match increased population.
- Increased demand for local schools, healthcare, transport, and utilities.
- Reduced demand for local schools.
- Cumulative increased pressure on local public transport, roads and public highways.

Officer response: The proposed uplift in units at the site is expected to have a negligible impact on local social infrastructure. Future local improvements in social infrastructure could be provided through the CIL funds secured from this application. Impacts on utilities have been considered and conditions attached as per requests from utility providers. TfL have been consulted on the proposal and not requested public transport mitigation. Mitigation on local transport infrastructure has been secured with a range of measures including financial contributions totalling more than £1.6 million.

Economic or community benefits, Community facilities

- Inadequate provision of community facilities.
- Economic benefits will not reach existing residents.
- Fears of loss of community cohesion and local identity.

Officer response: Matters regarding community facilities are considered in the 'Land use' section below. An increase in residents and construction activity on the Estate is expected to improve the local economy through increased local spending. Local employment and business activity will be boosted through legal measures secured through the shadow section 106 agreement, see 'Construction phase employment and training' section below. A mix of housing tenures on the Estate is expected to create a mixed and balanced community.

Environment, Climate, Energy

- Objection to increased carbon emissions from demolition and construction.
- Concerns about heat and reduced air quality due to dense layout.

- Preference for retrofit and refurbishment as a more sustainable approach.
- Concerns about air pollution and lack of climate resilience.

Officer response: The matters above are considered in the 'Quality of proposed housing', 'Sustainable Design and Construction' and 'Air quality' sections below.

Consultation process

- Claims of inadequate consultation and misleading ballot.
- Requests for more time and better engagement with residents and local schools.
- Claims that resident objections and alternative proposals have been ignored.

Officer response: The public have been able to comment on the application since it was submitted and were reconsulted on additional information during the application. Comments are accepted up until the date of committee. The next section sets out the developer-led consultation. No alternative proposal has been submitted, and the Local Planning Authority can only determine the application before it.

Living conditions, Health impacts

- Construction and loss of green space will worsen long-term health outcomes.
- Concerns about long-term exposure to pollution, noise, and stress.
- Risks highlighted for children, elderly, and people with respiratory conditions.

Officer response: The matters above are considered in the 'Transport', 'Air quality' and 'Health impact' sections below. Disturbance from construction works is an unavoidable element of development and the Council's aims to minimise disturbances and risks to residents through a comprehensive suite of management measures including demolition and construction management plans, monitoring of works and a construction working group which are secured through appropriate conditions and shadow s106 legal clauses.

Loss of parking

- Loss of parking within masterplan site.
- Increased parking stress in the area.

Officer response: See 'Transport' section below.

Accessibility / Safety

- Loss of accessible routes and increased isolation.
- Masterplan results in unsafe places.

Officer response: Routes through the site would be made clearer and wider. Further consideration of masterplan layout and public safety is provided in the 'Design' and 'Safety and security' sections below.

Not material

- Private views from properties affected.
- Property values and saleability of homes will be affected.
- Requests for Council Tax reduction or moratorium for nearby residents.
- Requests for compensation and triple glazing for nearby residents.
- Mistrust in Camden governance.

Officer response: Private views from individual properties and impacts on property values/saleability are not a material planning consideration. Requests for changes to Council Tax, provision of compensation or home improvements are also not matters for consideration through the planning process. The Council is also unable to respond to any mistrust in its governance through the planning process.

Neutral / Comments

Renewal, Need for regeneration / improvement

- Recognise the need for regeneration, improvement, and additional housing.

More homes, Affordable homes, Tenure / mix, Segregation

- Affordable housing is positive, but more social rent homes could support local schools.
- Recognise need for more homes in the borough.

Construction impact / period

- Acknowledgement that disruption is necessary for long-term improvement.
- Requests for mitigation plans and resident communication during works.
- Requests for quicker construction and completion of development.

Impact on infrastructure

- Requests for mitigation for infrastructure impacts.

Consultation process

- Ensure ongoing engagement and transparency during construction and later phases.

- Comments query data accuracy and registration of objections.

Support – Issues raised

Living conditions, Health impacts

- Urgent need to address damp, mould, cold, and poor health conditions.
- Conditions result in serious health impacts on disabled and elderly.
- High quality housing will support improved health, wellbeing, and safety.
- Development will deliver warm, dry, safe homes.

Overcrowding, Family need, Cramped homes

- Support for new homes to address severe overcrowding—children sharing beds, family members sleeping in living rooms.
- Residents see redevelopment as essential for family wellbeing and particularly school-age children's health and study.
- Cramped homes lack storage and general requirements for daily living.

Renewal, Need for regeneration / improvement

- Supporters welcome the opportunity for positive change with better housing and community facilities.
- Modern homes and improved design will bring community pride in the area.
- Regeneration will allow people to live in dignity and particularly help the vulnerable, creating a more equitable community.

Accessibility, Safety

- Proposal will address current lack of lifts and unsafe stairways, especially for *disabled* or *elderly residents*.
- Provide safer environment in and around buildings, improving security, lighting, and access.

Environment, Climate, Energy

- Need for warm and energy-efficient homes.

Scale, Density, Design

- Support for new, modern homes and improved design with storage.
- Support for increased density to address housing need.

More homes, Affordable homes, Tenure / mix, Segregation

- Support for more social and affordable homes.
- Support for rehousing and prioritising existing residents.

Economic / Community benefits, Community facilities

- Scheme could revive Queen's Crescent with more local customers.

- Support for local economic benefits, community cohesion, and opportunities for young people.
- Business owners support regeneration to rebuild dignity and trust in Camden housing.

Green space, Trees, Biodiversity

- Need to accept some loss of green space for better housing.
- Change to improve quality of green space.

Amenity, Light, Privacy

- Support for improved living standards, light, and privacy in new homes.

Impact on infrastructure

- Support for improved local facilities and services.

Developer-led consultation

- 7.8 The developer has submitted a Statement of Community Involvement with the application that sets out the engagement they have undertaken throughout the planning process.
- 7.9 The Applicant has carried out extensive engagement and consultation with the existing residents and neighbours to develop proposals for West Kentish Town Estate for and with the residents. The experiences and expectations of existing residents have shaped the project brief since early design stages which commenced in 2015.
- 7.10 In July 2019, proposals were taken to Camden's Cabinet to recommend that a preferred option be taken to a ballot. The Cabinet approved the recommendation on 17 July 2019. The resident ballot on redevelopment closed on 17 March 2020, and 93% of eligible voting residents voted in favour of the redevelopment of the Estate.
- 7.11 The applicant has carried out extensive pre-application engagement with several stakeholders, including the Council, GLA, TfL, existing residents and wider local community. The consultation approach undertaken responds to the guidance and requirements identified within the NPPF, as well as the Council's own Statement of Community Involvement and the Mayor of London's Good Practice Guide for Estate Regeneration.
- 7.12 The proposals were presented to a Development Management Forum on 6 December 2022. Questions were principally focussed on the proposed height of the buildings, daylight and sunlight impacts, construction traffic and the routes and spaces.

- 7.13 The proposals were presented to the Council's Developer's Briefing on 6 February 2023. Twelve Councillors attended (both ward councillors and those from the Planning Committee) and two officers from the Council.
- 7.14 Since the positive ballot result in 2020, the wider community, neighbours and local businesses have also been invited to a series of workshops to give their feedback on the proposals as they have developed. The applicant's community engagement has therefore had a direct and significant impact on how the plans for the site have evolved.
- 7.15 The applicant has often exceeded the recommendations outlined within the Mayor's Good Practice Guide for Estate Regeneration. The consultation strategy has included:
- Over 100 resident workshops, with WKTE residents as well as the wider community;
 - Regular drop-ins at local venues such as Queen's Crescent Library and Talacre Sports Centre;
 - An ongoing presence at the dedicated consultation spaces; 44 Queen's Crescent and 104a Queen's Crescent;
 - Regular stalls at Queen's Crescent Market;
 - A variety of surveys to focus comments and feedback to each design evolution of the masterplan;
 - Public site tours for key stakeholders and WKTE residents of the Estate and neighbouring CIP developments;
 - Dedicated youth workshops with young people, including Rhyl Primary School;
 - Interactive workshops and events on developing proposals for the new play and sports facilities on the Estate;
 - Door knocking exercises conducted by CLAs to check on the well-being of WKTE residents, provide advice and regular updates on the masterplan;
 - One-to-one meetings for residents and leaseholders, to discuss how the redevelopment would affect each of them individually;
 - Translations of all external materials (as needed), as well as conversations with translators to help communicate updates on the project;
 - Online meetings and webinars, to reach a wide cross section of local people;
 - Regular updates via WKTE newsletters, flyers and adverts on the progression of the proposals and public events for the project; and
 - Ongoing meetings with the Haverstock Partnership and WKTE Steering Group.
- 7.16 In collaboration with communications and consultation adviser LCA, the project team created an engagement plan with residents, stakeholders and

the wider community to support the WKTE masterplan. A 'residents first' strategy over four workshops was undertaken to respond to their needs and ascertain what their priorities are for the regeneration. These workshops include masterplan and phasing strategy, landscaping, open space and sustainability, masterplanning strategy and new public spaces, and new homes.

- 7.17 Following the approval of the business case via Cabinet in Summer 2022, the project team progressed to the pre-application consultation with the local community. The West Kentish Town Residents' Steering Group was established in December 2017, to provide additional guidance for the regeneration of the Estate and to act as a 'sounding board' for the engagement programme ahead of wider engagement with residents.
- 7.18 Meetings with the Haverstock Ward Councillors, as well as former Cllr Danny Beales, the Cabinet Member for Investing Communities, Culture, and an Inclusive Economy – were held on a monthly basis. During these meetings, members are provided with an update on the WKTE project, alongside a summary of the consultation programme.
- 7.19 The site is home to a diverse mix of people. Around 73% of residents who live on the Estate are from a black, Asian or other non-white background, with some not having English as a first language. The applicant employed two Community Liaison Officers to facilitate individual and group meetings and to act as translators as required.
- 7.20 To promote and encourage feedback from young people, the project team created the West Kentish Town Youth Steering Group. Residents under the age of 18 were encouraged to join the organisation and engage in debates about the future of the Estate.
- 7.21 During the consultation period, the design team received several responses in relation to designs for the proposed development. In summary, the scheme received considerable support whilst also raising questions in relation to several key themes, including:
- **Design** - Existing residents wanted to ensure the development proposals improved storage space and improved household appliances and facilities, including heating and insulation, when compared to the existing buildings; and
 - **Open Space, Amenity and Play Space, and Pedestrian Circulation** - Existing residents were interested to know how the development proposals were to provide new open space, communal areas and play space, private amenity space, balconies, and improvement of pedestrian routes on the Estate.

Camden Cabinet

- 7.22 In July 2019, Camden's Cabinet assessed options and approved the masterplan and business case for the full redevelopment of the Estate, with the Council acting as developer and delivering the scheme. The work undertaken by the applicant with the local community, dating back to 2015, provided the basis for the subsequent master plan proposals.
- 7.23 This option was supported by residents who voted in March 2020 overwhelmingly in favour of redevelopment, with 93% of residents voting yes with a turnout of 84.9%.
- 7.24 In July 2022, Camden Council's Cabinet approved the business case for unlocking funding and delivering the regeneration strategy for the future of West Kentish Town Estate.
- 7.25 The Council, acting through its CIP, has consistently supported the principle of the proposed development, and in its capacity as LPA, has sought to advance an allocation for growth of residential-led mixed-use development and densification of the site.

8. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2024 \(NPPF\)](#)

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

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

[London Plan Guidance](#)

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

[GG1 Building strong and inclusive communities](#)

[GG2 Making the best use of land](#)

[GG3 Creating a healthy city](#)

[GG4 Delivering the homes Londoners need](#)

[GG5 Growing a good economy](#)

[GG6 Increasing efficiency and resilience](#)

[Policy SD10 Strategic and local regeneration](#)

[Policy D1 London's form, character and capacity for growth](#)

[Policy D2 Infrastructure requirements for sustainable densities](#)

[Policy D3 Optimising site capacity through the design-led approach](#)

[Policy D4 Delivering good design](#)

[Policy D5 Inclusive design](#)

[Policy D6 Housing quality and standards](#)

[Policy D7 Accessible housing](#)

[Policy D8 Public realm](#)

[Policy D9 Tall buildings](#)
[Policy D10 Basement development](#)
[Policy D11 Safety, security and resilience to emergency](#)
[Policy D12 Fire safety](#)
[Policy D13 Agent of Change](#)
[Policy D14 Noise](#)
[Policy H1 Increasing housing supply](#)
[Policy H4 Delivering affordable housing](#)
[Policy H5 Threshold approach to applications](#)
[Policy H6 Affordable housing tenure](#)
[Policy H8 Loss of existing housing and estate redevelopment](#)
[Policy H9 Ensuring the best use of stock](#)
[Policy H10 Housing size mix](#)
[Policy S4 Play and informal recreation](#)
[Policy E1 Offices](#)
[Policy E2 Providing suitable business space](#)
[Policy E9 Retail, markets and hot food takeaways](#)
[Policy E11 Skills and opportunities for all](#)
[Policy HC1 Heritage conservation and growth](#)
[Policy HC2 World Heritage Sites](#)
[Policy HC3 Strategic and Local Views](#)
[Policy HC4 London View Management Framework](#)
[Policy G1 Green infrastructure](#)
[Policy G4 Open space](#)
[Policy G5 Urban greening](#)
[Policy G6 Biodiversity and access to nature](#)
[Policy G7 Trees and woodlands](#)
[Policy G9 Geodiversity](#)
[Policy SI 1 Improving air quality](#)
[Policy SI 2 Minimising greenhouse gas emissions](#)
[Policy SI 3 Energy infrastructure](#)
[Policy SI 4 Managing heat risk](#)
[Policy SI 5 Water infrastructure](#)
[Policy SI 6 Digital connectivity infrastructure](#)
[Policy SI 7 Reducing waste and supporting the circular economy](#)
[Policy SI 12 Flood risk management](#)
[Policy SI 13 Sustainable drainage](#)
[Policy T1 Strategic approach to transport](#)
[Policy T2 Healthy Streets](#)
[Policy T3 Transport capacity, connectivity and safeguarding](#)
[Policy T4 Assessing and mitigating transport impacts](#)
[Policy T5 Cycling](#)

[Policy T6 Car parking](#)
[Policy T7 Deliveries, servicing and construction](#)
[Policy T9 Funding transport infrastructure through planning](#)
[Policy DF1 Delivery of the Plan and Planning Obligations](#)
[Policy M1 Monitoring](#)

London Plan Guidance (LPG)

[Accessible London SPG](#)
[Planning for Equality and Diversity in London SPG](#)
[Characterisation and Growth Strategy LPG](#)
[Optimising Site Capacity: A Design-led Approach LPG](#)
[Housing Design Standards LPG](#)
[Affordable Housing and Viability SPG](#)
[Housing SPG](#)
[Play and Informal Recreation SPG](#)
[London View Management Framework SPG](#)
[All London Green Grid SPG](#)
[London's Foundations SPG](#)
[Urban greening factor LPG \(February 2023\)](#)
[Air quality positive LPG](#)
[Air quality neutral LPG](#)
[Be Seen energy monitoring LPG](#)
[Circular economy statements LPG](#)
[Energy Planning Guidance](#)
[The control of dust and emissions in construction SPG](#)
[Whole life carbon LPG](#)
[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

[Camden Local Plan \(2017\) \(CLP\)](#)
[Policy G1 Delivery and location of growth](#)
[Policy H1 Maximising housing supply](#)
[Policy H3 Protecting existing homes](#)
[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 E1 Economic development](#)

[Policy A1 Managing the impact of development](#)
[Policy A2 Open space](#)
[Policy A3 Biodiversity](#)
[Policy A4 Noise and vibration](#)
[Policy A5 Basements](#)
[Policy D1 Design](#)
[Policy D2 Heritage](#)
[Policy D3 Shopfronts](#)
[Policy D4 Advertisements](#)
[Policy CC1 Climate change mitigation](#)
[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC4 Air quality](#)
[Policy CC5 Waste](#)
[Policy TC1 Quantity and location of retail development](#)
[Policy TC2 Camden's Centres and other shopping areas](#)
[Policy TC3 Shops outside of centres](#)
[Policy TC5 Small and independent shops](#)
[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](#)
[Digital Infrastructure CPG - March 2018](#)
[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 \(2022\)](#)

[Gospel Oak and Haverstock Community Vision \(2022\)](#)

[West Kentish Town Conservation Area Statement \(2005\)](#)

[Inkerman Conservation Area Statement \(2001\)](#)

Proposed Submission Draft Camden Local Plan (DCLP)

The [Proposed Submission Draft Camden Local Plan](#) was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan will now be examined by a Planning Inspector.

Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.

The Proposed Submission Draft Local Plan (DCLP) is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

DCLP Draft Site Allocation (Central Camden) – C13

The DCLP identifies the site as a draft site allocation under [Draft Allocation C13 West Kentish Town Estate](#). It is allocated for permanent self-contained homes, small-scale employment space, and community uses, or other appropriate ground floor uses. The indicative housing capacity in the draft allocation is 569 additional homes. With the 316 homes already existing, this indicates a total capacity of 885 homes. Hawkridge House, which sits in the centre of the southern part of the site but outside the red line, is also subject to a [draft site allocation \(C14\)](#). However, this is not council owned and does not form part of the application.

9. ASSESSMENT

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

10. PRINCIPLE OF REDEVELOPMENT
11. LAND USE
12. TENURE AND UNIT MIX OF PROPOSED HOUSING
13. QUALITY OF PROPOSED HOUSING
14. HERITAGE
15. DESIGN
16. IMPACT ON NEIGHBOURING AMENITY
17. MICROCLIMATE
18. LANDSCAPE AND PUBLIC OPEN SPACE
19. TREES, GREENING, AND BIODIVERSITY
20. TRANSPORT
21. SAFETY AND SECURITY
22. FIRE SAFETY
23. AIR QUALITY
24. WASTE AND RECYCLING
25. BASEMENT CONSIDERATIONS
26. SUSTAINABLE DESIGN AND CONSTRUCTION
27. CONTAMINATED LAND
28. FLOOD RISK AND DRAINAGE
29. CONSTRUCTION PHASE EMPLOYMENT AND TRAINING
30. MANAGING PHASING
31. HEALTH IMPACT
32. PLANNING OBLIGATIONS
33. COMMUNITY INFRASTRUCTURE LEVY (CIL)
34. CONCLUSION

10. PRINCIPLE OF REDEVELOPMENT

- 10.1 The site is brownfield land, featuring ageing estate buildings of three to four storeys set in a landscaped setting. The buildings suffer from overcrowding and poor thermal performance.
- 10.2 The site is close to several rail/underground stations and is also well-connected by bus routes.
- 10.3 Use of highly accessible brownfield sites for the delivery of new housing is promoted and supported by paragraphs 124-130 of the NPPF 2024 which deals with 'making effective use of land'. Reference is made in paragraph 125(d) to use of under-utilised sites, especially if this would meet housing need and in locations where land supply is constrained. Camden Local Plan policies are in accordance with the NPPF in this respect and seek to direct growth to the most sustainable locations.

- 10.4 London Plan policy D2 says density of development proposals should consider future planned levels of infrastructure, rather than existing levels, and be proportionate to the site's connectivity and accessibility in terms of transport, jobs, and services. LP policy D3 says higher density developments should generally be promoted in areas well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 10.5 The application site benefits from good transport links and therefore it is expected that the site should deliver higher density development.
- 10.6 Several areas in Haverstock Ward are also in the 20% of most deprived areas in England and the London Plan indicates that where such areas are in London, development proposals should contribute to regeneration by tackling inequalities and the environmental, economic and social barriers that affect the lives of people in the area.
- 10.7 The proposed estate regeneration would also meet the Mayor of London's Better Homes for Local People principles, as set out in his Good Practice Guide to Estate Regeneration, including providing an increase in affordable housing on site, providing a full right to return for social tenants and providing a fair deal for leaseholders and freeholders on the estate. Further information on these points will be provided in the 'Tenure and unit mix' section of the report below.
- 10.8 Policy G1 of the Camden Local Plan (CLP) states that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure, and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.
- 10.9 The Gospel Oak and Haverstock Community Vision ("the Area Vision") is adopted guidance and sets out a vision for the area, including area specific guidance for the estate.
- 10.10 It aims to use development of West Kentish Town Estate to create a strong and more active frontage to Queens Crescent with space for health, community and/or commercial uses. It seeks:
- improvements to adjoining streets;
 - play and green spaces for the whole community;
 - improvement of north/south route for pedestrians to better link Queens Crescent with Talacre Town Green, Gospel Oak station and Lismore circus; and
 - new pedestrian routes linking into wider street network to make walking and cycling easier and safer.

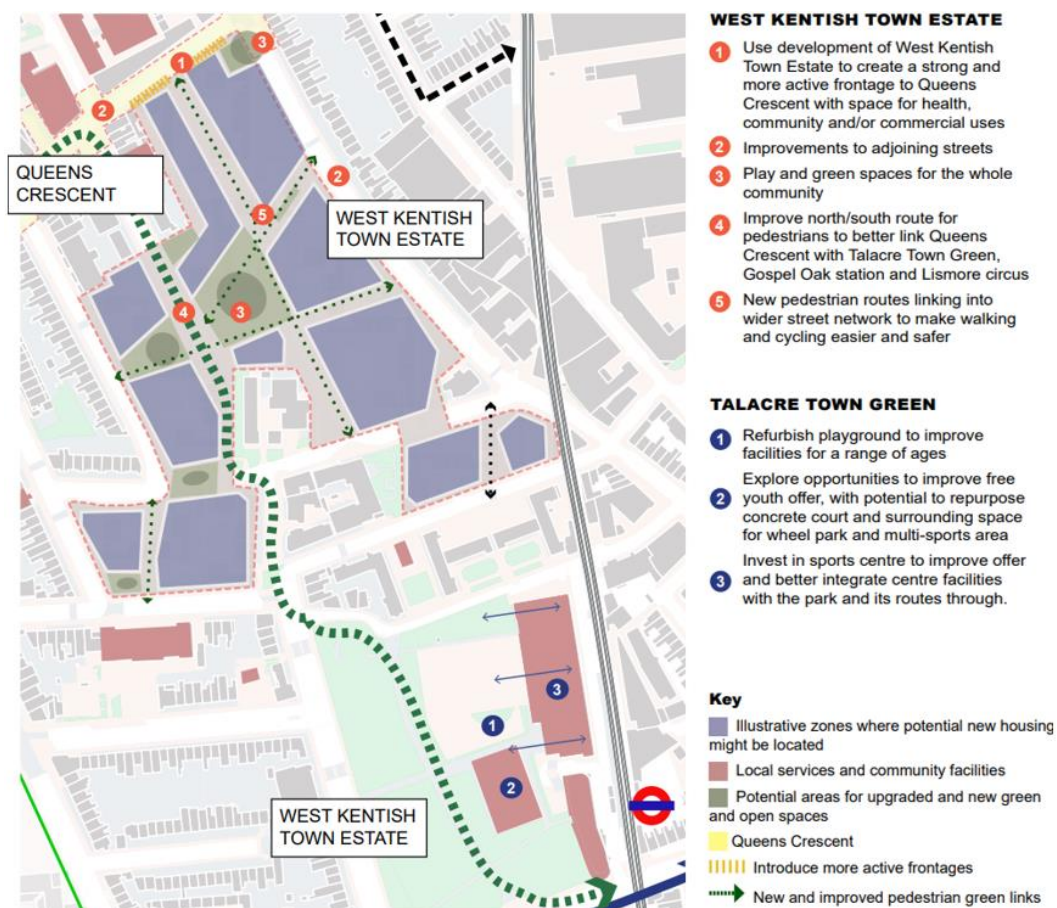


Figure 9 - Extract from the Area Vision for West Kentish Town Estate

- 10.11 The site is designated as a site allocation in the emerging draft Local Plan. The site forms proposed Allocation C13 'West Kentish Town Estate', which is identified for a housing-led mixed-use development, with an indicative capacity of 569 additional permanent self-contained homes (Use Class C3). With the 316 homes already existing, this indicates a total capacity of 885 homes.
- 10.12 The draft site allocation sets out the key development and design principles for development at West Kentish Town Estate, which include:
- Deliver regeneration benefits for the wider community that help to address the local priorities set out within the Gospel Oak and Haverstock Community Vision;
 - Re-provide existing homes to meet modern standards, ensuring no net loss of social housing, and maximise the delivery of additional affordable housing;
 - Make provision for particular housing needs identified by Policy H6 where appropriate, and consider the inclusion of affordable housing for older people, or other people with care or support requirements, as a proportion of the additional affordable housing provision;
 - Be undertaken in phases to ensure disruption to residents is minimised;

- Contribute towards the enhancement of the Queen's Crescent neighbourhood centre through the creation of a new frontage along the street to host community or commercial uses;
 - Improve local walking, wheeling, and cycling routes, by providing a clear, safe and accessible route connecting Talacre Park with Queens Crescent;
 - Create new and enhance existing areas of biodiversity across the site to support biodiversity corridors and create and improve connections for wildlife from nearby Sites of Important Nature Conservation to support the delivery of the Camden Nature Corridor;
 - Rationalise parking on-site in line with Policy T5 (Parking and car free development);
 - Address the lack of private amenity space and cycle parking facilities identified by residents;
 - Be designed to respect the sensitive heritage constraints, including the strategic view from Parliament Hill, as well as the nearby West Kentish Town and Inkerman Conservation Areas, and nearby listed buildings; and.
 - Seek to retain existing trees where possible.
- 10.13 In addition, the Camden Building Heights Study (CBHS, 2024) identified this site as a location where tall buildings may be an appropriate form of development, with 12 to 40 metres considered the potentially appropriate height range. The CBHS states that additional height, above the potentially appropriate height range, may be possible in some locations on the West Kentish Town Estate site, subject to testing of impacts on strategic views in the London View Management Framework (LVMF) and relevant local views.
- 10.14 The emerging site allocations document, although now submitted for examination, has not been through examination in public and holds limited weight at this time.
- 10.15 Whilst alternative options for the estate other than demolition of existing buildings have been considered, demolition is strongly supported by existing residents and would most comprehensively deal with reported issues on the estate including matters relating to overcrowding, size, access, and quality of the existing accommodation.
- 10.16 Full demolition would allow a comprehensive masterplan development to be provided that would meet a wide range of policy and quality objectives including larger high-quality energy efficient homes, better meeting the needs of local residents, and set in improved open spaces and public realm areas. The masterplan would provide a new estate that would support We Make Camden ambitions by providing homes that meet contemporary expectations of design, space and environmental sustainability, which would

improve the living conditions of existing residents, and which would bring significant benefits to the local area.

- 10.17 The proposed design would better address local streets with high-quality contemporary architecture that respects local context. The design has been robustly interrogated through a range of public consultations, pre-application meetings and design panel discussions. Reserved Matters applications would ensure the outline plots deliver high quality design with appropriate scale, articulation, and detailing. New housing would be inclusive and accessible, with low energy demand, and meeting up-to-date internal space standards, which provides a substantial improvement on the appearance and quality of existing homes (for more on this topic see the 'Design' section of this report below).
- 10.18 Demolition of the existing estate buildings must be robustly justified in terms of their sustainability impact and the climate emergency. This is dealt with in the 'Sustainable design and construction' section of this report below.
- 10.19 The principle of redevelopment of the estate to make better use of land and deliver more and better-quality new homes, including affordable homes, complies with national, regional and local planning policy and is therefore considered acceptable in principle. The proposed development would be car free and as such would remove all existing off-street car parking from the site which aligns with the Council's transport and sustainability objectives to prioritise active travel options such as walking and cycling. Policy H1 of the London Plan and policies H1 and T2 of the Local Plan encourage the development of underused sites and areas of car parking to provide mixed-use developments and achieve housing targets.
- 10.20 The comprehensive redevelopment approach would also achieve many other benefits including a public open space at the centre of the site that provides meeting spaces and play areas for the community, improved connectivity for pedestrians and cyclists through the site and to important local destinations such as Queens Crescent and Talacre Gardens, provision of new commercial units in key locations within the estate, and improvements in inclusivity and safety in the local environment.
- 10.21 Given the above, the principle of estate regeneration, demolition, and development on the site is considered acceptable in principle, subject to environmental and all other relevant considerations as discussed in the sections below. The acceptability of the density of the development is informed by conservation, design, and amenity issues, as part of a design-led approach, which are also assessed in turn in the report below.

11. LAND USE

Overall mix of uses

11.1 The current uses on the site are as follows:

Existing use	Floorspace (sqm GIA)	Dwellings
Social Rented Housing	17,397	263
Market Housing (Leaseholders)	3,637	53
Total Housing	21,034	316
Existing Commercial, Business and Service (Class E)	110	n/a
Total Area	21,144	316

Table 4 - Breakdown of existing land uses within the site area

11.2 The proposed floorspace is as follow for the detailed proposals (Phase 1):

Plot	Commercial (GIA)	Market Residential (GIA)	Affordable Residential (GIA)	Total Area (GIA)
A1	58sqm (2%)	0 (0%)	3,768sqm (98%)	3,826sqm
D1	0 (0%)	435sqm (15%)	2,472sqm (85%)	2,905sqm
TOTAL	58sqm (1%)	435sqm (6%)	6,240sqm (93%)	6,731sqm

Table 5 - Proposed floorspace for detailed plots

11.3 The maximum proposed commercial and other non-residential floorspace for the outline proposals is 200sqm. The maximum cap for the residential floorspace for the outline proposals is 76,420sqm. The proposed development must not exceed the floor spaces indicated in these tables, which shall be secured by condition RM22 which ensures compliance of reserved matters with the development specification document.

Plot	Commercial (GIA)	Residential (GIA)	Total Area (GIA)
A2	100sqm	8,300sqm	8,400sqm
A3	0	2,970sqm	2,970sqm
B1	100sqm	12,350sqm	12,350sqm

C1	0	14,510sqm	14,510sqm
D1	0	4,600sqm	4,600sqm
D3	0	4,200sqm	4,200sqm
E1	0	3,300sqm	3,300sqm
E2	0	11,100sqm	11,100sqm
F1	50sqm	2,850sqm	2,850sqm
F2	100sqm	5,500sqm	5,500sqm
G1	0	6,740sqm	6,740sqm
TOTAL	200sqm	76,420sqm	76,520sqm

Table 6 - Proposed maximum floorspace for outline plots

Residential use – Class C3

11.4 This comprehensive residential-led estate redevelopment proposal is being brought forward as part of the Council's Community Investment Programme (CIP) and has been subject to extensive consultation with the residents of the Estate since 2015. Through the consultation, existing residents of the Estate have highlighted the adverse effects that overcrowding, high energy bills, damp, antisocial behaviour, inaccessibility, and the poor condition of the existing buildings have had on them and their families.

11.5 The key challenges are summarised below:

- **Accessibility** - Most homes, including those on the ground floor, lack level access. The absence of lifts and poorly designed communal areas make it difficult for families with buggies, as well as elderly and disabled residents, leading to reduced mobility and increased isolation. This particularly affects those groups with impaired mobility, including those with protected characteristics. The redevelopment presents an opportunity to address these level changes and significantly improve access and connectivity throughout the site, helping to tackle inequality.
- **Connectivity** - Despite the site's central location and proximity to transport links, the estate's layout is poorly connected and difficult to navigate, limiting integration with the surrounding area.
- **Failing Buildings** - Ongoing structural problems persist despite past Council investment. Crumbling concrete ceilings and stairs have led to cold bridging, resulting in damp, condensation, and mould in residents' homes. Again, these conditions particularly affect more vulnerable residents including the disabled, those with other long-term conditions, the very young, and the elderly (disability and age being protected

characteristics). The energy inefficiency has a continuing impact on climate as well as living conditions.

- 11.6 The redevelopment concept seeks to revitalise the current West Kentish Town Estate by achieving several key goals: replacing current housing with modern standards; increasing the supply of larger homes to alleviate overcrowding and meet broader housing needs in Camden; integrating the Estate with its surroundings; improving visibility for safer neighbourhoods and creating an exemplary landscape setting with high-quality buildings.
- 11.7 LP policy H1 seeks to increase housing supply and meet the borough's housing targets. Camden's target for net housing completions from 2019/20 to 2028/29 is 10,380. LP Policy H1 says boroughs should deliver the housing by optimising the potential for housing delivery on all suitable and available brownfield sites, especially through:
- sites with existing or planned PTAL levels of 3-6 or which are located within 800m distance of a station or town centre boundary, and
 - mixed-use redevelopment of car parks and low-density retail parks and supermarkets.
- 11.8 Camden Local Plan policies H1, H3, H4, H6, H7 and Camden Planning Guidance (Housing) are relevant to the provision of housing, including affordable housing. Residential use is the Council's priority land use and is strongly supported. Existing affordable homes are protected, and schemes should deliver more affordable housing. Residential developments should provide a mix of accommodation which meets identified housing need. Policy H5 of the Local Plan states that the Council will provide more and better affordable housing through regenerating existing estates.
- 11.9 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 2023, when the government's measurement for Camden was 53% - which means that Camden's development plan policies are treated as being out-of-date in relation to housing provision.
- 11.10 The presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and great weight should be given to the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.
- 11.11 The table below sets out the proposed net change in residential floorspace taking account of all phases of the scheme.

Use	Existing	Detailed	Outline	Net change
Residential (C3)	21,034	6,673	76,420	+ 62,059

Table 7 - Net change in residential floorspace (sqm GIA)

- 11.12 The proposed development includes the provision of a significant amount of residential floorspace on the existing residential estate. The detailed and outline phases together would increase the amount of residential floorspace close to three times its current amount. A total of 6,673sqm (GIA) of residential floorspace is proposed in the detailed phase, which comprises 52 new homes. A further maximum of 76,420sqm (GIA) of residential floorspace is proposed in the outline phases, which equates to a maximum of around 804 homes. The exact number of units that provided in the later phases would be detailed within the specific reserved matters applications when these come forward for the later phases (the mix of units and tenure would also be agreed at that later point in the development process). The total residential provision across all phases is therefore expected to be a maximum of 856 homes. The proposed development must not exceed the site wide or plot maximum floorspace stated in the development specification document which shall be secured by condition RM19.

- 11.13 The detailed Phase 1 would provide housing in two blocks – Block A1 and D1 (see below).

Land Use	Plot A1	Plot D1	TOTAL
Residential floorspace	3,768	2,905	6,673

Table 8 - Proposed residential floorspace in Phase 1 (detailed) (sqm GIA)

- 11.14 The proposed development would deliver a significant amount of housing to help meet the borough's housing needs. It achieves this by optimising the use of underused and low-density land, including car parking areas, within an existing estate that is accessible from a range of public transport options.
- 11.15 The supply of new housing and the principle of housing on the site therefore complies with policy. Taking account of the Council's position with regards to its housing land supply and performance against the Housing Delivery Test, significant weight has been attached to the delivery of this housing, and in particular to the affordable housing which has the greatest need in the borough and is therefore the highest priority land use. The application should only be refused if the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Tenure and unit size mix are dealt with in the 'Affordable housing' and 'Housing mix' section.

Commercial uses – Class E

- 11.16 CLP policies TC1, TC2, TC3, TC4, and TC5 promote Town Centres, as well as smaller independent shops outside of designated Centres. The site is not in a designated centre, but it is immediately opposite and adjacent to the Queen's Crescent Neighbourhood Centre. Within Wedmore block at 104a Queen's Crescent there is a small vacant commercial unit.

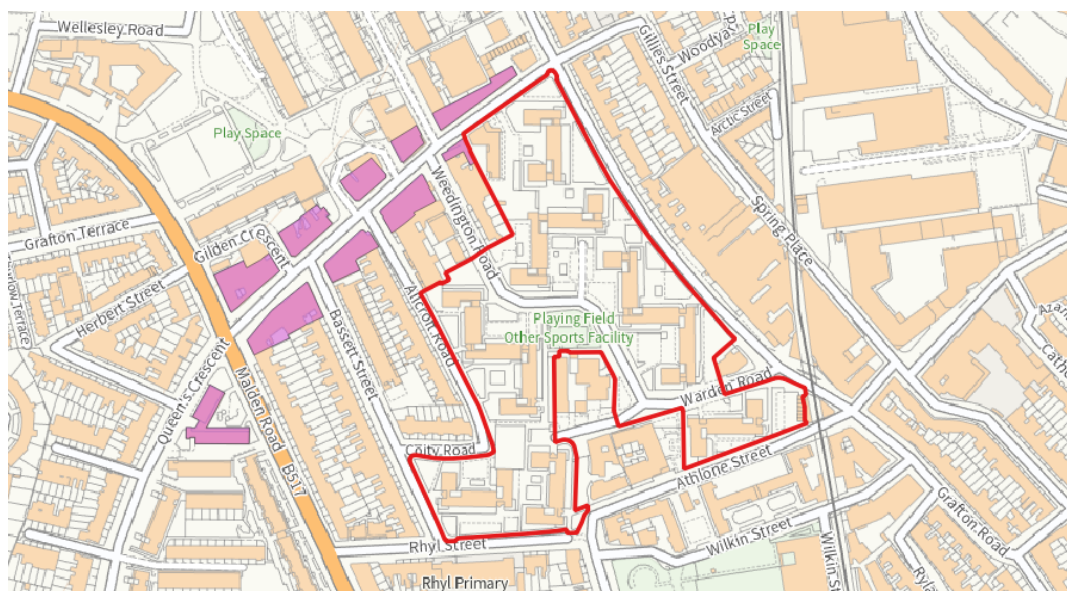


Figure 10 - Queen's Crescent Neighbourhood Centre (in purple)

- 11.17 The detailed proposals include 58sqm (GIA) of Class E (commercial, business and service uses) floorspace within Plot A1, fronting onto Queen's Crescent. This unit would be delivered as a flexible 'white box' space which would be fitted out to attract a range of potential occupiers. It would be sited to address both Queen's Crescent and the new north-south pedestrian street proposed within the masterplan area. CLP policy TC3 protects shops outside designated centres, and this commercial unit would ensure a reprovion in the first phase.
- 11.18 Although there is a reduction in commercial floorspace in the first phase, the smaller unit would be more suitable for small and independent business in line with CLP policy TC5. Furthermore, the outline proposals would include up to 200sqm of Class E floorspace, with the aim of providing these units fronting onto the central open space of the masterplan. Exact details of these commercial units would be secured through the future reserved matters applications. As such, a total of up to 258sqm of Class E commercial space could be secured in this proposal for the masterplan, building on the existing commercial provision. It should be noted that the end Class E uses shall exclude restaurants due to the lack of available space for ventilation and ducting. This restriction will be secured by condition RM22.

- 11.19 The table below sets out the proposed net change in commercial uses on site taking account of all phases of the scheme.

Use	Existing	Phase 1	Outline (max)	Net change
Class E	110	58	200	+148

Table 9 - Net change in commercial floorspace (sqm GIA)

- 11.20 The proposal is a residential-led mixed use estate regeneration development that provides a small element of commercial use that would contribute to and support the neighbourhood centre on Queen's Crescent. This would be suitable for the scheme's masterplan and would help support the proposed additional residential accommodation on the site, whilst avoiding an unreasonable amount of commercial floorspace which could undermine the long-term vitality of the neighbourhood centre to the north.
- 11.21 The comprehensive redevelopment of the site with substantial additional residential floorspace will support the neighbourhood centre as well as generating demand for small-scale commercial units within and around the upgraded estate. The proposed commercial units would also maximise safety and security in the local area by providing points of passive surveillance. The commercial units would create up to 22 jobs in the area depending on the end uses.
- 11.22 The uplift in commercial space for this development is welcomed. CLP policy TC1 seeks to focus new shopping and related uses in Camden's designated growth areas and existing centres. As such, the priority focus for the site is the regeneration of the existing estate and provision of greater amounts of residential floorspace. Given the commercial space on the site is small-scale and is most likely to be retail in nature to support the occupiers of the estate, it would not be appropriate or proportionate to seek affordable workspace policy.
- 11.23 Overall, the commercial provision is welcomed and is in accordance with the relevant development plan policies, particularly CLP policies TC1, TC2, TC3, and TC5.

Community space

- 11.24 CLP policies C1 (Health and wellbeing) and C2 (Community facilities) are relevant with regards to community facilities. LP policy GG1 states that development should provide access to good quality community spaces that encourage and strengthen communities. These policies seek to encourage the provision of new and improved community facilities within new developments where appropriate and protect existing community space.

- 11.25 The proposed development does not include the provision of community space. There is currently no community facility floorspace within the existing estate and so there is no loss of community facilities because of this scheme. Consideration was given to whether it would be appropriate and necessary to provide new community space with the development.
- 11.26 It is understood that at pre-application stage, consultation and discussions raised the possibility of community space being integrated into the development, but the priority for the development has always been to ensure the re-provision of housing on the site and to maximise the delivery of affordable homes. The applicant's position is that community space for the estate could be adequately provided within the local area if it was required, for example adjacent to the site on Queen's Crescent. However, it is also noted that there are already existing community facilities provided in the local area. For example, the former Carlton School site, 50m from the north-east corner of the site, provides a community hub (managed by Rhyl School) offering services such as stay-and-play sessions, adult and family learning, and community support.
- 11.27 Providing a new community facility can be problematic without end use operators and user groups being clearly defined at the outset, it can lead to empty and undefined community space units which end up being put to an alternative purpose.
- 11.28 Local plan policy and the draft local plan site allocation do not state that new community facilities must be provided on-site. Taking account of this, that fact that there are other existing community facilities in the area, the challenge of including community space in a scheme with such a long build programme and no defined user, it is considered reasonable in this case that new community space is not proposed at the outset. If a clear need for community facilities emerges in the future as the result of this development proposal it is likely to be later in delivery of the masterplan rather than in the first phases. In view of this it is considered appropriate to build in a regular review of community facilities through Community Facilities Plan that can be updated at each phase of the development.
- 11.29 Therefore, to ensure that the community on site is adequately served in terms of community space, a **Community Facilities Plan shall be secured by Section 106 legal agreement**, which would ensure that a review of existing local community facilities is undertaken at each phase, and provisions made for management of an appropriate space for residents, including a new or refurbished space if necessary and appropriate.

Local market

- 11.30 Camden Local Plan policy E1 states that the Council will recognise the importance of markets in supporting the local economy and local

employment. Policy TC2 of the Local Plan states that Camden's markets shall be protected.

11.31 There is a regular market on Queen's Crescent which supports the local economy and contributes to creating a vibrant neighbourhood centre on that street. The proposals would not permanently encroach on the market, which sits outside of the application site boundary. There would be a temporary use of a small part of the market during the construction phase of the development. The Council's Markets Officer has been consulted on this application and raises no objections. The market would benefit significantly from additional local spending generated by the additional residents associated with this development proposal. Any impacts from constructions would be carefully considered and managed under the detailed Construction Management Plans secured under the detailed application, and reserved matters applications.

11.32 As such, it is considered that the local market will be protected, and the proposal would align with the development plan policies.

Conclusion

11.33 The provision of up to 856 homes is strongly welcomed and, taking account of the development plan priorities and the NPPF, it should be given significant weight in decision making. Additional commercial space would be provided which adds to and supports the neighbourhood centre on Queen's Crescent and which would also support the needs of residents on the redeveloped estate. The local market would be protected, and residents would have access to community facilities in the local area. In addition, future provision of community facilities will be investigated under a planning obligation. The proposals are therefore acceptable in land use terms, prioritising the provision of new housing in a sustainable location which is the borough's priority land-use.

12. AFFORDABLE HOUSING AND VIABILITY

Affordable housing requirements

12.1 CLP policies H1, H3, H4, H5, H6, H7 and CPG2 (Housing) are all relevant as they set out the Council's approach to considering applications for new housing, including priorities for tenure and unit size. London Plan policies H4, H5 and H6 set out the Mayor's target for the provision of affordable housing, tenure priorities and a fast-track approach.

12.2 Camden Local Plan policy H4 and the Housing CPG set out the appropriate level of affordable housing for a given scheme.

12.3 The estate currently provides 21,034 sqm of residential floorspace. Under the application proposals the estate would be redeveloped to provide 6,675

sqm of residential in the Phase 1 detailed proposals and up to 76,420 sqm of residential in the later phases which are outline proposals, giving a total of c. 83,095 sqm of housing across the masterplan. This represents a residential uplift of 62,061 sqm or an indicative capacity of around 621 additional homes.

- 12.4 CLP policy H4 confirms an affordable housing target of 50% applies to sites with a capacity of 25 or more additional homes. In these cases, it expects affordable housing to be provided on site, subject to viability. The guideline split of the affordable housing provided is 60% social-affordable rent and 40% intermediate rent.
- 12.5 Policy H8 of the London Plan states that demolition of affordable housing as part of an estate regeneration scheme should only be permitted where it is being replaced with an equivalent amount of affordable housing floorspace. Social rent housing must be re-provided as social rent housing where a right of return for tenants is provided. Replacement affordable housing should be integrated into proposed development to ensure mixed and inclusive communities. All proposals with demolition and replacement of affordable housing are required to following the 'viability tested route' and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.
- 12.6 Policy H8 of the London Plan states that existing housing should be replaced by new housing at existing or higher densities.

Affordable provision – detailed proposals (Phase 1)

- 12.7 The detailed element of the application (Phase 1) proposes 93% affordable housing by floorspace (92% by habitable room), significantly exceeding the policy target. All affordable homes would be provided as social affordable rent – the most affordable tenure, and the homes have been designed to be tenure blind.

Plot	Market (GIA sqm)	Market %	Affordable (GIA sqm)	Affordable %	Total residential (GIA sqm)
A1	0	0%	3,768	100%	3,768
D1	435	15%	2,470	85%	2,905
Combined	435	7%	6,238	93%	6,673

Table 10 - Proposed housing floorspace split in the detailed phase (Phase 1)

- 12.8 The above table shows the proposed floorspace split between affordable and market in the detailed proposals. For the detailed element the mix would include a large proportion of family-sized homes, with 29 three and four-

bedroom properties proposed (66% of the total in Phase 1 by habitable room). The Mayor measures affordable housing by habitable rooms rather than floorspace, and the table below shows the breakdown of habitable rooms across the market and affordable homes in the detailed scheme.

Unit Type	Market	Market %	Affordable	Affordable %
1 Bed homes	0	0%	4	2%
2 Bed homes	3	17%	63	32%
3 Bed homes	15	83%	100	51%
4 Bed homes	0	0%	30	15%
All homes	18	8%	197	92%

Table 11 - Proposed habitable rooms by unit type in the detailed phase (Phase 1)

- 12.9 The tenure of Block A1 would be provided entirely as social affordable rent whilst Block D1 would have a mix of both social affordable rent and market sale. There is a conflict with the guideline tenure mix of 60% social affordable and 40% intermediate set out in policy. However, the mix is a guideline and considers several factors, and this is covered in the 'Guideline affordable tenure split' section below.
- 12.10 The social affordable rent units in these two blocks are provided in line with the wider decant strategy for the site. The four market units in Block D1 are intended for leaseholders. This would allow existing estate residents to move into these buildings minimising moves and displacement under the decant.



Figure 11 - Map showing location of Phase 1 plots A1 and D1 (shaded orange)

Affordable provision – outline proposals (Phases 2 to 8)

- 12.11 For the purposes of the outline proposals an illustrative masterplan and an illustrative market mix schedule have been submitted as a reasonable assumption of the likely maximum unit mix that will be brought forward within the development parameters for each phase. The total number of affordable dwellings would be around 278 which equates to 35% of the total housing provision (by floorspace and by unit). This is summarised in the table below.

Tenure	Homes	% of homes	GIA (sqm)	% of GIA
Market	526	65%	49,634	65%
Affordable	278	35%	26,672	35%
Total	804	100%	76,306	100%

Table 12 - Proposed level of affordable housing in the Outline phases

- 12.12 As with the detailed phase, all affordable housing would be provided as social rent. The GLA is supportive of the approach to affordable housing and tenure at this site subject to a viability assessment which would ensure the maximum viable amount of affordable housing is provided. Further information on financial viability is provided in the relevant section below.
- 12.13 As referenced above, there is a conflict with the guideline tenure mix of 60% social affordable and 40% intermediate set out in policy. However, the mix is a guideline and considers several factors, and this is covered in the 'Guideline affordable tenure split' section below.
- 12.14 The **Shadow Section 106 legal agreement would secure a Housing Delivery Plan** to be submitted with the reserved matters applications (RMAs) for each phase, demonstrating that the outline elements will cumulatively deliver the overall 35% affordable housing committed to by the applicant.
- 12.15 The Housing Delivery Plan would have to confirm/include:
- the number, floorspace, and habitable rooms of Residential Units to be provided as part of the relevant RMA;
 - the number, floorspace, and habitable rooms of Affordable Housing Units to be provided as part of the relevant RMA as well as by floor area and habitable room;
 - the number, floorspace, and habitable rooms of Market Housing Units to be provided as part of the relevant RMA;
 - the dwelling mix of the Affordable Housing Units to be provided as part of the relevant RMA (number, floorspace and habitable room);
 - the dwelling mix of the Market Housing Units to be provided as part of the relevant RMA (number, floorspace and habitable room);
 - the tenure mix of the Affordable Housing Units to be provided as part of the relevant RMA number, floorspace, and habitable rooms;
 - an indicative programme for the delivery of the Affordable Housing as part of the relevant RMA;
 - where known at the time of submission, details of the proposed Registered Provider if not the Council;
 - the overall percentage of the total Habitable Rooms and GIA in those parts of the Development which have been granted RMA or planning permission to date (including the Habitable Rooms and GIA to be provided as part of the relevant RMA) that will be provided as Affordable Housing;
 - a full cumulative housing schedule covering development delivered (or in construction) to date through any consents on the masterplan area.

- 12.16 This would allow full assessment under each of the RMAs or be used to inform consideration of alternative planning applications on the masterplan plots, of the dwelling mixes in each of the tenures, taking account of the housing needs at that time rather than relying on the broad ranges provided in the indicative unit mix. This allows adaptability because the indicative unit mix was submitted as part of the application to broadly demonstrate what the outline might be able to deliver in terms of unit mix taking, account of current unit mix priorities as set out in CLP Policy H7.
- 12.17 It would also allow control over the cumulative housing delivery over phases, with details included of the housing each development plot has already delivered in the masterplan. The following table gives the indicative mix of affordable and market homes by unit size based on the current policy.

Unit Type	Market	Market %	Affordable	Affordable %
1B	212	40%	45	16%
2B	239	46%	128	46%
3B	75	14%	92	33%
4B	0	0%	11	4%
5B	0	0%	2	1%
All homes	526	65%	278	35%

Table 13 – Indicative affordable housing by unit type in the Outline phases

- 12.18 In the event an RMA contains less than 35% of the habitable rooms or GIA as affordable housing, the Housing Delivery Plan would have to identify the locations within the development masterplan that could deliver the remaining affordable housing to ensure programme of affordable housing delivery for the site can be achieved.

Affordable provision – overall masterplan summary

- 12.19 This hybrid application includes a detailed element providing 93% affordable housing and an outline element providing 35% affordable housing. Combined, this provides a 38% provision of affordable housing overall by unit (326 units from an indicative total of 856) or 40% by floorspace, all in social rent tenure. This replaces an existing 263 social rented units (and 53 leasehold properties) and therefore provides a net gain of 63 social rent homes in total.
- 12.20 The Queen's Crescent Neighbourhood Forum have stated that the provision of only 63 affordable homes on site is insufficient. However, all existing social housing is required to be replaced and the financial viability of the development, as is explained in the sections below, confirms that this

number of net additional affordable homes is the maximum possible at this stage in the development process. Future financial reviews of the proposals will seek to secure additional affordable housing. Further discussion of this is provided in the sections below. LP policy H5 protects existing affordable housing floorspace. LP policy H4 says that for schemes re-providing affordable housing in estate regeneration schemes such as this, affordable housing should be provided in addition to any retained or replacement affordable housing arising under Policy H5.

- 12.21 The following table shows the overall provision of 40% affordable housing by floorspace across the masterplan, which includes re-provision of existing affordable floorspace and the provision of new additional floorspace. The table shows that when considering only the uplift in housing and affordable housing floorspace, and when excluding any existing floorspace being re-provided, the provision equates to 25% of the uplift being affordable.

Floorspace	Proposed residential (GIA sqm)	Proposed Affordable (GIA sqm)	Affordable %
Total residential (masterplan)	83,095	32,912	40%
Additional residential (uplift)	62,061	15,515	25%

Table 14 - Proportion of affordable housing for whole Masterplan, and uplift

- 12.22 This falls short of the 50% target for the additional housing. However, the scheme involves re-providing a very high existing level of affordable housing (83%) and when this is viewed in the context of the wider masterplan which delivers 40% affordable by floorspace overall, this is considered acceptable subject to a robust viability assessment (see 'viability assessment' section below).

Guideline affordable tenure split

- 12.23 The proposed development would deliver 100% of the affordable housing as social rent tenure, and this is not consistent with the guideline split in Local Plan Policy H4 which requires 60% social affordable rent and 40% intermediate rent tenures.
- 12.24 However, the mix as shown in the policy is a guideline only and several factors must be taken into account when considering whether a proposed housing mix is acceptable, including the character of the development, the policy requirement to optimise the overall amount of development, development economics and viability including any distinctive viability characteristics of particular types of development, and whether an alternative approach could better meet the objectives of the development plan.

- 12.25 This proposal is for the regeneration of an existing housing estate where existing social rented accommodation is required to be replaced.
- 12.26 Around 83% of the existing residents are living in social rented accommodation. The remaining occupiers are leaseholders (either as residents or non-resident private renters). All existing occupiers will be given the opportunity to return to the estate, in line with LP policy H8 and the Mayor's Good Practice Guide to Estate Regeneration.
- 12.27 This right of return is an important part of the proposal and is required to achieve the wider development plan objectives to regenerate housing estates, address inequality through regeneration of deprived areas, and to provide new housing in the borough, including meeting the most pressing need for genuinely affordable homes.
- 12.28 Social rented accommodation is the tenure priority in Camden and represents the most pressing housing need. The applicant has taken the initiative in prioritising social rented tenures when re-developing its own housing stock on its own land with the wider ambition of accommodating those on the Council's housing needs waiting list that are in most need of new housing. Such an approach helps to support the most vulnerable members of the community, helps to address inequalities in line with the We Make Camden vision and also helps to meet the wider objectives of the development plan. The proposed provision of market homes, and the diverse accommodation provided in the surrounding area, means the risk of creating an unbalanced community is mitigated.
- 12.29 The distinct development economics of the affordable sector also favour a focus on social affordable rented homes, because current grant funding prioritises social affordable rent over intermediate products.
- 12.30 Therefore, given the need to re-house existing social rent tenants and also the severe need for social rent accommodation as evidenced by the Council's housing waiting list it is considered that providing the affordable housing entirely in social rent tenure is acceptable in this case. The GLA supports this approach, subject to a viability review, which is discussed separately in the 'Viability assessment' section below.

Rents and service charges

- 12.31 All affordable homes would be provided in social affordable rent tenure, the rents for which are set by Central Government.
- 12.32 The scheme has been designed to ensure any additional estate service charges are as affordable as possible, whilst providing residents with appropriate amenities such as good quality accessible landscaping, play space and a safe and secure local environment.

Viability assessment

- 12.33 London Plan policy H8 states that where the demolition and replacement of affordable homes is proposed all schemes should follow the viability tested route. The applicant has submitted a Financial Viability Assessment for the masterplan and this has been reviewed by the Council's independent viability auditor, BPS, as well as the GLA.
- 12.34 The viability has been assessed on the basis of current values and costs, and also on the basis of a growth model projecting future values and costs. The review by BPS found that the scheme is not viable based on current day values and costs.
- 12.35 BPS agreed that the Benchmark Land Value is £1. This valuation is not unusual for estate regeneration projects due to the existing housing stock being towards the end of its operational life and given there is a policy requirement (and desire from residents given the ballot result where 93% of residents have voted in favour of complete redevelopment) to re-provide the existing affordable homes. In such cases the costs, including those of re-providing the affordable homes and buying back leasehold properties, would exceed the value of the properties as affordable housing and therefore the agreed BLV is effectively nil (but adopted as £1 for the purposes of the viability appraisal).
- 12.36 BPS concluded that the masterplan scheme has a significant deficit at around £30.5m under current day values and costs, with a profit level target set at 8.5% (a private developer would normally expect in the region of 15%-20%). To ensure realistic deliverability of the scheme, the viability of the scheme has also been assessed and predicted on a growth model and BPS have stated that it is possible for the development proposal to break even over the lifetime of the scheme if private sales grow adequately (11.7% growth is required). This growth modelling should be viewed in the context of a long-term public sector investment to provide homes, both affordable and market.
- 12.37 As such, it is considered that the proposed provision of 40% affordable housing (by floorspace) across the whole masterplan development based on current costs and values represents the maximum viable amount as demonstrated by the BPS viability appraisal. The GLA has also reviewed the appraisal and has agreed that this is the maximum viable amount of affordable housing. They have also agreed that any viability improvements secured through changes in improved market conditions or housing price growth **can be adequately secured through review mechanisms, secured through a shadow section 106 agreement.** As such, early, mid and late-stage reviews shall be secured in line with formulas set out in the Mayor's Affordable Housing and Viability SPG and on an open book review basis.

- 12.38 To secure support from the Mayor at Stage 2, the GLA normally require the detailed wording and provisions of the legal agreement in relation to the affordable housing elements to be provided to them.
- 12.39 The early-stage review is to ensure adequate progress is made in commencing the scheme. The Shadow s106 agreement would set the level of implementation that constitutes substantial progress (typically construction of the ground floor), the timeframe in which this must be achieved to avoid triggering the early-stage viability review (typically two years from determination), and details of the early-stage review mechanism.
- 12.40 The Shadow s106 Agreement would also secure a mid and late-stage review mechanism. A mid-stage review happens part way through construction, normally at the completion of around 50% floorspace or homes, and a late-stage review happens near completion, normally at the sale of around 75% floorspace or homes and using actual figures.
- 12.41 Where a review mechanism is triggered **and** viability has improved beyond the level anticipated, an additional affordable housing contribution could be secured, on-site where possible, by converting the proposed market homes. In exceptional circumstances or where the surplus is very small, this could be provided through a payment-in-lieu.
- 12.42 Policy H4 states that where the development's contribution to affordable housing falls short of the required policy targets due to financial viability, and there is a prospect of viability improving prior to completion of the development, the Council will seek a deferred contribution based on updated financial viability once costs and receipts are known.
- 12.43 The target amount of affordable housing is 31,030.50 sqm (50% of 62,061 sqm). The scheme proposes up to 15,515 sqm of affordable housing which equates to 25% of the uplift, which is half the policy target. This means a current shortfall of 15,515.50 sqm affordable housing. Therefore, any deferred contribution will be for 15,515.50 sqm, or a financial equivalent of £77,577,500 (charged at a rate of £5,000/sqm).
- 12.44 This deferred affordable housing contribution (DAHC) is not certain, and the ability to secure it will depend on viability improving, for example, because construction costs fall, or development values increase. If the viability improves when real inputs (like the actual costs and values of the scheme) are used, and a surplus is then identified, 60% of that surplus will be paid to the Council's Affordable Housing Fund, with 40% retained by the developer as an incentive to improve the viability, in line with the Housing CPG. In this case however, the developer is the Council's CIP programme. The total amount to be paid to the Council under the DAHC is therefore capped at the maximum policy requirement – in this case £77,577,500.

- 12.45 The national policy for 25% of affordable housing as First Homes no longer applies. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need. The Council has adopted a Planning Statement on the Intermediate Housing Strategy and First Homes, which indicates that some affordable housing tenures, including First Homes, would not be affordable to median income residents in Camden, and consequently First Homes and other unaffordable tenures will not be sought in the borough. Any homes delivered as part of the proposal, whether on site, off-site, or through 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 or intermediate rented housing.
- 12.46 As stated in the sections above, the **Shadow Section 106 legal agreement would secure a Housing Delivery Plan** is to be submitted with the reserved matters applications (RMAs) for each phase, demonstrating that the outline elements will cumulatively deliver the overall 40% affordable housing floorspace for the masterplan agreed by the applicant, as well as additional affordable housing on site or a payment in lieu where appropriate, if the review mechanism is triggered and it is demonstrated to be viable.

13. HOUSING MIX

- 13.1 CLP policy H7 requires developments to include a mix of homes of different sizes. All developments should include some large homes (with 3-or-more bedrooms) and some smaller homes and should contribute to meeting the priorities set out in the Dwelling Size Priorities Table in this policy. Policy H7 also indicates that the Council will apply the priorities flexibly having regard to a range of criteria relating to the characteristics of the location and the development. CLP supporting text in paragraphs 3.197 to 3.199 discusses the need in the borough for large homes. However, paragraph 3.201 recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development and will consider adjusting the mix of dwellings (particularly the mix of market dwellings) to achieve the maximum reasonable amount of affordable housing floorspace on the site. The Dwelling Size Priorities Table is reproduced below.

Tenure	1 bed or studio	2 bed	3 bed	4 bed +
Social-affordable rent	lower	high	high	medium
Intermediate	high	medium	lower	lower
Market	lower	high	high	lower

Table 15 - Camden Local Plan Policy H7 – Dwelling Size Priorities

- 13.2 The Council's Housing CPG (adopted 2021) sets out more detail about the dwelling size priorities. In relation to social-affordable rent homes, the CPG requires a minimum of 30% of all social rented homes provided to have three bedrooms or more, and for 20% to have four bedrooms where possible. Where 20% four-bedroom homes cannot be provided the CPG requests that the target for three-bedroom homes is increased proportionally up to 50%. For smaller homes, the aim of CPG is for 35% to have two bedrooms and no more than 15% to have a single bedroom.

Mix of unit sizes – detailed proposals (Phase 1)

- 13.3 The proposed unit sizes for the detailed phase (Phase 1) are as follows:

Home size	Market homes	Market %	Affordable homes	Affordable %
1-bed	0	0%	2	4%
2-bed	1	25%	20	40%
3-bed	3	75%	21	46%
4-bed	0	0%	5	10%
Total	4	100%	48	100%

Table 16 - Proposed mix of housing in Detailed proposals (Phase 1)

- 13.4 The mix of homes in the detailed phase exceeds the Housing CPG's stated target provision of 50% of all social rent tenure homes to be provided as family-sized (three and four bedroom) homes with 56% provided at this size in this phase. The number of two-bedroom homes also exceeds the 35% target stated in the CPG. The housing mix in Phase 1 has been shaped by existing residents of the Wedmore, Milverton, Ashington and Beckington block to ensure that the homes are tailored to meet needs to local families. Block A1 would include several larger family-sized maisonettes above minimum floorspace standards across the lower floors of the block, to re-house existing families on the estate.
- 13.5 All the market dwellings are also provided in a high demand size of two and three bedrooms. Therefore, the mix of dwelling sizes proposed in Phase 1 is acceptable.

Mix of unit sizes – outline proposals (Phases 2 to 8)

- 13.6 The illustrative unit sizes for the outline phases, as produced for the EIA, are as follows:

Home size	Market homes	Market %	Affordable homes	Affordable %
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1-bed	212	40%	45	16%
2-bed	239	46%	128	46%
3-bed	75	14%	92	33%
4-bed	0	0%	11	4%
5-bed	0	0%	2	1%
Total	526	100%	278	100%

Table 17 – Illustrative mix of housing in Outline proposals (Phase 2 to 8)

- 13.7 The illustrative outline proposals would provide a range of unit sizes. Based on the illustrative unit size proposals 38% (105) of the social rent homes would have three-bedrooms or more which does not meet the overall target of 50% family-sized homes. However, it is noted that the majority (79%) of the social rent homes in the outline phase are provided as two- and three-bedroom units which are in highest demand according to Table 1 of the Local Plan. The mix has also been developed to respond to the needs of residents on the estate.
- 13.8 Although there is a high provision of one-bedroom homes, particularly within the market housing, it is considered that the overall mix is acceptable in the circumstances noting the viability shortfall in the short term and the ambition to break even in the long-term.
- 13.9 The Queen's Crescent Neighbourhood Forum have stated that the provision of four-bedroom affordable homes is insufficient. However, the dwelling sizes of the affordable homes has been led by the need of residents and the desire to reduce overcrowding on the estate and provide better homes for families. Family homes are considered to be those with three-bedrooms or more and 40% of the affordable housing would be provided as family-sized, with a range of provision of three, four and five bedroom affordable properties included in the overall mix. As such, it is considered that the affordable housing mix is acceptable in this regard.
- 13.10 Given the long build out time of the scheme it possible that local and market needs and priorities may have changed before the reserved matters come forward. Officers will consider and agree final housing mix in the context of reserved matters applications for each outline phase to secure a mix that is appropriate to the particular type of housing proposed, having regard to planning policies and need applying at the time. The **Housing Delivery Plan which will be secured by shadow section 106 legal agreement** and should be submitted as part of each reserved matters application will set out details of the housing mix which is proposed.

- 13.11 Overall, the scheme provides a balanced mix of homes, suitable to the location and contributing to the identified needs in the development plan, in accordance with CLP policy H7.

14. QUALITY OF PROPOSED HOUSING

- 14.1 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.
- 14.2 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 a number of factors, including privacy, outlook, light, and noise. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise sensitive development.
- 14.3 LP policy D5 says development should provide the highest standard of accessible and inclusive design, which allows them to be to be used safely, easily and with dignity by all, also reflected in CLP policies D1, H6, and C6.
- 14.4 Officers have assessed the quality of the residential accommodation proposed in the detailed Phase 1, and the potential for the residential accommodation in the outline phases of the masterplan to provide high quality homes, albeit final details will be assessed at reserved matters stage when detailed designs come forward for those plots.

Outline Development (Phases 2 to 8)

Daylight and sunlight - Outline

- 14.5 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.
- 14.6 An Internal Sunlight, Daylight and Overshadowing Report by Point 2 has been submitted with this application. It summarises and applies the relevant guidelines to the proposed units in Phases 2 to 8 (the outline elements). This has been reviewed for the council by an independent third-party assessor at Lichfields Planning and Development. Lichfields raise no objections to the

methodologies used in the report. Daylight and sunlight have been assessed qualitatively for the outline elements of the masterplan.

- 14.7 In line with the BRE guidance Point 2 have undertaken façade studies. These studies look at the potential daylight and sunlight striking the facades of the outline elements and indicate where restrictions may occur as an aid for future detailed design. It is noted that these façade studies assess the illustrative scheme only and not the maximum parameters. However, it is considered this is the correct approach as the design code prevents a scheme from being erected in accordance with the maximum parameters and a more detailed day/sunlight review will occur at reserved matters stage in any case. The illustrative scheme also includes balconies and walkways, which are not included in the maximum parameters scheme, and therefore assessing the illustrative scheme is considered a pragmatic and appropriate approach for proposed residential blocks.
- 14.8 The Virtual Sky Component (VSC) daylight studies show good daylight compliance overall. However, there will be some failures to achieve the recommended levels (i.e. VSC values below 20%) at lower levels and in locations immediately below balconies/walkways, particularly on courtyard facades. Careful unit design will be required to ensure that homes at these levels make best use of the available daylight, i.e. by placing living spaces on facades with least obstruction and staggering balconies to ensure clearer outlook for windows below.
- 14.9 The Annual Probable Sunlight Hours (APSH) sunlight studies show that the east/west-facing layout of the scheme allows for good overall access to sunlight. As with the daylight tests, there are restrictions to the courtyard facades and below the balconies and walkways but predominantly sunlight access exceeds the expectations of the BRE guidance.
- 14.10 Condition RM18 requires each reserved matters application to be accompanied by a day/sunlight compliance report demonstrating the levels of adherence with the standards recommended in the BRE guidance. Detailed designs for the blocks could help to optimise the light in proposed homes whilst balancing this against overheating risks.
- 14.11 The overshadowing assessments for the illustrative scheme also indicate that a good level of direct sunlight access would be available for the significant areas of open amenity space.
- 14.12 Overshadowing assessments of the proposed courtyard spaces show that for the March 21 test date there is a limited degree of direct sunlight striking ground level. Further testing has shown that each of these internal spaces would achieve the BRE guidance area target of 50% within April or early May instead. Whilst transgressing the strict application of the BRE Report guidance the additional assessments do show that good access to sunlight

will occur from early spring. Lichfield's review states that the overshadowing transgressions are not considered significant due to the urban character of the local environment. It is also important to note that residents would all benefit from a private balcony and the adjacent public open space as well as an internal block courtyard, so it would not be their only amenity area.

- 14.13 Furthermore, the overshadowing assessments will also be fully assessed at the reserved matters stage where access to light will be maximised through detailed development design.

Other matters – Outline

- 14.14 The detailed design and layout of the buildings and proposed flats within them, in the outline phase, are reserved. This would be assessed against the policies set out above and any other relevant development plan policies when the reserved matters come forward. This means that the size, arrangement, and accessibility of proposed flats can be assessed fully at the reserved matters stage, along with provision of outlook, amenity space, and noise mitigation, this is secured by conditions RM10, RM14, RM20 & RM21.

Detailed (Phase 1)

Design and layout – Detailed

- 14.15 Part of the design-led approach to delivering effective high-density housing is about ensuring the development does not compromise the size and layouts of homes, ensuring high-quality housing 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 in Table 18.

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

Table 18 - Minimum internal space standards (London Plan Table 3.1, Policy D6)

14.16 All the homes in the detailed scheme meet or exceed the minimum standards. The new homes would have good floor to ceiling heights (2.5 metres in living rooms and bedrooms for Phase 1) and good room sizes. They are well laid out with a simple and rational plan form. All flats have a balcony or access to a terrace. Maisonette units will benefit from enclosed gardens.

14.17 The homes all have their own secure front door, with the maisonettes having a front door that leads to the street. Flats are served by residential cores with two staircases and two lifts. The cores provide access to secure lobbies leading to street.

Noise and vibration – Detailed

14.18 Block A1 is mixed use with commercial use on the ground floor levels, whilst Block D1 is residential only. The lower levels also contain plant, refuse, and cycle parking. The separation between the residential and non-residential uses as appropriate will be subject to a condition that requires sound insulation that is at least 10dB above the usual Building Regulations requirements (condition M15).

14.19 Internal sound insulation at least 5dB above the Building Regulations requirements will also be required for any walls ceilings or floors that separate different types of rooms or uses in adjoining dwellings (condition M14). For example, this would be required where a living room and kitchen may be stacked above a bedroom of a separate dwelling.

14.20 Noise from plant within and on top of buildings would also be conditioned in terms of noise levels, and there would be a requirement for anti-vibration mounts (conditions M8 and M9).

14.21 Block A1 is adjacent to Queen's Crescent and Block D1 is adjacent to a railway. The east-facing rooms in D1 cannot be opened as a means by which to protect residents from railway noise. This will be mitigated through the provision of mechanical ventilation systems which enables air flow and cooling internally. To ensure future residential occupiers are protected from external traffic noise sources (the roads and the railways) details of noise mitigation/insulation shall be secured by condition (conditions M10 to M12). Details of the ventilation systems shall be secured by condition M13.

14.22 The dwellings will be constructed to a high standard that would ensure that the occupiers are not unduly impacted by noise from inside the block, or outside the block.

Dual aspect units – Detailed

14.23 LP policy D6 says dual aspect units should be optimised. All units in Block D1 would be dual aspect. In A1 this falls to 87% however this is a high proportion of dual aspect units and therefore is considered acceptable.

Daylight and sunlight – Detailed

14.24 Blocks A1 and D1 have been tested for daylight by Point 2 with the both the existing context and the illustrative masterplan development proposal in place.

14.25 Of the 200 habitable rooms tested through the climate-based daylight modelling assessment the overall level of compliance is 89% in the current day scenario and 70% in the future scenario with a completed illustrative development in place. Both of these levels of compliance are considered good for an urban environment. It is also noted that for both blocks combined, 42 of the 61 affected rooms are bedrooms where expectations of daylight are less (than in main habitable rooms such as living rooms, for example). Excluding bedrooms only 19 (9.5%) of habitable rooms (kitchens and living/dining rooms) would have a notable reduction in daylighting levels against the BRE guideline targets which is considered a good result for an urban area. It should also be noted that this situation would only arise once the masterplan development is fully built out and, in the meantime, daylight conditions would be better.

14.26 In terms of sunlight, the BRE sunlight exposure assessment guidelines state that at least one room per unit should achieve compliance, and that preferably that would be a living room. With the illustrative scheme in place compliance across both blocks in the detailed scheme is 79% which is considered good given the urban nature of the site. Rooms that fail against the criteria are located either on the north (where sunlight cannot reach due to the southerly positioning of the sun) or west (where obstructions exist) of their respective blocks. Officers are satisfied that the scheme has been designed to maximise sunlight levels to the proposed homes.

14.27 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. Overall, the proposed development is considered to strike the right balance, the daylight and sunlight assessment results show a good level of compliance while ensuring optimising use of the land to deliver new homes.

Outlook and privacy – Detailed



Figure 12 - Separation distances on Phase 1 Block A1 (detailed)

14.28 The siting of Block A1 reflects the existing street pattern to the north which provides a 13-metre separation width. Such a precedent provides a suitable baseline for similar levels of outlook on this redeveloped estate which aims to reflect the historical urban grain. To the east the separation distance would be slightly shorter at 12 metres, once the masterplan development comes forward. There is a staircase at the southern end of the building and therefore no outlook from that side of the building. To the west outlook from rooms in the upper floor flats is, around 14 metres and that reduces to 12 metres for the upper floor of the maisonettes at first floor level, which is also considered an acceptable provision of outlook. The west outlook from the ground floor of the maisonettes is just over 6m to the rear boundary wall of the properties on Weedington Road, but this helps to provide a sense of enclosure and privacy for the ground floors.

14.29 In terms of privacy the 12 metre separation distances referenced above could be considered close where balconies or main habitable rooms are located directly opposite one another. However, relationships between Block A1 and nearby buildings can be managed through the use of insets, canted bays, balustrade detailing and where appropriate, screening between adjoining balconies, whilst buildings in the masterplan phase can adapt to

locate habitable rooms to avoid direct overlooking. Furthermore, the existing separation distances for Wedmore block drop to around 8m at their narrowest. The final details, including materiality of all balconies and screening for phase 1 will be secured by condition D1.

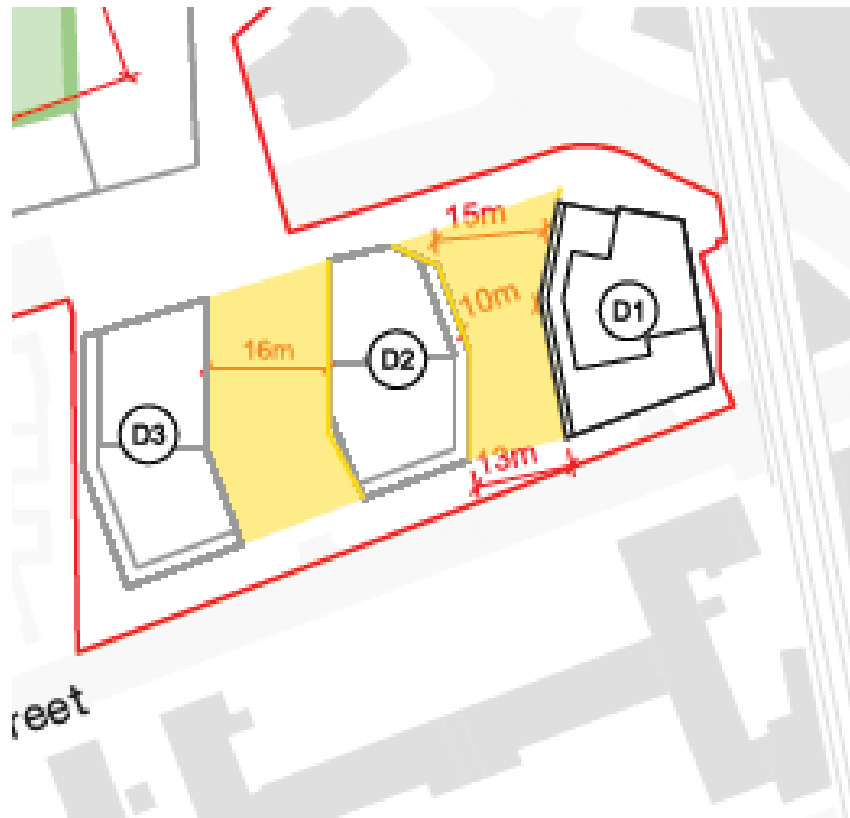


Figure 13 - Separation distances on Phase 1 Block D1 (detailed)

- 14.30 Figure 13 Block D1 would be separated from blocks to the north and south by at least 15 metres, and from the railway line by 5 metres. The emerging masterplan buildings to the west would be separated from Block D1 by between 10 metres and 15 metres. The north and south outlook from Block D1 is good and consistent with the local urban environment whilst the outlook close to the railway line is also acceptable given that commercial space is provided at lower levels and higher up, excellent outlook for flats is available above the railway. The proposed separation from Block D1 to the west is lower than in other parts of the masterplan, once Block D2 is built out. However, the western facade has been designed with dual-aspect corner balconies sited where separation distances are at their greatest. At pinch points between Blocks D1 and D2 both facades are angled to face away from one another with a more oblique relationship, which increases the separation distance and prevents direct overlooking, and the rooms are also not main habitable rooms (bedrooms). As such, such outlook for the proposed Block D1 is also considered acceptable.

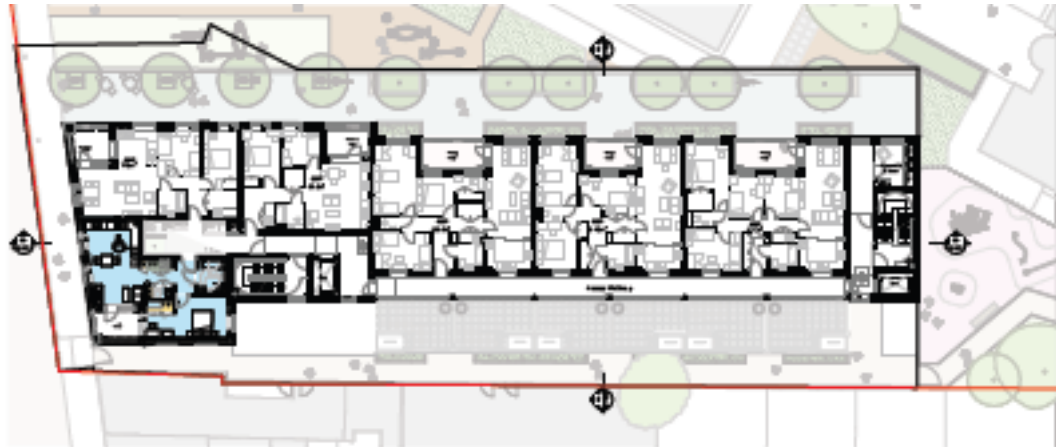
- 14.31 These design measures mean that a reasonable sense of outlook and privacy can be maintained, even in a denser environment such as that proposed in the surrounding masterplan.

External amenity space – Detailed

- 14.32 All homes would have the benefit of an external amenity space of at least 5sqm in the form of a garden, terrace or balcony. The proposals also feature significant public open space nearby with play space within this area. Conditions are attached requiring detailed landscape plans for each phase and plot (conditions D1, D6, D7 & D8). Further detail is provided in the 'Landscape and open space' section.
- 14.33 Overall, the provision of amenity space, both private and publicly accessible, complies with policy and would result in a high-quality development and provision for future occupiers.

Accessible units – Detailed

- 14.34 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 units).
- 14.35 Each block has two staircases, and two lifts, providing level access to all proposed homes.



Third Floor Plan



Second Floor Plan

Figure 14 – Location of wheelchair units for Block A1 (shaded)

- 14.36 The proposed units have been designed to accommodate 10% as M4(3) of the Building Regulations, with the remaining 90% meeting M4(2). The M4(3) standard refers collectively to "Wheelchair User Dwellings". This includes 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). The Wheelchair Accessible Dwellings are only required on the social-affordable sector where the council will have nominations.
- 14.37 There are 3 wheelchair units in Block A1 and 2 in Block D1 which equates to the 10% target. These will all be fully adapted Wheelchair Accessible Dwellings in affordable tenure (under Part M4(3)(2)(b)). There would be 2 one-bed units, 2 two-bed units and 1 three-bed unit. Accessible units would benefit from larger amenity spaces and level thresholds. Given the accessible nature of the building with good access to upper floors via multiple lifts, the wheelchair units have been provided on upper as well as lower floors.

- 14.38 Condition D23 would secure a Fire and Evacuation Strategy which would have to take account of any current and emerging standards (such as new Building Regulations – see ‘Fire safety’ section). It would include requirements for managing assisted evacuation within the building, including operation of the evacuation lifts. The strategy can be updated to account for new standards or safety requirements.
- 14.39 A condition would also be attached to secure the final location, layout, and design of the wheelchair units, as well as securing their provision in the finished scheme (conditions D3 & D4). This would allow their current position to be reviewed and moved, if necessary, during the detailed design process.

Conclusion

- 14.40 The proposed flats 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 flats for all, including an appropriate provision of wheelchair homes, allowing the buildings to house an inclusive community that can use them safely, easily and with dignity. The provision of fully adapted wheelchair homes for those in affordable housing, where occupants are more likely to be disabled (a protected characteristic under the Equality Act), would benefit disabled residents and enable a more inclusive community. The quality of residential units within the later phases of the development shall be secured through relevant reserved matters conditions RM10 and RM14.

15. HERITAGE

Legislation and policy context

- 15.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.
- 15.2 Any harm arising should be mitigated as far as possible, for example, through the design and approach of the scheme. Considerable weight and importance must be given to any harm to designated heritage assets, and any harm identified should be outweighed in the balance by considerable public benefits.
- 15.3 Paragraph 215 of the NPPF states:

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should

be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

15.4 There are also non-designated heritage assets in the surrounding area and these most notably include locally listed buildings, as well as buildings that make a positive contribution to conservation areas.

15.5 Any harm to non-designated heritage asset is a matter of planning balance as set out in paragraph 216 of the NPPF:

216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

15.6 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision making. The design and heritage policies in CLP policy D2 and LP policy HC1 also note the importance of character and appearance, and so officers have given great weight to these considerations. The development plan focuses on the potential impact of new development on the built environment, but also the impact on archaeological remains which may often be unidentified but discovered in the future. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets. The ES considers impacts on heritage both in terms of the built environment and archaeology.

15.7 The following table summarises the impact on heritage assets in the area:

Heritage asset	Designation	Impact on Significance
West Kentish Town Conservation Area	Designated – Conservation Area	Less than substantial harm – low level
Inkerman Conservation Area	Designated – Conservation Area	No harm
Rhyl School	Designated – GII Listed	Less than substantial harm – low level
87 Holmes Road (French bilingual college)	Designated – GII Listed	No harm
155-163 Queens Crescent	Non-designated – locally listed building	No harm
Former Public House (Mamelon Tower), 149 Grafton Road	Non-designated – locally listed building	No harm

Spring House, 10 Spring Place	Non-designated – locally listed building	No harm
Former Public House (Carlton Tavern), 73 Grafton Road	Non-designated – locally listed building	No harm
Former Public House, 61 and 61A Grafton Road	Non-designated – locally listed building	No harm
Former Public House, 84 Warden Road	Non-designated – locally listed building	No harm

Table 19 - Summary of impact on heritage assets

Conservation areas and listed buildings (designated heritage assets)

- 15.8 The site is not in a conservation area, and there are no listed buildings within the site. There are several designated heritage assets in the surrounding area consisting of conservation areas and listed buildings.

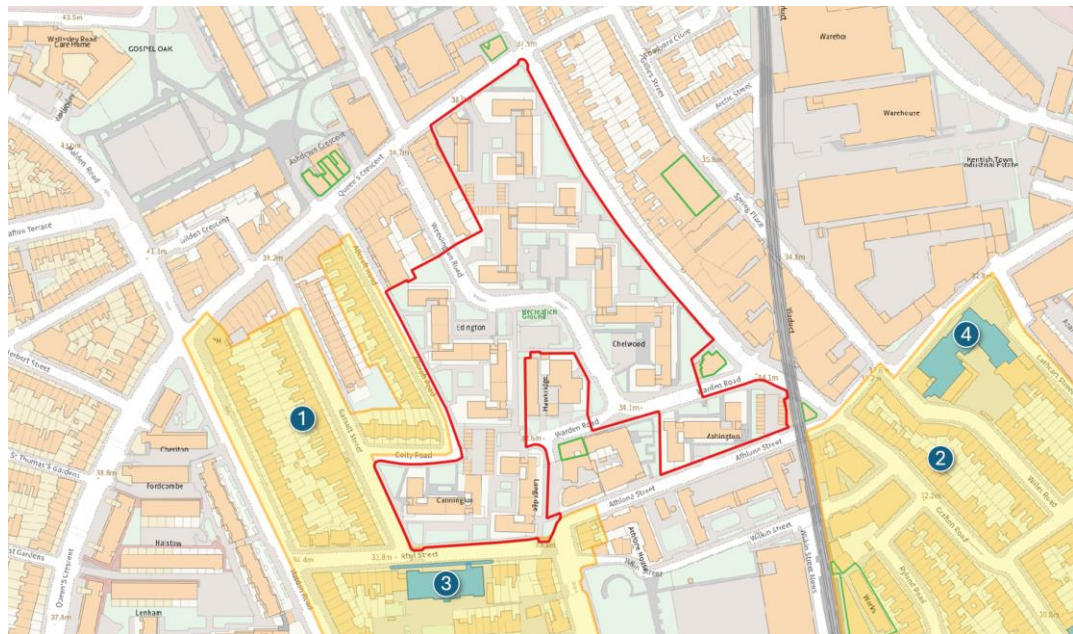


Figure 15 - Map of Conservation Areas and Listed Buildings near the site

- 15.9 The map above shows the key conservation areas around the site, along with two listed buildings closest to the site. These designated assets are:

1. West Kentish Town Conservation Area
2. Inkerman Conservation Area
3. Rhyl Primary School with attached railings and wall (Grade II Listed)
4. 87 Holmes Road (French bilingual college) (Grade II Listed)

- 15.10 The potential impacts of the development on these heritage assets will be on their setting, largely impacting on views from within the conservation areas in a way which alters their relationship to the surrounding context. Their settings however do not always contribute to their significance.

- 15.11 With the outline elements, until reserved matters applications come forward for the plots, the true extent of the impact of the outline plots, alongside the detailed phase, and cumulatively across the scheme, cannot be easily assessed. For example, mitigation through reduced heights and massing within the parameter plans, or architectural detailing, cannot be built into the assessment. Therefore, the largest potential impact has been assumed, what would the impact be if the scheme was built out to the maximum parameters in line with the design code (shown in purple outlines in the verified views). As such, the assessment effectively represents a worst-case scenario.

West Kentish Town CA (1 on the map) – less than substantial harm

- 15.12 West Kentish Town Conservation Area is characterised by long terraces of well detailed mid nineteenth century houses, generally three to four storeys in height. Initially the area was intended to be detached or semi-detached villas, but this scheme was never built and was replaced by less prestigious piecemeal development built by speculative builders. Its significance stems from its character and appearance as a fairly uniform piece of townscape in terms of building ages, typology and materials.
- 15.13 War time bombing and twentieth century slum clearances have led to a large amount of post-war development surrounding the area, with the stark contrast in the two styles dictating the conservation area boundary. To this extent, its immediate setting makes a limited contribution to its significance.
- 15.14 The proposed outline development immediately abuts the conservation area along Allcroft Road, Coity Road, Bassett Steet and Rhyl Street, which consist of two or three-storey terraces of houses. These are set back slightly from the pavement edge. On the other side of these roads the existing site consists of three storey blocks of flats set back from the pavement edge in spacious grounds. The image below shows a typical terrace, this one in Bassett Street.



Figure 16 - Typical terrace in the conservation area (Bassett Street)

- 15.15 The proposals to place linear blocks of flats which runs parallel to the pavement is appropriate and would help reinstate the historic enclosure of the streets. However, the proposed maximum heights along these streets are much higher, ranging from 49 to 58 metres AOD. The image below shows the parameter heights along the conservation area boundary (in yellow) with the lowest (49m AOD) in plot E1, and the highest (58 metres AOD) in block E2 facing Coity Road, Allcroft Road, and Rhyl Street.

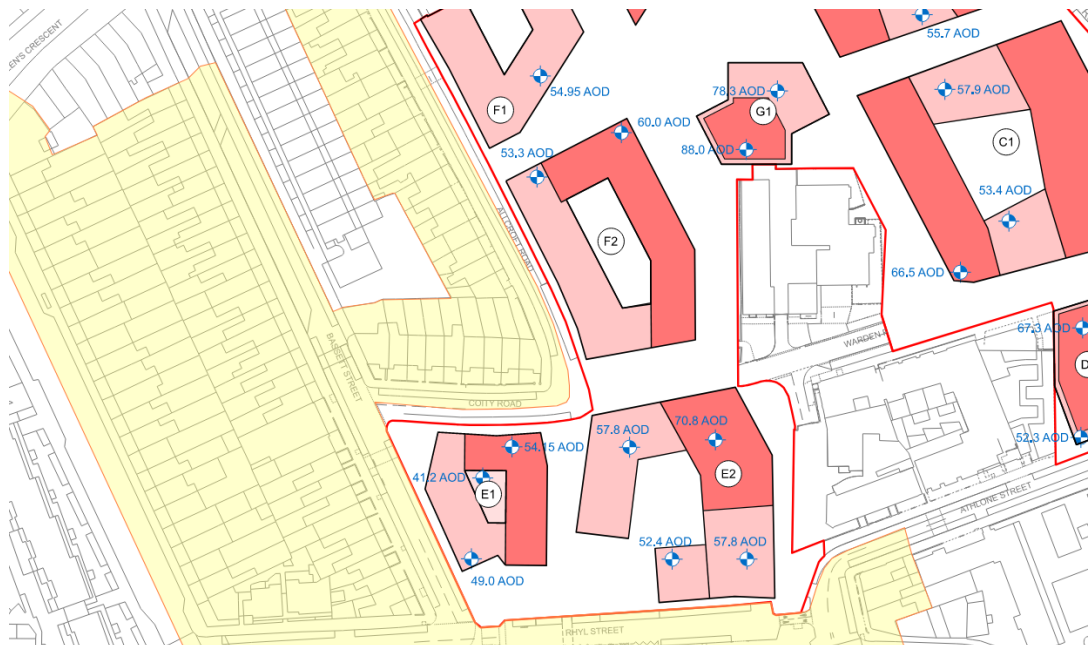


Figure 17 - Map showing maximum heights along the CA bounday

- 15.16 This will not necessarily equate to development to this height immediately adjacent to the pavement edge, and the impact of development could be

reduced through careful massing, detailing and materials during subsequent reserved matters or alternative planning applications for the plots. However, the scale of the proposed development could be overbearing when viewed along these streets and would certainly contrast with the domestic scale terraces with which they would share the street. This is demonstrated in the view below.



Figure 18 - View from the corner of Bassett Street and Coity Road

- 15.17 In assessing the impact on a conservation area, it must be considered against the area as a whole. The existing contrast in character means that the setting of the area makes a limited contribution to its overall significance. The contribution it does make is largely from the more modest scale of the existing blocks. Therefore, the level of harm would be less than substantial and at the lower end of the scale, given the development will reinstate the building line on this side of the street, and the site already differs considerably in terms of its massing and appearance compared with the conservation area.

Inkerman CA (2 on the map) – no harm

- 15.18 Inkerman Road Conservation Area forms a dense and homogenous environment in the heart of Kentish Town of two to three-storey terraced houses. The prevailing character is residential, with incidental corner shops on ground floor level integrated with institutional, educational, light industrial and commercial uses. Most of the buildings were built in the 1850s and 1860s and they form its core. The later buildings and the mix of uses give the area a lively diversity and mostly they have had a positive impact on the townscape and contribute to the character of the Conservation Area.

Although the area has a cohesive overall identity each street within it displays different characteristics.

- 15.19 The proposed development is separated from Inkerman Conservation Area by the viaduct, so it is really only the overall height at the southeastern corner of the development site which will be visible from Grafton Road and Holmes Road. There would remain a visual and physical separation between the conservation area to the east of the viaduct and the site to the west.



Figure 19 - View from Inkerman CA along Grafton Road

- 15.20 In these views from the conservation area, the development will be seen in the background, rather than having a direct relationship with the conservation area. In views along both streets, the proposed development will be visible against the sky, but this will not be dominant, nor unusual in a conservation area which is surrounded by a variety of building heights and styles.
- 15.21 As such, the proposal would preserve the conservation area's setting and significance.

Rhyl School (Grade II Listed) (3 on the map) – less than substantial harm

- 15.22 The building dates from 1897-98 by TJ Bailey and is of both special architectural and historic interest. Its architectural interest comes from its robust form, rich architectural detailing and composition as well as its landmark qualities, which differentiate it from its surroundings. Its boundary wall is also listed as part of the building's overall composition and relationship to the street. The building's historical interest comes from its association with

the organised provision of education on a London-wide level in the late nineteenth century.

- 15.23 The building's height and bulk is prominent in the townscape, with the scale of surrounding development being subservient. To this extent, the setting of the subservient existing buildings to the north make some contribution to the building's significance. The image below shows the building from Rhyl Street.



Figure 20 - Rhyl School and attached wall and railings (GII listed)

- 15.24 The main impact on the setting of this school will be in views east and west along Rhyl Street. Whilst the western pedimented bay which is visible terminating the view southwards along Bassett Street, is a view which would be maintained by the proposal.
- 15.25 Presently, due to its height and bulk, the building is prominent in the townscape, with the scale of surrounding development being subservient. The proposed development on the northern side of Rhyl Street would be six storeys which is significantly taller. In views eastwards the impact of Block E1 is limited as it is set well back from the pavement edge and screened by existing mature trees.
- 15.26 However, in westward views the mass of Block E2 could be brought to the pavement edge under the parameters and would have an overbearing impact which erodes the primacy of the school as a landmark in this view, harming its significance. The image below shows such a view with the maximum parameters shown in purple wireframe.



Figure 21 - Westward view on Rhyl Street with Rhyl School on the left

- 15.27 However, the block is only in outline with final details including scale, layout, and design, being reserved. As such the impact could be further minimised. Furthermore, the notable impact is only one view of the school, so the level of harm is at the very low end of less than substantial.

87 Holmes Road (Grade II Listed) (4 on the map) – no harm

- 15.28 Like Inkerman Conservation Area, this listed building is far away, on the other side of the railway viaduct, and visually detached from the site in character and townscape. As such, the site is not in its direct setting and, at this distance, has no impact on its significance.

Locally listed buildings (non-designated heritage assets)

- 15.29 There are several Locally listed buildings around the site, and these are shown on the map below. Any impact on them is a matter of balanced judgement.

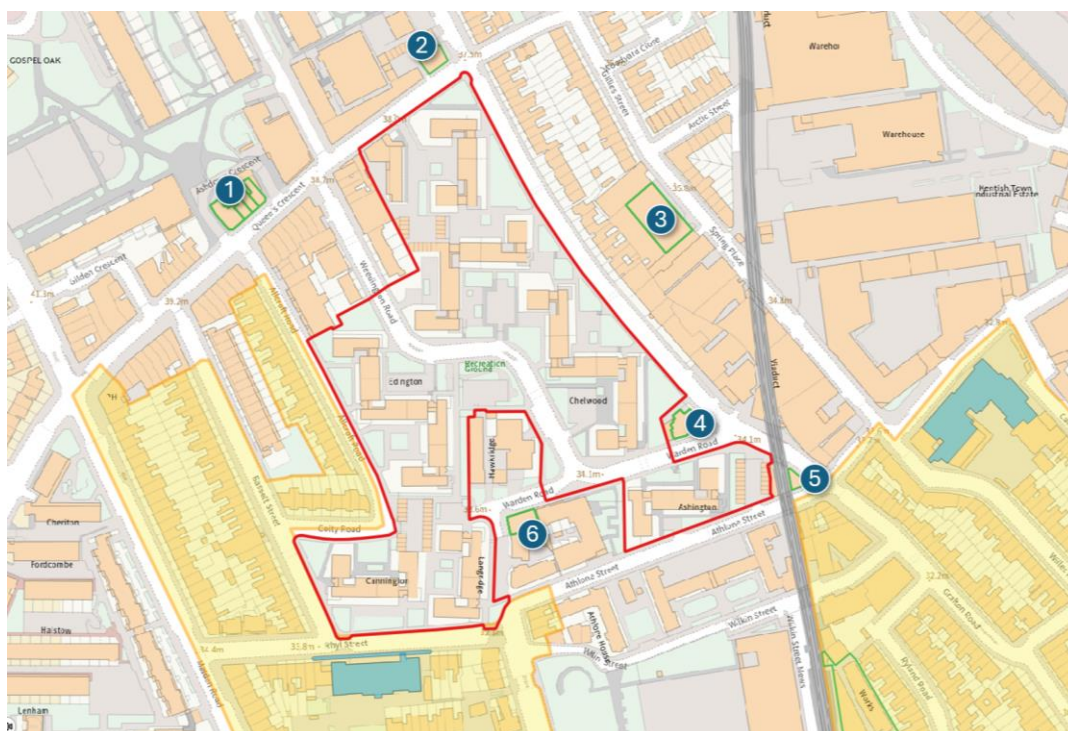


Figure 22 - Map of Locally Listed Buildings near the site

1. 155-163 Queens Crescent (group of buildings) (Ref420)
2. Former Public House (Mamelon Tower), 149 Grafton Road (Ref358)
3. Spring House, 10 Spring Place (Ref357)
4. Former Public House (Carlton Tavern), 73 Grafton Road (Ref655)
5. Former Public House, 61 and 61A Grafton Road (Ref299)
6. Former Public House, 84 Warden Road (Ref656)

155-163 Queens Crescent and Spring House (1 and 3 on the map)

15.30 Due to the location of the nearby locally listed buildings in relation to the site the development will largely have no impact on their setting or surroundings. In particular, the group of buildings at 155-163 Queens Crescent (Ref420 and labelled 1 on the plan above) and Spring House (Ref357 and labelled 3 on the plan above) remain physically and visually separate enough to have no notable impact arising from the proposal. There would be no harm to their significance.

15.31 However, the remaining buildings, all of which are former pubs, are closer and have a more notable albeit acceptable impact as set out below.

Former PH (Mamelon Tower), 149 Grafton Road (2 on the map) – no harm

15.32 This is a mid-nineteenth century former public house on corner of Grafton Road and Queens Crescent. Formerly the Mamelon Towers public house, this building is well detailed with pediments to first floor windows and a prominent dentil cornice.

- 15.33 When the upper floors were converted to separate residential, a side extension and mansard were added. It is a landmark building on this corner site and has an important role as one of the few remaining historic buildings in this area, relating well to the 19th century terrace opposite.
- 15.34 The proposed block A2 would be located on the south side of Grafton Road, immediately opposite this locally listed building. The significance of this building comes mainly from its main elevations on Grafton Road and Queen's Crescent. In most views the new development will be seen in conjunction with the locally listed building, but within a varied townscape of a mixture of building heights and styles.

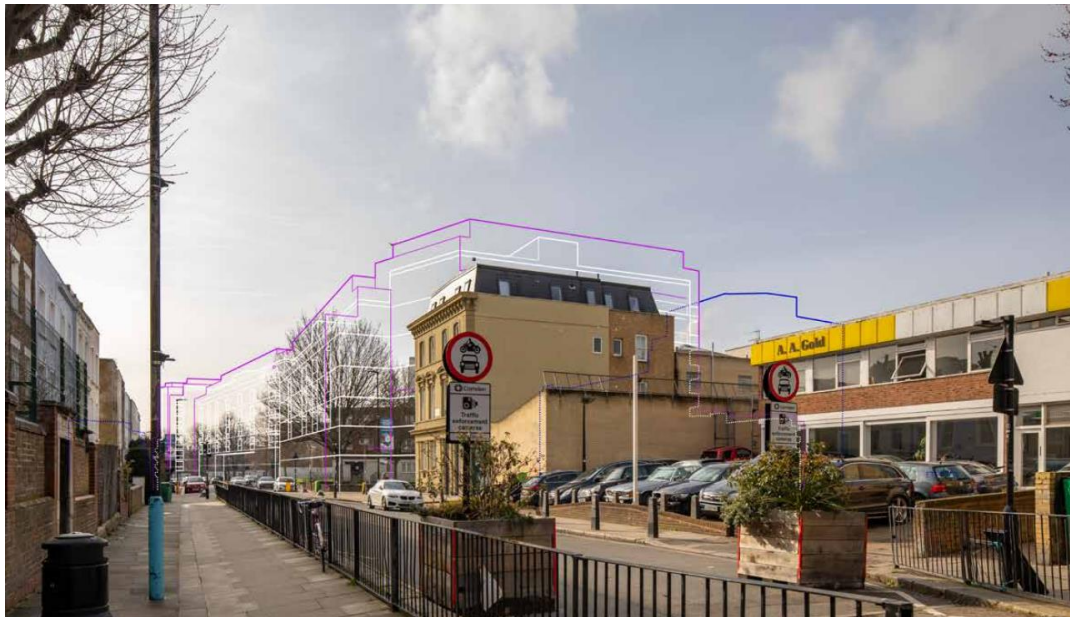


Figure 23 - Looking south on Grafton Road to number 149 with the proposed development behind

- 15.35 Its landmark qualities, which come primarily from decorative appearance on a corner site, which would be maintained. It would still serve as a reminder of the historic origins of the area and relate to the terrace opposite. There would be no harm to its significance.

Former PH (Carlton Tavern), 73 Grafton Road (4 on the map) – no harm

- 15.36 The building is a mid-nineteenth century former public house on the corner of Grafton Road and Warden Road, identified on the 1875 1st edition OS map as The Carlton. It is one of a very few buildings dating from the original 19th century street layout of this area which escaped demolition in the 1960s and is important for its architectural quality which refers to the area's history, and for the contribution it makes to the appearance of the townscape and in providing a marker at this road junction. It is of architectural, townscape and social significance.

- 15.37 This locally listed building is a surviving fragment of an otherwise lost piece of townscape, surrounded by a variety of building styles and heights. Whilst it does have some prominence in the street scene, due to its isolation, this is a result of wartime bomb damage and post war redevelopment, rather than the original design intention for the building.



Figure 24 - 73 Grafton Road with the development behind it

- 15.38 Development immediately next to the pub is not in itself harmful, as the building was intended to be part of wider group of buildings. Whilst the adjoining development would be significantly taller at 6/7 storeys in height it would not impact on the locally listed building's architectural, townscape, and social significance which would still be clearly evident. There would be no harm to its significance.

Former PH, 61 and 61A Grafton Road (5 on the map) – no harm

- 15.39 The building is a former public house on a prominent corner site. Although it has lost its original fenestration and shopfront features, it retains stuccoed window architraves at first and second floors with bracketed cornices to first and is an unusual and eye-catching feature which supports the historic character just outside the boundary of the Inkerman Conservation Area. It is of both historical and townscape significance.
- 15.40 The proposed development is seen behind this locally listed building. Historically the building has always been separated from the development site by the existing viaduct.



Figure 25 - 61 Grafton Road with the development in the backdrop

- 15.41 Block D1 would be seen directly behind the local listed building, and whilst it would be significantly taller at 6/7-storeys in height, due to the distance from the locally listed building, much of this height is screened from view. The existing townscape to the west of is already quite varied in terms of building heights and styles, and in this context would not harm its historical or townscape significance.

Former PH, 84 Warden Road (6 on the map) – no harm

- 15.42 This is a former public house located at the western end of Warden Road on the corner with its southern arm. It's a mid-19th century building of three storeys plus attic, stock brick, stuccoed ground floor elevation, stucco quoins and architraves and timber sliding sash windows. It is one of a very few buildings dating from the original 19th century street layout of this area which escaped demolition in the 1960s and is important for its architectural quality which refers to the area's history, and for the contribution it makes to the appearance of the townscape and in providing a marker at this road junction. It is of historical and townscape significance.
- 15.43 This locally listed building is a surviving fragment of an otherwise lost piece of townscape, surrounded by a variety of building styles and heights.
- 15.44 The proposed plot E2 will be located to the west of the buildings and could rise to ten storeys. Although this would be significantly taller than the locally listed building, its townscape significance comes from it being a surviving fragment of a previous phase of development, so in this respect its significance would be unaltered. It is also noted that there is a ten-storey building to the north, so the proposed height is contextual in this location. There would be no harm to its significance.

London View Management Framework (LVMF)

- 15.45 There are some important views across London, from parks and other public spaces that take in important buildings, to urban landscapes that help define London. The London Plan protects these and provides the basis for more detailed guidance on each view. This is called the London View Management Framework (LVMF) and is an adopted SPD. LP policies HC3 and HC4 refer

to the importance of views and state that development should preserve and, where possible, enhance a viewer's ability to recognise and appreciate Strategically Important Landmarks in these views.

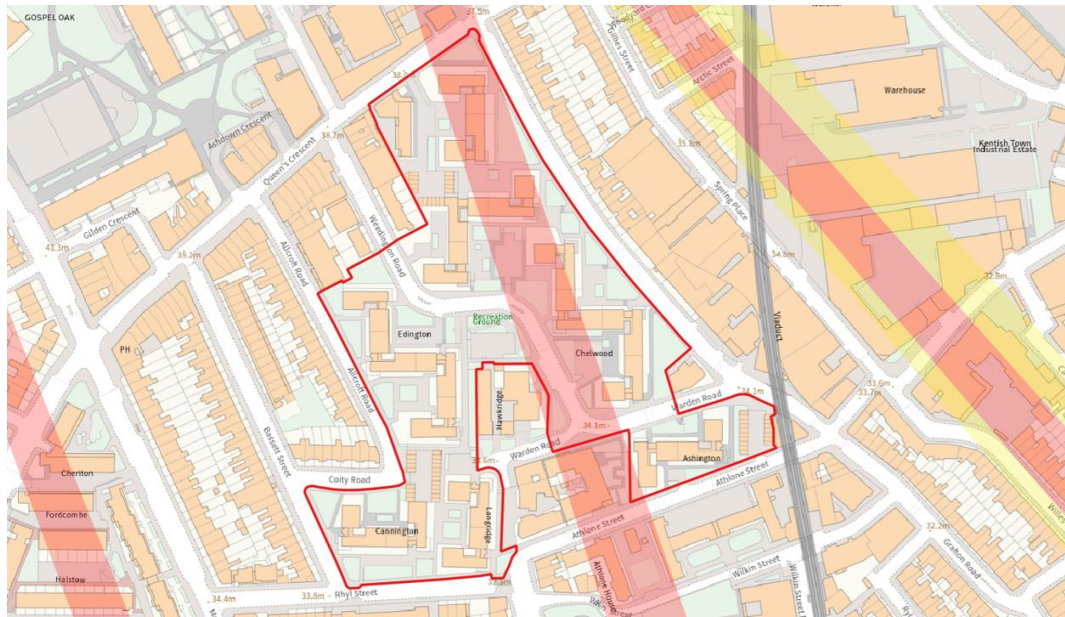


Figure 26 - LVMF view 2B.1 Parliament Hill oak tree to Palace of Westminster

- 15.46 View 2B.1 runs north to south across the site (above) providing the view from Parliament Hill oak tree to Palace of Westminster. Palace of Westminster is Grade I listed and also a World Heritage Site, protected by LP policy HC2. St Paul's Cathedral (Grade I) and BT Tower (Grade II) are also in the view.



Figure 27 - LVMF view 2B.1 From Parliament Hill to Palace of Westminster

- 15.47 As seen in the image above, the site is visible in the foreground of the Palace of Westminster, just to the west of the Viewing Corridor. The LVMF notes that it provides one of the few publicly available views of all the principal towers of the Palace of Westminster. The viewer's ability to perceive the visual relationship between the Clock Tower, the Central Tower and the Victoria Tower should be maintained or enhanced.
- 15.48 The proposed development largely falls under the viewing corridor. However, the maximum parameter of the tower on Plot G1 will marginally encroach onto the western edge of the viewing corridor. As it would sit in front of the larger Hawkridge House, which already encroaches into this view, it will leave this view unaffected in terms of the viewer's ability to appreciate the three towers of the Palace of Westminster.
- 15.49 As such, the development would protect the views in the LVMF, the landmarks within those views, and preserve the setting of the listed buildings, the most notable being Palace of Westminster.

Archaeology

- 15.50 The site is not located in an Archaeological Priority Area, and the Greater London Archaeology Advisory Service (GLAAS) raised no objection to the current application and information submitted in support. The site is considered very low risk by GLAAS but nonetheless, the applicant carried out a desk-based assessment of archaeological impact.
- 15.51 In agreement with the desk-based assessment submitted GLAAS confirmed this site has very low potential for archaeological remains from all periods other than medieval and modern. Given this low potential and the high level of truncation caused by the construction of the existing estate buildings in the 1960s, it is unlikely that significant archaeological remains will be disturbed.
- 15.52 Given any archaeological remains will be likely to be very limited in number and significance, GLAAS have advised that no further archaeological investigation or conditions are considered necessary.

Conclusion

- 15.53 The site is close to two conservation areas, with the West Kentish Town Conservation Area wrapping around the south-western corner of the site, and the Inkerman Conservation Area separated from the site by a railway viaduct. This viaduct also separates listed and locally listed buildings from the site. The proposed development would introduce a more urban character to the area, resulting in a higher density of buildings and a change in the setting of several heritage assets.
- 15.54 The assessment has identified that this change in setting to a more urban form would result in less than substantial harm, at the lowest end of the scale,

to the significance of the West Kentish Town Conservation Area and Rhyl School (Grade II Listed). In accordance with Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and relevant case law, great weight has been given to this harm in the planning balance. The NPPF and local policies (CLP D1, D2; LP HC1, HC2, HC3, HC4) require that any harm to designated heritage assets must be clearly and convincingly justified and outweighed by public benefits.

- 15.55 No harm has been identified to other surrounding heritage assets, both designated and non-designated, and their significance would be preserved. The development would also protect key views identified in the London View Management Framework, including those of the Palace of Westminster, and would not result in any detrimental impact in terms of archaeology.
- 15.56 In weighing the less than substantial harm identified against the public benefits of the proposal, it is considered that the significant and convincing public benefits associated with the scheme — particularly in the context of a significant housing regeneration scheme — are sufficient to outweigh the identified harm. These public benefits are discussed elsewhere in the report and summarised in the Conclusion section. The final design of the outline plots, and conditions relating to detailed design and materials, will provide further opportunities to minimise and mitigate any impact or harm.
- 15.57 Given the above, the proposal complies with the development plan in respect of heritage impact, most notably CLP policies D1 and D2, and LP policies HC1, HC2, HC3 and HC4. The statutory duty and policy requirement to give considerable weight to the conservation of heritage assets has been fully applied in this assessment.

16. DESIGN

- 16.1 CLP policies D1, D2 and CPG (Design) are relevant to the consideration of design when assessing planning applications. LP Policies D3, D4, D5, D8, and D9 are also relevant. Site Allocation C13 of the emerging draft Local Plan (West Kentish Town Estate) identifies the area as having the potential to strengthen its role as a residential area and deliver a significant increase in the number of permanent self-contained homes.
- 16.2 The Gospel Oak and Haverstock Community Vision sets out guidance for development of the estate. It supports redevelopment that improves pedestrian links and creates safer streets, and includes play and open spaces for all section of the community.
- 16.3 The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 40m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations

on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The site is situated within the London View Management Framework (LVMF) viewing corridor 2B, Parliament Hill: East of the Summit. This corridor, which bisects the site's centre-east, dictates the height and massing strategy, suggesting a maximum building height of approximately eight storeys.

- 16.4 Representations have been received from local groups requesting the provision of further supporting information as regards development design, with particular reference to additional site sections to show massing in relation to the surrounding context. The Council considers the sections provided, which demonstrate a single illustrative version of the masterplan that could be brought forward within the maximum scheme parameters, to be sufficient and clear enough to enable an adequate planning assessment to be made for this application. Officers are familiar with the site, the context, and with the height parameters of the proposal, and so have sufficient information to make an assessment. The sections (shown in the paragraphs below) are also broadly consistent with the information provided with other masterplan developments in Camden, such as the O2 proposal. Further information on the detailed design of the future buildings within the outline phases of this application will be provided as part of future reserved matters applications. Furthermore, the Design Code requires articulation and refinement of massing within the parameters – for example requiring set backs on upper floors and so any details with reserved matters applications will also need to comply with these as part of the outline application framework.

Historic development and surrounding townscape

- 16.5 The West Kentish Town Estate was constructed in the early 1960s following the demolition of Victorian street properties. The northern and southeastern corners of the site boundary were affected by World War Two bombings. The original linear routes of Carlton Street and Weedington Road were lost or rerouted when the estate was redeveloped.
- 16.6 The wider area is broadly characterised by a mix of typically scaled Victorian terraces and 20th-Century housing estates. To the southeast, the Inkerman Conservation Area showcases mid-Victorian terraced housing built in the 1850s, characterised by features like small front gardens, cast iron railings, stock brick walls with stone detailing, and traditional street paving.
- 16.7 To the west, the West Kentish Town Conservation Area extends from Prince of Wales Road to Queen's Crescent and features long terraces of 19th-Century houses with ornate detailing, typically ranging from two to four storeys. Examples of this architectural style are evident on streets like Malden Road, Bassett Street, Allcroft Road, Coity Road, and Rhyl Street, highlighting the area's distinct historical character. The site's southwestern

boundary abuts the Grade II listed Rhyl School, a significant architectural landmark.

Site appraisal and opportunity

- 16.8 The existing West Kentish Town Estate consists of 316 flats across eight residential buildings: Wedmore, Milverton, Durston, Chelwood, Ashington and Beckington, Langridge, Cannington, and Edington. It includes a small commercial unit within the Wedmore block at 104a Queen's Crescent.
- 16.9 The blocks are 3-4 storeys and have an angular north-south and east-west orientation which is at odds with the prevailing street pattern. As a result, blocks and entrances turn away from the surrounding streets and open spaces are fragmented.
- 16.10 Existing homes fall short of modern standards. They suffer from poor insulation, lack adequate accessibility, are cramped, and are undersized.
- 16.11 The site slopes from north to south, resulting in an overall elevation change of about 6.5 metres. Along the site's boundaries are low retaining walls, approximately 0.5m high, so the site appears to be slightly raised from the surrounding street levels.
- 16.12 There are many mature trees across the estate, which give it a green character. These contribute to a positive tree-lined edge along Grafton Road, Weedington Road and provide focal points across the estate. Aside from this, soft and hard landscaping are of limited quality. It has some value in terms of visual amenity and provides open views, but the green areas themselves are not easily used for recreational activities due to being fragmented into small pockets with limited accessibility due to retaining walls, raised elements, and gated and fenced off areas. There is a well-used community garden adjacent to Durston block.
- 16.13 The redevelopment of the site offers the opportunity to:
- Provide high quality, accessible new housing for existing and new residents.
 - Provide environmentally responsible development that is flexible and adaptable ensuring its long-term sustainability.
 - Improve the relationship of the site with the surrounding area through the introduction of safe routes and positive frontages along Queen's Crescent, Grafton Road and surrounding streets.
 - Provide new accessible green spaces across the site and a variety of dedicated private amenity spaces for residents in the form of private gardens, balconies and communal gardens.
 - Improve the quality of the public realm across the site including the planting of new trees and ecologically beneficial landscaping.

- Provide a safe and welcoming route through the site connecting Queen's Crescent and Warden Road.

Masterplan - Outline proposals

- 16.14 The outline application establishes a set of development parameters accompanied by a design code.
- 16.15 The Parameter Plans set out a fixed spatial framework for the outline phases of the development in plan form through defining the maximum and minimum spatial parameters within which the development must conform. This includes quantitative boundaries such as building heights, footprints, amount of open public realm, and so on.
- 16.16 The Design Code provides a detailed guide to the design principles that the development must incorporate or have regard to. Some of these are mandatory and some are guidelines. This includes qualitative principles such as architectural detailing, materials, street hierarchy, landscape design and boundary treatments.
- 16.17 The Development Specification defines the minimum and maximum parameters in terms of quantum and land use.
- 16.18 The parameter plans and the design code are complimentary documents, which combine to manage the scale, massing and appearance of the completed development. The qualitative boundaries for scale and massing set by the parameters are sculpted by the rules and guidance of the design code. Together, these documents work to control the design of the development within stated limits. In practice, the design code limits the maximum parameters as described in the parameter plans from being fully achieved. The design code ensures that qualitative controls secure a refined massing and layout, reasonable development proportions relative to local character, buildings that are fully integrated with the local public realm and high-quality design detailing.
- 16.19 Reserved matters applications will be assessed against these documents and as such the reserved matters proposals are expected to be more refined than the parameter plans would suggest.

Overall masterplan and layout

- 16.20 The vision for the redeveloped West Kentish Town Estate is a landscape-led masterplan focusing on creating a well-connected and green neighbourhood that integrates positively with the surrounding context.
- 16.21 The proposed masterplan is formed of 13 development plots arranged around a central public space, and a landscaped pedestrian route running north-south through the site. These are connected by a number of clearly defined routes, establishing a simple and clear arrangement of streets,

allowing good visibility and permeability across the site with overlooking of these streets providing passive surveillance throughout.

- 16.22 There is a clear hierarchy of private, communal and public areas, which will create safe and usable amenity spaces for residents and the local community. The alignment of building plots with the existing streets and reinstatement of elements of the original Victorian street pattern helps to define plot boundaries and open spaces and will help to embed the new development into the existing neighbourhood, reconnecting the estate with its surrounding context.

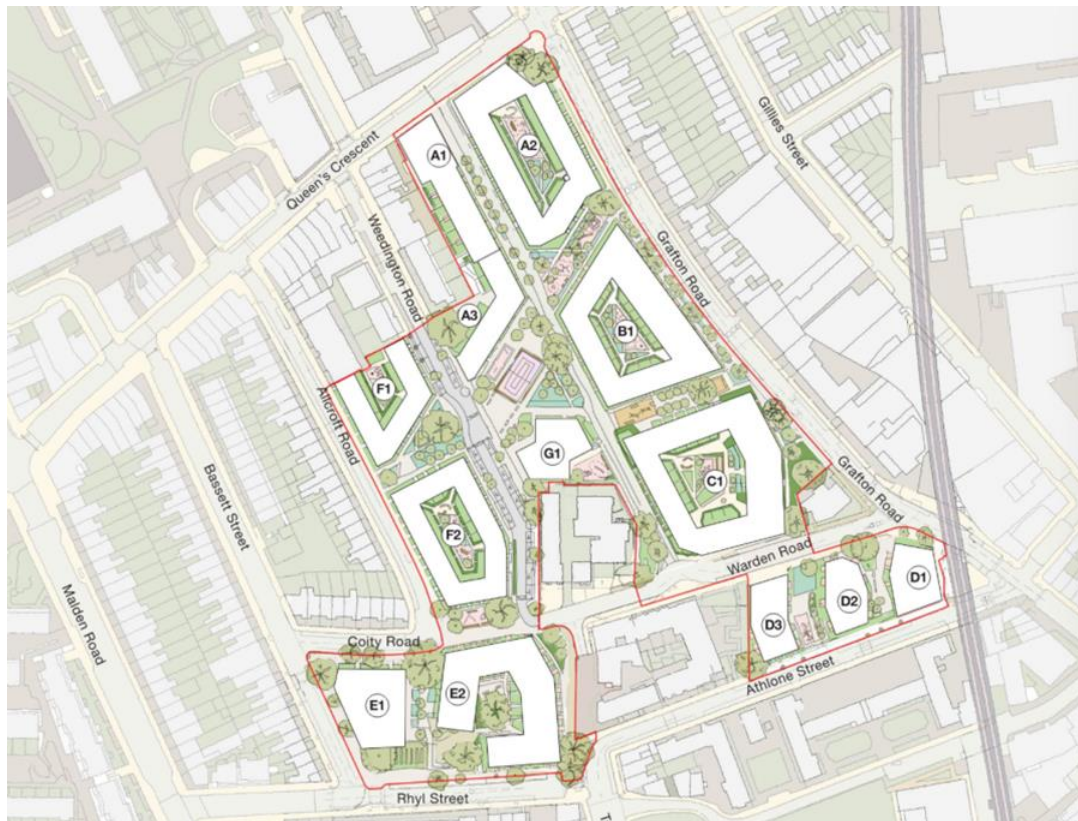


Figure 28 - Illustrative Masterplan

Building heights and massing

- 16.23 The overall massing approach aligns with the design criteria identified in the Camden Building Heights Study (CHBS). The massing strategy seeks to relate new development to the wider townscape by proposing lower height buildings at the northern, eastern and western edges to tie into the existing context. A single, taller building is proposed at the centre of the site, to the north of the existing 15 storey Hawkridge House.
- 16.24 Building heights proposed across the site range between 10m and 51m (approx. 3-16 storeys). The scale is generally greater than that of its immediate context, however taller buildings and mid-rise perimeter blocks are located more centrally away from the eastern and western edges in order to mitigate the townscape impact in wider views. The tallest building

breaches the guidelines within the CBHS by three storeys, however the remaining 12 building plots sit within the parameters of the guidance which recommends between three and twelve storeys, and it is considered that a single taller element within the wider masterplan will not impact negatively on the surrounding streets outside of the estate or otherwise adversely affect the overall masterplan for the site. The largest building is located in the centre of the masterplan, adjacent to an existing tall building and at the furthest point from the existing residential neighbourhood. London Plan policy requires development proposals to be optimised and providing a sensitively designed and located building of up to 16 storeys in this location is considered to achieve this policy aim of making the most efficient use of land to deliver more homes.

- 16.25 The distribution of height respects the LVMF 2B.1 viewing corridor and ensures that there is visible space around the Palace of Westminster in this view. Much of the proposed development would also be screened by trees in the foreground of that view. The siting of the proposed taller building adjacent to Hawkridge House means it would not extend beyond the building line of that neighbouring building and therefore, as set out in the Heritage section, there is no reduction on the ability to view the Palace of Westminster as a result.
- 16.26 It is noted that building height is an important issue for the Queen's Crescent Neighbourhood Forum. However, for the reasons as described above it is considered that the proposed masterplan building heights are acceptable.

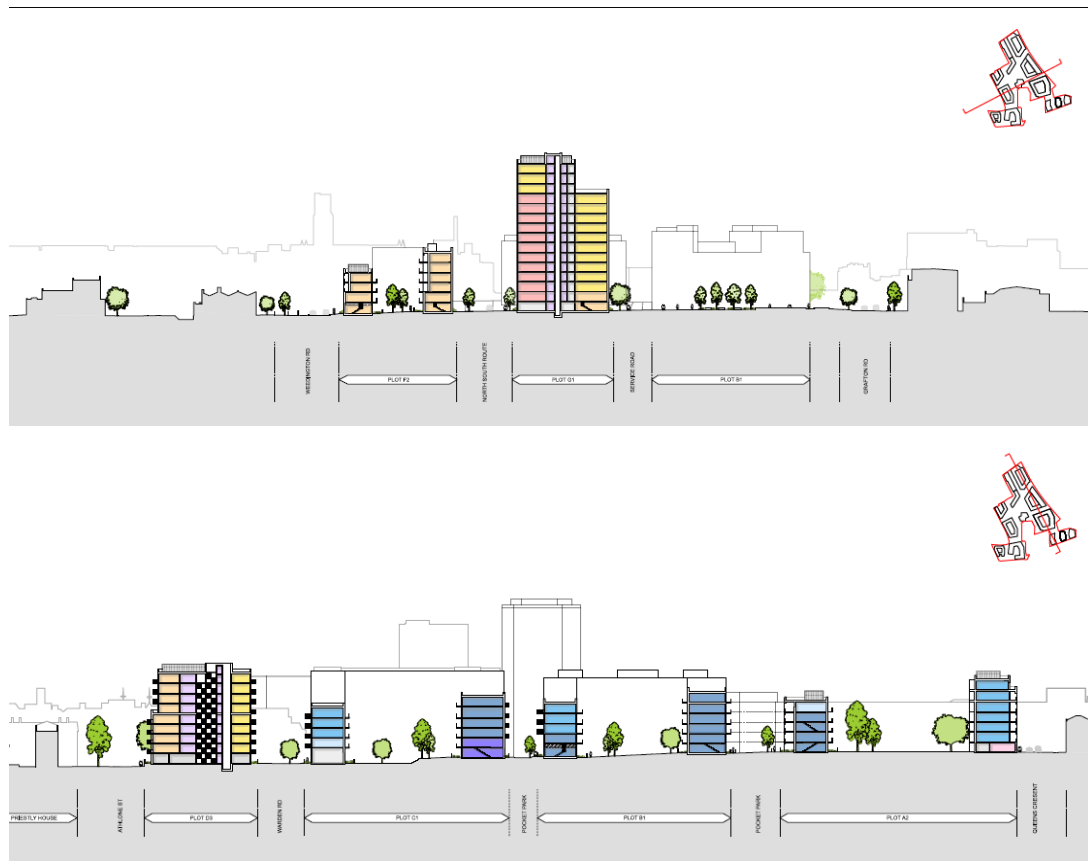


Figure 29 - Indicative sections sketches through the site, on east-west and north-south axes

Building typologies and character

- 16.27 The overall masterplan is made up of eight character areas, which help to define distinct areas and street types within the site extent, and which respond to the site's edges to create a coherent neighbourhood.
- 16.28 Within these character areas three main building typologies are proposed that respond to the site conditions and help to define the character areas. These are terraces, courtyard buildings and singular apartment buildings which are located across the site to provide appropriate degrees of access, aspect, and orientation.

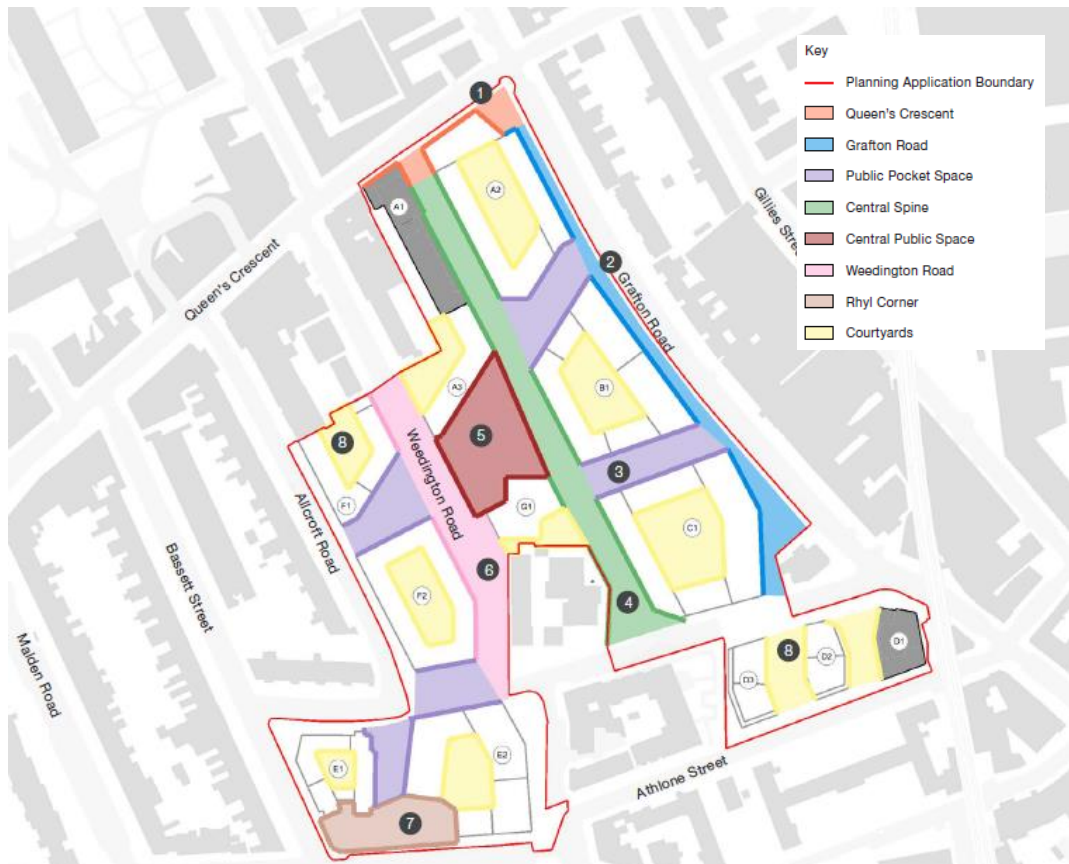


Figure 30 - The site's character areas

- 16.29 Perimeter courtyard blocks are proposed to form the residential blocks addressing Grafton Road. These provide generous outlook and amenity space to flats, with communal residents' gardens within courtyards. More modestly scaled terraces are proposed primarily on the western side of the masterplan to relate to the terraces of houses on Allcroft Road, Coity Road and Bassett Street as well as facing towards the new north-south pedestrian route through the site. The terrace is a recognisable building typology in Kentish Town, where long frontages line the streets with a height of 3-4 storeys. This typology is appropriate for the eastern and western edges of the masterplan, albeit at a larger scale, as they are the principal areas where the masterplan is viewed in an existing setting. Maisonettes at ground and first floor are proposed across all courtyard and terraced blocks within the masterplan, which is welcome as this prevents street-facing ground floor bedrooms, affording residents more privacy, and allowing curtains and blinds to be open, promoting more engaging, safer streets.



Figure 31 - Perimeter blocks fronting Grafton Road.

- 16.30 Single apartment buildings are proposed at the centre and south-eastern corner of the masterplan. These face onto areas of public space and provide flats with good aspect, private balconies and access to play spaces at ground level.



Figure 32 - Weedington Road providing maisonettes onto a wide street with the tower in the background

Ground floor, access and servicing

- 16.31 The masterplan seeks to maximise the number of entrances along building frontages in order to reinforce existing and newly created routes and create a legible network of streets. All homes at ground floor are maisonettes and have their own entrances along the neighbourhood streets. This will promote passive surveillance and ensure there are no bedrooms facing the street. The introduction of regular entrances will animate routes, which aligns with key design policies, and is an important factor in creating a safe and accessible environment.

Public realm, landscape and open space

- 16.32 Across the site the public realm extends to 31,813 sqm, which represents 55% of the total site area. The overarching strategy is to create a legible public realm structure, around a series of building plots. The proposals seek to retain as many trees as possible across the estate, which form an important part of its current character, and create new green amenity areas that are more usable than those that exist currently. Where 87% of the existing estate's green areas are inaccessible due to fencing and retaining walls, the proposed landscape strategy seeks to ensure the new open space is highly accessible to everyone. This will be a marked improvement

particularly for those with reduced mobility, including the very young, the elderly, parents with young children, and disabled people.

- 16.33 The central public square is conceived as the heart of the masterplan and is a triangular shaped space, with a width ranging from 15m to 55m over a length of over 100m. The public square will provide a civic heart to the masterplan with places to sit, meet and engage with a multifunctional play space, which is intended to cater for all genders and ages, with seating framed by large existing trees and new soft landscaping.
- 16.34 The central landscaped route runs north-south connecting Queen's Crescent with Warden Road. It would be well overlooked, linking into the central public square. The route is proposed to be the primary pedestrian route through the masterplan, allowing only occasional vehicular access. Weedington Road would remain the primary vehicular route for access, servicing and deliveries.
- 16.35 Secondary routes between blocks are designed to be play streets. Along these, public pocket spaces are proposed between buildings to provide soft landscaping, seating and play space to serve residents. The distribution of play space throughout the streets and open spaces, as well as within private communal courtyards, provides a rich variety of play opportunities and is welcomed.
- 16.36 There is provision for a 1.5m strip of defensible space between the public realm and all buildings, which supports privacy and security and for ground floor residents and which doubles up as amenity space. Courtyard spaces are designed to accommodate a mix of landscaping, play space and seating, and will be surrounded by the private rear gardens of ground floor maisonettes. The provision of different types and degrees of private, semi-private, communal and public spaces enables flexibility and choice for residents and is welcomed in this proposal.



Figure 33 - Soft landscape strategy

- 16.37 The detailed design of the public realm and amenity spaces is of key importance to the success of the landscape strategy, and this will be conditioned (conditions RM24 & RM25) to ensure the aspirations set here are met through subsequent reserved matters applications.

Phase 1 - Detailed proposals

- 16.38 Development Plots A1 and D1 are submitted in detail and comprise Phase 1 of the application. Block A1 proposals are for a part 5, part 6-storey apartment building containing 30 homes. Block D1 proposals are for a 6-storey apartment building containing 22 homes.



Figure 34 - Plot A1 overlaid onto existing estate

Detailed Phase Block A1 – Layout

- 16.39 Plot A1 is situated to the north of the site on Queen's Crescent, and includes the existing residential block Wedmore, a commercial unit facing Queen's Crescent, and areas of car parking and hardstanding. The proposed building is an apartment building expressed as two elements: a 6-storey block facing Queen's Crescent, arranged as three flats per floor, and a terrace of maisonettes and apartments running north-south, perpendicular to Queen's Crescent that will ultimately face a new pedestrian street through the West Kentish Town estate.
- 16.40 At ground floor the northern part of the block houses a commercial unit that faces Queen's Crescent, which turns the corner into the new route helping to activate a new gateway into the site. The entrance lobby to the flats at upper levels on this elevation is flanked by refuse store and bike store providing easy access for residents. Plant areas are to the rear opening onto a passageway that runs to the rear of the existing buildings on Weedington Street. This passageway is gated and secure to prevent an isolated walkway with minimal surveillance. The requirement to gate it will be conditioned (condition **Error! Reference source not found.D28**).

- 16.41 The southern part of the building is 5-storeys in height and takes the form of a terrace. It is laid out as maisonettes at ground and first floor, and flats on second to fourth floors accessed via rear decks. Each of the maisonettes is provided with its own street entrance, creating an engaging frontage. Upper flats are accessed via decks to the rear of the building at second and third floors. The principal communal entrance is from the new route on the eastern side of the building, with a secondary entrance at the southern end of the building.

Detailed phase Block A1 – Scale and massing

- 16.42 Building A1 is a part-5 part-6 storey building with plant store above. The northern part of the building reads as 6 storeys in height plus plant store. Roof level plant is stepped back from Queen's Crescent to reduce its visibility from the street, and it is also shaped to read as a coherent form integrated within the building. On Queen's Crescent it is adjacent to a three storey Victorian terrace, and whilst the change in scale from this neighbouring property is evident, this is not an unusual condition in Camden. In order to mitigate the sense of scale, strong horizontal banding is introduced at 2nd floor level to reflect the datum of the neighbouring building and helping to embed it within the streetscape.
- 16.43 The southern part of the building is five storeys in height with a modulated façade of integrated balconies and bays to give the building a dynamic form. Within the new pedestrian street, the proposed building has a four storey shoulder height, and at the upper level steps back in order to reduce the sense of scale when in the new street itself.
- 16.44 The building heights sit comfortably within the townscape and are consistent with general prevailing building heights within the area.



Figure 35 - Block A1 as viewed from Queen's Crescent

Detailed phase Block A1 - Facades and materiality

- 16.45 The primary facing material is brick, which is found throughout the local area and is appropriate for a domestic building. Interest and richness is added to the facades through inset balconies, contrasting brick tones, and stone banding. A lighter brick colour is proposed for the northern part of the block which relates to the stucco façades and lighter tones found in surrounding streets.
- 16.46 The proposed street elevation creates texture and richness in the facade of the building through its use of a contextual material palette and a variety of punched windows and balconies, introducing a contemporary interpretation of the terrace character.
- 16.47 The roof plant enclosure is in the same brick as the primary facades which ensures the architectural treatment is coherent.
- 16.48 The non-residential use on the ground floor on Queen's Crescent has large openings which help to animate the ground level and relate to the commercial character of the street following design principles from CLP policies D3 and D4 for shopfronts and adverts.

- 16.49 A robust material palette has been developed to compliment the immediate surroundings, adding to the rich variety of masonry and materials already apparent in the local vernacular. The proposed materials respond contextually to the established palette in the area and are welcomed in this proposal. Brick is a prevalent building material in the area and is an appropriate choice due to its robustness and ability to stand the test of time.
- 16.50 The materials will be conditioned and samples provided (conditions D1 & D2) prior to commencement to ensure they are of the high quality described in the application.



Figure 36 - Block A main residential entrance bay study

- 16.51 The non-residential uses on the ground floor are marked with larger openings which help to animate the ground level and create moments for interaction and activity.

Detailed Phase Block D1 – Layout

- 16.52 Plot D1 is situated adjacent to the elevated Overground railway at the southern end of the estate, between Warden Road and Athlone Street. The proposed building is a single apartment block with a central core, oriented with entrances to the north and south. At ground level, the principal communal entrance is from Warden Road, with a secondary entrance on Athlone Street, ensuring activity on both streets. Plant areas are located to the east, facing the railway. On the west side of the block, two three-bedroom

flats overlook the existing Ashington building. Each flat is provided with its own street entrance, creating engaging frontages on all sides of the building.

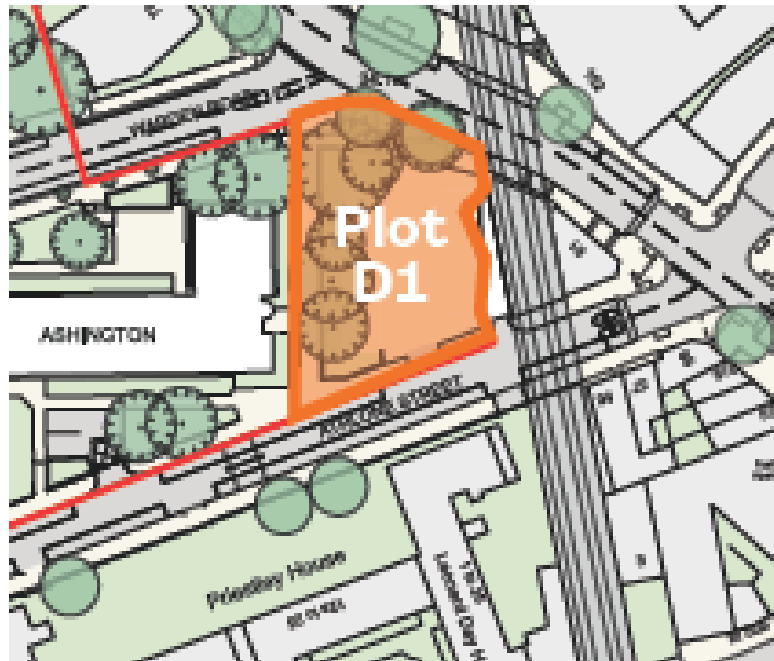


Figure 37 - Plot D1 overlaid onto existing estate

- 16.53 The upper floors comprise four dual aspect apartments around a central core. Each apartment includes inset corner balconies to enhance privacy for the residents. Plant requirements including the generator, PV panels, and air source heat pumps are located on the roof.

Detailed phase Block D1 – Scale and massing

- 16.54 The building is proposed to be six residential storeys with plant above. The scale of the building is similar to that of other local buildings adjacent to the railway such as the Victorian brick warehouses of Brinsmead (6 storeys) and Perren Street (5 storeys), and c.20th residential schemes, Priestley House (5 storeys) and Princes Park (7/8 storeys). Its overall height therefore is considered acceptable in this location. Originally proposed at 14 storeys, after discussions with officers this has been reduced in height to six residential storeys to better relate to the existing townscape. This provides a more comfortable scale on Athlone Street and mitigates impacts on the adjacent Inkerman Conservation Area.
- 16.55 The building is modulated to respond to the buildings and spaces around it. On the western side of the building, at fourth floor level, the floors above steps back by 1m. This creates a datum that relates to Priestley House opposite. Plant is located on the roof and occupies around 50% of the roof area, resulting in a deep set back from the west and south elevations where the impact of scale over public streets and spaces would be most felt. As a result the massing of the building is considered to relate positively to the

context and helps to reduce the sense of scale when viewed and experienced from the street.



Figure 38 - Plot D1 from north on Grafton Road

Detailed phase Block D1 - Facades and materiality

- 16.56 Brick is proposed as the primary material for the façades, which are composed of vertical brick piers and contrasting rendered panels, central precast band and lintels add interesting detailing. The main structure will feature darker bricks, complemented by light grey horizontal banding of protruding stretcher brickwork between ground and first floor, with precast concrete at third floor, reflecting the datums of the neighbouring buildings. There are rendered panels and precast lintels positioned above the windows, contrasting with darker brick sections below on either side.
- 16.57 The windows are simple punched openings, and the incorporation of inset balconies at corners will enhance the building's sense of depth. Plant enclosures at roof level are in brick and have been integrated into the facade design.



Figure 39 - Closer image of Block D1

- 16.58 A green colour is proposed for the glazed tiles, window frames, balustrades, and other metalwork, creating a complementary contrast with the brick tones. Perforated patterned metal panels, colour-matched to the doors, will feature on the plant room doors, louvres and ventilation units, to ensure coherence across the building.
- 16.59 The rich detailing contributes to engaging facades that relate well to the surrounding buildings. Materiality is considered appropriate to its use and context. The design relies on the quality and subtlety of materials and detailing. These will therefore be conditioned (conditions D1 & D2) to ensure a building of the highest quality with a durable finish that weathers gracefully.
- 16.60 The design quality of Phase 1 would be secured through the retention of the architect (Mae Architects) through the detailed design stage of this phase via **shadow section 106 legal agreement**.

Design Review Panel feedback

- 16.61 The scheme was presented to the Camden Design Review Panel on 10 September 2021, 2 December 2022, and 28 April 2023. The panel was pleased by the level of design aspiration for the redevelopment of the West Kentish Town Estate, and supported the overall approach taken by the masterplan. The panel considered that the restoration of the Victorian street

pattern and introduction of clearer east-west routes across the site are positive, helping the site to become a more integral part of Kentish Town.

- 16.62 The panel were pleased to see that the design team has taken a landscape-led approach to the masterplan. They considered the overall arrangement of routes clear and logical, representing a significant improvement on the current layout.

Masterplan

- 16.63 The following key comments were discussed and subsequently addressed:
- The panel were generally happy with the overall massing approach, however raised some concerns around the height of D1 which was previously proposed as 14 storeys. The height was subsequently reduced to 6 storeys to better relate to the existing townscape which was welcomed by the panel.
 - The panel felt the central open space was key to the masterplan and needed more design development to ensure this could be a space for all users. More work was done to introduce seating and a multigenerational space as well as play space to ensure it serves the wider community.
 - The panel suggested the masterplan should go further to address the character of the streets in detail. This has been developed in the design code which provides context and guidance for the character of different streets and spaces across the development.

Block A1

- 16.64 The following key comments were discussed and subsequently addressed:
- There were concerns about the jump in scale from the neighbouring 3-storey Victorian buildings on Queen's Crescent. A strong horizontal banding was introduced at 2nd floor level to create a datum that relates to these buildings.
 - Comments were made about the ground floor commercial unit on Queen's Crescent and ensuring the visibility of this along the street. The windows were enlarged to improve the interaction and activity on the street.
 - Concerns were raised about levels of daylight in the living areas in ground floor homes. These have been tested and officers are comfortable with anticipated light levels.

Block D1

- 16.65 The following key comments were discussed and subsequently addressed:
- Simplify design, adding more visual interest to the south-east elevation and improving the scale of darker brick on lower levels.

- Address west-facing flats and enhance noise management and privacy for ground-floor flats near public spaces.
- Improve interim conditions for ground-floor flats facing construction hoardings during phased development.

Conclusion

- 16.66 The overall masterplan approach is well suited to the site conditions – featuring buildings that respond to the specific characteristics of the surrounding, providing new routes on a north-south and east-west axis that better integrate the estate into the surrounding area, and providing a generous central open space as part of a landscape-led redevelopment. The tallest building is located at the centre of the site well away from the surrounding neighbourhood and not affecting the protected viewing corridor.
- 16.67 The masterplan makes efficient use of the existing estate land that is currently underused and requires redevelopment due to the age, size and condition of the buildings. The detailed phase and the outline phases, subject to the detailed design in the RMA stages, would promote regeneration and change by establishing a new character and sense of place, connecting and referencing the character areas to the east and west, whilst maintaining the wider prevailing character and urban setting.
- 16.68 The detailed and outline schemes would achieve key aims of the Gospel Oak and Haverstock Community Vision including provision of a strong active frontage onto Queen’s Crescent, improved connections through the estate, improvements to surrounding streets and new play and green space which are accessible to all.
- 16.69 The development optimises the development potential of the site by sensitively increasing its density and facilitates significant improvements in the quality and an uplift in the quantity of the housing and affordable housing on the site, in line with Policy D3 of the London Plan.
- 16.70 It is therefore considered the proposed detailed and outline developments are acceptable in design terms.

17. IMPACT ON NEIGHBOURING AMENITY

- 17.1 CLP policies A1 and A4 and the Amenity CPG require consideration of 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. Whilst the focus is on residential amenity, there are also amenity sensitive uses in the area, including Rhyl School to the southwest, and Baitul Aman Mosque to the northwest.

- 17.2 LP policy D9 addresses tall buildings and says that daylight and sunlight conditions in the neighbourhood must be carefully considered.
- 17.3 Officers have assessed the amenity impact of the detailed Phase 1, and the potential impact of the outline phases of the masterplan, on surrounding uses, albeit final details will be assessed at reserved matters stage when detailed designs come forward for those outline plots.

Daylight and sunlight

- 17.4 Daylight, Sunlight and Overshadowing Reports have been submitted with the application which details any impacts upon neighbouring properties. The technical information in the report, as well as the methodology, has been reviewed for the council by an independent third-party assessor, Lichfields.
- 17.5 As with proposed accommodation, 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.
- 17.6 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

- 17.7 The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
 - *The BRE considers 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)** – The daylight penetration into a room. It measures 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)** - 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. If below this, 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.

- **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
- *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.*

17.8 Whilst the reports consider the effects of both the proposed Maximum Parameter (detailed elements included) and an Illustrative Massing scheme, officers have considered the impacts of the Maximum Parameters accounting for the design code (and the detailed elements), effectively indicating a worst-case scenario. The Illustrative Massing scheme is useful for demonstrating the mitigation effect of a detailed design and building articulation which will occur through RMAs.

Categorising impacts and alternative targets

17.9 The assessment has set significance criteria for impacts which is the approach recommended by BRE guidance in the case of EIAs. The council's independent assessor endorses the approach, and officers have used the criteria in the table below.

BRE compliant	20.1% to 30% reduction	30.1% to 40% reduction	More than 40.1% reduction
Negligible	Minor Negative	Moderate Negative	Major Negative

Table 20 - Impact significance criteria

17.10 Whilst officers have not used retained light values to categorise impact significance, considering retained values as appropriate alternative targets is a useful approach. The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.

17.11 The approach is supported by the London Plan. The LP Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from

those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

- 17.12 Lichfields advised that, in the context of the West Kentish Town Estate, the appropriate alternative contextual VSC target is 23–24% to reflecting the current urban context. The applicant suggested a lower 18% target, but Lichfields have pointed out this is more appropriate for historic mews or highly constrained sites.
- 17.13 Whilst a VSC of 23–24% is consistent with current context of the site, the development plan is clear that regeneration schemes delivering significant levels of housing in well connected areas, particularly replacement housing, should seek to do so at higher appropriate densities. Camden commonly applies alternative targets of around 18% VSC for urban locations to optimise sites, which is also endorsed by planning inspectors at appeal. This is can still be considered an acceptable level of retained daylight for surrounding properties in an urban context.
- 17.14 As such, officers have considered an alternative target of 20% VSC appropriate here. Officers also consider retained NSL of 50% or more to be generally acceptable in this context. These targets are considered appropriate to the local context but also remain consistent with targets applied to other schemes in Camden and across London.
- 17.15 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.

Summary

- 17.16 A significant proportion of properties (63%) would see either moderate or major adverse effects. Impacts on sunlight are fairly minimal overall, and the largest impacts are to daylight.
- 17.17 With the baseline (the existing position):
- 975 (68%) of the 1434 rooms tested across the studied properties will meet both the VSC and NSL base daylight criteria (27% VSC and 80% of room seeing direct sky view).
 - 735 (83%) of the 889 windows tested will meet the base sunlight criteria (25% APSH of which 5% occurs in winter).

17.18 With the maximum parameters:

- 872 (42%) of the 2057 windows tested will meet BRE Report guidance for VSC.
- 927 (65%) of the 1434 rooms tested (some of which are served by more than one window) will meet BRE Report guidance for NSL.
- 725 (82%) of the 889 windows tested will meet BRE Report guidance for APSH.

17.19 Overall, the analysis shows that:

- 654 (46%) of the 1434 rooms studied will comply with BRE Report daylight (VSC and NSL) criteria (Negligible effect)
- 725 (82%) of the 889 windows tested will comply with sunlight (APSH) criteria (Negligible effect)

17.20 Looking at the significance on a property-by-property basis, the assessment shows that:

- 39 properties (37%) will see either a Negligible or only Minor Adverse effect.
- 23 properties (22%) will see predominantly Moderate Adverse effects.
- 43 properties (41%) will see a predominantly Major Adverse effects.

17.21 Although there are moderate and major impacts across the area, they tend to be focussed on several properties around the edge of the site, facing or backing onto the proposed larger blocks. The most significant impacts are focussed around:

- the eastern edge of the site, along Grafton Road (opposite plots A2 and B1),
- the southeastern edge of the site, along Athlone Street (opposite blocks D1 to D3), and
- the northwestern edge of the site, along the top of Weedington Road (backing on to blocks A1 and A3).

Officers have identified conflicts with policy A1 in relation to some rooms within some of these buildings on Grafton Road and Weedington Road. This has been clearly set out below.

Daylight and sunlight impacts

17.22 Based on the maximum parameters many of the surrounding buildings or groups of buildings would be compliant with BRE guidelines and only experience a negligible impact, or would experience a minor adverse impact, and are therefore not discussed further.

- 17.23 The remaining buildings or groups of buildings would experience moderate or major negative daylight effects.
- 17.24 Several of these buildings experience only moderate or major impacts in isolated areas of the building where they still retain good levels of light at the alternative targets, so they are predominantly minor or negligible overall.
- 17.25 The remaining buildings or groups of buildings with more notable moderate and major impacts are discussed below.

138-152 Weedington Road

- 17.26 This building is to the west of block A1 (detailed plot), backing on to the site, and its elevational arrangement includes an external walkway on the upper floors so windows below will have a hindered view of the sky.
- 17.27 None of the windows meet strict application of the BRE Guidelines for VSC with all but four seeing a major adverse reduction.
- 17.28 However, 5 of the 24 rooms tested show little impact on the daylight distribution inside the room, with only negligible or minor impacts on NSL and with 4 of the 5 still retaining good VSC levels over the alternative target.
- 17.29 Of the remaining 19 rooms, 1 only has negligible impacts on its NSL. A further 3 rooms, despite receiving major adverse relative reductions for both VSC and NSL, nonetheless have at least one window retaining more than 20% VSC.
- 17.30 However, the remaining 15 rooms out of 24 see major or moderate impacts for both VSC and NSL, retaining levels between 3.29% and 14.42% VSC.
- 17.31 The external walkway is likely compounding the negative effect on daylight availability, together with the close relationship to the boundary. Any increase in density on the application is likely to have notable impacts. Nonetheless, the remaining **15 rooms** would see major adverse impacts which conflict with the aims of CLP policy A1. The buildings are shown in the image below (left).



Figure 40 - 138 to 158 Weedington Road

154-158 Weedington Road

- 17.32 This building is to the west of block A1 (detailed plot), backing on to the site, and was assessed in an addendum requested by the council's independent assessor. The building is shown in the image above (right). The building hosts a mosque and commercial unit on the ground floor, and residential flats (10 flats) across the upper floors. The windows don't face south so it was not tested for sunlight.
- 17.33 None of the 28 windows meet the strict application of the BRE Guidelines for VSC, but of those, four are not residential units and so they are less sensitive - one is a commercial unit and the other a Mosque. Of the remaining 24 windows, 8 still retain good VSC levels exceeding the alternative target (20% retained VSC). The 5 rooms they serve also retain acceptable levels of internal daylight distribution, all exceeding 50% NSL.
- 17.34 Of the 10 remaining residential rooms with major adverse NSL reductions exceeding 40%, 4 have windows which retain VSC levels of between 15-18%. Although below the alternative 20% VSC target these are still common levels seen across London in regeneration schemes.
- 17.35 The configuration of the property means six windows are recessed and adjoin a return wall of the building's design, effectively self-obstructing its own access to daylight and making the windows more sensitive to alterations in massing on the application site. It is also right on the boundary of the site.
- 17.36 Nonetheless, the remaining **6 rooms** would see major adverse impacts which conflict with the aims of CLP policy A1.

- 17.37 One of these rooms is part of the mosque and any significant adverse impact on this space will disproportionately impact on those with protected characteristics, most notably religion (Islam). In London and the wider UK there is also a strong correlation between Muslims and certain ethnic groups. As such the impact will likely be more keenly felt by those of South Asian Heritage, Black African ethnic groups, and Arab and other ethnic groups.

160-170 Grafton Road

- 17.38 These buildings are mostly houses but some also contain flats. They are opposite the eastern boundary of the site, opposite plot A2.



Figure 41 - 160-170 Grafton Road

- 17.39 There is very little impact on sunlight and only 2 windows fail to comply with the BRE Guidelines. However, none of the windows meet strict application of the BRE Guidelines for VSC with all but 2 seeing a major adverse reduction.
- 17.40 All but 3 of the 20 rooms tested also show a major adverse reduction in NSL so the impacts are significant. However, 7 of the 20 rooms tested (at least one in every property) retain good VSC levels over the 20% VSC alternative target. Of the remaining 13 rooms, all but 2 have windows which retain VSC levels of between 16-19%. Although below the alternative 20% VSC target these are still common levels seen across London in regeneration schemes.
- 17.41 Nonetheless, the remaining **2 rooms** would see major adverse impacts, in terms of daylight and sunlight, which conflict with the aims of CLP policy A1.

152 Grafton Road

- 17.42 This building is a house opposite the eastern boundary of the site, opposite northern corner of plot B1.
- 17.43 None of the windows meet strict application of the BRE Guidelines for VSC with 6 out of 7 tested seeing a major adverse reduction. In terms of NSL, 2 of the 4 rooms tested have major impacts, and 2 have moderate impacts.
- 17.44 However, 1 of the 4 rooms retains good VSC levels over the 20% VSC alternative target, as well as meeting the strict application of the BRE Guidelines for sunlight (APSH). A further 2 rooms have windows which retain VSC levels of between 18-21%, common across London in regeneration schemes, whilst only having a moderate adverse effect on NSL.
- 17.45 Nonetheless, the remaining **1 room** would see major adverse impacts, in terms of daylight and sunlight, which conflict with the aims of CLP policy A1.

132-148 Grafton Road

- 17.46 The buildings from 132-148 are houses, neighbouring two commercial units at 128-130 Grafton Road. The buildings are opposite the eastern boundary of the site, opposite plot B1. The image below shows the buildings.



Figure 42 - 132-148 Grafton Road

- 17.47 All but 1 of the windows fail strict application of the BRE Guidelines for VSC with all fails seeing a major adverse reduction. All 12 of the rooms tested have major adverse reductions in NSL too.
- 17.48 The sunlight however is good with only two windows failing to meet the strict application of the BRE Guidelines for sunlight (APSH). The retained levels of

VSC are also below the 20% alternative target, ranging from between 14% to 18% VSC.

- 17.49 Whilst still lower than the alternative target, 10 of the 12 rooms tested have windows which retain VSC levels of between 15-18%, common across London in regeneration schemes,
- 17.50 Nonetheless, the remaining **2 rooms** would see major adverse impacts, in terms of daylight and sunlight, which conflict with the aims of CLP policy A1.

Leonard Day House, Priestly House, and Pentland House

- 17.51 These are three large, connected housing blocks south of the site, directly facing plots D1 to D3.
- 17.52 They sit in an H shape plan form with Priestly House, the most impacted sitting between the two other blocks. The arrangement creates deep corners with projecting wings which limit access to daylight. To compound matters, the blocks also have projecting walkways which further limit access to daylight for the windows and rooms below.



Figure 43 - Leonard Day House, Priestly House, and Pentland House

- 17.53 For Leonard Day House (left above), 21 of the 47 windows have only negligible or minor adverse effects on VSC, and for Pentland House (right above), 25 of the 59 windows have only negligible or minor adverse effects on VSC. Priestly House (centre) has the more significant impact, with all 163 windows having moderate or major adverse effects on VSC.
- 17.54 However, the majority of rooms in Priestly House have a much lesser impact in terms of daylight distribution inside the room with 63 of the 85 rooms tested seeing only negligible or minor reductions in NSL. For the other two blocks,

with Leonard Day House seeing 21 out of 41 rooms being fully compliant with BRE Guidelines, and for Pentland House 30 out of 80 rooms tested show negligible or minor reductions in NSL.

- 17.55 Whilst there is a significant impact to some rooms, these are limited to specific areas and restricted by the building design. When considered in the round the impact on these buildings is acceptable on balance, given the site context and policy drive for densification and delivery of homes.

116-126 Grafton Road

- 17.56 Both 116-125, and 126, are blocks of flats opposite the eastern boundary of the site, opposite plot C1.

- 17.57 Whilst the buildings see a significant amount of major adverse reductions in VSC, this is from a high starting value, with the retained VSC levels ranging from 8.68% to 22.81%, with the vast majority in the mid to high teens. There are 16 windows which retain levels in excess of the alternative target of 20% VSC.

- 17.58 Furthermore 15 of the 32 rooms tested have only negligible or minor reductions in NSL and almost all windows meet the strict application of the BRE Guidelines for sunlight (APSH).

- 17.59 Whilst there is a significant impact to some rooms, when considered in the round the impact on these buildings is acceptable on balance, given the site context and policy drive for densification and delivery of homes.

150 Grafton Road

- 17.60 This is a house opposite the eastern boundary of the site, opposite the northeast corner of plot B1.

- 17.61 Of the 7 windows tested, 4 serve see major adverse reductions in VSC, but the remaining 3 windows meet the strict application of the BRE Guidelines for VSC. Those 3 windows (serving 2 rooms) also meet the strict application of the BRE Guidelines for NSL and APSH.

- 17.62 The remaining 4 windows with major adverse reductions in VSC serve 2 rooms, both of which meet the strict application of the BRE Guidelines for APSH. Although below the alternative target, one room retains VSC values of more than 18% with only a minor impact on NSL, and the other retains VSC values of more than 16%.

- 17.63 Whilst there is a significant impact to some rooms, when considered in the round the impact on this building is acceptable on balance, given the site context and policy drive for densification and delivery of homes.

172-174 Grafton Road

- 17.64 These buildings are opposite the eastern boundary of the site, opposite the north end of plot A2.
- 17.65 The buildings see a mix of major and moderate adverse reductions in VSC, but 6 of the 10 windows tested have retained values exceeding the alternative target of 20% VSC. The remaining 4 windows all retain values between 17-20% VSC.
- 17.66 Of the 6 rooms tested, 3 see major adverse reductions in NSL, and 3 see moderate reductions, but all windows meet the strict application of the BRE Guidelines for sunlight (APSH).
- 17.67 Whilst there is a significant impact to some rooms, when considered in the round the impact on these buildings is acceptable on balance, given the site context and policy drive for densification and delivery of homes.

160 Weedington Road

- 17.68 This building is to the west of block A1 (detailed plot), backing on to the site.
- 17.69 The building sees 5 of the 9 windows receive major adverse reductions in VSC, with a further 2 experiencing a moderate reduction and the remaining 2 complying with BRE Guidelines. In addition, 3 of the 9 windows tested have retained values exceeding the alternative target of 20% VSC. Another window retains more than 18% VSC. Of the 8 rooms 3 have negligible impact on NSL.
- 17.70 Only 1 window was tested for sunlight but it fully complied with the BRE Guidelines for APSH.
- 17.71 Whilst there is a significant impact to some rooms, when considered in the round, the impact is acceptable on balance, given the site context and policy drive for densification and delivery of homes.

6-8 Allcroft Road

- 17.72 These buildings are opposite the western boundary of the site, opposite plot F2 but near the gap between plots F1 and F2.
- 17.73 Whilst they mainly see major adverse relative reductions, the baseline for these properties is fairly high and so the retained values are generally good. However, of the 9 rooms tested, all but 1 have major adverse NSL reductions.
- 17.74 Nonetheless, even after some significant reductions, 3 out of the 9 windows tested retain VSC levels above the alternative target of 20% VSC. A further 2 windows retain levels between 16-18% VSC. The remaining 4 windows retain lower levels of VSC, but all had a lower baseline to begin with.

- 17.75 Whilst there is a significant impact to some rooms, when considered in the round, the impact is acceptable on balance, given the site context and policy drive for densification and delivery of homes.

78-82 Warden Road

- 17.76 The building is set within the inset southern boundary of the site, between Warden Road and Athlone Street and directly between plots D3 and E2, to the west of Lyndhurst Hall.
- 17.77 Only 9 of the 26 windows tested see major adverse reductions in VSC with the remaining 17 having negligible or minor reductions. In addition, 6 of the windows retain values exceeding the alternative target of 20% VSC, and another 3 retain values of between 17-20% VSC.
- 17.78 In terms of NSL, there would be 9 major adverse reductions, but the remaining 12 would only have negligible or minor reductions in NSL.
- 17.79 Whilst there is a significant impact to some rooms, when considered in the round, the impact is acceptable on balance, given the site context and policy drive for densification and delivery of homes.

176-180 Grafton Road

- 17.80 These buildings are opposite the eastern boundary of the site, opposite the north end of plot A2.
- 17.81 Only 1 of the 10 windows tested see major adverse reductions in VSC with the remaining 9 having moderate reductions. All but 1 of the 10 windows retain values exceeding the alternative target of 20% VSC, and the one shortfall is only marginal at 19.57% VSC.
- 17.82 Whilst 2 of the 6 rooms tested see major adverse reductions in NSL, the remaining 4 only see minor reductions, and all windows meet the strict application of the BRE Guidelines for sunlight (APSH).
- 17.83 Whilst there is an impact to some rooms, the impact on these buildings is acceptable on balance.

154-158a Grafton Road

- 17.84 These buildings are opposite the eastern boundary of the site, opposite the gap between plot A2 and B1.
- 17.85 Only 7 of the 24 windows tested see major adverse reductions in VSC with the remaining 17 having moderate reductions. Most windows also exceed the alternative target of 20% VSC, with the remaining 7 windows retaining values between 17-20% VSC.

17.86 Whilst 4 of the 16 rooms tested see major adverse reductions in NSL, the remaining 12 only see negligible or minor reductions, and all but 3 windows meet the strict application of the BRE Guidelines for sunlight (APSH).

17.87 Whilst there is an impact to some rooms, the impact on these buildings is acceptable on balance.

110-114 Grafton Road

17.88 These buildings are opposite the eastern boundary of the site, opposite the southern part of plot C1 as it chamfers away from the street.

17.89 Only 2 of the 18 windows tested see major adverse reductions in VSC, with 12 having moderate reductions, and the remaining 4 meeting the strict application of the BRE Guidelines. Most windows also exceed the alternative target of 20% VSC, with the remaining 5 windows retaining lower values in between 10-17% VSC.

17.90 Only 2 of the 12 rooms tested see major adverse reductions in NSL, the remaining 12 only see negligible or minor reductions, and all but 1 window meeting the strict application of the BRE Guidelines for sunlight (APSH).

17.91 Whilst there is an impact to some rooms, the impact on these buildings is acceptable on balance.

162-164 Weedington Road

17.92 This building is to the west of block A1 (detailed plot), backing on to the northwest corner of the site.

17.93 Of the 17 windows tested, 10 start off below the BRE guideline levels for VSC with 4 windows in total seeing major adverse reductions in VSC. Of the remaining 13 windows, 3 have moderate reductions, and the remaining 10 only see negligible or minor adverse reductions.

17.94 There are 4 windows that still retain good VSC values exceeding the alternative target of 20% VSC, with another 3 windows retaining values between 15-20% VSC.

17.95 Only 3 of the 9 rooms tested see major adverse reductions in NSL. Of the remaining 6, 3 have moderate reductions and 3 have minor or negligible reductions. All but 3 windows meet the BRE Guidelines for sunlight (APSH).

17.96 Whilst there is an impact to some rooms, the impact on this building is acceptable on balance.

18-26 Allcroft Road

17.97 These buildings are opposite the western boundary of the site, opposite plot F1.

- 17.98 Whilst they see a range in impacts from negligible to major adverse relative reductions, the baseline for these properties is very high and so the retained values are generally good.
- 17.99 Even after some significant reductions, 19 out of the 24 windows tested retain VSC levels above the alternative target of 20% VSC. The remaining 5 windows retain levels between 16-18% VSC.
- 17.100 Most reductions in NSL are major or moderate, but 4 of the rooms meet the BRE Guidelines. All sunlight impacts meet the BRE Guidelines.
- 17.101 Whilst there is an impact to some rooms, the impact on this building is acceptable on balance.

2-4 Allcroft Road

- 17.102 These buildings are opposite the western boundary of the site, opposite plot F2.
- 17.103 Whilst they mainly see major adverse relative reductions, the baseline for these properties is also high and so the retained values are generally good.
- 17.104 Even after some significant reductions, 6 out of the 13 windows tested retain VSC levels above the alternative target of 20% VSC. A further 4 windows retain levels between 16-17% VSC. The remaining 3 windows retain lower levels between 10-12% VSC, but all of them have a low baseline to begin with.
- 17.105 Of the 11 rooms tested, 6 have major adverse NSL reductions, with the remaining 5 having only negligible or minor reductions.
- 17.106 Whilst there is an impact to some rooms, the impact on these buildings is acceptable on balance.

1-5 Rhyl Street

- 17.107 These buildings are to the south of the site, and opposite plot E2. Numbers 1 and 5 are split into flats and number 3 is a house.
- 17.108 All of the windows tested see moderate or major adverse reductions in VSC, but the actual retained levels are generally fairly good with 4 of the 11 windows tested exceeding the alternative target of 20% VSC, and another 4 windows retaining levels between 15-19% VSC.
- 17.109 In addition, of the 11 rooms tested for NSL, 4 retain more than 50% daylight distribution in the room, and another 4 are only marginally under 50% with retained NSL between 44-49%.

- 17.110 Whilst there is an impact to rooms, the retained levels are generally acceptable and the impact on these buildings overall is acceptable on balance.

Athlone House

- 17.111 This housing block is to the south of the site, and between plots D3 and E2.
- 17.112 The assessment notes 47 of the 128 windows tested mainly see major or moderate adverse relative reductions. The baseline for these properties is already very low, so any impact, even if small, causes a major relative reduction. All those windows with major or moderate adverse reductions have low baseline values ranging between 0.03% VSC and 9.07% VSC due to the arrangement of the building including walkways and projections.
- 17.113 All other windows have good retained levels based on their starting point, ranging up to 33.85% VSC. All 75 rooms tested have negligible or minor adverse effects on NSL.
- 17.114 The impact is very limited and only relative to windows with existing poor lighting, and so the impact on these buildings is acceptable on balance.

Lyndhurst Hall

- 17.115 This block of flats is set within the inset southern boundary of the site, between Warden Road and Athlone Street and directly between plots D3 and E2.
- 17.116 The building had many protruding and inset balconies which limit access to daylight and will generally worsen impacts.
- 17.117 The building would see 152 out of 292 windows meet the BRE Guidelines for VSC, and a further 12 have only minor adverse effects. Where there are major or moderate adverse reductions in VSC, these rarely have significant impact on the internal daylight distribution. Of the 267 rooms tested, 176 rooms have negligible or minor adverse reductions in NSL. Only 34 rooms have major adverse relative reductions in NSL.
- 17.118 Whilst there is an impact to some rooms, the impact on this block overall is acceptable on balance.

84 Warden Road

- 17.119 This housing block is within the inset southern boundary of the site, and between plots D3 and E2 and next to Lyndhurst Hall.
- 17.120 This building sees 16 of the 44 windows tested with major or moderate adverse relative reductions to VSC. The remaining 28 windows have only negligible or minor adverse impacts. There are also good retained levels of VSC for many windows with 16 of the 44 windows above the alternative

target of 20% VSC, and another 13 windows with retained levels between 15-20% VSC.

- 17.121 Impacts on NSL also have a similar impact with 26 of the 37 rooms tested have only negligible or minor adverse effects to NSL.
- 17.122 Again, whilst there is an impact to some rooms, the impact on this block overall is acceptable on balance.

Hawkridge House and Hawkridge House Tower

- 17.123 These buildings sit together in the centre of the site, but outside the red line. They include 216 student units in a part 10, part 15 storey tower and 2 storey annex buildings, but have been vacant since 2020.
- 17.124 Student accommodation tends to be more temporary in nature more transient occupiers, and it is generally given less weight than permanent residential.
- 17.125 The assessment shows that 158 out of 356 windows fully comply with the VSC tests in the BRE Guidelines. In terms of daylight distribution, 202 of the 308 rooms also fully comply with the NSL tests in the BRE Guidelines. Furthermore, many of the retained levels for windows are very good with the levels climbing to almost 40% on upper floors.
- 17.126 The impacts are more significant on the lower floors, but overall impact on these student blocks is acceptable on balance.

Other moderate and major adverse impacts

- 17.127 There are some other properties that experienced some moderate or major adverse impacts under some of the tests in the BRE Guidelines. However, they are generally isolated windows or rooms within the buildings with other rooms and windows showing only negligible or minor reductions.
- 17.128 In addition, where there are moderate or major reductions seen under one test, the other tests tend to show only negligible or minor reductions, and retained levels are also good. Many exceed the alternative target or are otherwise close to the target. As such, these are considered acceptable overall and not discussed in further detail.

Rhyl School

- 17.129 The Rhyl School, while not residential, still faces onto the site and so was tested to understand impact. The technical analysis shows that 80% of windows assessed for VSC will fully meet the BRE guideline recommendations. In addition, all classrooms and breakout spaces will retain a VSC of more than the 20% alternative target, or full BRE compliance within the building. As such the impact is considered acceptable.

Illustrative Scheme

- 17.130 The scheme assessed reflects the maximum parameters, but the applicant will have to apply for future reserved matters in respect of the outline development plots. At the RMA stage, detailed designs, articulation, and refinement of scale can help to further reduce and mitigate the impact. The Illustrative Scheme, as an example of a scheme within the parameters and compliant with the design code, is useful in demonstrating how adverse effects can be reduced when compared to the maximum parameters, as shown in the table below:

Scheme	VSC Strict BRE Compliance	NSL Strict BRE Compliance	APSH Strict BRE Compliance
Maximum Parameters	43%	65%	82%
Illustrative Scheme	49%	74%	90%

Table 21 – BRE compliance comparing max parameters and an illustrative scheme

- 17.131 Looking at the impact significance on a property-by-property basis, the illustrative scheme assessments show a notable improvement too.

Scheme	Negligible / Minor Adverse	Moderate Adverse	Major Adverse
Maximum Parameters	39	23	42
Illustrative Scheme	52	34	18

Table 22 – Significance impacts comparing max parameters and an illustrative scheme

- 17.132 The illustrative testing clearly shows the positive effects of the application of mitigation methods and detailed design with improved BRE strict compliance and fewer properties with moderate or major adverse impacts.

Solar Glare

- 17.133 The solar glare test is not a generally a comparative one so there is no baseline assessment in this instance. Typically, only highly glazed buildings are considered, and the Solar Glare assessment considers the likely effects on nearby road and railway users.
- 17.134 With regards to the solar glare assessment, only the detailed elements of the Proposed Development have been assessed as the window positions and façade details of these Blocks are confirmed. The outline elements will be assessed, as required, at the RMA stage.

- 17.135 Viewpoints have been determined using aerial photography, identifying sensitive visual areas in relation to overhead traffic signalling on the tracks and road junctions.
- 17.136 The Solar Glare assessment has been undertaken to consider the potential reflective glint and glare effect on the adjoining railway line. The plan below shows the location of the viewpoints.



Figure 44 - Viewpoints for solar glare analysis

- 17.137 The significance of the solar glare effects is of negligible significance in viewpoints 1, 3 and 4. A minor negative impact was identified in viewpoint 2.
- 17.138 Whilst there will be instances of glare occurring at viewpoint 2 when the sun is lower in the sky, these instances are either in the far periphery field of view, or do not last long enough to cause concern. Furthermore, the solar reflection does not align with any signals, with the driver's main (foveal) range of vision, and does not give rise to disability glare. As such the reflective glare is not considered potentially hazardous.
- 17.139 Again, this is a worst-case scenario in any event, assuming mirrored surfaces for the buildings. The same assessment would be carried out for each RMA, also taking account of any permitted RMAs or planning applications at the time. Condition RM18 would require the submission of a detailed Daylight/Sunlight report with each RMA. Therefore, the impact is considered acceptable.

Overshadowing

- 17.140 The proposed Sun on Ground (SoG) test was run for gardens and spaces around the site, and they were assessed for 21 March (spring equinox). The

overshadowing assessment found that all but one amenity space will meet or exceed the BRE's 50% target for sunlight on 21 March.

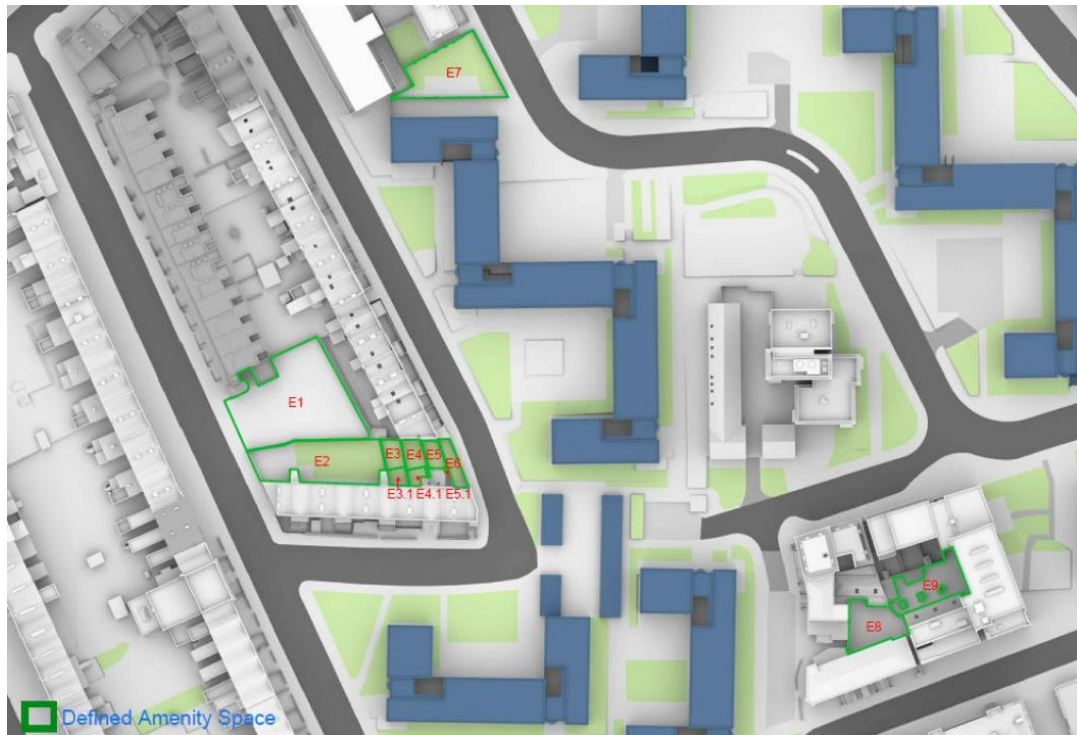


Figure 45 - Overshadowing plan showing the spaces tested

- 17.141 The only non-compliant amenity area (E5) would see a 29% relative reduction from existing which is only considered a minor adverse impact. This is a small back garden at the rear of a property on Coity Road and backing onto the end of terrace on Allcroft Road. Furthermore, the existing baseline is extremely low (only 4.5% of the area currently receives two hours of sunlight) and so the 1.3 percentage point decrease to 3.2% retained SoG translates as a large relative reduction, despite being so small in actual terms.
- 17.142 Given the absolute change is small and not significant, there would be no significant overshadowing impacts.

Conclusion – Daylight and sunlight

- 17.143 Whilst many of the impacts on surrounding properties are notable, most would be commensurate with the local context and the nature of the site as an opportunity for regeneration and growth and the need to ensure effective use of land, particularly to deliver housing.
- 17.144 The Queen's Crescent Neighbourhood Forum have stated that daylight is excessively reduced below acceptable levels at neighbouring properties. However, the end daylight result is not always the most important and it is relative loss of daylight resulting from the proposed development that is of greatest interest. Furthermore, it is important to note that reserved matters

applications will aim to minimise impacts on neighbouring properties through considerate design measures in accordance with the submitted design codes, and therefore the actual impact to neighbouring daylight from outline phases of the development is expected to be lower.

- 17.145 There are some major adverse impacts to several properties with 26 rooms in buildings around the north end of the site identified as having particularly adverse impacts. Clearly this must be considered in the context of the scale of the site and development, and the more than 1,400 rooms tested under the analysis. Nonetheless, the impact on these properties would conflict with the part of Policy A1 which seeks to protect the amenity of communities and neighbours.
- 17.146 The impact on other residential properties surrounding the sites is generally moderate and considered acceptable, although there are still notable impacts for surrounding residents. Those impacts are, however, considered acceptable in the round, given the context of the site, the development proposal, and the need to deliver housing.
- 17.147 There are several houses and blocks in the area with council or housing association tenants who will be affected by the adverse light impacts. People with disabilities, older adults (particularly those over 65), and some ethnic groups are more likely to live in social or affordable housing. In addition, Haverstock has an older population than the rest of the borough, and a statistically significant higher prevalence of Long-Term Conditions (LTCs) compared to the rest of the borough¹¹. Disability, ethnicity, and age are all protected characteristics under the Equality Act.
- 17.148 As such, the amenity impact on some of the surrounding properties is likely to have a greater impact on those with certain protected characteristics, including disability, age, and race. This should be viewed in the context of the key beneficiaries of the proposed development also being local people sharing those same characteristics. Furthermore, detailed designs within the maximum parameters will still need to be assessed under RMAs and could reduce the impact further through articulation and refinement of massing.
- 17.149 Solar glare effects will be negligible or minor adverse, and this is assuming mirrored surfaces, so this is considered acceptable.
- 17.150 The overshadowing impact is negligible overall and acceptable.

¹¹ [Haverstock ward profile – JSNA Hub](#)

Outlook, overlooking, and privacy

Outline Development (Phases 2 to 8)

- 17.151 The outline element reserves all matters, including scale, access, and layout so the final details are not known. Nonetheless, the broader principles of plot layouts in terms of plot locations, footprint parameters, and scale parameters for bulk and height have been set out in the outline application framework.
- 17.152 The minimum and maximum footprints in the outline application framework, taken with the maximum parameter plans, design code and other framework controls, give a clear indication of the potential for ensuring appropriate amenity for neighbours. Generally, the plots have been set out to ensure relief in outlook by reintroducing elements of the historic urban grain, introducing routes across and through the site which allow views through the area, and into new areas and pocket of landscaping and activated open space.
- 17.153 The separation distances generally maintain those found in the existing and historical context, but nonetheless, these are still generous for a densifying urban regeneration scheme. Following established building lines, they range from around 15m along the north, west, and south of the site, to 21m along the east edge of the site.
- 17.154 Where there are slightly narrower separations like between Hawkridge House and the surrounding plots C1 and F2, these still maintain gaps of around 13m or more. Plot G1 will have a much closer relationship to the north side of Hawkridge House dropping down to around 5-8m. There is also a fairly close relationship between the back of plot A3 and the site boundary (around 6m), but the properties on the east side of Weedington Road are also set back from the boundary giving a total separation of 12-15m.
- 17.155 There would be some additional overlooking to Rhyl School which faces the south edge of the site; however the separation distances are good and it is not unusual to have a degree of overlooking to and from schools in urban areas. This is therefore unlikely to have a detrimental impact on the school or the children (age being a protected characteristic) and any impacts can be carefully considered and managed at detailed design stage.
- 17.156 In accordance with CLP policies D1 and A1, these separation distances are adequate and capable of successfully maintaining outlook for neighbours, whilst addressing overlooking and maintaining a sense of privacy. This will be dependent on the final detailed design effectively managing the closest relationships, and balancing the need for active surveillance and privacy. The detailed design for all plots will come forward in future applications or RMAs where these can be designed and assessed in detail.

Detailed (Phase1)

- 17.157 The impact of the detailed Phase 1 blocks, A1 and D1, will be limited and demonstrate the success of carefully designing the detailed blocks to manage the closer relationships.
- 17.158 Block A1 generally has good separation distances between it and its neighbours, there will be some closer relationships between it and the surrounding housing blocks of Milverton and Durston during construction of the masterplan (down to around 6m), but these are generally oblique angles which will help to mitigate any of the temporary impact. The plan below shows some general separation distances around the southern end of the block.



Figure 46 - Separation distances around southern end of Block A1

- 17.159 The gap between the back of Block A1 and the boundary is about 6m at ground floor and first floor level, rising to around 8m from third floor and above with the deck access providing additional relief. Although there are some existing windows on the boundary at the rear of the Weedington Road properties, these tend to be fairly small and don't provide outlook to what are generally commercial or community uses, like the mosque.
- 17.160 The gap between the boundary and the closest back of the properties on Weedington Road at upper floors is about 5.5m giving an adequate total separation distance, maintaining privacy and outlook and preventing unreasonable overlooking. The deck access at the rear of the block could create a sense of overlooking from upper levels, but as an access space, these tend to be seen as more communal and providing surveillance, rather than an imposing private space. This helps reduce the sense of overlooking for neighbours.

- 17.161 Block D1 generally has good separation distances between it and its neighbours, there will be some closer relationships between it and the surrounding housing block of Ashington during construction of the masterplan (down to around 6m), but this is at the tightest point and the west elevation of D1 is canted away from the west boundary which will help to mitigate any of the temporary impact. The plan below shows some general separation distances around the southern end of the block.



Figure 47 - Separation distances around Block D1

- 17.162 Generally, the other surrounding separation distances are around 15m to 25m, and across streets, maintaining a good sense of outlook and privacy, whilst reducing a negative sense of overlooking.

Noise and disturbance

- 17.163 The blocks in the detailed scheme (Phase 1) are predominantly residential, with only a small commercial unit facing Queens Crescent which is already in commercial character. There is capacity for some more commercial in the outline elements, but these are to be directed to busier commercial character areas and will also be relatively small scale.
- 17.164 The plots on the outline phases will be subject to RMAs and these will allow an assessment of the noise impacts from plots, individually and cumulatively.
- 17.165 In terms of Phase 1, even though there is significant separation between it and neighbouring properties, conditions would be attached to limit noise from plant within and on top of buildings, and there would be a requirement for anti-vibration mounts (conditions M8 & M9). These conditions would ensure

there would be no detrimental impact in terms of noise and vibration on the adjoining premises for this and later phases.

Neighbouring amenity conclusion

- 17.166 There will be some significant impacts in terms of light for some surrounding properties. In the majority of cases, the retained levels of light are appropriate for the context. The exceptions to this are the major impacts on some rooms in properties around the northwest and eastern edge of the site. With respect to those properties, there is a conflict with CLP policy A1 insofar as it relates to protecting the amenity of those neighbours.
- 17.167 This should be considered in the context of an outline permission however, where final detail on scale, height, design and articulation of the buildings are yet to be determined. It therefore represents a worst-case scenario as the impacts relate to the full extent parameter plans, subject to articulation requirements in the outline application framework. A detailed assessment will form part of the RMA stage, and this can ensure that any impacts are further mitigated through the detailed design.
- 17.168 Generally, outlook, privacy and overlooking is adequate and the plot separation distances and orientation mean that these can again be managed through the RMA or planning application stage when assessing a detailed design for the later phases of housing.
- 17.169 Noise impact can be adequately limited and managed through conditions, as referenced above.
- 17.170 Overall, the amenity impact on neighbouring properties is considered acceptable in the context, the pressure on housing provision, and the NPPF drive to encourage a significant uplift in density of residential development. Whilst acknowledging a policy conflict in relation to light, for some particular rooms in some properties, the proposal overall accords with CLP policy A1, and complies with the development plan as a whole in terms of the impact on neighbouring amenity.

18. MICROCLIMATE

- 18.1 CLP policy A1 acknowledges the impact that large developments can have on the local climate. CPG Amenity requires new developments to consider the local wind environment, local temperature, overshadowing and glare both on and off site.
- 18.2 Additional guidance from TfL's Healthy Streets for London recommends that streets should design in opportunities for sun, shade, and shelter from high winds to create places that can be enjoyed all year round.

- 18.3 CLP policy A2 recognises that the quality of open spaces is closely linked to the degree to which it is overshadowed and LP policy D9 says that daylight and sunlight conditions in the neighbourhood must be carefully considered when tall buildings are proposed.

Overshadowing of private and public amenity areas

- 18.4 The BRE's guidance set out in "Building Site layout planning for daylight and sunlight: a guide to good practice (BR 209 2022)" provides an industry standard framework for assessing and understanding light impacts of development. BRE guidance recommends that for amenity areas to appear adequately sunlit throughout the year, at least 50% of a garden or amenity area should receive at least two hours of sunlight on 21 March.
- 18.5 The impact on nearby properties is covered in the previous section (neighbouring amenity). The applicant has also submitted a full overshadowing assessment based on the maximum parameters for the masterplan and from those results has generated a map showing which areas of the proposed internal public realm within the masterplan area. Taking the site as a whole, 69% of the new public amenity areas will have at least 2 hours of sunlight on 21 March and there are therefore BRE compliant.



Figure 48 - Areas receiving at least two hours sunlight on 21 March (in yellow)

- 18.6 Officers recognise that assessing the site as a whole doesn't take account of overshadowing of each individual amenity spaces within the development. It is important that each space can function as a high-quality amenity space that is well suited to its proposed function. The map above shows there are areas of the masterplan with more significant overshadowing (the areas that are not yellow). The scheme has been designed to minimise

overshadowing and the layout and massing means that the key public spaces are well lit. Further details of the designs of the landscaping in the outline scheme will be secured through reserved matters applications to ensure the layout, design and planting of these amenity areas maximises their suitability and usability and this will be secured by condition RM24. Detailed scheme amenity layout will also be confirmed through conditions D6 & D7.

- 18.7 The analysis above excludes internal courtyard areas which have different characteristics as they are more enclosed. There are seven internal courtyard spaces throughout the outline phases which have been assessed including the internal projecting balconies in place which necessarily increases overshadowing of these areas. The analysis undertaken shows that these courtyards fall below the BRE's 50% target for 2 hours of sunlight on March 21. However, this does not mean that these courtyards are devoid of sunlight. 25-30% of their areas would receive a minimum of between 45 and 60 minutes of direct sunlight on March 21. All courtyards would meet the BRE's criteria in the summer months, when the sun is higher, with each having reached the 50% direct sunlight threshold by May 21.
- 18.8 Overall, the layout means the levels of sunlight on ground are good. The levels of sunlight experienced in the overshadowed areas and internal courtyards would be difficult to improve without a substantial reduction in the height of the host and adjacent blocks which would reduce the amount of homes and affordable homes which could be delivered. Given the nature of those spaces, it would not add proportionate amenity value to the scheme when considered on balance. It is also noted that the courtyard areas are sheltered from wind and add to the mix of amenity areas on the masterplan, allowing residents to choose from a selection of public open, sheltered courtyard or private balcony amenity areas. Sunlight access to these amenity spaces will be maximised through the detailed design of later plots through reserved matters applications, and this will be secured through condition RM18.

Wind Microclimate

- 18.9 Policy A1 of the Camden Local Plan 2017 acknowledges how large developments can alter the local climate as buildings can affect the flow of air causing wind tunnels. CPG Amenity provides further detail on design guidance for large buildings, and the assessment of their impact on local wind environments.

Methodology

- 18.10 Computational Fluid Dynamics (CFD) modelling evaluated wind conditions and pedestrian comfort for the completed site. The outline plan used maximum parameters to test the worst-case scenario. As building design

advances, adjustments in massing and detailing should help reduce windy areas around building bases and corners.

- 18.11 The Lawson Criteria is the commonly used scale for assessing the suitability of wind conditions in terms of safety and comfort based upon threshold values of wind speed and frequency of occurrence. The safety criteria categorise areas as either safe or unsafe, whereas the comfort criteria set out a range of public activities, like sitting or strolling, and defines a corresponding comfortable wind speed and frequency of occurrence. If the proposed wind condition exceeds the threshold, then the conditions can be considered unacceptable for the activity. The criteria reflect that less active pursuits require less windy conditions. For example, strolling is less tolerant to stronger wind conditions than walking because people tend to have a more leisurely pace.
- 18.12 The assessment comprises desktop analysis of development configurations in accordance with the Lawson Safety Criteria (LSC) and the Lawson Comfort Criteria (LCC). Given the number of different permutations resulting from the flexibilities afforded by an outline permission, it is not realistic to model them all. A range of modelling has occurred, which includes variations on the detailed and outline proposals including some with landscaping in place to provide mitigation.
- 18.13 To ensure the impacts are compliant as the outline phases come forward, it is recommended that each Reserved Matters application for the outline development plots are accompanied by a statement confirming that the wind microclimate effects remain as assessed, or improved, and compliant with the Environmental Statement. If the results are worse than the ES conclusions, then a supplementary environmental statement or addendum would be provided which assesses any new or different impacts. This is secured by condition RM23.






Key	Comfort Category	Threshold	Description
	Sitting	0-4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods
	Standing	4-6 m/s	Gentle breezes acceptable for main building entrances, pick-up/drop-off points and bus stops
	Strolling	6-8 m/s	Moderate breezes that would be appropriate for strolling along a city/town street, plaza or park
	Walking	8-10 m/s	Relatively high speeds that can be tolerated if one's objective is to walk, run or cycle without lingering
	Uncomfortable	>10 m/s	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is typically recommended

Table 23 - Lawson Comfort Criteria (wind comfort levels)

- 18.14 Chapter 12 of the Environmental Statement, along with the ES addendum, evaluates wind conditions on and around the site. The assessment compares current wind patterns to those after the proposed development is completed, factoring in all other planned developments within a 450-metre radius.
- 18.15 Analysis has been conducted on a seasonal basis, but the report focuses on the windiest season results (winter) and those for the summer season when people spend more time outdoors. The assessment has not accounted for the proposed landscaping scheme and design interventions such as balustrading, screening, and planting which can help to mitigate windier conditions.

Demolition and construction phase

- 18.16 The construction phase would not give rise to any significant change to the existing wind microclimate both on and off-site. As construction progresses the wind conditions would gradually adjust towards those experienced with the completed development. Conditions are expected to be suitable for a working construction site and thoroughfares, and entrances and amenity spaces would be usable with a hoarding in place. The effect of this phase on wind conditions is expected to be negligible.

Proposed development - ground level

- 18.17 The below diagram shows that in winter (windiest season) with the proposed development completed in accordance with maximum parameters and other cumulative schemes in place, almost all areas on and around the site would be suitable for standing and sitting. There are small areas south of Block G1, east of Block D1, and between Blocks D1 and D2 (in yellow), that are deemed suitable for strolling only. However, as noted above this is the worst-case scenario and the detailed design of those buildings, and the landscaping of plots, will look to improve local wind conditions. Wind conditions at Block D1 have been assessed without mitigation. Only strolling

is recommended nearby, while sitting or standing could be directed elsewhere, for example by using soft landscaping. Details of mitigation measures for Phase 1 can be secured by condition D5 and for reserved matters submissions there is condition RM23. The summer conditions are significantly better and do not include any areas that are not suitable for sitting or standing.

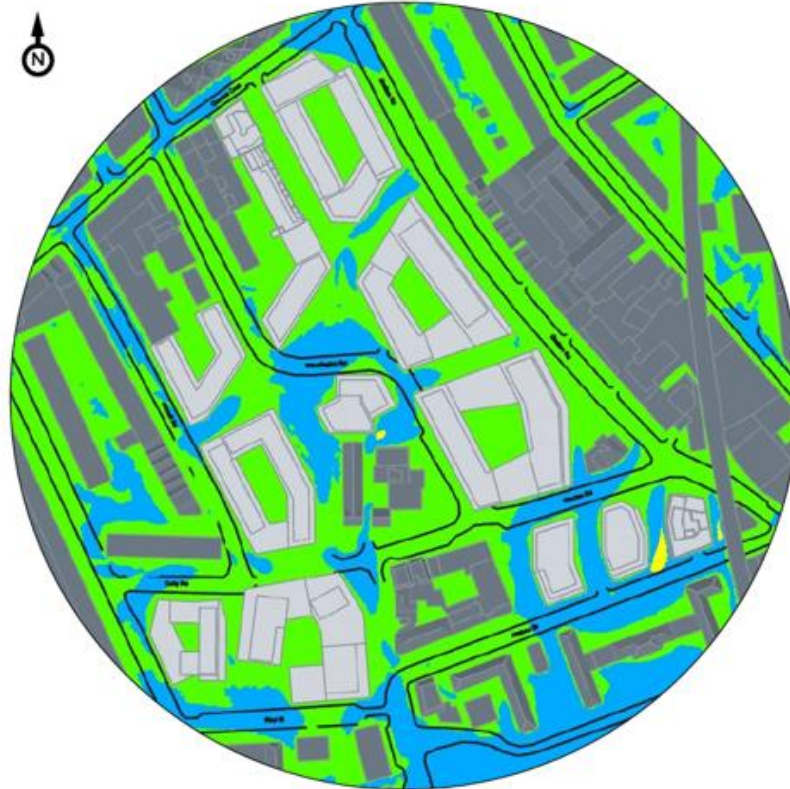


Figure 49 - Proposed winter safety levels at ground level for completed development

Proposed development - Above ground level (roof, balconies, terraces)

- 18.18 Most balconies on the detailed element of the scheme have suitable conditions in winter. For the detailed Phase 1 the wind conditions on the parts of some upper floor balconies would not be suitable for their intended use (i.e. they are identified as suitable for strolling in parts) however this situation can be improved through consideration of wind mitigation measures such as provision of balustrades that are 1.1 metres in height with 30% solidity. Further analysis of mitigation measures will be secured through condition D5. Wind conditions are also noted to improve from winter to summer, and these conditions are also less significant once the outline elements of the development are completed.
- 18.19 In terms of the outline proposal, detailed assessment of balcony designs has not yet occurred as the design of these features is not yet known. Further analysis will take place with all reserved matters applications and mitigation measures applied at that stage as appropriate, secured by condition RM23.

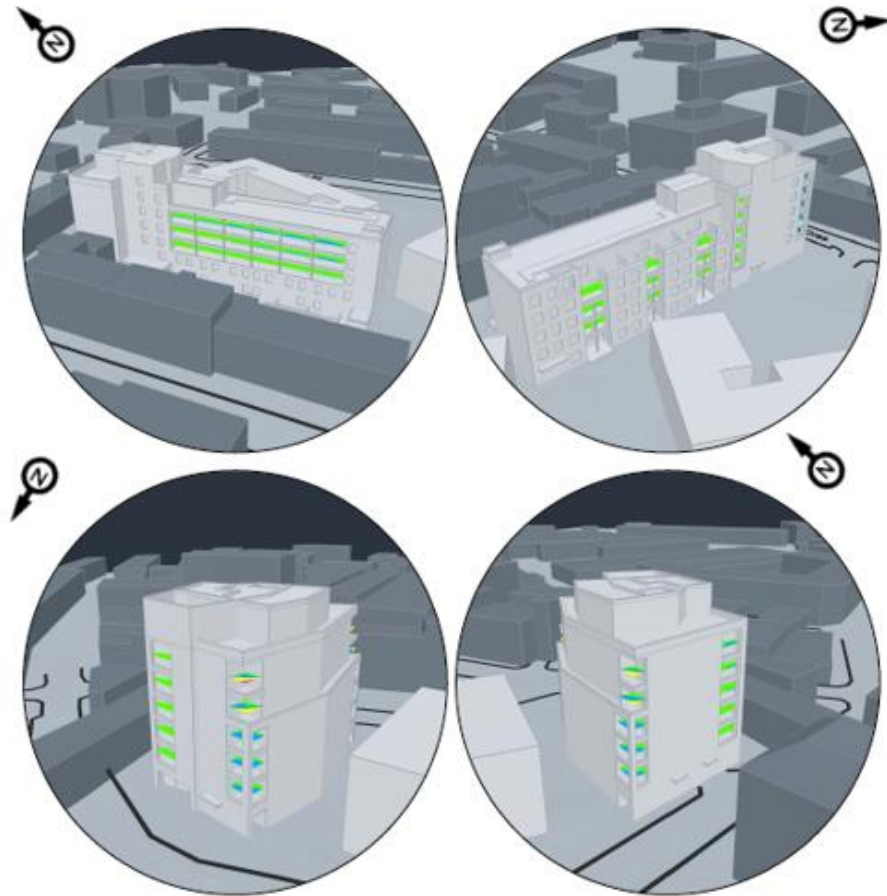


Figure 50 - Wind comfort levels on balconies (detailed phase – Block A1 above, D1 below)

- 18.20 At roof level, most of the terraces in both the outline and detailed elements would exceed the Lawson Comfort Criteria for the intended use with some areas around the perimeter identified as 'uncomfortable'. For the outline phases, it is not known where the terraces would be, and the worst-case scenario has been assessed. Detailed Blocks A1 and D1 have been designed with private balconies and without usable roof terraces, an approach possible in later phases, particularly where the buildings are identified to have uncomfortable wind conditions at roof level. Mitigation will be considered further at the point of submission of reserved matters applications through condition RM23.

Proposed development - Off-site impacts

- 18.21 The wind assessment has stated that all off-site impacts would be negligible at completed development stage including to thoroughfares, entrances and car parks in the windiest season.

Mitigation summary

- 18.22 For the detailed phase 1 scheme, mitigation measures would be required at the upper most southwestern and northwestern balconies of Block D1, which would include 1.1 metre tall 30% solid balustrades. It would also be needed at the seating area west of Block D1, which would require the inclusion of both the proposed and retained landscaping around Block D1. These measures would result in suitable wind conditions in these locations for their intended uses. Details of these measures will be secured by condition D5.
- 18.23 Some parts of the outline scheme currently show potentially unsuitable wind conditions, but the exact locations of wind-sensitive spots like entrances, balconies, and seating are not yet determined. Mitigation will be addressed during the reserved matters stages for each phase, with further analysis secured by condition RM23 as appropriate.
- 18.24 The public open spaces are compliant with the BRE guidance on overshadowing and internal courtyard areas are of an acceptable quality and will be maximised through the detailed design of later reserved matters applications.

Conclusion

- 18.25 Overall, it is considered that the microclimate impacts are acceptable. The impacts outside the site are minimal, and the impacts within the site, where they occur, can be managed and mitigated through careful design and landscaping.

19. LANDSCAPE AND PUBLIC OPEN SPACE

- 19.1 The development plan seeks to secure open space of high quality in new developments. LP policy G4 states development should create areas of publicly accessible open space, and LP policy D8 requires that appropriate management and maintenance arrangements are in place for the public realm, minimising rules governing the spaces in accordance with the [Public London Charter](#). CLP policies A2 (Open space) and A3 (Biodiversity) and the Biodiversity CPG seek to protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure. They also seek to protect existing trees, secure additional trees and vegetation and to protect and promote biodiversity.
- 19.2 Developments for over 100 dwellings trigger the GLA play requirements under the London Plan. LP policy S4 requires 10sqm play space per child. Policy G4 states that new developments should provide public open space in areas of deficiencies. The policies strive for an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction.

- 19.3 Camden policy requires that 9sqm of Public Open Space is required per additional resident plus an additional 6.5sqm of play provision. Some of the Public Open Space can include play. Some of this could also be in communal or private gardens where it is provision for 0-5s, but this 0-5 provision should not comprise more than 55% of the total play provision.
- 19.4 The Council's Open Space CPG requires regenerated estates to consider enhancing the function and benefits provided by housing estate land. If there is a shortfall in public open space on the site then a financial contribution will be required to address the shortfall, based on:
- £200 per sqm of open space shortfall (capital)
 - £7 per sqm of open space shortfall for 10 years (maintenance)
- 19.5 The Gospel Oak and Haverstock Community Vision also seeks a network of new green and play spaces for the whole community.

Introduction

- 19.6 The site is not subject to an existing public open space designation, although there are fragmented open areas of soft landscaping around blocks which are mostly mown lawns and ornamental planting beds. This covers around 38% of the site area, but 87% of the green space on the site is inaccessible due to its demarcation by fencing or retaining walls. Residents also lack private ground floor amenity spaces.
- 19.7 Beckington Open Space, adjacent to the southwest boundary of the site, is designated as private open space. Talacre Public Open Space is around 60m to the south of the site, and creating improved links to this and open spaces to the north, Hampstead Heath, is a key objective of the Area Vision.
- 19.8 The masterplan creates an integrated urban district with a strong public realm structure that includes a range of amenity and play areas for residents and the wider community. The key focus of the masterplan is the creation of a new open space at its heart, which would include new play space and areas to meet.
- 19.9 Landscaping plans, an arboricultural report and tree survey, and a landscape design and access statement were submitted as part of this application. The Council's Nature Conservation Officer, Tree and Landscape Officer and Open Spaces Officer have reviewed these documents as well as the Urban Design Officer.

Public open space

- 19.10 The proposals have been designed as 'a landscape-led masterplan'. The landscape and public open space strategy comprises a legible public realm structure around a series of building plots. The central public square is the primary open space at the heart of the masterplan with a width of between

15 and 55 metres and a length of over 100 metres. Secondary public spaces are formed in the spaces between the new blocks. There is a public space on the southern side of the masterplan fronting onto Rhyl Street which includes play space and a raised garden. Communal private amenity spaces are also available centrally within the courtyard blocks.

- 19.11 The masterplan landscaping approach connects the site to its surroundings by creating accessible routes and clear entry points for residents and visitors. It defines a structured public realm with distinct private, communal, and public areas. The plan improves the existing landscape by adding more open spaces, tree-lined paths, squares, and diverse green areas while preserving many of the most important trees.

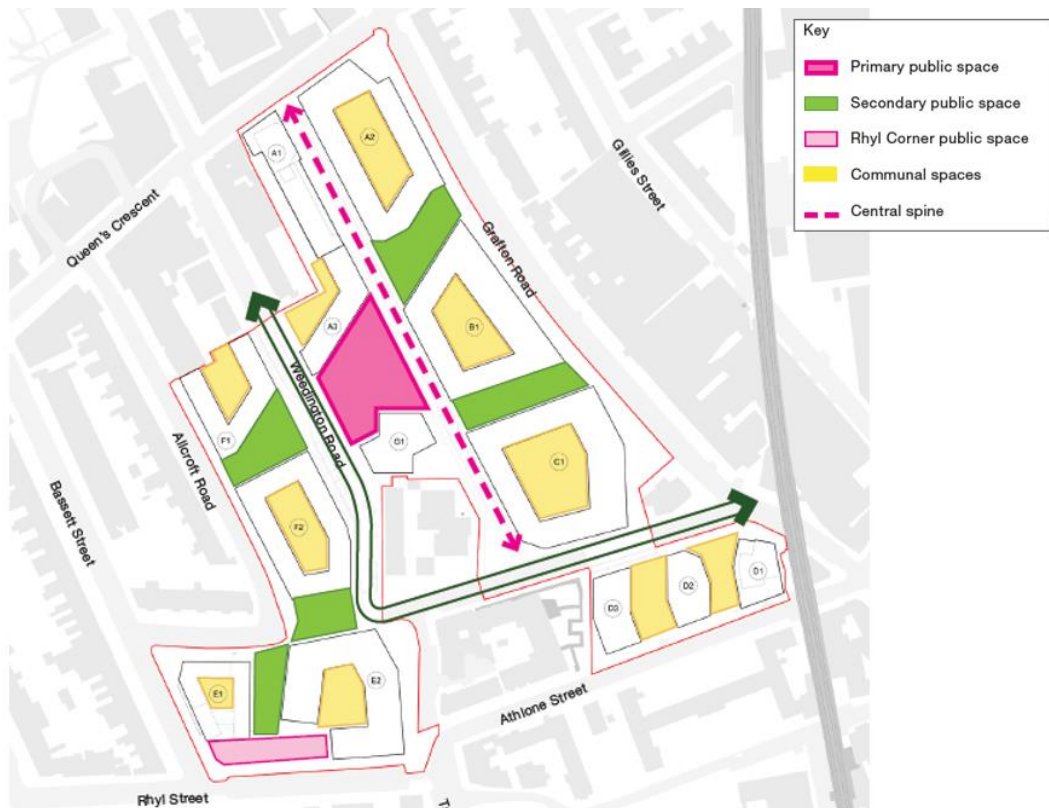


Figure 51 - Proposed public space hierarchy

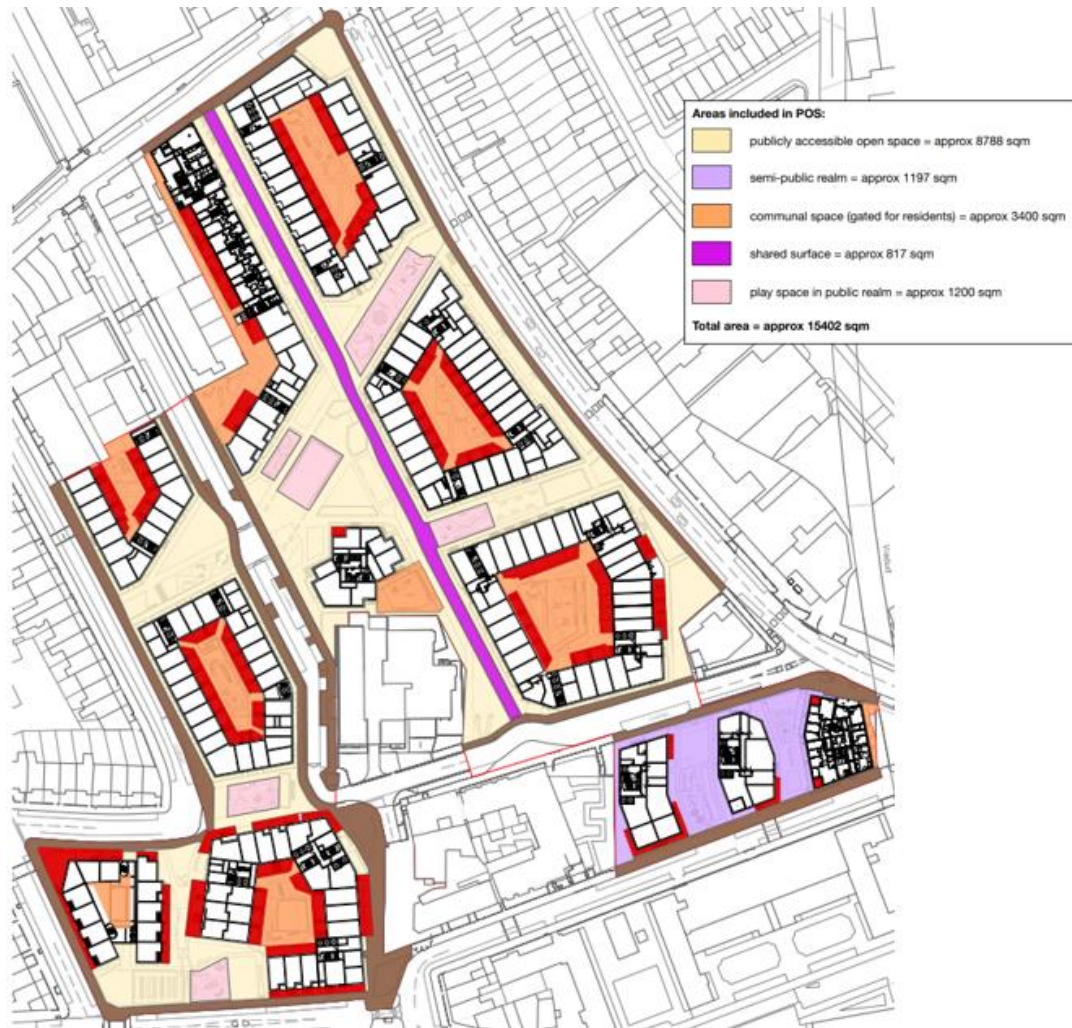


Figure 52 - Map of proposed public open space

19.12 The public open space typology is split as follows:

- Publicly accessible open space – 8,788sqm
- Semi-public realm – 1,197sqm
- Shared surface – 817sqm
- Public realm play space – 1,200sqm
- TOTAL of 12,002sqm

19.13 The following areas are also provided within the public realm and are excluded from the public open space calculation:

- Public footways – 3,901sqm
- Private amenity space at ground floor – 2,882sqm
- Communal courtyard areas – 3,400sqm

19.14 Carriageways and roof tops are also excluded from this calculation.

19.15 The three main categories of open space include publicly accessible open space, semi-public realm and public realm play space. The first of these

includes most of the open areas and all pedestrian routes through the site. It includes the main square which is intended to be a focal space for public life and a place where informal play and sports can take place as well as public events, gatherings and areas intended for rest. The semi-public realm areas are more enclosed pocket-square areas with more tightly located seating, planting and play space. Public realm play is spread out throughout the site in small clusters to ensure there is range of play space close to all each block. One of these play spaces would be located across from the school on Rhyl Street to allow ease of access for students.

- 19.16 There is further ground floor amenity space provided within communal courtyards. The communal courtyards accommodate some local play and the under-5s play space. Private amenity spaces would also be provided at ground floor level in form of enclosed gardens. In some instances, the private amenity would be located adjacent to the public realm which provides visual benefits to the masterplan without it being directly accessible for all residents. In all cases the private gardens or terraces will be screened by means of garden walls or railings and will include a green buffer such as a hedge or ornamental shrubs for additional privacy. These private amenity spaces are not counted towards the open space calculations.



Figure 53 - Illustrative landscaping proposals

- 19.17 Public realm areas would be finished with hardstanding materials and a range of differing types of soft landscaping including ornamental planting, amenity grassland, sustainable drainage features and planting for shade. A grow garden would be provided fronting onto Rhyll Street. The requirement to demolish and rebuild the existing buildings and the ambition of the masterplan to entirely redesign the estate layout means that 73 trees must be removed. However, the Category A trees on site would be retained, as would a further 66 other trees. All trees that are removed would be replaced and substantial additional tree planting is proposed. More information on tree protection and planting is provided in the 'Trees, greening and biodiversity' section below.
- 19.18 The Open Space CPG requires a contribution towards open space for all new dwellings being provided and also requires that proposals for redevelopment of housing estate land should ensure the retention of all open space of amenity value. Given c. 540 new homes would be created an indicative 11,178sqm of public open space would be required to meet policy in terms of uplift (the exact requirement could change as reserved matters applications are submitted, based on the exact final amount of housing). The

commercial spaces would also generate demand for open space up to a maximum of 17sqm, giving a total requirement of 11,195sqm of open space across the masterplan. 12,002sqm of open space would be provided which exceeds the policy requirement for the additional homes.

- 19.19 Much of the current public open space on site is inaccessible and low quality. CLP policy A2 makes clear that whilst open space on housing estates should be safeguarded, there should be flexibility taking account of the nature and function of the current open space, and whether it is replaced by better provision. The policy also says any public value of retaining existing open space should be outweighed by the benefits of the development for existing estate residents and the wider community,
- 19.20 If the masterplan is viewed as a whole, the 856 homes would generate a total public open space requirement of 16,332sqm. Looking at the 12,002sqm to be provided on site, there would be a deficit of 4,330sqm, subject to final layout and landscaping arrangements for the outline plots. However, the proposed public open spaces are considered to be better in terms of quality and useability than the existing public open space and taking account of this and the need to make more efficient use of the site to deliver new homes this is accepted, in line with CLP policy A2.
- 19.21 As such the open space provision, which is a clear improvement over the existing position, and whilst there is a shortfall in terms of area the quality and function is a notable improvement. As such, the provision is acceptable and complies with the policy overall, and so there would be no requirement for a payment-in-lieu to address the masterplan sqm shortfall.
- 19.22 The Queen's Crescent Neighbourhood Forum have stated that open space on site is inadequate however the Council's view, given the comments above, it that it is compliant with policy and is therefore considered acceptable.
- 19.23 The detailed Phase 1 includes private garden space for the maisonettes accessed from the ground floor. It also incorporates temporary landscaping and play equipment on site, ahead of more comprehensive open and play space provision coming forward in later phases. This approach provides an acceptable interim solution.

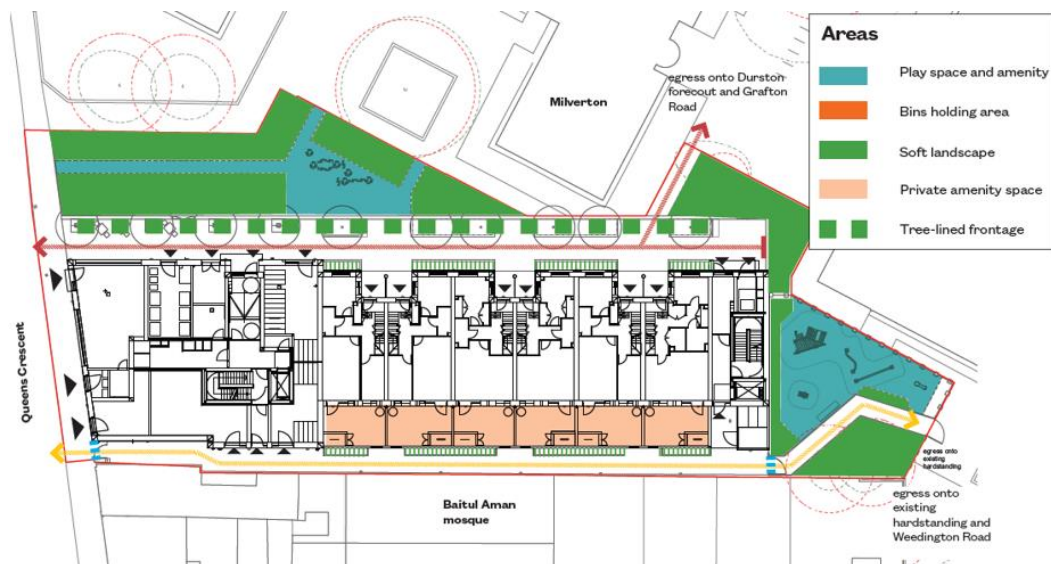


Figure 54 - Temporary landscaping and play space for Phase 1

- 19.24 Details of management and maintenance of the open space will be secured through planning obligations via the shadow s106 legal agreement for all phases and the detailed designs of the open space will be secured through conditions D6 & D7 for the detailed phase and through conditions RM24 & RM25 for the future reserved matters applications. Accordance with the Public London Charter would also be secured through planning obligation through the shadow s106 agreement for all phases.
- 19.25 Contributions towards public realm improvements in the wider local area would also be secured through a pedestrian, cycling and environmental improvements contribution (see Transport section below).
- 19.26 Given the above, it is considered that the proposed Public Open Space provision is acceptable.

Play space

- 19.27 Children's play facilities would be included across various phases of the proposed masterplan development. They would meet the needs of different age groups and include a range of play typologies including informal play spaces and formal play areas featuring equipment.

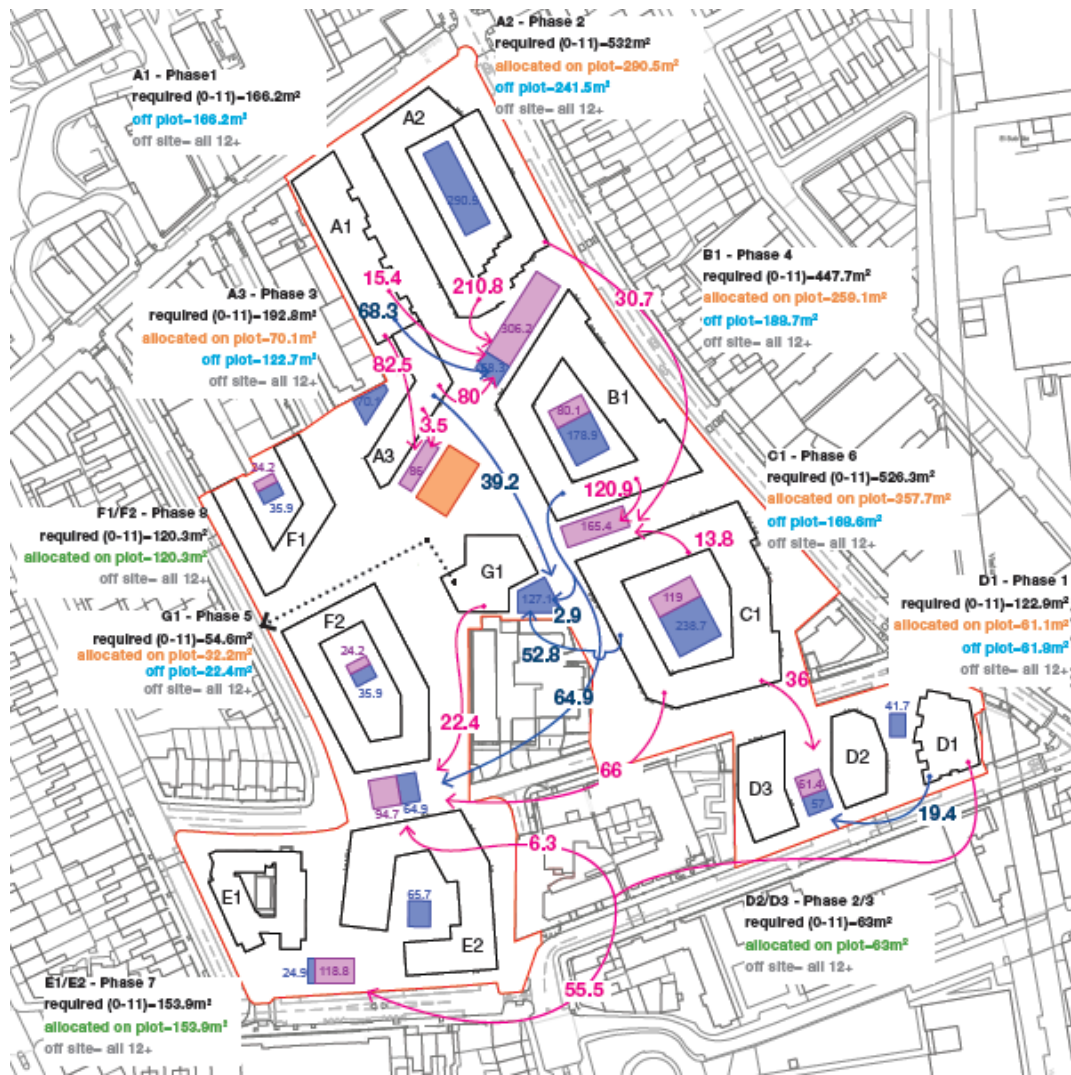


Figure 55 - Masterplan play space strategy

- 19.28 The plan above shows a well-considered arrangement with play areas spread across the masterplan area. Doorstep play for 0-5s is provided that includes formal equipment such as timber steps, boulders and rocking animals. This will be included in areas with good passive surveillance and in physically protected areas. Local play for 5-11s would be included in a combination of courtyards and public realm areas with inclusive sets of equipment including slides and swings.
- 19.29 Much of the play space for older children (12+) is located off-site (Malden Road play pitches and Talacre Gardens) which is acceptable given these spaces are within a very short walk of the site and within the distance guidelines as recommended by the Mayor's Play and Informal Recreation SPG. An open play space is located within the open space at the centre of the masterplan that is also suitable for older children. There is a slight shortfall in the play space provision overall with 3,138.5sqm of play space provided against a target of 3,218sqm. However, given that play space for young children under 12 has been overprovided on site and that adequate

play areas for older children already exist within a short walk north and south of the site the slight shortfall is considered acceptable in this case. Again, taking account of the current situation in the estate, the provision would be a significant improvement for current and future residents in the area.

- 19.30 The Queen's Crescent Neighbourhood Forum have stated that play space on site is inadequate however in the Council's view, given the comments above, it is considered acceptable.
- 19.31 A temporary play area would also be provided as part of the temporary landscaping scheme for Phase 1. As future phases come forward this would be replaced with the wider masterplan play strategy. Details of the temporary landscaping scheme, and the permanent play space provision and management strategy for Phase 1 (conditions D6, D7 & D8) and all reserved matters applications (conditions RM24 & RM25) will be secured through conditions.
- 19.32 Overall, the open space and play space provision would see a notable improvement on the current situation. The safer, more accessible and higher quality provision would improve the situation for those who most feel the adverse impacts of the current provision – in particular, the young, the elderly, the disabled, as well as those who currently feel unsafe to use the public spaces, normally women and certain ethnic groups. Overall, the provision is in accordance with the development plan.

20. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 20.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation. This approach is supported by LP policy G5 which uses Urban Greening Factor (UGF) targets to evaluate the quality and quantity of urban greening. The policy applies a target of 0.4 for mainly residential schemes, and 0.3 for mainly commercial schemes.
- 20.2 Policy G7 of the London Plan states that trees of value should be retained wherever possible and that adequate replacement trees should be provided if tree removal is necessary. Policy A3 of the Local Plan states that replacement trees should be provided where the loss of significant trees occurs and that developments are expected to incorporate additional trees and vegetation wherever possible. CPG Trees seeks to preserve existing tree and canopy coverage.

- 20.3 Site allocation C13 of the draft Local Plan seeks to retain existing trees where possible. The allocation also identifies the objective of creating new and enhanced areas of biodiversity to create and improve connections for wildlife and to support biodiversity corridors including the Camden Nature Corridor.
- 20.4 The removal of mature trees across the site, as well as reduction in existing greenspace, was a key issue raised in public consultation with more than 50% of objections mentioning the issue.
- 20.5 There are 141 existing trees within the site, and it is proposed to remove 73 trees (52%). No Category A trees would be removed. 22 Cat. B and 46 Cat. C trees must be removed to facilitate the masterplan development. Trees outside of the site boundary are not expected to be affected by the development proposals.
- 20.6 The primary driver for the removal of trees is the block layout, which for the masterplan is significantly different to the existing block layout. Wider and longer blocks are proposed to address the street better than the existing blocks and it is in these areas where many of the existing trees are located. Many of the trees on site have been self-seeded and are consequently very close to existing buildings, their seeds having been driven into these locations by the elements. Trees of this nature would be at significant risk during any development works, including demolition.
- 20.7 It is relevant to note that the masterplan has been designed around the most valuable Category A trees, which have been accentuated as local landmarks. The removal of the lower quality trees on site represents an opportunity to develop a thoughtful landscaped led masterplan for the area that responds to the local environment including the new buildings to create a characterful, verdant and long-lasting landscape that is more accessible and usable for all the local community.
- 20.8 In total 152 new trees will be planted to replace those lost, leading to the provision of a total of 220 trees throughout the masterplan area, an overall uplift of 79. Details of species and sizes of trees will be secured through conditions (D7, D8, RM24 & RM25) for both the detailed phase and the reserved matters applications and will be interrogated in detail at that stage by the Council's Trees and Landscaping Officer and Nature Conservation Officer to ensure suitability for the site, context and local climate.

Tree Category (quality)	No. of trees	No. to be removed
Category A (high, 40yrs life)	2	0
Category B (moderate, 20 yrs life)	49	22
Category C (low, 10yrs life)	83	46
Category U (should be removed)	7	5

Total	141	73
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Table 24 - Summary of trees and proposed removals

- 20.9 Other requirements such as tree protection measures shall also be secured though conditions D9 & RM26 for phase 1 and the reserved matters applications respectively.
- 20.10 The masterplan aims to provide a rich mosaic of planted green spaces that contribute to the biodiversity of the site while supporting wildlife conservation and habitat creation. Policy G6 of the London Plan seeks a net gain in biodiversity on site, while policy A3 of the Local Plan states that developments will be assessed for their ability to realise biodiversity benefits. The site is not within a designated biodiversity zone such as a Site of Importance for Nature Conservation (SINC). An Ecological Impact Assessment (EclA) prepared by Ecology by Design has been submitted with this application and this has been reviewed by the Council's Nature Conservation Officer.
- 20.11 The EclA indicated the site has a low potential to support roosting bats, and during surveys no roosts were found and bat activity was noted to be low. Thirteen trees were identified as having the potential to support bats, whilst other trees and shrubs were identified as suitable habitats for nesting birds, and as support for hedgehogs and the common toad. However, the site is considered to be of negligible biodiversity value as it supports species which are relatively common and which are widespread at the local level. Given this negligible designation and the lack of policy protection by way of a SINC for this site it is considered that in planning policy terms the removal of habitats from the site with the aim of facilitating this development is acceptable subject to securing appropriate biodiversity enhancements via appropriate conditions D1 & RM31 for both the detailed phase and via reserved matters applications for the outline phase. Such enhancements would include incorporation of native planting into the comprehensive landscaping proposals, the provision of bat (a minimum of eight) and bird (a minimum of 30) boxes and installation of bee bricks and insect nest boxes.
- 20.12 On completion of these measures, it is anticipated that the proposed development would have a positive impact on local biodiversity, including supporting the emerging Camden Nature Corridor. The Council's Nature Conservation Officer has reviewed the proposals and agrees with this conclusion.
- 20.13 The London Plan uses the UGF scores to help objectively evaluate the quality and quantity of urban greening. Given this is a residential-led scheme 0.4 is an appropriate target. The proposals achieve an UGF of 0.42 across the masterplan, which includes a range of greening measures such as semi-

intensive green roofs with 150mm substrate and a biodiverse planting mix, a range of soft landscaping including dense areas of planting, and installation of permeable paving where possible. The development UGF will be finessed and reviewed at each stage of the proposal with conditions D1, RM24, RM25 & RM30 secured for the detailed phase and with each reserved matters application.

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

Statutory Biodiversity Net Gain

- 20.15 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 20.16 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to conditions which require the submission of a Biodiversity Net Gain Plan (BGP) and appropriate monitoring measures before development can commence, showing how the 10% gain will be met.
- 20.17 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits. For multiple phase schemes like this one, the regulations specify that the 10% net gain is for the site as a whole and it is not necessary for each phase to achieve this.
- 20.18 Based on the information provided, this scheme will require the approval of a BGP before development begins. The site has a baseline habitat of 18.61 habitat units. As there are no hedgerow or river habitats on the site the metric does not include an assessment of these features. Most features on the existing site, such as introduced shrubs and grassland have a low habitat rating (less than 0.5). The features with the highest rating are trees or groups of trees some of which have a rating greater than 2 and need to be removed to facilitate the development. Replanting trees cannot entirely replace the habitat units lost in this case and as such additional biodiversity credits must be purchased to secure the required 10% net gain. The masterplan results in a loss of 5 habitat units overall which is a 26.85% reduction in habitat units at the site.
- 20.19 A Habitat Management and Monitoring Plan (HMMP) covering a 30-year period would be secured by condition M31. This would be to secure the on-site enhancements included in the scheme. The remaining additional biodiversity habitat credits will be secured through an appropriate offset provider and provided off-site. These credits will be secured though a statutory biodiversity net gain condition (secured through separate non-

planning legislation). The applicant would need to submit an Overall Biodiversity Gain Plan (BGP) for the entire development before any work starts, and then a Phase BGP for each phase before that phase begins. The overall BGP sets out the strategy for achieving the 10% net gain across the whole site, while phase BGPs provide detailed delivery for each stage. This ensures compliance and monitoring throughout the project. Any credits would be purchased at before commencement of the relevant phase. The overall BGP would be secured with each reserved matters application through condition RM36. A detailed BGP would be secured for each phase through condition M30.

- 20.20 Council's Nature Conservation Officer considers that the biodiversity gain conditions are capable of being discharged successfully. The 10% gain can be met through the on-site biodiversity enhancement measures (subject to the HMMP) and purchasing off site habitat unit credits. This would be confirmed via discharge of the statutory BNG condition. The statutory condition will not be repeated on the decision notice, in line with guidance, but informatives explaining the statutory obligations will be included.

21. TRANSPORT

Policy context

- 21.1 The Mayor's Transport Strategy 2018 (MTS) sets a target for 80% of all Londoners' trips to be made by foot, cycle, or public transport by 2041. The MTS and the London Plan require new developments to promote sustainable transport, reduce congestion, improve air quality, and restrict car parking, especially in areas with good public transport access.
- 21.2 Policy T1 of the London Plan and Local Plan prioritise walking, cycling, and public transport, while Policy T2 mandates car-free developments. Policy T3 and T4 address infrastructure improvements and the sustainable movement of goods and materials.
- 21.3 In the DCLP, Site allocation C13 (West Kentish Town Estate) and Policy C1 (Central Camden) commit to new pedestrian and cycle routes and public realm improvements, supporting the Council's Transport Strategy and Cycling Action Plan. Camden's Transport Strategy (CTS) 2025–2028, Clean Air Action Plan, and Climate Action Plan further reinforce these objectives.

Site context

- 21.4 The site is in Kentish Town, bounded by several residential streets and near Kentish Town Road, part of the Strategic Road Network (SRN). Public Transport Accessibility Level (PTAL) ratings range from 2 (poor) to 5 (very good), but it is generally well connected to public transport. The site is served by nearby Underground, Overground, and bus routes, though some bus stops lack shelters.

- 21.5 Plans are in place to expand cycle hire and micromobility infrastructure in the area, including new docking stations and parking bays, supported by developer contributions. A Council study (Shared Transport Availability Level (STAL) scores) indicate further opportunities for improvement.

Detailed Element: Phase 1

Trip generation and modal split

- 21.6 The Transport Assessment (TA) shows that the masterplan as a whole would result in a maximum of 322 two-way person trips in the AM peak and 269 in the PM peak. Phase 1 will add 45 homes, generating up to 27 two-way trips in the AM peak and 23 in the PM peak, primarily by sustainable modes like public transport, cycle or on foot. The new commercial unit will likely attract trips from within or in very close proximity to the development and not have wider impacts.
- 21.7 Given the car free nature of Phase 1 and its location, a high modal share for public transport, cycling and walking can be achieved via a travel plan and the implementation of public realm and public transport improvements in the local area. TfL have acknowledged that the estimated additional customers using their infrastructure (which includes public transport) appears reasonable and no mitigation has been requested.
- 21.8 A framework travel plan was submitted in support of the planning application which promotes trips by sustainable modes of transport. This should be used to inform a single Local Level Travel Plan is required for Phase 1. The Travel Plan would be targeted towards encouraging residents, staff and visitors to make walking, cycling and travel by public transport the natural choice for day-to-day trips. The Travel Plan (and associated monitoring and measures contribution of £5,674) would be **secured by shadow s106 agreement**.

Car parking and vehicle access

- 21.9 The site is in controlled parking zone CA-L Inner, which operates from 08:30-18:30 Monday to Friday only. The development will be **car free secured by shadow s106 agreement**, restricting both residential and business permits in accordance with CLP policy T2.
- 21.10 In line with London Plan standards, accessible parking should be provided for 3% of dwellings at the outset. The applicant proposes not to provide new Blue Badge spaces off or on-street unless a resident comes forward to request one, in which case a regular on-street parking space would be converted into an accessible bay. These could be provided on any of the streets immediately surrounding the site. The Transport Officer and TfL accept this approach. Further details of how this will operate in practice can be detailed in **Car Parking Management Plan secured by shadow s106 agreement**.

Cycle parking

- 21.11 Cycle parking will meet London Plan standards, with secure, covered spaces for residential units and commercial premises to meet the London Plan standards, in accordance with CLP policy T1.
- 21.12 In total 65 cycle spaces will be provided at Block A1. Two stores would be provided at ground floor level at the north of the building for 50 spaces in the form of two-tier racks and Sheffield stands. A further cycle store would be provided at ground floor level at the southern end of the building which would provide three enlarged Sheffield stand spaces. The maisonettes would be provided with two cycle parking spaces within the back gardens of each unit, with access from the rear of the building.

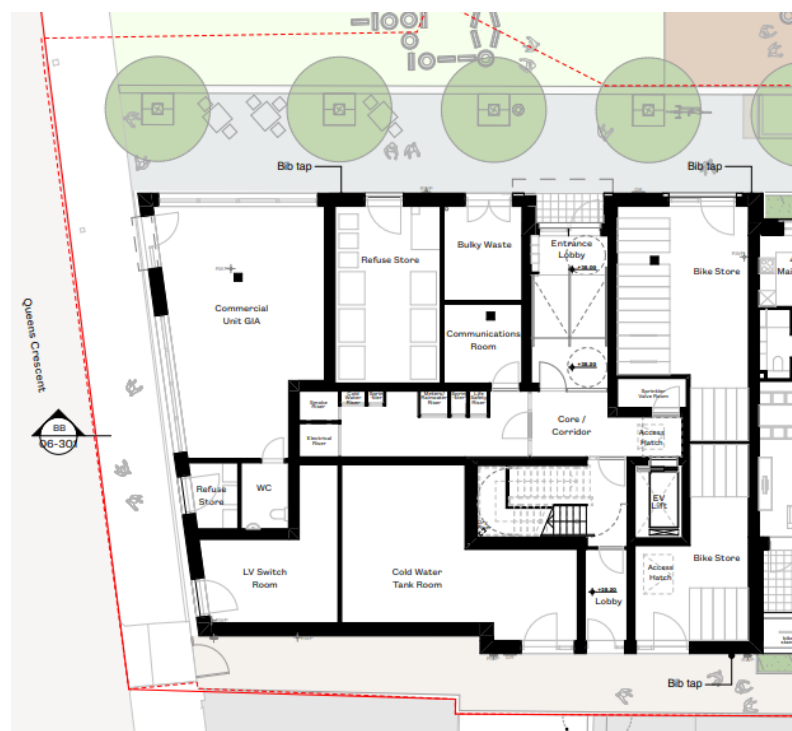


Figure 56 - Cycle Parking at ground floor of Block A1 (right of image)

- 21.13 In total 40 cycle spaces will be provided at Block D1. These would consist of two-tier racks and 8 spaces consisting of Sheffield stands in the lower ground floor. A ground floor cycle store would provide 6 Sheffield Stands and 3 enlarged cycle stands. A lift designed in accordance with the requirements set out within the London Cycling Design Standards (LCDS) document would provide access to the basement cycle store.

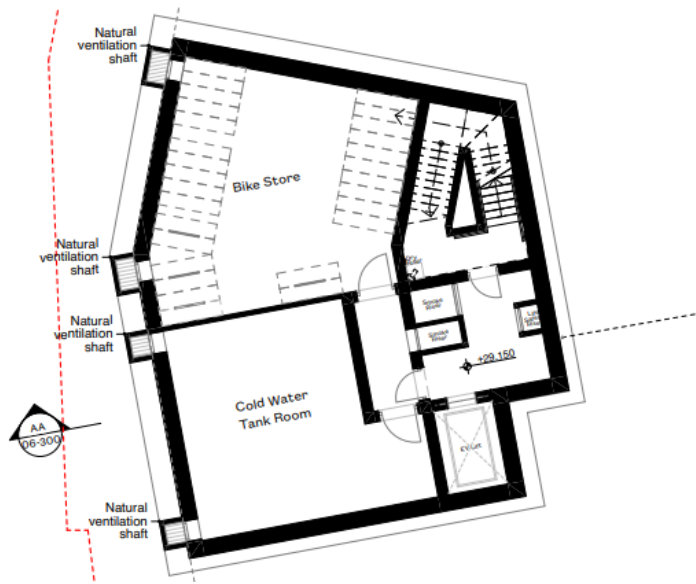


Figure 57 - Cycle Parking at lower ground level of Block D1

21.14 Cycle parking for a commercial unit comprising 58sqm (GIA) of floor space (in A1) would be dependent on the final designated land use. If not known at the time the final details are submitted, this will be optimised for a range of uses. There is capacity for this cycle parking in the form of Sheffield stands in the public realm but within the red line of the site.

21.15 Final details of the cycle parking provision for Phase 1 would be secured by condition D22.

Servicing and deliveries

21.16 Phase 1 interim refuse collection for Block A1 would take place from Queen's Crescent, and Athlone Street for Block D1, in line with the existing arrangements.

21.17 A detailed **Delivery and Servicing Management Plan (DSMP)** will be secured by the shadow s106 agreement for phase 1.

Construction Management

21.18 An outline Construction/Demolition Management Plan has been submitted but this will be finalised when a principal contractor is appointed. A Construction Management Plan (CMP) and Demolition Management Plan (DMP) is an important way of managing construction impacts for both environmental concerns, like air quality, parking, noise and disturbance, but also by managing vehicle movements.

21.19 Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. The primary concern is public safety, particularly with Schools nearby, but the CMP and DMP can help manage the impact of construction on traffic congestion in the local area. This would help ensure construction

vehicle movements to and from the site are scheduled to avoid peak periods and minimise impacts of construction on the transport network and surrounding area. The contractor will need to register the works with the Considerate Constructors' Scheme and comply with the CLOCS standard for Construction Logistics and Community Safety.

- 21.20 Construction impact is a major issue raised in consultation responses and so this careful management and continuing liaison with the local community will be important in limiting the adverse impacts that come with construction operations. This is especially important given the scale and build period. The wider health impacts of the construction phase are also discussed in the Health Impact section. Impacts on Network Rail infrastructure during construction shall be managed through condition M21.
- 21.21 A Demolition Management Plan (DMP) with implementation support contribution of £10,116 and impact bond payment of £16,000 would be **secured via shadow s106 agreement**.
- 21.22 A Construction Management Plan (CMP) with implementation support contribution of £30,513 and impact bond payment of £32,000 would be **secured via shadow s106 agreement**.
- 21.23 The final CMP and DMP would require significant input from Council officers, Transport for London, local residents and other stakeholders, such as Rhyl School, before being approved. A local Construction Working Group be **secured by shadow s106 agreement**.

Highway works

- 21.24 Phase 1 requires minor works to the public highway outside of the new buildings and a financial contribution as well as details of the works would be required to mitigate the impact. The Highways Works Contribution would be **secured by shadow s106 agreement** which has been calculated as £100,785.05 for Phase 1.

Outline Element

Trip generation

- 21.25 The development proposes to provide 856 residential units, an increase of 540 (including the phase 1 development). The residential trip generation was calculated by interrogating the TRICS database and the modal share from 2011 Census data.
- 21.26 The proposal will result in a significant increase in walking, cycling, and public transport trips. The anticipated high volume of the walking trips is likely to be made from Kentish Town and Chalk Farm London Underground stations, Kentish Town West London Overground station, bus stops on Malden Road, Prince of Wales Road and Kentish Town Road, and Kentish

Town, Camden Town and Chalk Farm town centres. TfL have acknowledged that the estimated additional customers using their infrastructure appears reasonable and no mitigation has been requested.

- 21.27 An Active Travel Zone (ATZ) assessment included in the TA identifies opportunities for improvements to walking and cycling environment, helping to implement the Safe & Healthy Streets programme in the Kentish Town Area.

Car parking

- 21.28 The wider masterplan would also be car free. Existing residents use 13 off-street car parking spaces within the estate car park. There are no records of any of the residents having a dedicated Blue Badge permit. The proposed development will displace 13 vehicles into the surrounding CPZ through the provision of new parking permits. These permits would be linked to the existing residents, not their homes, and therefore when residents leave the permits would be revoked and this would free up capacity within the local CPZ. The parking stress survey shows there is spare capacity to accommodate 13 displaced vehicles.
- 21.29 A total of 33 on street parking bays would be removed on Weedington Road, Warden Road and Grafton Road to allow for the realignment of Weedington Road, the provision of the proposed loading bay on Warden Road and the areas of double yellow lines along Grafton Road. All removed bays would be re-provided within the estate on the realigned Weedington Road or on the roads surrounding the estate including Warden Road, Athlone Street and Rhyl Street. Five spaces would also be provided on Grafton Road.
- 21.30 As with the detailed elements, accessible parking for dwellings would be managed through a **Car Parking Management Plan secured by shadow s106 agreement**. This would be updated with each phase as each reserved matters application is submitted.
- 21.31 There is potential for increased demand for Electric Vehicles parking bays in the CPZ. To mitigate this, three additional electric vehicle charging points (fast chargers) would be provided on the public highway near the site. A financial contribution of £60,000 for **EV Charging Bays will be secured by shadow s106 agreement**.
- 21.32 The development will impact on the demand and operation of the CA-L Inner CPZ, and as such this is likely to require further reviews in future, particularly around extended hours to weekends. As such, a contribution of **£20,000 for future CA-L CPZ reviews would be secured by shadow s106 agreement**.
- 21.33 Whilst a car-free approach is fully supported it is also acknowledged that there are a wide range of mobility needs, and fluctuating demands for motor

vehicle trips from individuals. As such, **one car club parking bay would be secured through shadow s106 legal agreement.**

Cycle parking

- 21.34 Long stay cycle parking for each building is expected to be within each associated plot. Short stay cycle parking will be required to be close to front entrances and access points to the associated buildings. All cycle parking should be designed to be in accordance with the guidelines of the London Cycling Design Standards (LCDS) document.
- 21.35 Compliant long stay and short stay cycle parking in accordance with CPG Transport and London Plan policies will be required for each of the plots within the outline phase and condition RM27 will be secured to ensure this information is provided with each reserved matters application.

Micro/shared mobility

- 21.36 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby and will be under significant additional demand. In order to mitigate this impact and continue to promote these modes of transport, a **cycle/e-scooter hire improvements contribution of £20,000 would be secured by a shadow s106 agreement.**

Travel planning

- 21.37 A framework travel plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. Modal share projections for walking and cycling are acceptable, and a Local Level Travel Plan will be required for all phases. Each **Travel Plan (and multiple related monitoring and measures contributions of £5,674 each) would be secured by shadow s106 agreement.**

Servicing and deliveries

- 21.38 The proposed masterplan has the potential to generate demand for 121 daily service vehicles. Four loading bays would be provided to accommodate deliveries and servicing throughout the estate. Each loading bay can accommodate approximately 30 delivery vehicles over a 12-hour period (07:00–19:00), or fewer than 3 servicing vehicles per hour.
- 21.39 Information on servicing must be provided with all reserved matters applications (condition RM11) and updated DSMPs will be secured for the outline phases by **shadow section 106 legal agreement.** This will help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated and adapted over time.

Construction management

- 21.40 As set out under the Detailed element section above, a DMP and CMP, along with appropriate support contributions and bonds, would be required for each phase. These would also be supplemented by a Construction Working Group. Impacts on Network Rail infrastructure during construction shall be managed through condition M21.

Pedestrian, cycling and environmental improvements

- 21.41 The development will place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes. In line with the increase in walking and cycle trips generated by the proposed development and general increased pressure on the public realm in the local area, a Pedestrian, Cycling, and Environmental (PCE) contribution of £1,620,000 would be secured by shadow s106 legal agreement. This would go towards:

- segregated cycle lanes and wider Healthy Streets interventions on Malden Road,
- segregated cycle route on Mansfield Road and Kentish Town Road,
- new and improved bus stops/shelters on Malden Road, Prince of Wales Road, Kentish Town Road and Mansfield Road,
- the upgrade of the Grafton Road modal filter and in-flight Healthy School Street scheme to wider Safe & Healthy Streets intervention with potential further traffic restriction measures and Healthy Streets initiatives (cycle hangars, EVCPs etc), in the Holmes Road Area/Kentish Town West area,
- a Green Mobility Hub in the site's vicinity,
- Healthy School Street improvements on Rhyl Street.

Highways works

- 21.42 The financial contribution towards highways works is a standard request applicable to all major developments where construction works might result in damage to public highway. The proposal will also include Weedington Road realignment, a new Central Spine, raised table crossing, and junction layout changes.
- 21.43 A highways contribution is needed to secure repairs to the public highway, if necessary, ahead of the final public realm improvements works within the site being undertaken. Costs for the highway works have been estimated at £806,280 for the whole masterplan development. (including the £100,785.05 for Phase 1 as referenced above). The **Highways contribution would be secured by shadow s106 agreement.**

Conclusion

- 21.44 The proposed detailed and outline schemes, forming an overall masterplan development for the estate, is acceptable and complies with the development

plan in terms of transport implications subject to the conditions and obligations set out.

22. SAFETY AND SECURITY

- 22.1 Camden Local Plan (CLP) policy C5 requires that development incorporate design principles which contribute to community safety and security. London Plan (LP) policy D8 requires public realm to be well-designed, safe, accessible and inclusive. LP policy D6 deals with housing quality and the supporting text explains that gated forms of development that could realistically be provided as a public street are unacceptable, and alternative means of security should be achieved through the principles of good urban design and inclusive design. LP policy D11 requires schemes to work with Designing Out Crime Officers (DOCOs) to design and maintain a safe and secure environment that reduces fear of crime. However, it also deals more generally with safety, security, and resilience to emergency. It says development proposals should maximise resilience and minimise potential physical risks including those resulting from extreme weather, fire, and flood.
- 22.2 The [Women and the Criminal Justice System 2021](#) report, published in November 2022, states that men are more likely to be victims of violent crime, but women are more likely to have a fear of violent crime. Younger people (18-24 years old) are also more likely to be victims of crime. The [Ethnicity Fear of Crime Survey](#) updated in October 2020 notes variation of fear of crime across ethnicities. A smaller proportion of white people report fear of crime, compared with non-white people from other ethnic groups. Asian people have the highest levels of fear of crime. Such discrepancies mean that if the environment is not perceived as a safe public space for **all** users, certain groups are likely to be excluded or suffer greater impact, contrary therefore not only to CLP Policy C5 on safety and security but also to CLP policy C6 which aims to secure access for all.
- 22.3 The chart below shows the breakdown of types of recorded crimes in the last three years for the local ward. More than half of all recorded crimes were anti-social behaviour, violence and sexual offences, or theft from the person.

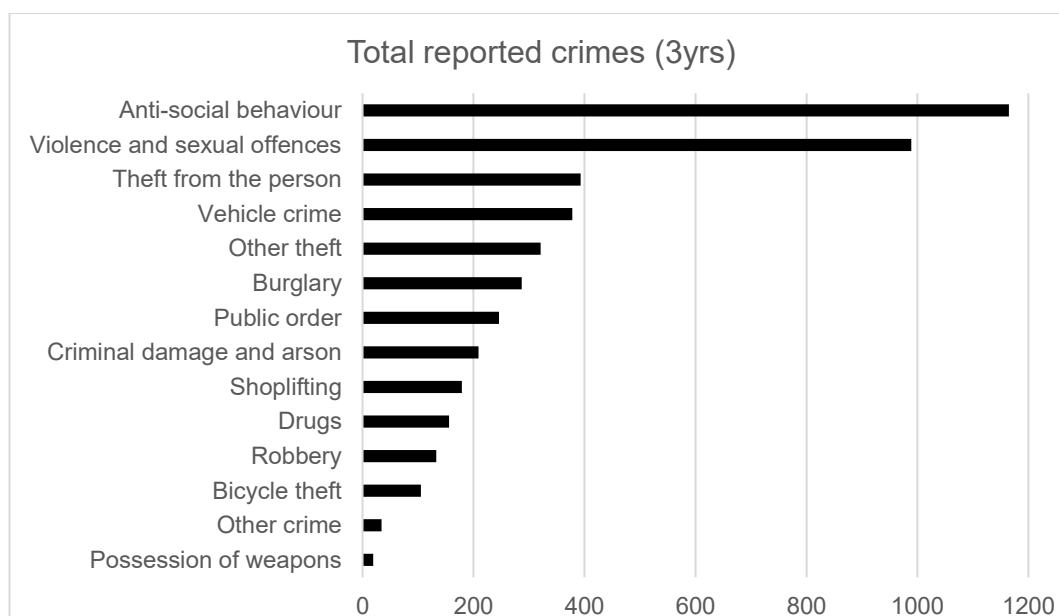


Figure 58 - Types of recorded crime over the last 3 years in Haverstock ward

- 22.4 Many of the crimes in the area tend to be associated with crimes in public spaces and the street. Therefore, preventing these types of crimes, and the perception or fear of such crime, can have a notable impact on the area, residents, and those with protected characteristics.

Crime and security

- 22.5 A Crime Impact Assessment was submitted as part of this application which considered the context of the site, the likely impacts, and measures to address crime and safety. The proposed redevelopment of the estate has been carefully designed to help reduce crime and the fear of crime, in line with Policy C5 (Safety and Security) of the Camden Local Plan (2017) and the supporting Camden Planning Guidance on Design (2021).
- 22.6 The current estate has some areas with poor natural surveillance, such as garage forecourts, separate isolated footpaths, and fenced-off open spaces that feel unsafe and underused. The current layouts mean there are areas with lower levels of natural surveillance.
- 22.7 The design includes multi-use common access routes where there is vehicular movement, pedestrian traffic, and cycle lanes. This enables a good level of vehicle use and footfall boosting the natural surveillance along key routes into the site. There are no separate public footpaths poorly overlooked which could otherwise become flash points for street crime including robbery type offences as well as sexual assault and other violent crime.
- 22.8 Local residents have said during consultation that antisocial behaviour is a problem, and that some areas feel unsafe, particularly in the evenings. Local crime data shows that antisocial behaviour and violent crime are still of concern.

- 22.9 The use of clear sight lines and activated spaces which address streets helps to establish a sense of ownership and safety. Multiple legible routes through the site give confidence to users, especially those groups more fearful of crime, that they can use the space throughout the day and night. This will help create a safer and more inclusive environment.
- 22.10 Other key measures include:
- Clear and well-lit routes that are easy to navigate, helping to remove hidden corners and dead ends.
 - Good natural surveillance from active frontages, balconies and maisonettes facing the street and play spaces.
 - Defined public and private spaces to promote a sense of ownership and community responsibility.
 - Secure cycle storage to prevent theft and misuse.
 - Lighting and landscape design that avoids dark or isolated spaces and supports community safety.
- 22.11 Each plot would also be conditioned to ensure Secured by Design standards are applied (condition M26). The final lighting will also be important within this development and externally should meet the relevant British Standards too. This needs to be carefully balanced against the biodiversity and nature impacts of lighting, and a final lighting strategy will be secured for each plot as it comes forward (conditions D25 and RM34).

Building resilience

- 22.12 The [London Risk Register \(version 14\)](#) identifies several risks with medium to high likelihood and impact. These include crime-related risks such as public disorder, and attacks on transport. The risk from public disorder is more limited on the site with uses proposed across the site, which is overwhelmingly residential, mitigating this risk. The final outline areas may change over time as the scheme is delivered, and so as the detailed proposals come forward under the reserved matters applications, the buildings and spaces will need to be designed to ensure they are resilient to such risks, and this is secured by a range of conditions.
- 22.13 As well as crime-related risks, LP policy D11 and the London risk register identify other risks that should be minimised to ensure a safe and secure environment. These include several environmental risks with medium to high likelihood and impact, most notably; poor air quality, flooding, overheating and severe cold, and fires in high-rise flats.
- 22.14 These issues are dealt with in more detail under the other relevant sections of the report. Overall, the scheme would comply with the relevant policies of the development plan, building in resilience for the detailed phase. Again,

conditions are attached to ensure relevant detailed information would be provided for the outline areas as they come forward.

23. FIRE SAFETY

Policy context

- 23.1 LP policy D12 requires the application to be accompanied by a fire statement, prepared by a suitably qualified third-party assessor. It also says development should achieve the highest standards of fire safety. LP policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. Further draft guidance is provided in the Mayor's [Draft Fire Safety LPG](#).
- 23.2 The current fire safety regulatory framework includes three gateways for "relevant buildings". This A relevant building is a building 18 metres or more in height OR 7 or more storeys tall, containing two or more dwellings or student accommodation. This applies to new buildings as well as changes of use of existing relevant buildings.
- 23.3 Planning Gateway One addresses fire safety considerations for relevant buildings in terms of land use planning, with the Building Safety Regulator (BSR) which is part of the Health and Safety Executive (HSE) acting as the statutory consultee. Gateways Two and Three, introduced by the Building Safety Act 2022, ensure thorough scrutiny of detailed information by the BSR, including building regulations compliance, prior to construction and upon completion.
- 23.4 Whilst the detailed element includes no relevant buildings, the outline elements could include taller buildings which will need to go through the Planning Gateway One. As a result, the applicant submitted both detailed and outline fire statements to address fire safety to meet the requirements of both the London Plan and Planning Gateway One.

Outline (Masterplan)

- 23.5 The nature of the outline elements means that only the plots and parameter plans are shown for approval alongside indicative elements, such as landscaping or massing. Only once detailed reserved matters are submitted for later phases and plots will there be enough information to determine fire-safety at planning stage.
- 23.6 As a result, the HSE confirmed it would not comment in full on the outline application. To ensure any future reserved matters applications deal with fire safety adequately, the HSE has recommended conditions requiring a Fire Statement with each reserved matters application, and a requirement that the HSE is again consulted with each of those submissions.

- 23.7 Conditions are recommended requiring the submission of a satisfactory fire statement with each reserved matters application, for consideration by the LPA and the BSR (condition RM28). This would ensure the HSE (as the current Building Safety Regulator) is a consultee for each detailed reserved matters application.
- 23.8 The GLA has considered the fire safety of the masterplan outline phases taking a more general approach that considers the ability for the policy objectives to be met at each detailed planning stage. After seeking clarifications on author qualifications, building materials, lifts, fire service escape, and second stairs at the Stage 1 consultation, the GLA confirmed they are satisfied with the submitted fire statement for the outline phase. The reserved matters applications and detailed information submitted under conditions D23 & M2 would be assessed for compliance with LP policies D5 and D12, as well as through Gateway 1 for relevant buildings.
- 23.9 The Council's Resident & Building Safety team noted that during construction, there would need to be access for fire and emergency vehicles, and this is particularly important given the age and health profile of the area. For example, Haverstock has an older population than the rest of the borough, and a statistically significant higher prevalence of Long-Term Conditions (LTCs) compared to the rest of the borough², with age and disability being protected characteristics under the Equality Act. This means there may be a greater than usual demand for emergency access including ambulance or fire.
- 23.10 Although not directly raised by the HSE or GLA as an area of concern, given the scheme is a phased development, it is necessary to secure interim arrangements for fire vehicle access to any occupied blocks while development continues until the final access arrangements are in place across the completed scheme. This would help minimise impacts on residents in the area, particularly those with reduced mobility and greater health needs as mentioned above. Condition M2 **Error! Reference source not found.** would ensure the developer provides updated interim arrangements as each phase of the scheme comes forward. This would be reviewed as new plots and areas of the site progress and are completed ensuring a safe environment throughout the construction phases for occupied buildings and spaces on and around the site.

Detailed (Phase 1)

- 23.11 The plot A1 and D1 buildings are designed to incorporate fire safety principles. The façade materials are A1/A2 fire-rated non-combustible materials and both buildings would have sprinkler systems throughout. All homes and floors will form individual compartments with a minimum of 60

²² [Haverstock ward profile – JSNA Hub](#)

minutes fire resistance. Internal wall and ceiling linings will meet recognized fire safety standards, and cavity barriers will be installed to prevent hidden fire and smoke spread. Mechanical smoke ventilation will be provided throughout, incorporating smoke shafts and automatic opening vents to maintain safe conditions during an incident.

- 23.12 The plot A1 building has two stairs, one at each end of the building. Each of the two cores has a single stair and a combined firefighting and evacuation lift. Both cores are connected by the access walkways at second, third, and fourth floor.
- 23.13 The plot D1 building, has one stair. The stair core is central to the building and provided with two lifts - one being a firefighting lift and the other being an evacuation lift.
- 23.14 Internal layouts will allow the stairs to discharge directly outside or via a protected lobby. The evacuation lifts will assist mobility-impaired residents, in line with LP policy D5, ensuring safe evacuation with dignity for all, particularly those which protect characteristics such as the elderly or disabled.
- 23.15 Access for fire service personnel is provided around the whole outside of each building with dry risers located within 90m of hydrants or 18m of pumping appliance parking on the road.
- 23.16 Firefighting access will be provided at ground level for all blocks, with staircases designed for firefighting use and equipped with dry risers. Each block will also include a firefighting lift within a dedicated shaft, compliant with British Standards, ensuring safe and efficient access for emergency services.
- 23.17 Although the buildings on plots A1 and D1 are not relevant buildings (because they are only six-storeys and less than 18m above ground), the HSE confirmed that the site plans provide reasonable permeability for fire appliance access around and within the site. They confirmed they are content with the fire safety design, and it will be for the applicant to demonstrate compliance with building regulations at the Building Control stage.
- 23.18 The measures set out in the fire statements would be secured by condition D23.

Conclusion

- 23.19 The HSE and the GLA have confirmed they are satisfied with the details provided at this stage. The fire safety measures confirmed at this stage in the planning process are acceptable, subject to the additional information sought by conditions RM28 and M2 and provide the framework for detailed

measures which will be subject to later regulatory consideration through the later Gateways. The outline elements will need the same detailed approach, set out in a Fire Statement to be reviewed by the LPA and HSE, which will be submitted with each reserved matters application. As such, the proposal complies with the national fire safety regime and the requirements of the development plan, particularly having regard to London Plan policies D5 and D12.

24. AIR QUALITY

24.1 London Plan Policy SI1 states that masterplans for large-scale development proposals subject to an EIA should consider how local air quality can be improved across the area of the proposal as part of an Air Quality Positive (AQP) approach. At a local level, CLP policy CC4 seeks to ensure that the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the borough. The Council will consider the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. CPG Air Quality 2021 recognises the AQP approach.

24.2 Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

24.3 The application site is not within any Air Quality Focus Area (AQFA) or any particularly sensitive sources of poor air quality such as main roads.

Impacts on local air quality (operational)

24.4 The development proposes all electric heating and hot water. It would be car free with no onsite car parking spaces provided. The proposals are therefore Air Quality Neutral for building and transport emissions.

24.5 Two life safety generators are proposed within phase 1 for emergency use only. Condition M17 is recommended for all phases to ensure that alternatives to diesel are considered, and to ensure the generators are appropriately sized, located and maintained to minimise air quality impacts.

Impacts on occupants

24.6 The proposed development would be constructed over several phases and a detailed assessment has been provided for the first phase only. Air quality is expected to improve at the site through measures that reduce private vehicle use such as car free development, travel plans and improvements to the local pedestrian and cycle environment. Air quality changes over time and so an updated Air Quality Assessment (AQA) and Air Quality Positive

Statements will be needed for each reserved matters application, which will include measures specific to each phase, taking into account up to date Air Quality data. These statements will be secured by condition M18.

- 24.7 For phase 1, considering the current air pollution for the site and air quality standards, the proposed residential use is appropriate. Both Block A1 and D1 are set back from local roads, the scheme is car free development supported by travel plans, and uses all electric heating, which maximise the air quality of the scheme. This is considered adequate for this phase of the development.
- 24.8 No mitigation is required but the best practice design standards as set out in the Air Quality Positive Statement are welcomed to help reduce occupant exposure to air pollution.
- 24.9 Some dwellings are reliant on mechanical ventilation with intakes located in the building facades – this is the case for flats in D1 near the railway line. In terms of air quality, the key concern is to ensure that the location of the air inlets does not expose the occupants to poor air quality. Condition M13 is attached to ensure details of mechanical ventilation and air inlet locations are acceptable.

Demolition and construction impact

- 24.10 The overall dust risk during construction and demolition for phase 1 is considered 'Medium' without mitigation. The construction impact on local air quality is also an important issue raised by many residents in their consultation responses, particularly as it tends to have disproportionate impacts on the young, the elderly, and those with long term respiratory conditions. Appropriate mitigation is recommended which would be secured through the Construction Management Plan (i.e. through **shadow s106 legal agreement**). Each of the locations for phase 1 (A1 and D1) should have at real time air quality monitors which would be approved by the local authority and in place at least 3 months prior to commencement (to check baseline conditions) and remain in place throughout the construction and demolition process. Condition M19 is attached to ensure real time dust monitoring is undertaken. With appropriate mitigation in place the residual effect will be negligible and therefore considered 'Not Significant' for the detailed phase 1.
- 24.11 Specific methodology for the management of construction dust for later phases is not yet known and will be considered through all future reserved matters submissions for later phases. This can also be secured through the construction management **plan** obligations secured through the shadow s106 agreement.

25. WASTE AND RECYCLING

Construction Waste

- 25.1 The London Plan Policy SI7 sets a target of 95 per cent for recycling/ reuse of construction, excavation and demolition waste. A condition is attached (condition M27) requiring this occurs for all phases.
- 25.2 The applicant will specifically prioritise targeting those materials with the highest levels of embodied carbon and the monitoring, reduction, and recycling of construction waste will be included as part of a waste management strategy as a component of the Construction Management Plans being secured. Further information on construction waste and circular economy is set out in the 'Sustainability and Energy' section. The minimisation of construction waste will comply with CLP policy CC1, LP policy SI 7, and other relevant guidance.

Domestic and commercial waste and recycling

Detailed Element

- 25.3 One main communal bin store is provided for Block A1, with a satellite store also provided to store an extra bin. A communal store would also be provided for Block D1. The commercial unit would have its own bin store.
- 25.4 Collections would be from adjacent local streets Queen's Crescent and Athlone Street. Bulky waste storage areas of at least 10sqm have been accommodated within the buildings, conveniently located adjacent to the residential bin stores. Nonetheless, residents will be encouraged to take bulky waste items to the nearest Reuse and Recycling Centre for disposal.
- 25.5 The Council's Waste Management team has raised no objections to the bin collection proposals. The final details for domestic and commercial waste collection would be secured by the **Delivery and Servicing Plan (DSP) secured by shadow s106 agreement**.
- 25.6 Deliveries would take place via the proposed loading bays and double yellow line sections. It is anticipated that the majority of deliveries would be undertaken via smaller vehicles including bicycles, cargo bikes / powered two-wheelers, which do not require much space.

Outline Element

- 25.7 For the later phases of the outline scheme, communal refuse stores would be located at ground floor level within 10m of collection points. For maisonettes with direct ground floor access, individual bins would be provided, and residents would be responsible for moving these to the street on collection days. Similarly to the detailed phases, deliveries would take place via the proposed loading bays and double yellow line sections via mainly smaller vehicles including bicycles, cargo bikes / powered two-

wheelers, which do not require much space. The outline proposals include space for separate collections from each block for the three waste streams (recycling, residual and food waste), with each block also containing storage areas for bulky and ancillary wastes. The Council's Waste Management Officer has raised no objections to this approach.

25.8 Details for domestic and commercial waste collection for the outline elements would be secured by the **Delivery and Servicing Management Plan (DSMP) secured by shadow s106 agreement**. This would be treated as a live document so it could be updated throughout the delivery period.

25.9 The proposals for waste and recycling storage are acceptable and in accordance with policy CC5.

26. BASEMENT CONSIDERATIONS

26.1 Policy A5 of the Local Plan notes that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) neighbouring properties;
- b) the structural, ground, or water conditions of the area;
- c) the character and amenity of the area;
- d) the architectural character of the building; and
- e) the significance of heritage assets.

26.2 The policy requires an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment (BIA) and, where appropriate, a Basement Construction Plan (BCP).

26.3 Basements are proposed as part of the detailed and outline planning applications. The submitted BIA covers both the detailed and outline proposal; however, further updated technical information would be expected to come forward as part of future reserved matters for the outline element of the proposed development.

Detailed Element

26.4 With regards to the detailed planning permission Block D1 would include a basement within its footprint which would accommodate cycle parking and water storage. This is shown in the image below. Block A1 does not include a basement.

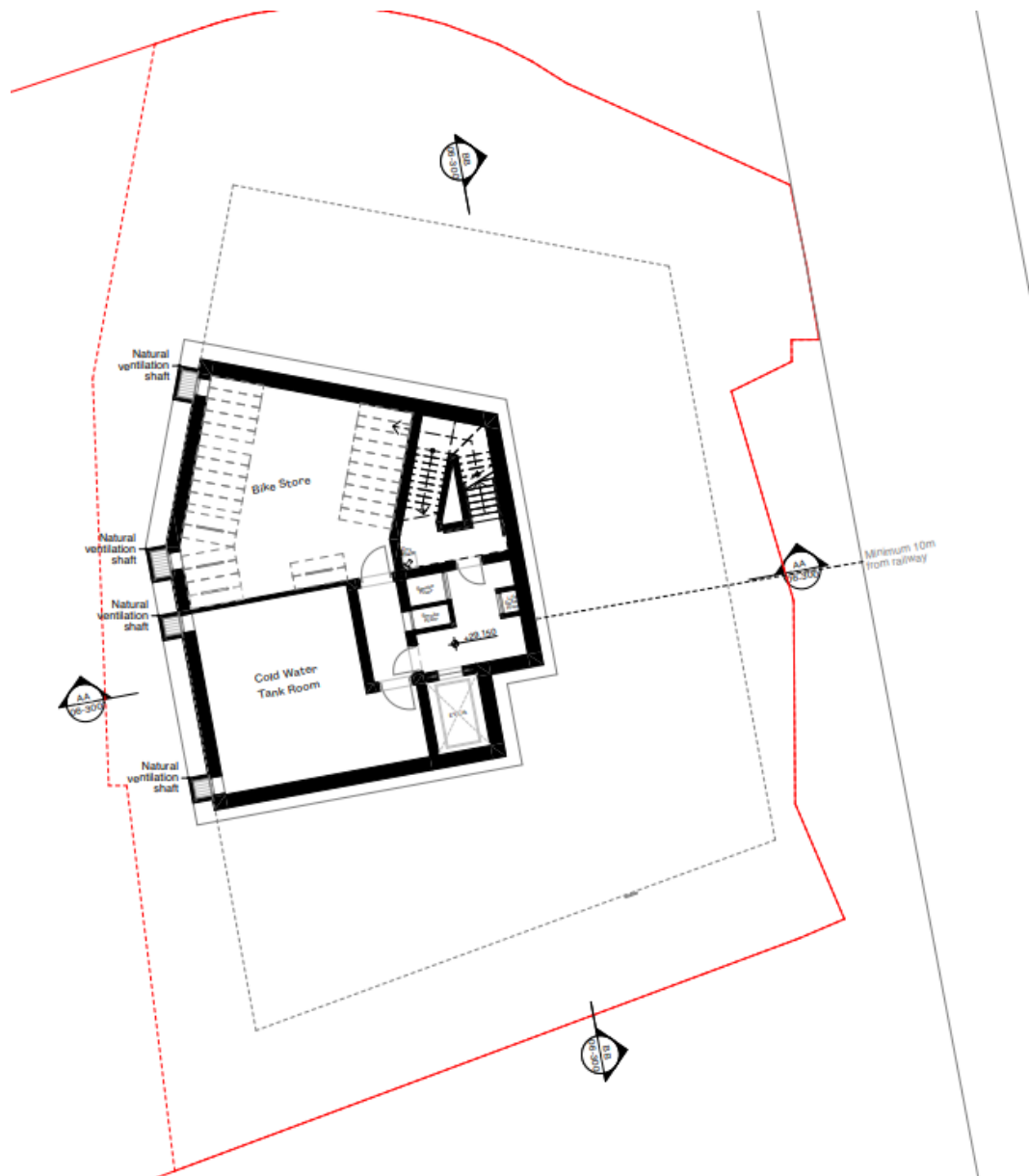


Figure 59 - Extent of basement for Block D1

- 26.5 The Basement Impact Assessment for the Block D1 basement was submitted with the application and has been reviewed by Campbell Reith. A revised BIA was provided following their recommendations. After reviewing this revised BIA report, Campbell Reith have concluded that it meets the requirements of CPG Basements (2021).
- 26.6 The following conclusions were reached in the revised audit report:
- The basement (for Block D1) is single level and would be formed using contiguous piled walls.
 - Ground conditions are made ground over London Clay Formation, which is a non-aquifer. No significant groundwater has been encountered.
 - Geotechnical parameters to inform the retaining wall design have been provided and are accepted. Additional structure information about the

piled walls construction and pile lengths has been submitted and is accepted.

- The extent of impermeable areas would remain unchanged, and the site has a low risk of flooding from all sources.
- There should not be any impacts to hydrological or hydrogeological environments.
- The site is close to Network Rail and Thames Water assets and discussions with those asset owners is ongoing.
- There is tree removal proposed within the footprint of Block D1. Associated shrink-swell risks would be minimal because soil from the root zones would be removed during excavation.
- A ground movement assessment has been undertaken for the basement construction and predicts a maximum damage of Burland Category 1 (very slight) to neighbouring buildings and/or infrastructure.

26.7 The revised BIA audit recommends a movement monitoring strategy and a condition survey for the neighbouring structures prior to commencement, and during the undertaking, of basement works to ensure nearby properties are protected. These can be secured by condition D26 which will ensure the recommendations of the BIA audit are followed).

26.8 Details of the appointed engineer to oversee the basement works will need to be approved by the Council to ensure the engineer has suitable qualifications (condition M16).

Outline elements

26.9 For the outline element Blocks B1, C2, D2, D3, E2 and G1 would all have basement areas of up to 4 metres in depth. The basements are all located underneath areas identified as residential in the parameter plans and as such, they are all expected to be used for ancillary residential space to service the residential accommodation, such as for water tanks, plant rooms and cycle parking. As the outline proposals are developed, additional BIA documents will be submitted for audit the relevant reserved matters applications. This can also be secured by condition RM17. The submitted information would need to demonstrate compliance with policy A5 of the Local Plan or any appropriate replacement policy.



Figure 60 - Basement areas within the outline phase

26.10 Updated and detailed technical information for the outline element will come forward with future reserved matters applications as discussed above. With these conditions and controls in place, officers are satisfied that the submission meets the requirements of Policy A5.

27. CONTAMINATED LAND

27.1 Policy A1 of the Camden Local Plan requires consideration of land contamination in development proposals to protect residents' amenity. Assessing and remediating contaminated sites helps prevent health risks from exposure and environmental harm, both during and after construction activities.

27.2 A Phase 1 Geotechnical and Geo-Environmental Desk Study has been prepared by Land Science and is submitted with this application. The site has a moderate risk of contamination primarily due to the depth and composition of made ground beneath the site which has the potential to produce ground gases and vapours.

27.3 Potentially contaminative land uses identified in the vicinity of the site include a printers, dry cleaners, printing engineering services, footwear manufacturers, French polishing, clothing and fabrics manufacturers, car

customisation and car dealers, unspecified works and vehicle repair, testing and servicing. Various works and depots were noted in the industrial area to the east of the site through mapping, with land uses including a colour works, electrical substation, engineering works, shoe factory, optical works, glass works, metal works, builders yard, depots (including coal and scrap metal), asphalt works, vehicle works and an engineering workshop.

- 27.4 The site is considered to pose a Low-High risk to end users, with the highest risk to end users anticipated from potentially contaminated soils. In addition, a moderate risk from ground gases was identified. Adjacent land users were anticipated to be at a low-moderate risk, with soft landscaped areas at a low-high risk (high for phytotoxic effects). Asbestos may exist within buildings on site, and the submitted report recommends an appropriate survey should be undertaken to assess the presence of asbestos within the building fabric.
- 27.5 The site is formed of London Clay and borehole records indicate there is no groundwater infrastructure within 17 metre depth and 50 metre width of the site. Further surveys are required to investigate site contamination and groundwater infrastructure and to ensure there are appropriately managed.
- 27.6 Plots A1 and D1 include residential and commercial uses and landscaped areas. As such, there could be potential unacceptable risks to end users from land contamination. The Council's Contaminated Land Officer recommends a condition is applied to secure an updated desk study (with a walkover completed, that was still pending at the time of submission) for all phases of the development (condition M25).
- 27.7 Given the historic development on site, and extensive historic land uses in proximity to the site, a site investigation (including for gas monitoring) is also required to confirm the risks identified in the desk study report.
- 27.8 Given the above, the proposal is acceptable and in compliance with the development plan in terms of contaminated land, subject to condition M25 requiring an updated desk study, written programme of ground investigation and remediation measures.

28. SUSTAINABILITY AND ENERGY

- 28.1 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.
- 28.2 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.

Redevelopment strategy

- 28.3 CLP policy CC1 and LP policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building, and to optimise resource efficiency.
- 28.4 The redevelopment strategy involves complete demolition of the existing buildings, having explored options of retrofit and retention.
- 28.5 In line with Energy Efficiency and Adaption CPG, a detailed Pre-Demolition Audit and Sustainability & Energy Statement were prepared. These assess the condition of the existing buildings and evaluates the following options:
- Option 1 - Refurbishment
 - Option 2A - Substantial Refurbishment and extension
 - Option 2B - Substantial refurbishment and extension including partial demolition and partial redevelopment
 - Option 3 - Full redevelopment
- 28.6 Option 1: Refurbishment found that while some elements of the existing buildings are in reasonable condition, many parts of the estate are outdated and do not meet modern standards for energy efficiency, accessibility, or resident well-being. The buildings have poor insulation, inefficient heating systems, and layouts that do not support current needs. The design life of the existing structures and their services have now expired. The repairs to the existing concrete elements are possible but would be likely to only extend the overall life of the buildings by 25 years.
- 28.7 Simple refurbishment would not address these fundamental issues, and the buildings would continue to fall short of modern requirements for comfort, safety, and sustainability. Of further relevance is the panellised nature of the building structures and their age. As such, there is also an inherent risk that the existing structure is not robust and may require additional strengthening as the structural integrity of the buildings is not yet known.
- 28.8 Furthermore, refurbishment would not deal with the fundamental issues around overcrowding, internal layouts, the estate layout, or address additional housing need.
- 28.9 Option 2A: Substantial Refurbishment and Extension considered making major improvements to the existing buildings. These included adding new insulation, updating heating systems, and extending the buildings to provide more space.

- 28.10 However, the audit showed that even with significant investment, the buildings would still be limited by their original design and structure. Many of the problems, such as poor layouts, lack of accessibility, and limited potential for energy efficiency, would remain. Extensions could allow reconfiguration of some flats to help address space issues, but this would then seriously limit the number of new homes and control over the mix. Also, the cost and disruption of such extensive works would be high, and the outcome would still not deliver the quality of homes needed for the future.
- 28.11 Option 2B: Substantial Refurbishment and Extension with Partial Demolition looked at more radical interventions. This option involved a mix of refurbishing some buildings, extending others, and demolishing the worst blocks to replace them with new homes. Even though there are some structural concerns given the panellised nature of the existing building construction, it may be technically possible to retain and improve at least some of existing buildings through strengthening and remediation, although as per Option 2A above, the cost and disruption of doing so would be high given the lower benefits than currently proposed in terms of increased numbers of better quality homes.
- 28.12 It is also important to note that the refurbishment options referenced above have negative impacts on other planning areas, including requiring increased numbers of double decants (up to 39 off-site homes would be required to enable this for Option 2B) including for many family units.
- 28.13 While this approach could improve some parts of the estate and allow delivery of some additional homes, it would create a patchwork of old and new buildings, making it difficult to achieve consistent standards across the estate. Partial demolition would also limit the ability to redesign the estate layout to improve open spaces, accessibility, safety, and transport links. It would also make it harder to deliver the highest standards of energy efficiency and sustainability across all homes. Partial refurbishment schemes would also not achieve the aspirations of the residents on the Estate, most of whom voted for the comprehensive redevelopment of the Estate and the associated benefits that would bring.
- 28.14 Option 3: Full Redevelopment looked at complete demolition and new build. This option involves demolishing all existing buildings and constructing new homes in their place. The studies found that this approach offers the greatest benefits for residents and the wider community. New buildings can be designed to meet modern standards for energy efficiency, accessibility, and safety. The new layout will provide better open spaces, improved community facilities, and more homes for local people. The redevelopment will also allow for the use of modern construction methods and materials, supporting Camden's goals for sustainability and reducing carbon emissions. The audit confirmed that materials from the demolished buildings can be largely

recycled or reused, minimising waste to landfill and supporting circular economy principles.

- 28.15 The studies concluded that full redevelopment (Option 3) is the best way to deliver high-quality, sustainable homes that meet the needs of current and future residents. This option will provide the greatest improvements in living conditions, energy efficiency, and placemaking, while still supporting Camden's climate and sustainability goals. Retrofit, refurbishment, and extension options are technically possible (subject to some potential structural constraints), but they are not feasible for achieving the same objectives as the current application.
- 28.16 Consultation responses point to a study by AAB architects which also considered a refurb and extend option, a variation on Option 2A, and suggest this as a reasonable alternative. However, this demonstrates some of the significant limitations of the approach, only achieving an uplift of around 40 homes from the current estate and delivering around 500 fewer homes than the application proposal. The below image shows the concept in the study applied to some of the blocks.



Figure 61 - Example of retrofit and infill from AAB study

- 28.17 Considering the various options and the broader objectives of the development plan, the principle of demolition is acceptable. Findings in the pre-redevelopment audit indicate that only limited improvements are available to the existing buildings on the site. The design life of the existing structures and their services have now expired. Repairs to existing concrete elements are possible but would be likely to only extend the overall life of the buildings by 25 years. Further extension would seriously inhibit the opportunity to address the other issues with the estate.
- 28.18 Alternative options would not effectively meet the Council's broader housing needs or optimise site capacity. While refurbishment would lower embodied carbon compared to full demolition, it would not adequately resolve overcrowding, housing size, or layout issues as effectively. The chosen development approach aims to maximise homes and improve estate quality

in line with the Local Plan and London Plan. Given its greater benefits over retaining existing buildings, substantial demolition is deemed the most suitable option.

- 28.19 A Circular Economy Statement in line with the London Plan guidance has been provided alongside a completed Circular Economy template. The development aims to go beyond the standard practice through maximising material recovery and high-quality recycling. As identified in the Pre-demolition Audit, over 95% of the demolition arising will be diverted from landfill. The design team will continue to evaluate the feasibility of reusing materials on site. The materials with potential for secondary use (crushed concrete to be used as sub-base aggregate, steel sent for re-melting) will be prioritised and tracked to ensure responsible end-of life management. The likely destination of all waste streams will be provided via condition D16 and a post-completion report will also be secured via condition D17 for Phase 1 prior to first occupation of that phase.
- 28.20 To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use (condition M27).

Whole Life Carbon

- 28.21 If demolition is justified, then the development plan policies require consideration is given to Whole Life Carbon (WLC) through an assessment shows any replacement building has considered the carbon impact of the new construction.
- 28.22 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life.
- 28.23 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).
- 28.24 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are "regulated emissions" and so are considered separately and in detail in relation to the zero-carbon target (see the "Energy and carbon reductions" section below).
- 28.25 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).

- 28.26 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square meter of gross internal area in kilograms of carbon equivalent (kgCO₂e/m² GIA). These minimums are not policy requirements, but a target to demonstrate consideration has been given to WLC. The assessment guidance also encourages development to aim for more ambitious aspirational benchmarks. The table below shows how the development performs against the guideline benchmarks, as well as the aspirational targets.
- 28.27 The Whole Life Carbon assessment reports the same kilogram of CO₂ equivalent per sqm for both the Masterplan and the Phase 1 results. However, it is noted that the total tonnes of CO₂ for the Masterplan area is 99,102 tonnes and for phase 1 is 8,015 tonnes. The assessment for the masterplan had been calculated from the results from Phase 1 and therefore is only indicative at this stage of the development process.

Modules	Min benchmark RESIDENTIAL (kgCO ₂ e/m ² GIA)	Aspirational Benchmark for RESIDENTIAL (kgCO ₂ e/m ² GIA)	Proposal (kgCO ₂ e/m ² GIA)
A1-A5	<850	<500	806
B-C (excl B6 & B7)	<350	<300	401
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1191

Table 25 - Summary of Whole-Life Carbon results for Masterplan area assessed against residential development benchmarks

- 28.28 It is also noted that these do not include pre-construction demolition related carbon emissions which are calculated for Phase 1 at 30,205kgCO₂e based on 35kgCO₂e/m² for demolished area (863m² existing on site). Assuming the calculations are scaled up in line with this guideline then demolition emissions are expected to be 373,459kgCO₂e for the masterplan area.
- 28.29 In this case, the development meets the benchmarks for modules A1-A5 and overall targets for modules A-C including sequestration but does not reach the aspirational benchmarks as shown above. For modules B-C the benchmark is not met, but the total for A-C is met overall. There is potential for optimisation to reduce the carbon impact of modules A1-A5 to 667kgCO₂e through inclusion of greater amounts of GGBS and Celsa Rebar in the construction which if achieved would reduce the overall carbon impact to 1,036kgCO₂m³ which would be welcomed. A condition is recommended

to secure feasible reductions in the WLC of the development to as close to the benchmarks as possible for phase 1 (condition D14).

28.30 Condition D15 is also attached to make sure a post-construction assessment of WLC is completed for phase 1 and provided for monitoring and compliance.

28.31 Each subsequent RMA or planning application for the outline plots will still require their own WLC assessment (condition RM35) and so there will be the ongoing opportunity to review construction methods and equipment to further reduce embodied carbon, with further thereafter conditions secured at each RMA stage as appropriate.

Energy and carbon reductions

Energy and carbon summary

28.32 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

28.33 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

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

28.35 The site-wide total reductions for Phase 1 (detailed) meet the 35% target:

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	7.1%
Be green stage (renewables): CLP policy CC1	20%	73%
Total carbon reduction: LP policy SI2 and LP CC1	35%	75%

*Table 26 - **Phase 1 (Detailed) Site-wide** – Detailed Carbon saving targets*

28.36 The following tables give Phase 1 (detailed) breakdowns for residential and non-residential:

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	7.2%
Be green stage (renewables): CLP policy CC1	20%	73.6%
Total carbon reduction: LP policy SI2 and LP CC1	35/50%	75.5%

Table 27 - Phase 1 (Detailed) Residential – Detailed Carbon saving targets

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	2.6%
Be green stage (renewables): CLP policy CC1	20%	6.3%
Total carbon reduction: LP policy SI2 and LP CC1	35%	8.8%

Table 28 - Phase 1 (Detailed) Non-Residential – Detailed Carbon saving targets

- 28.37 The site-wide total reductions for the whole masterplan (Phase 1-8) meet the 35% target:

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10/15%	7%
Be green stage (renewables): CLP policy CC1	20%	73.5%
Total carbon reduction: LP policy SI2 and LP CC1	35%	75.4%

Table 29 - Masterplan Total – Phases 1-8 with site wide heat network - Carbon saving targets

- 28.38 The following tables give the whole masterplan (Phase 1-8) breakdowns for residential and non-residential:

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	7%
Be green stage (renewables): CLP policy CC1	20%	73.6%
Total carbon reduction: LP policy SI2 and LP CC1	35/50%	75.4%

Table 30 - Masterplan Residential – Phases 1-8 with site wide heat network - Carbon saving targets

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	20.8%
Be green stage (renewables): CLP policy CC1	20%	22.4%
Total carbon reduction: LP policy SI2 and LP CC1	35%	38.6%

Table 31 - Masterplan Non- residential – Phases 1-8 with site wide heat network - Carbon saving targets

- 28.39 The operational carbon savings and measures as discussed below will be secured under an **Energy and Sustainability Strategy secured by shadow s106 agreement** which includes monitoring, in compliance with the development plan.

Total carbon reductions

- 28.40 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.
- 28.41 This is charged at £95/tonne CO₂/yr (over a 30-year period) which for the detailed Phase 1 is 13.6 tonnes x £95 x 30 years = £38,686. This amount will be spent on delivery of carbon reduction measures in the borough. For the whole development phases 1-8 this would be expected to be 229.6 tonnes = £654,351 when the heat network is site wide. Updated calculations will be made and appropriate offset contributions secured on a phase-by-phase basis.
- 28.42 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHPs) for non-residential developments.
- 28.43 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.
- 28.44 In this case, the detailed development (Phase 1) performs very well and significantly improves on the policy target of 35% reductions, achieving an overall on-site reduction of 75% below Part L requirements as shown in Table

26 above. The residential part also exceeds the 50% aspirational target with a 75.5% reduction. The non-residential areas taken in isolation do not achieve the target with only 8.8%, but the non-residential targets are more challenging, as explained above and, the non-residential in this case only represents around 1% of the operational carbon emissions so the key consideration is the residential carbon. This is reflected in the overall excellent performance for Phase 1. The **carbon offset of £38,686 will be secured by shadow Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

- 28.45 The outline development proposals also perform very well and, with a site wide heat network, aim to significantly exceed the policy target of 35% reductions, achieving an overall on-site reduction of 75.4% below Part L requirements. The residential part of the outline scheme also exceeds the 50% aspirational target with a 75.4% reduction. The non-residential areas achieve the target with 38.6%. For the outline areas an energy assessment (in the form of an environmental sustainability plan) will need to be submitted with each reserved matters application secured through condition RM9 and details would need to comply with the energy standards and planning policies in place, including any offset or equivalent payments for future phases, at the time that the reserved matters applications come forward. Offsets would be secured by **shadow s106 legal agreement**.

Be lean stage (reduce energy demand)

- 28.46 London Plan policy SI 2 sets a policy target for reductions of at least a 10% for residential and 15% for non-residential through reduced energy demand at the first stage of the energy hierarchy.
- 28.47 The detailed development (phase 1) does not meet the policy target of 10% (residential) and 15% (non-resi), reducing emissions by 7.2% for residential areas and 2.6% for the non-residential areas at this stage through energy efficient design. This lack of compliance is primarily due to the siting of Block D1 by a railway line which requires closed windows and therefore active cooling. The proposals have considered the design of the façades to maximise passive solar gains in wintertime, whilst minimising excessive sunlight penetration in summertime. The design includes energy efficiency measures including good levels of insulation, good levels of low air permeability (3m3/h/m3), LED lighting with sensors, energy efficient lifts, mechanical ventilation heat recovery (MVHR) but also active cooling which would impact on the efficiency. Wastewater heat recovery is not included in this proposal.
- 28.48 The outline development does not meet the policy target of 10% (residential) but does for the 15% (non-resi), reducing emissions by 7% for residential areas and 20.6% for the non-residential areas for the whole masterplan site through energy efficient design. The calculations for the outline plots are

based on the detailed element and there is not expected to be a need for active cooling with all later phases. As such, it is expected that there would be an opportunity to further improve the performance at this stage of the outline phases through the subsequent detailed designs as each plot comes forward.

Be clean stage (decentralised energy supply)

- 28.49 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.
- 28.50 An assessment of the existing London Heat Map has been made and the only existing district heating network (DHN) identified close to the project site is Gospel Oak heat network fed by the Royal Free Hospital energy centre. No other existing or future DHNs have been identified in proximity to the project site. Confirmation was received that connection was not viable and further a Heat Network Feasibility Study concluded that there is no significant benefit in connecting the proposed masterplan development to the existing Gospel Oak district heating network or any other planned future networks. As such, the proposed development would instead provide its own site-wide heating network for the masterplan development.
- 28.51 At Phase 4 of the development a critical mass will be achieved, and pipework will be installed to connect all the buildings together via a single heat network. Each building will have their own energy centre. At Phase 6 the full heating load will be achieved, and therefore no further energy centres are required for phases 7 and 8. These heat network proposals are a site-wide communal heat network but are not considered to be a district heat network from the perspective of policy, and therefore the relevant carbon reductions are counted under Be Green (renewable energy) and not Be Clean (decentralised supply).
- 28.52 In addition to the above, the masterplan proposals also include future proofing to connect to a district heating network in the future if one becomes available, which includes an allowance of space and capped-off pipe connections within the energy centres. Future proofing will be **secured by shadow s106 agreement**.
- 28.53 Therefore, although the proposals do not include any carbon reductions at Be Clean, because the proposals assess the feasibility of connection and allow for future connection the site wide network reductions can instead be included under Be Green (see below). Therefore, in this case, it is considered

that the Be Clean policy requirements of CC1 and London Plan SI 3 have been met.

Be green stage (renewables)

- 28.54 CLP policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 28.55 The detailed development (phase 1) site-wide significantly exceeds the policy target of 20%, reducing emissions by 75% through renewables. Again, the minimal commercial floorspace taken in isolation does not meet the policy target of 20% with a reduction of only 6.3%, but the high performance of the residential elements means that Phase 1 meets the target overall.
- 28.56 The outline development with site wide heat network meets the 20% policy target for both the non-residential and residential areas and significantly exceeds the policy target of 20%, reducing emissions by 73.5% for the whole masterplan site through renewables, in compliance with the development plan.
- 28.57 The proposal includes PV panels which generate 46.6kWp (31.8kWp for A1 and 14.8 for D1) for the detailed phase 1 and a total of 483kWp for the whole masterplan area. The proposals also include low carbon heating through air source heat pumps (ASHPs). Active cooling is provided through MVHR not ASHPs and therefore a condition will be included to ensure that the ASHPs in phase 1 are not used for cooling (condition D27).
- 28.58 Condition M28 would be secured to ensure that before each phase detailed drawings of the solar PV extent and details of generation are provided, and the approved details are then installed and maintained. For phase 1 the currently proposed extent and capacity of Solar PV should be installed and maintained, and this will be secured through condition D19. Analysis of renewable energy generation options for each of the outline plots will be secured through each reserved matters application via condition RM33.

Be seen (energy monitoring)

- 28.59 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 completed predicted energy consumption in the Be Seen spreadsheet. The proposal includes CIBSE TM39-compliant metering systems, ensuring at least 90% of estimated annual electricity in landlord areas is tracked by end-use. This system will also monitor most energy supplied to tenanted areas. Reporting will be prior to occupation and for the first 5 years after occupation.

- 28.60 The **Energy and Sustainability Strategy secured by shadow Section 106 legal agreement** will also secure reporting to the GLA in line with their published guidance.

Climate change adaption and sustainable design

- 28.61 Local Plan policy CC2 expects non-residential development over 500sqm to meet BREEAM Excellent. The non-residential areas do not meet this threshold and therefore in this case BREEAM is not required. Where any larger non-residential areas come forward in the outline elements of the scheme, these will be assessed under relevant RMAs.
- 28.62 The new construction will also consider circular economy principles supporting a sustainable construction. The proposed development substructure has been designed to last for 120 years. Slab to slab height has been considered for flexibility of future uses. At least 20% by value for the new building should be reused or recycled content, with phase 1 calculating it will achieve 22%. For the outline application, it is assumed that the buildings will be able to achieve the same recycled content target as the Phase 1 buildings.
- 28.63 Natural ventilation with openable windows is feasible for all blocks. However, due to the proximity of the railway line, and other security and noise constraints, the north-east facing dwellings in Block A1 and east facing dwellings in Block D1 in Phase 1 cannot rely on natural ventilation.
- 28.64 New residential developments should avoid overheating without relying on active cooling. If security, air quality, or noise prevent window opening, applicants must show all passive design options have been considered and maximized, with façades optimized despite site constraints. Proposed measures include a g-value of 0.4, balcony shading, light-absorbing materials, green roofs, high insulation, and airtightness. An effective balance of daylighting and solar gain in Blocks A1 and D1 also help control overheating.
- 28.65 In this case the modelling indicates that, if natural ventilation was not constrained then, proposed development would not overheat. When assuming all windows closed (due to noise) the units would overheat and mechanical ventilation alone is not sufficient to mitigate the overheating risk.
- 28.66 When assuming the adoption of a hybrid cooling system in the affected dwellings in Block D1 and A1, which would provide tempered air via MVHR, the dwellings show compliance with Part O. Air tempering is generally more efficient than air conditioning but does still use additional energy and is therefore considered to be active cooling. In this case its use is justified for those units which have acoustic constraints. Further information is required to confirm the exact number of units that will require this, and the expected cooling load associated with it. Further details of MVHR requirements will be

secured as part of energy statements submitted with later phase reserved matters applications (condition RM9). This shall be secured through condition M13 for all relevant phases.

- 28.67 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.
- 28.68 The masterplan development incorporates sustainable urban drainage systems including rainwater butts, blue roofs, green roofs, rain gardens, permeable paving, and attenuation tanks.
- 28.69 The plans for the biodiverse green/blue roofs are at illustrative stage only. Further details are required on the extent of green/blue roofs for phase 1 and these will be secured prior to commencement by condition D10. Details demonstrating how green/blue roofs will be maximised throughout the outline phases will also be secured at reserved matters stage by condition RM29. The provision of green and blue roofs integrated with the solar panels, would enhance the biodiversity of the site and reduce water runoff.
- 28.70 Condition M24 will secure water efficiency measures for the whole masterplan, 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 further in the 'Flood risk and drainage' section of this report.

Conclusion

- 28.71 The proposed redevelopment demonstrates a comprehensive and robust approach to sustainability and energy, aligning with both Camden and London Plan policies. The preferred option of full redevelopment achieves significant carbon reductions and maximises resource efficiency, with clear commitments to circular economy principles and climate change adaptation. While refurbishment and extension options were explored, only complete redevelopment fully addresses the estate's longstanding deficiencies. Whilst embodied carbon will be higher than retrofit options, and not meet some benchmarks, the scheme exceeds other key policy targets, incorporates future-proofed energy infrastructure, and secures measures to mitigate flood risk and overheating. Overall, and on balance, the development complies with the development plan in terms of energy and sustainability and will contribute meaningfully to a net zero future in line with the NPPF. Through conditions and planning obligations the energy requirements, carbon demand and resource requirements of the scheme will be minimised at all stages of the development process and for all phases, with later phases being required to meet any relevant updated policies, guidance and legislation published at the time.

29. FLOOD RISK AND DRAINAGE

- 29.1 CLP policy CC3 requires developments to avoid increasing flood risk and, where possible, reduce it. This includes assessing impacts in flood-prone areas, incorporating flood resilience measures, and using Sustainable Drainage Systems to achieve greenfield runoff rates.
- 29.2 LP Policy SI 13 highlights London's vulnerability to surface water flooding, calling for developments to manage runoff near its source and prioritise green infrastructure according to the drainage hierarchy. LP policy GG6 emphasises designing developments to improve efficiency and resilience, considering climate change and flood risks.
- 29.3 There are 3 flood zones for flooding by rivers and the sea as defined by the Environment Agency; Flood Zones 1, 2 and 3. The site is in Flood Zone 1, like all Camden sites, and so is low risk from flooding from rivers and sea. The site has some areas of medium or high surface water risk, is in the Counters Creek catchment area, and adjacent to Maitland Park Local Flood Risk Zone.
- 29.4 The masterplan development is therefore considered to be at low risk of flooding from fluvial, groundwater, and sewer flooding, but has potential for surface water flooding. The detailed elements (Plots A1 and D1) are low risk of surface water flooding under current modelling. However, some of the later outline phases include medium and high-risk areas of surface water flood risk with current modelling and this risk increases by 2040-60 accounting for climate change predictions. Policy CC3 states that vulnerable development should not be located in flood prone areas.
- 29.5 A Flood Risk Assessment and a Drainage Strategy have been submitted as part of this application. The masterplan development incorporates SuDS to manage the water environment, including rainwater butts, blue roofs, green roofs, rain gardens, permeable paving, and attenuation tanks.
- 29.6 A runoff rate of 26.5l/s is proposed for the whole site which meets the greenfield runoff rate for 1 in 30 year storm event and is half of the runoff expected from a greenfield for a 1 in 100 year storm event. It is also a significant reduction on the 674l/s for the whole of the existing site for a 1 in 100 year storm event. This means there is likely to be a notable improvement over the current site.
- 29.7 For Plot A1 the proposals include 7.3m³ of blue roof, 120m² of pervious pavements and 84m³ of attenuation tanks with a runoff reduction to 1.5l/s which meets the greenfield runoff rate for 1 in 30 year storm event and is half of the runoff expected from a greenfield for a 1 in 100 year storm event. It is a significant reduction on the 60l/s from the existing site.

- 29.8 For Plot D1 the proposals include 13.2m³ of blue roof, 160m² of green roof and 32m³ of attenuation tanks with a runoff reduction to 1.5l/s which meets the greenfield runoff rate for a 1 in 100 year storm event and a significant reduction on the 25.5l/s from the existing site. A flow rate of 1.5l/s is acceptable to enable self-cleaning of the proposed hydro-brake.
- 29.9 Therefore, it is considered that plot D1 is acceptable in terms of its management of surface water, whilst further analysis for plot A1 and the later outline phases of this development proposal are required to ensure that flood risk has been minimised.
- 29.10 Due to the potential surface water flood risk for future outline phases the Finished Floor Level (FFL) should be higher than the estimated 100-year pluvial (surface water) flood level and should not displace pluvial flood water off site. This shall be secured through condition RM37 for all the reserved matters applications.
- 29.11 Condition M29 is attached to secure full details of the SuDS and their proposed storage capacities for each of the detailed and reserved matters plots. The information will be required to demonstrate that the system has been designed to accommodate all storms up to and including a 1:100 year storm with 40% provision for climate change as well as demonstrating a discharge rate of not more than run off rates set out above. A further condition (D12) requires evidence of drainage systems installation for both plots in Phase 1 once the agreed measures are provided. Condition D10 secures the details of the green/blue roofs in Phase 1.
- 29.12 Thames Water has been consulted and has no objections subject to conditions confirming that there is sufficient infrastructure in place to allow all phases of the development to be occupied as well as appropriate protections during construction where piling is required. Conditions have been attached accordingly (conditions M22 & M23).

30. EMPLOYMENT AND TRAINING

- 30.1 Policies E1 and E2 seeks to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services. CPG Employment Sites and Business Premises (Employment CPG 2021) sets out that the Council will use S106 agreements to secure local employment and training initiatives.
- 30.2 The proposed masterplan development is a large residential-led scheme providing significant new homes and some commercial space. The residential nature of the redevelopment means that the employment benefits of the scheme will principally be secured through construction phases.

Construction Phase

- 30.3 The scheme could deliver a range of training and employment benefits during the construction phase which would benefit local residents and businesses. As well as the direct economic and employment benefits, local employment and training opportunities can help to maximise health benefits for residents (see 'Health Impact' section). This package of recruitment, apprenticeship and procurement measures will be secured via shadow S106 legal agreement and will comprise:

- Construction apprenticeships and work placement opportunities through the King's Cross Construction Skills Centre;
- Local employment; and
- Local Procurement.

Construction Phase

- 30.4 Apprenticeships - as the build cost for this scheme would exceed £3 million the applicant must recruit one 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 CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. This equates to **96 apprenticeships and a £163,000 financial contribution** over the course of the masterplan development.
- 30.5 Given that the development would occur in phases, the apprenticeship requirements shall be apportioned across the different phases. A **Construction Apprenticeship Management Plan secured by shadow s106 agreement** will ensure this happens for the detailed phase, and each reserved matters application.
- 30.6 Construction Work Experience Placements - the applicant should provide **27 construction work placements** of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment CPG.
- 30.7 Local Recruitment – the Council's standard local recruitment target is 20%. The planning statement suggests 90 full time equivalent construction jobs will be created over the 20 years of the development, equating to a target of **18 construction jobs recruited locally**. The applicant will work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with the Council for no less than a week before the roles are advertised more widely.
- 30.8 Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment CPG, which sets a

target of **10% local procurement** of the total value of the construction contract.

End Use / Occupation Phase

- 30.9 As laid out in the 'Land use' section there would be a relatively small amount of Class E commercial space secured through this proposed development – a maximum of 258sqm through the masterplan including 58sqm in Phase 1. This amount of floorspace is not sufficient to trigger policy requirements for end user employment or affordable workspace contributions. Nevertheless, the commercial space is expected to generate up to 22 new full time equivalent jobs once the masterplan is fully built.
- 30.10 The development has the potential to have a substantial positive impact on the local economy, including on businesses and traders who operate there already, both through economic activity related to the construction process and through the new residents and workers brought to the area. By directing opportunities to local residents, this will also have long term health benefits.
- 30.11 Given the above, the proposals are in accordance with the development in relation to employment and training.

31. HEALTH IMPACT

- 31.1 CLP policy C1 and LP policy GG3 promote strong, vibrant, and healthy communities and seek to tackle health inequalities. Healthy and inclusive communities are a key objective of the Council, supported by the development plan's commitment to improving health through a range of policies, such as affordable housing, housing quality, active travel, and seeking to reduce health inequality.
- 31.2 A Health Impact Assessment (HIA) has been submitted as part of this application. The Proposed Development's potential health impact has been assessed based on the HUDU Planning for Health Rapid HIA Tool and has been reviewed by the Council's Public Health Strategist.
- 31.3 The scheme will deliver significant health benefits by replacing poor-quality, overcrowded homes with up to 856 new dwellings, including a substantial uplift in affordable and accessible units.
- 31.4 The serious adverse impact that the current housing on the estate has on health is a key driver of the application, and was a key issue raised in consultation responses in support of the application. The disproportionate impact on the elderly, the young, and disabled people, as well as the impact on their carers (who in many responses were cited as unpaid women) was a recurring theme in consultation responses.

- 31.5 This scheme directly addresses local health inequalities, particularly for low-income households, older people, and those with disabilities, as well as their families and carers. All new homes will meet or exceed accessibility and space standards.
- 31.6 The development will also provide a notable increase in high-quality open space and play areas, including a new central square and community food growing space. These improvements are expected to support physical activity, mental wellbeing, and social cohesion. The design code requires that open and play spaces are inclusive and accessible, and the Public Health Strategist recommends a commitment to meaningful community engagement—especially with young people—in their design. A **Co-production of play and open space designs with local groups would be secured by shadow s106 agreement.**
- 31.7 Active travel is prioritised through new pedestrian and cycle links, traffic calming, and a car-free approach (except for blue badge parking), which will encourage healthier lifestyles and improve access to local services. The scheme also incorporates Secured by Design principles and well-lit public spaces to address concerns about anti-social behaviour and fear of crime, which disproportionately affect women, older people, and ethnic minorities.
- 31.8 Potential negative impacts are generally limited to construction-phase noise and disruption, a key concern raised in consultation responses in objection to the proposal especially given the planned construction period. Many objections also highlight the disproportionate impact these effects will have on disabled people, the elderly, and more generally, on mental health outcomes. Specific examples include those with severe learning disabilities and the need for clear communication and engagement with carers and families in the local area to help mitigate and manage these impacts.
- 31.9 The construction will be managed through a robust Construction Management Plan (CMP), which includes liaison with local residents, as well as other measures like air quality controls. In addition to this, it is recommended a Construction Working Group be formed to ensure robust engagement and communication with the local community which could include representation from vulnerable groups. The **CMP and Construction Working Group would be secured by shadow s106 agreement.** The length of the construction period will likely increase the adverse impacts identified, but this needs to be balanced with the need to reduce impacts on the most vulnerable groups by ensuring a fair decant strategy. Furthermore, the CMP is a live document, and it will need to be updated as each phase is delivered. The applicant would need to engage each time they update as different people would be impacted given the size of the site.

- 31.10 The HIA used transparent modelling (HUDU) and found that local GP surgeries and schools have sufficient capacity to accommodate the new population, resulting in a neutral impact on these services. While the scheme will generate construction and end-use jobs, the Public Health Strategist recommends that local employment and training opportunities be actively promoted to maximise health benefits for residents. A package of **local employment and training opportunities will be secured by shadow s106 agreement**.
- 31.11 Equality considerations have been central to the assessment, with the scheme expected to particularly benefit groups experiencing health inequalities. Whilst there will be adverse impacts arising from the construction activity itself, these can be carefully managed and mitigated to some degree through the CMP and air quality controls, as well as through other highways and environmental legislation.
- 31.12 The proposal is likely to have an overall positive impact on health and wellbeing, with clear benefits for those most affected by health inequalities and as such, it complies with the objectives of the development, particularly in relation to CLP policy C1.

32. MANAGING PHASING

- 32.1 The application envisages delivery of the scheme over eight phases. Phase 1 is expected to take a period of around 3 years (up to the end of 2028). Completion of the development is expected in around 2045.

Construction Task/ Activity	Duration	Start Date (Quarter and Year)	Completion Date (Quarter and Year)
Phase 1			
Wedmore Demolition	19w	Q1 Y1	Q2 Y1
Building A1	102w	Q2 Y1	Q2 Y3
Building D1	84w	Q2 Y1	Q1 Y3
Phase 2			
Beckington, Ashington, Milverton Demolition	25w	Q3 Y3	Q1 Y4
Building A2	97w	Q1 Y4	Q1 Y6
Building D2	88w	Q1 Y4	Q4 Y6
Phase 3			
Durston Demolition	20w	Q1 Y6	Q3 Y6
Building A3	78w	Q3 Y6	Q1 Y8
Building D3	89w	Q3 Y6	Q2 Y8
Phase 4			
Chelwood Demolition	16w	Q2 Y8	Q3 Y8
Building B1	116w	Q3 Y8	Q1 Y11
Remove MUGA	13w	Q4 Y10	Q1 Y11
Phase 5			
Building G1	100w	Q1 Y11	Q1 Y13
Phase 6			
Building C1	115w	Q1 Y13	Q2 Y15
Phase 7			
Landridge, Cannington Demolition	23w	Q3 Y15	Q4 Y15
Building E1	83w	Q1 Y16	Q3 Y17
Building E2	95w	Q4 Y15	Q4 Y17
Phase 8			
Edington Demolition	19w	Q4 Y17	Q1 Y18
Building F1	87w	Q1 Y18	Q4 Y19
Building F2	96w	Q1 Y18	Q1 Y20

Table 32 - Indicative phasing plan

- 32.2 Given this and the many challenges which might be encountered in delivering the scheme it is possible that the phasing programme and timings may change from those envisaged currently. In view of this, condition M1 is attached to the permission which requires the submission of an updated phasing plan prior to implementation of Phase 1 and prior to the commencement of each plot thereafter. This allows flexibility in the approach taken, through RMAs or drop in planning applications, whilst still allowing control over the delivery and overall impacts on the masterplan.
- 32.3 As the scheme has a long build programme and Phase 1 will be occupied as construction work continues, due consideration needs to be given to managing this process. The local environment must be safe and liveable for the occupants of Phase 1 and surrounding properties during construction of later phases, and the same must be true for the occupiers of each later phase.
- 32.4 Phase 1 will have construction works alongside it during works for phases 2 and three, and later phase construction could also cause an impact on living

conditions. To effectively manage this process, the construction practices and sites must be well-planned and managed. Draft Demolition and Construction Management Plans would be required to be submitted as part of the future reserved matters applications, with full DMP/CMPs thereafter being secured via shadow section 106 legal agreement.

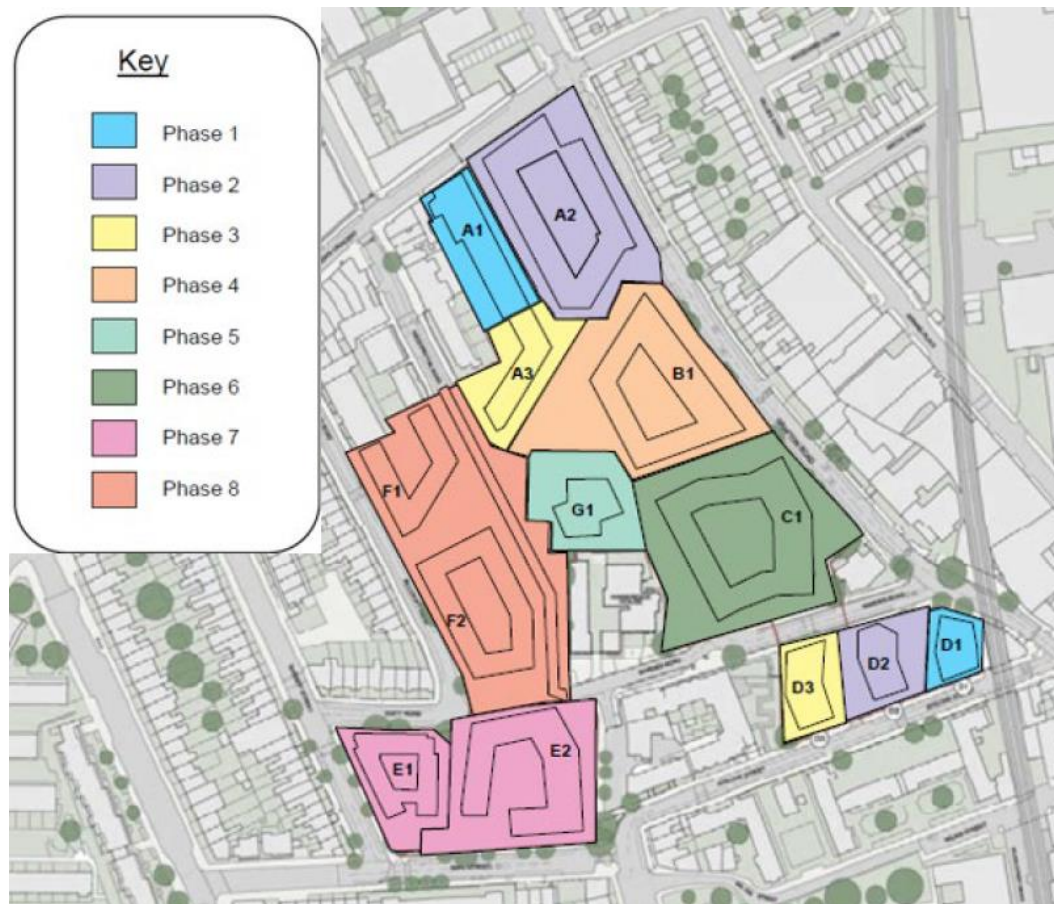


Figure 62 - Overview of phases

- 32.5 Temporary landscaping will be secured, for example for Phase 1 Block A1 which will be replaced with a permanent landscape after the construction of Phase 2. Provision of meanwhile uses and activities on the site would be considered by the applicant on a phase-by-phase basis, as necessary. The management of the phasing will also allow the planning authority to track the housing delivery across the masterplan.
- 32.6 The monitoring and management of the phasing will ensure the delivery of the masterplan continues to comply with the objectives of the development plan, set out in the various sections of the report above, while minimising and managing the impacts of the development.

33. PLANNING OBLIGATIONS

Obligations (Heads of Terms)

- 33.1 The following planning obligations (including financial contributions) are required to mitigate the impact of the development. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area. They will be secured through a shadow s106 agreement as the Council is the applicant and the landowner.
- 33.2 For the purposes of the final decision notice, each of these Heads of terms will be included in a “shadow s106 condition”. The conditions, normally, marked with **, would cover the heads of terms to be incorporated into a Section 106 Agreement if the council disposes of the land in the future. The final wording for these shadow s106 conditions is not included in the conditions list at the end of this report and will be added prior to issuing a final decision, but they will incorporate the following.

Land Use

- Community Facilities Plan
- Strategy for meeting Mayor’s Good Practice Guide to Estate Regeneration requirements:
 - Full right to return or remain for social tenants
 - Fair arrangements for leaseholders including the offer of shared equity homes, home loss payments and independent valuations
- Housing Delivery Plan (including affordable delivery)
- Affordable Housing
 - 197 homes in detailed Phase 1
 - 40% affordable housing overall masterplan
 - 100% social rent tenure
 - Early, mid and late-stage viability reviews
 - Deferred affordable housing contribution (capped at £77,577,50)

Employment and training

Overall masterplan

- Employment and Training Plan
- 96 Construction apprenticeships through the King’s Cross Construction Skills Centre
- Apprenticeships support fee of £163,000
- 27 construction work experience placements
- Local employment - 18 construction jobs recruited locally.
- Local procurement measures - 10% local procurement
- Construction Apprenticeship Management Plan

Design Quality

- Retention of development architect for Phase 1 (Mae Architects)

Public Realm and Landscaping

- Co-production of play and open space designs with local groups
- Landscaping and Public Spaces Delivery Plan (including interim)
- Public Space and Public Realm Management and Maintenance Plan
- Commitment to principles in Public London Charter

Sustainability and Energy

Phase 1 (detailed)

- Energy and Sustainability Strategy
 - Total carbon reductions of 75%
 - Green stage reductions of 73%
 - Lean stage reductions of 7% (but target improvement to 10%)
 - 'Be Seen' measures for energy monitoring and reporting
 - Carbon offset payment of £38,686
 - Future connection to site-wide energy network
 - Safeguarded future connection to District Heating Network

Outline Phases

- Energy and Sustainability Strategy
 - Compliance with energy reduction standards in place at the time of submission for each phase
 - Carbon offset payment calculated at each phase based on the formula in place the time of submission for each phase.
 - Safeguarded future connection to District Heating Network
 - Strategy for delivery of the Energy Centre
 - 'Be Seen' measures for energy monitoring and reporting for each phase

Transport

Whole Masterplan

- Car free development
- Car Parking Management Plan (CPMP) - updated each phase
- Siting of loading bays
- Pedestrian, Cycling and Environmental improvements contribution of £1,620,000
- Electric vehicle charging and contribution of £60,000
- Micromobility improvements and contribution £20,000
- CPZ review and contribution of £20,000
- Construction working group (CWG) formed of representatives from the local community

Phase 1 (detailed)

- Local Travel Plan (LTP)
- LTP monitoring and measures contribution of £5,674
- Delivery and Servicing Management Plan (DSMP)
- Demolition Management Plan (DMP) and support fee of £10,116
- DMP impact bond of £16,000
- Construction Management Plan (CMP) and support fee of £30,513
 - Details of pit lane/holding areas
 - Tracked HGV access arrangements
- CMP impact bond of £32,000
- Highway works contribution (estimated) of £100,785.05

Outline Phases

- Local Travel Plan (LTP) updated phase
- LTP monitoring and measures contribution of £5,674 per phase (total £39,718)
- DSMP updated per additional phase
- DMP updated per additional phase
- DMP implementation support fee of £10,116 per phase (£70,812)
- DMP Impact Bond secured through Phase 1 to be topped up at each additional phase if this is drawn from in an earlier phase.
- CMP updated per additional phase
- CMP implementation support fee of £32,000 per phase (£224,000)
- CMP Impact Bond secured through Phase 1 to be topped up at each additional phase if this is drawn from in an earlier phase
- Highway works contribution of (estimated) £705,494.95 for all remaining phases
- One Car Club parking bay

34. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 34.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. Camden collects 2 types of Community Infrastructure Levy: Mayoral CIL and Camden CIL.

Mayoral CIL

- 34.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of private residential units. This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

- 34.3 The amounts shown below are estimates based on the submitted plans for the detailed phase and the illustrative development for the outline phases (and as such final CIL figures may differ than those stated below). Final amounts will be stated in the relevant CIL Demand Notices provided at commencement stage of each part of the development, as appropriate.

Phase 1	Outline	TOTAL
£40,738.99	£3,478,945.85	£ 3,519,684.84

Table 33 - Estimated Mayoral CIL

Camden CIL

- 34.4 The proposal would also be liable for the Camden Community Infrastructure Levy (CIL). Again, the amounts shown below are estimates based on the plans for the detailed phase and the illustrative development for the outline phases.

Phase 1	Outline	TOTAL
£145,279.72	£ 13,788,904.31	£ 13,934,184.03

Table 34 - Estimated Camden CIL

- 34.5 Most of the Camden CIL (75%) is used for strategic purposes and is spent on borough-wide infrastructure to support growth.
- 34.6 25% of the Camden CIL collected is identified as 'Local' CIL and is allocated locally by ward councillors. In this case, this would equate to approximately £3.5 million for the entirety of the masterplan development. The spending process for Local CIL is guided by a priority list for each ward. These have been developed by ward members in consultation with their local communities and for Haverstock ward this includes initiatives to support local schools, sustainable transport projects and community safety initiatives.

35. CONCLUSION

- 35.1 The current application would allow for the comprehensive redevelopment of this under-developed land and support the provision of new housing in the borough to meet identified need. The applicant's vision is to provide a new landscaped led-masterplan approach providing up to around 856 high quality, energy efficient homes to address the chronic overcrowding on the Estate together with key green routes and spaces to encourage walking and cycling and a range of play and growing space for residents and the local community. Officers support this vision, and it meets the strategic objectives set out in national, regional and local policy and guidance for this site.

- 35.2 The masterplan development would provide good quality homes (up to 856 residential units are proposed in total, with 52 of these in the detailed phase) and the maximum viable amount of affordable housing (93% in the detailed phase and 40% across the whole site) which is welcomed. The provision of this housing will help improve the living conditions for residents on the existing Estate, will help reduce the Council's social housing waiting list and will contribute significantly towards the Borough meeting its housing targets. Early, mid and late-stage viability reviews will be secured through shadow s106 agreement to secure additional affordable housing (or financial contributions in lieu) should that be viable in later phases of the development.
- 35.3 As well as the re-provision of the current homes on the estate, there would be an additional c. 540 new homes making a significant contribution to the borough's housing. The current housing delivery in the borough means the presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and great weight should be given to the provision of housing in decision making. The application should be granted unless the adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.
- 35.4 Options to retain, refurbish, and extend buildings have been explored, but these options would fail to achieve the same benefits as the current proposal. The scheme has taken steps to reduce whole life-cycle carbon emissions and whilst it falls short of benchmarks in guidance, design of future phases will continue to explore further reductions. Comprehensive redevelopment of the Estate is the best way to optimise the development potential of this site and to achieve the strategic planning policy objectives, especially in terms of meeting the aims and objectives of both the Gospel Oak and Haverstock Community Vision and the emerging draft site allocation C13 which requires re-provision of existing homes to meet modern standards and no net loss of social housing, enhance Queen's Crescent, improve local walking and cycling routes and improve local open spaces. The principle of comprehensive redevelopment was given support by the majority of Estate residents in a ballot.
- 35.5 The masterplan development would address existing issues on the Estate with regards to overcrowding, high energy bills, ageing buildings, safety, connectivity and inaccessibility. The new homes would have excellent operational energy efficiency once built, significantly exceeding the policy target for total operational energy reductions, helping to provide warm energy efficient homes with lower energy bills.
- 35.6 The masterplan design would create an exemplary landscape-led setting featuring plentiful planting, open space and play space. The design is high quality and welcomed in architectural terms. It is accepted that there will be less than substantial harm to heritage assets, at the lower end of the scale,

and that this should be given considerable weight and importance in decision making. However, the level and nature of the harm has been carefully considered and viewed in the context of the fact that this Estate is expected to come forward for development with an increased density and which would secure social, environmental and economic benefits including replacement and new social housing.

- 35.7 The scale of the scheme also harms amenity of some nearby homes through major adverse light impacts exceeding what would normally be expected in this urban context. However, most of these are as a result of outline plots on Grafton Road and so further mitigation may be possible through refined massing and articulation. The impact on other properties is considered acceptable.
- 35.8 The development would be car free, with good quality cycle parking provided in all new blocks. Significant financial contributions would secure improvements to the transport, pedestrian and cycling environment in the local area, mitigating impact on the transport infrastructure. The impact from demolition and construction would be carefully managed throughout the development with each phase having updated management plans, and a Construction Working Group for the duration of the masterplan build to ensure continuous engagement.
- 35.9 The scale of the scheme would generate notable economic benefits including employment, and planning obligations ensure some of these employment and training benefits are directed to local residents and businesses.
- 35.10 The scheme directly addresses local health inequalities, particularly for low-income households, older people, and disabled people, as well as their families and carers. Directing the economic benefits to local residents will also have a positive impact on long term health, along with the public spaces and placemaking which will support physical activity, mental wellbeing, and social cohesion, with young people co-designing spaces.
- 35.11 As set out above areas of harm have been identified including less than substantial harm to a Conservation Area and a Listed Building through their setting (at the lower end of the scale), and harm to amenity of some nearby homes through light impact. Considerable weight and importance must be given to the heritage harm, but further mitigation (both to heritage harm and amenity impact) can be achieved through detailed design development, and there are considered to be public benefits that outweigh harm and negatives identified with the scheme:
- Improvement to housing standards for existing residents, directed at meeting their needs.
 - Significant additional housing to help address overall housing delivery.
 - Additional affordable housing at the most affordable tenure.

- Energy efficient new homes.
- Regeneration and urban renewal with high quality design and placemaking.
- Significant improvements and contributions to transport infrastructure, including active travel like walking and cycling.
- Improved safety and security in and around the estate.
- Improved open space provision and more inclusive spaces for wide a range of residents, including co-design of spaces.
- Improved accessibility, internally and externally, including wheelchair homes.
- Economic and employment benefits, including local employment, training, and procurement.
- Positive health impact, particularly for low-income households, older people, and disabled people.

36. RECOMMENDATION

- 36.1 Grant conditional Full Planning Permission (phase 1 detailed proposals) and conditional Outline Planning Permission (phases 2 to 8 outline proposals) subject to a Shadow s106 Agreement.

37. LEGAL COMMENTS

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

38. CONDITIONS

IMPLEMENTATION

1 (I1) Implementation date of this permission

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

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

2 (I2) Reserved Matters submission

The outline elements of this permission shall lapse unless the first Reserved Matters application is made within five years of the date of this permission.

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

APPROVED DRAWINGS

3 (AD1) Approved drawings – Masterplan

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

Site Location Plan, prepared by AHMM		
Site Location Plan	0WKTE_AHMM_ZZ_ZZ_DR_A_PL010	Rev P01
Indicative Construction Phasing Document		
Indicative Construction Phasing Document	0WKTE_AHMM_XX_XX_RP_PL046	Rev 01
Documents:		
Affordable Housing Statement, Rev P01 (dated 18 June 2025)		
Tree Survey, Arboricultural Impact Assessment & Method Statement (BS5837:2012) Rev B (dated 16 April 2025)		
Archaeology Desk-Based Assessment (dated May 2025)		
Basement Impact Assessment, Rev 3 (dated October 2025)		
Biodiversity Net Gain Assessment and Statutory Metric Version 2 (dated 16 July 2025)		
Built Heritage, Townscape and Visual Clarification Note (dated October 2025)		
Circular Economy Statement, Rev P04 (dated 16 October 2025)		
Design and Access Statement, Volume 1 Outline Proposals Rev 04 (dated 26 November 2025)		
Design and Access Statement, Volume II Detailed Proposals (dated 9 June 2025)		
Design and Access Statement, Volume III Landscaping Statement (dated 3 June 2025)		
Design Code, Rev P02 (dated 6 November 2025)		
Development Specification (dated 18 June 2025)		
Daylight / Sunlight Supporting Document Rev P01 (dated 11 June 2025) and Lichfields Opinion Response V2 (dated November 2025)		
Sustainability and Energy Statement, Rev P04 (dated 14 November 2025)		
Equalities Impact Assessment, Rev P01 (dated May 2025)		
Financial Viability Assessment, Rev P01 (dated June 2025)		
Flood Risk Assessment, Rev P02 (dated 23 May 2025)		
Stage 3 Fire Strategy Report – Block A1, Rev 8 (dated 18 June 2025)		
Stage 3 Fire Strategy Report – Block D1, Rev 7 (dated 11 June 2025)		
Plot A1 Fire Statement Form (dated 8 July 2025)		
Plot D1 Fire Statement Form (dated 8 July 2025)		
Masterplan Fire Statement Rev 4 (dated 15 September 2025)		
Health Impact Assessment, Rev P01, dated 13 June 2025		
Indicative Construction Phasing Document, Rev 01, dated 26 November 2025		
Land Contamination Assessment, dated April 2020;		
Landscape Management and Maintenance Report (21213-BBK-XX-ZZ-OM-L-7600), dated 3 October 2025		
Landscape Materials Schedule, dated 2 June 2025		
Operational Waste Management Strategy, Rev P02 (dated 17 November 2025)		
Outline Construction Management Plan Version 3 (dated 6 June 2025)		

Preliminary Ecology Appraisal (dated 10 July 2025)
Pre-Demolition Audit Rev 4 (dated 28 October 2025)
Pre-Redevelopment Audit Rev P01
Regeneration Statement Rev P01 (dated 13 June 2025)
LLFA Technical Note Rev P01 (dated 1 October 2025)
Statement of Community Involvement (dated June 2025)
Internal Daylight, Sunlight and Overshadowing Report Rev P01 (dated 29 May 2025)
Sustainable Drainage Strategy, Rev P03 (dated 1 October 2025)
Town Planning Statement, Rev P03 (dated 18 September 2025)
Transport Assessment, Rev P01 (dated 17 June 2025)
Delivery and Servicing Management Plan, Rev P01 (dated 17 June 2025)
Residential Travel Plan, Rev P01 (dated 17 June 2025)
Construction Logistics Plan, Rev P01 (dated 17 June 2025)
Whole Life Cycle Carbon Assessment, Rev P06 (dated 10 October 2025)
Environmental Statement Rev P01 (dated 6 June 2025)
Environmental Statement Addendum Rev P01 (dated 29 October 2025)
Environmental Statement Chapter 11 Addendum (dated October 2025)
Environmental Statement Non-Technical Summary (dated October 2025)

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

4 (AD2) Approved drawings – Reserved Matters (parameters)

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

Parameter Plans, prepared by AHMM		
Buildings and Structures to be demolished	0WKTE_AHMM_ZZ_ZZ_DR_A_PL150	Rev P01
Trees to be removed/retained	0WKTE_AHMM_ZZ_ZZ_DR_A_PL151	Rev P01
Proposed Public Realm	0WKTE_AHMM_ZZ_ZZ_DR_A_PL152	Rev P01
Minimum and Maximum Footprints	0WKTE_AHMM_ZZ_ZZ_DR_A_PL153	Rev P02
Proposed Basement Extents	0WKTE_AHMM_ZZ_ZZ_DR_A_PL154	Rev P01
Proposed Vehicular Movement Strategies	0WKTE_AHMM_ZZ_ZZ_DR_A_PL155	Rev P01
Detailed and Outline Plots	0WKTE_AHMM_ZZ_ZZ_DR_A_PL156	Rev P01
Proposed Ground Floor Uses	0WKTE_AHMM_ZZ_ZZ_DR_A_PL157	Rev P01
Proposed Upper Floor Uses	0WKTE_AHMM_ZZ_ZZ_DR_A_PL158	Rev P01
Proposed Maximum Heights	0WKTE_AHMM_ZZ_ZZ_DR_A_PL159	Rev P01
Proposed and Existing Site Levels	0WKTE_AHMM_ZZ_ZZ_DR_A_PL160	Rev P01
Documents:		
Affordable Housing Statement, Rev P01 (dated 18 June 2025)		

Tree Survey, Arboricultural Impact Assessment & Method Statement (BS5837:2012) Rev B (dated 16 April 2025)
Archaeology Desk-Based Assessment (dated May 2025)
Basement Impact Assessment, Rev 3 (dated October 2025)
Biodiversity Net Gain Assessment and Statutory Metric Version 2 (dated 16 July 2025)
Built Heritage, Townscape and Visual Clarification Note (dated October 2025)
Circular Economy Statement, Rev P04 (dated 16 October 2025)
Design and Access Statement, Volume 1 Outline Proposals Rev 04 (dated 26 November 2025)
Design and Access Statement, Volume II Detailed Proposals (dated 9 June 2025)
Design and Access Statement, Volume III Landscaping Statement (dated 3 June 2025)
Design Code, Rev P02 (dated 6 November 2025)
Development Specification (dated 18 June 2025)
Daylight / Sunlight Supporting Document Rev P01 (dated 11 June 2025) and Lichfields Opinion Response V2 (dated November 2025)
Sustainability and Energy Statement, Rev P04 (dated 14 November 2025)
Equalities Impact Assessment, Rev P01 (dated May 2025)
Financial Viability Assessment, Rev P01 (dated June 2025)
Flood Risk Assessment, Rev P02 (dated 23 May 2025)
Stage 3 Fire Strategy Report – Block A1, Rev 8 (dated 18 June 2025)
Stage 3 Fire Strategy Report – Block D1, Rev 7 (dated 11 June 2025)
Plot A1 Fire Statement Form (dated 8 July 2025)
Plot D1 Fire Statement Form (dated 8 July 2025)
Masterplan Fire Statement Rev 4 (dated 15 September 2025)
Health Impact Assessment, Rev P01, dated 13 June 2025
Indicative Construction Phasing Document, Rev 01, dated 26 November 2025
Land Contamination Assessment, dated April 2020;
Landscape Management and Maintenance Report (21213-BBK-XX-ZZ-OM-L-7600), dated 3 October 2025
Landscape Materials Schedule, dated 2 June 2025
Operational Waste Management Strategy, Rev P02 (dated 17 November 2025)
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Preliminary Ecology Appraisal (dated 10 July 2025)
Pre-Demolition Audit Rev 4 (dated 28 October 2025)
Pre-Redevelopment Audit Rev P01
Regeneration Statement Rev P01 (dated 13 June 2025)
LLFA Technical Note Rev P01 (dated 1 October 2025)
Statement of Community Involvement (dated June 2025)
Internal Daylight, Sunlight and Overshadowing Report Rev P01 (dated 29 May 2025)
Sustainable Drainage Strategy, Rev P03 (dated 1 October 2025)
Town Planning Statement, Rev P03 (dated 18 September 2025)
Transport Assessment, Rev P01 (dated 17 June 2025)
Delivery and Servicing Management Plan, Rev P01 (dated 17 June 2025)
Residential Travel Plan, Rev P01 (dated 17 June 2025)

Construction Logistics Plan, Rev P01 (dated 17 June 2025)
Whole Life Cycle Carbon Assessment, Rev P06 (dated 10 October 2025)
Environmental Statement Rev P01 (dated 6 June 2025)
Environmental Statement Addendum Rev P01 (dated 29 October 2025)
Environmental Statement Chapter 11 Addendum (dated October 2025)
Environmental Statement Non-Technical Summary (dated October 2025)

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

5 (AD3) Approved drawings – Phase 1 (detailed)

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

Plot A1 Existing, Demolition and Proposed Drawings, prepared by Mae Architects		
Existing Site Plan	2113-MAE-A1-00-DR-04-100	Rev P02
Existing Site Elevation – 01-02	2113-MAE-A1-XX-DR-04-200	Rev P02
Existing Site Elevation – 03-04	2113-MAE-A1-XX-DR-04-201	Rev P02
Existing Site Plan - Demolition	2113-MAE-A1-00-DR-05-100	Rev P02
Existing Site Elevation – Demolition 01-02	2113-MAE-A1-XX-DR-05-200	Rev P02
Existing Site Elevation – Demolition 03-04	2113-MAE-A1-XX-DR-05-201	Rev P02
West Elevation Proposed	2113-MAE-A1-XX-DR-06-200	Rev P02
East Elevation Proposed	2113-MAE-A1-XX-DR-06-201	Rev P02
North and South Elevation Proposed	2113-MAE-A1-XX-DR-06-202	Rev P02
North/South Site Elevation Proposed	2113-MAE-A1-XX-DR-06-210	Rev P02
West/East Site Elevation Proposed	2113-MAE-A1-XX-DR-06-211	Rev P02
Site Plan Proposed	2113-MAE-A1-00-DR-06-020	Rev P02
Ground Floor Plan Proposed	2113-MAE-A1-00-DR-06-100	Rev P02
First Floor Plan Proposed	2113-MAE-A1-00-DR-06-101	Rev P02
Second Floor Plan Proposed	2113-MAE-A1-00-DR-06-102	Rev P02
Third Floor Plan Proposed	2113-MAE-A1-00-DR-06-103	Rev P02
Fourth Floor Plan Proposed	2113-MAE-A1-00-DR-06-104	Rev P02
Fifth Floor Plan Proposed	2113-MAE-A1-00-DR-06-105	Rev P02
Plant Roof Plan Proposed	2113-MAE-A1-00-DR-06-106	Rev P02
Roof Plan Proposed	2113-MAE-A1-00-DR-06-107	Rev P02
Block A1 Section AA Proposed	2113-MAE-A1-XX-DR-06-300	Rev P02
Block A1 Section BB Proposed	2113-MAE-A1-XX-DR-06-301	Rev P02
Plot D1 Existing, Demolition and Proposed Drawings, prepared by Mae Architects		
Existing Site Plan	2113-MAE-D1-DR-04-100	Rev P02
Existing Site Elevation 01-02	2113-MAE-D1-XX-DR-04-200	Rev P02
Existing Site Elevation 03-04	2113-MAE-D1-XX-DR-04-201	Rev P02

Block D1 North and South Elevations Proposed	2113-MAE-D1-XX-DR-06-200	Rev P02
Block D1 East and West Elevation Proposed	2113-MAE-D1-XX-DR-06-201	Rev P02
North / South Site Elevation Proposed	2113-MAE-D1-XX-DR-06-210	Rev P02
West / East Site Elevation Proposed	2113-MAE-D1-XX-DR-06-211	Rev P02
Site Plan Proposed	2113-MAE-D1-00-DR-06-020	Rev P02
Ground Floor Plan Proposed	2113-MAE-D1-00-DR-06-100	Rev P02
First to Second Floor Plan Proposed	2113-MAE-D1-01-DR-06-101	Rev P02
Third Floor Plan Proposed	2113-MAE-D1-01-DR-06-102	Rev P02
Fourth Floor Plan Proposed	2113-MAE-D1-01-DR-06-103	Rev P02
Fifth Floor Plan Proposed	2113-MAE-DQ-01-DR-06-104	Rev P02
Plant Roof Plan Proposed	2113-MAE-D1-01-DR-06-105	Rev P02
Roof Plan Proposed	2113-MAE-D1-01-DR-06-106	Rev P02
Lower Ground Floor Plan Proposed	2113-MAE-D1-LG-DR-06-099	Rev P02
Block D1 Section AA and BB Proposed	2113-MAE-D1-XX-DR-06-300	Rev P02
Detailed Landscaping Drawings, prepared by BBUK Studio Limited		
Proposed Key Plan	21213-BBK-XX-00-DR-L-0020	Rev P01
GA Plan – Permanent Landscaping Block A1	21213-BBK-XX-00-DR-L-0120	Rev P01
GA Plan – Temporary Landscaping Block A1	21213-BBK-XX-00-DR-L-0121	Rev P01
GA Plan – Permanent Landscaping Block D1	21213-BBK-XX-00-DR-L-0130	Rev P01
GA Plan – Temporary Landscaping Block D1	21213-BBK-XX-00-DR-L-0131	Rev P01
Hardworks Plan – Permanent Landscaping Block A1	21213-BBK-XX-00-DR-L0210	Rev P01
Hardworks Plan – Temporary Landscaping Block A1	21213-BBK-XX-00-DR-L-0211	Rev P01
Hardworks Plan – Permanent Landscaping Block D1	21213-BBK-XX-00-DR-L-0220	Rev P01
Hardworks Plan – Temporary Landscaping Block D1	21213-BBK-XX-00-DR-L-0221	Rev P01
Planting Plan – Temporary Landscaping Block A1	21213-BBK-XX-00-DR-L-0411	Rev P01
Planting Plan – Permanent Landscaping Block A1	21213-BBK-XX-ZZ-DR-L-0410	Rev P01
Planting Plan – Temporary Landscaping Block D1	21213-BBK-XX-00-DR-L-0421	Rev P01
Planting Plan – Permanent Landscaping Block D1	21213-BBK-XX-ZZ-DR-L-0420	Rev P01
Tree Pit Details 01	21213-BBK-XX-00-DR-L-3000	Rev P01
Tree Pit Details 02	21213-BBK-XX-00-DR-L-3001	Rev P01
GA Roof Plan – Block A1	21213-BBK-XX-ZZ-DR-L-0125	Rev P01
GA Roof Plan – Block D1	21213-BBK-XX-ZZ-DR-L-0135	Rev P01
UGF Plan – Interim Condition Landscaping	21213-BBK-XX-ZZ-DR-L-0950	Rev P01

UGF Plan – Permanent Landscaping	21213-BBK-XX-ZZ-DR-L-0951	Rev P01
Documents:		
Affordable Housing Statement, Rev P01 (dated 18 June 2025)		
Tree Survey, Arboricultural Impact Assessment & Method Statement (BS5837:2012) Rev B (dated 16 April 2025)		
Archaeology Desk-Based Assessment (dated May 2025)		
Basement Impact Assessment, Rev 3 (dated October 2025)		
Biodiversity Net Gain Assessment and Statutory Metric Version 2 (dated 16 July 2025)		
Built Heritage, Townscape and Visual Clarification Note (dated October 2025)		
Circular Economy Statement, Rev P04 (dated 16 October 2025)		
Design and Access Statement, Volume 1 Outline Proposals Rev 04 (dated 26 November 2025)		
Design and Access Statement, Volume II Detailed Proposals (dated 9 June 2025)		
Design and Access Statement, Volume III Landscaping Statement (dated 3 June 2025)		
Design Code, Rev P02 (dated 6 November 2025)		
Development Specification (dated 18 June 2025)		
Daylight / Sunlight Supporting Document Rev P01 (dated 11 June 2025) and Lichfields Opinion Response V2 (dated November 2025)		
Sustainability and Energy Statement, Rev P04 (dated 14 November 2025)		
Equalities Impact Assessment, Rev P01 (dated May 2025)		
Financial Viability Assessment, Rev P01 (dated June 2025)		
Flood Risk Assessment, Rev P02 (dated 23 May 2025)		
Stage 3 Fire Strategy Report – Block A1, Rev 8 (dated 18 June 2025)		

Stage 3 Fire Strategy Report – Block D1, Rev 7 (dated 11 June 2025)
Plot A1 Fire Statement Form (dated 8 July 2025)
Plot D1 Fire Statement Form (dated 8 July 2025)
Masterplan Fire Statement Rev 4 (dated 15 September 2025)
Health Impact Assessment, Rev P01, dated 13 June 2025
Indicative Construction Phasing Document, Rev 01, dated 26 November 2025
Land Contamination Assessment, dated April 2020;
Landscape Management and Maintenance Report (21213-BBK-XX-ZZ-OM-L-7600), dated 3 October 2025
Landscape Materials Schedule, dated 2 June 2025
Operational Waste Management Strategy, Rev P02 (dated 17 November 2025)
Outline Construction Management Plan Version 3 (dated 6 June 2025)
Preliminary Ecology Appraisal (dated 10 July 2025)
Pre-Demolition Audit Rev 4 (dated 28 October 2025)
Pre-Redevelopment Audit Rev P01
Regeneration Statement Rev P01 (dated 13 June 2025)
LLFA Technical Note Rev P01 (dated 1 October 2025)
Statement of Community Involvement (dated June 2025)
Internal Daylight, Sunlight and Overshadowing Report Rev P01 (dated 29 May 2025)
Sustainable Drainage Strategy, Rev P03 (dated 1 October 2025)
Town Planning Statement, Rev P03 (dated 18 September 2025)
Transport Assessment, Rev P01 (dated 17 June 2025)
Delivery and Servicing Management Plan, Rev P01 (dated 17 June 2025)

Residential Travel Plan, Rev P01 (dated 17 June 2025)
Construction Logistics Plan, Rev P01 (dated 17 June 2025)
Whole Life Cycle Carbon Assessment, Rev P06 (dated 10 October 2025)
Environmental Statement Rev P01 (dated 6 June 2025)
Environmental Statement Addendum Rev P01 (dated 29 October 2025)
Environmental Statement Chapter 11 Addendum (dated October 2025)
Environmental Statement Non-Technical Summary (dated October 2025)

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

APPROVAL OF RESERVED MATTERS

6 (RM1) Approval of Reserved Matters

Approval of the Reserved Matters shall be obtained from the Local Planning Authority in writing prior to the commencement of any development to the development plot which those Reserved Matters relate and the development shall be carried out only as so approved.

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

7 (RM2) Time limit – Reserved Matters applications submission

No later than 20 years following the date of this permission an application or applications shall have been submitted to the Local Planning Authority for the approval of Reserved Matters in respect of all of the built accommodation in the Development hereby permitted.

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

8 (RM3) Time limit – Reserved Matters implementation

No Reserved Matters approval shall be implemented more than 25 years from the date of this permission or 2 years from the date of the final approval of any Reserved Matters application, whichever is the later.

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

9 (RM4) Parameter Plans and Development Specification

Each Reserved Matters application (or groups of related applications) shall be carried out in accordance with the approved Parameter Plans (as per Condition AD2 above) and as described in the specified paragraphs of the approved Development Specification document (Rev. 01 dated June 2025).

For each Reserved Matters application, the following shall be submitted to and approved in writing by the Local Planning Authority:

A compliance report detailing how it complies with the approved parameter plans.

A compliance report detailing how it complies with the approved design codes.

A compliance report detailing how it complies with the approved Development Specification document.

Reason: The development is the subject of an Environmental Impact Assessment and any change to the development from the particulars assessed as above might have an impact, which has not been identified and assessed. The requirements of this condition are to ensure a comprehensive and sustainable development, to achieve integration, regeneration and good design and to accord with the assessment and conclusions of the Environmental Impact Assessment in accordance with policies G1, H1, C1, C2, C3, C4, E1, E2, A1, D1, D2, TC1, TC2 and TC4.

10 (RM5) Reserved Matters – Urban Design Report

Relevant applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by an Urban Design Report which demonstrates how the Reserved Matters has/have been designed to take account of the approved parameter plans, development specification and design code.

The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure a comprehensive and sustainable development, to achieve integration, regeneration and good design and to accord with the

assessment and conclusions of the Environmental Impact Assessment in accordance with policies G1, A1, D1 and D2 of the Camden Local Plan 2017.

11 (RM6) Reserved Matters – Earthworks and Remediation Plan

Relevant applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by an Earthworks and Remediation Plan to deliver appropriate site levels and ground conditions for that part of the development. All works shall be carried out in accordance with the Earthworks and Remediation Plan as approved.

Reason: To ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment, in accordance with policy A1 of the Camden Local Plan 2017.

12 (RM7) Reserved Matters – Illustrative Build Out Plan

Relevant applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by an illustrative build out plan showing:

- (a) the disposition of any buildings for which approval has been given and the take-up through those approvals of the land uses permitted by this planning permission;
- (b) the disposition of any buildings for which approval of Reserved Matters is sought and how the approved uses are to be incorporated in these buildings;
- (c) how the development plots within which buildings for which approval has been given under (a) and those for which approval has been sought under (b) above, may be built out and completed in conformity with this planning permission;
- (d) Development plots (or part thereof) for which buildings have yet to come forward for approval of Reserved Matters;
- (e) the status of each area of public realm as regards the phasing of development; and
- (f) the relationship between the buildings/development referred to in (a) to (e) above.

The proposals will thereafter be constructed in accordance with the approved illustrative build out plan.

Reason: To ensure a comprehensive and sustainable development and to achieve regeneration, integration and good design in accordance the

Environmental Impact Assessment, in accordance with policies G1, A1, D1 and D2 of the Camden Local Plan 2017.

13 (RM8) Reserved Matters – Construction Timetable

Relevant applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by details of:

- (a) the construction timetable for those developments for which approval is sought; and
- (b) how that construction timetable relates to the overall sequence of the development and its division into major phases.

The proposals will thereafter be constructed in accordance with the approved construction timetable.

Reason: To ensure a comprehensive and sustainable development, to protect amenities and ensure safe access in accordance the assessment and conclusions of the Environmental Impact Assessment, in accordance with policy A1 of the Camden Local Plan 2017.

14 (RM9) Reserved Matters – Environmental Sustainability Plan

Relevant applications (or groups of related applications) for approval of Reserved Matters in respect of buildings shall be accompanied by an Environmental Sustainability Plan. The Environmental Sustainability Plan shall explain:

- (a) how the proposed building design(s) realise(s) opportunities to include design and technology energy efficiency measures;
- (b) the reduction in carbon emissions achieved through these building design and technology energy efficiency measures, compared with the emissions permitted under the national Building Regulations prevailing at the time the application(s) for approval of Reserved Matters are submitted;
- (c) the specification for any green and/or blue roofs;
- (d) how energy shall be supplied to the building(s);
- (e) any other measures to incorporate renewables;
- (f) how the proposed building(s) have been designed to achieve BREEAM requirements, as appropriate; and
- (g) the incorporation of bird boxes, bat roosts and other wildlife features on buildings.

The proposals will thereafter be constructed and maintained in line with the approved Environmental Sustainability Plan.

Reason: To ensure a comprehensive and sustainable development and to achieve good design through the development in accordance with the assessment and conclusions of the Environmental Impact Assessment, in accordance with policies A3, CC1, CC2 and CC3 of the Camden Local Plan and London Plan policies SI 2, G5 and G6.

15 (RM10) Reserved Matters – Access Statement

Relevant applications (or groups of related applications) for approval of Reserved Matters pursuant to this permission shall be accompanied by an Access Statement for the development in those Reserved Matters. Each access statement shall:

- (a) address the relevant design principles for those Reserved Matters; and
- (b) highlight any areas where technical or other constraints have prevented or constrained the application of these design principles.

The proposals will thereafter be constructed and maintained in line with the approved Access Statement.

Reason: To ensure a comprehensive and sustainable development and to achieve good design through the development in accordance with the Environmental Impact Assessment, in accordance with policies H1 and C6 of the Camden Local Plan 2017.

16 (RM11) Reserved Matters – Servicing Strategy

A servicing strategy demonstrating where servicing for any building will be located will support any relevant application for approval of Reserved Matters. The strategy shall include details of the proposed hours of servicing and the mechanisms that will be used to ensure loading and unloading takes place and details of waste and recycling in accordance with the strategy as approved. No servicing of any building shall take place on any part of the highway network or public realm other than in accordance with the servicing strategy so approved.

The proposals will thereafter be constructed and maintained in line with the approved Servicing Strategy.

Reason: To ensure safe, efficient and sustainable access to, and protect amenities in, the development in accordance with the assessment and

conclusions of the Environmental Impact Assessment, in accordance with policies A1 and T4 of the Camden Local Plan 2017.

17 (RM12) Reserved Matters – Highways Plan

Relevant applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by a Highways Plan. The Highways Plan shall show any works that are required to the existing adopted highways on and/or around the site to achieve appropriate means of access to those buildings for which approval is sought.

Development shall not commence on those buildings until a detailed concept scheme for the highway works required has been approved by the Local Planning Authority and the buildings shall not be first occupied until the level of works specified by the Local Planning Authority as being required prior to occupation have been completed and provision has been made for the completion of the remaining works.

The proposals will thereafter be constructed and in line with the approved Highways Plan.

Reason: To ensure safe, efficient and sustainable access and to protect amenities and to ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment, in accordance with policies A1, T3 and T4 of the Camden Local Plan 2017.

18 (RM13) Reserved Matters – Housing Delivery Plan

Accompanying each application (or groups of related applications) for approval of Reserved Matters there shall be submitted to the Local Planning Authority a Housing Delivery Plan in relation to those residential units, with the plan giving details of the number of units, size, dwelling and tenure mix.

The proposals will thereafter be constructed and maintained in line with the approved Housing Delivery Plan.

Reason: To ensure a comprehensive and sustainable development and the provision of a variety of housing in terms of size and type of affordability in accordance with policies H1, H2, H4, H6 and H7 of the Camden Local Plan 2017.

19 (RM14) Reserved Matters – Floorplans etc

Accompanying each application (or groups of related applications) for approval of Reserved Matters, details and particulars including floorspace figures, floorplans and layouts of the uses, and the vehicle and other servicing and access, including provision for any cycle parking to be accommodated in built accommodation, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure a comprehensive and sustainable development, to ensure safe and efficient access, to achieve good design and protect amenities and to ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment and in accordance with policies G1, H1, C1, C2, C3, C4, E1, E2, A1, TC1, TC2, TC4, T2, T3, T4.

20 (RM15) Reserved Matters – Statement of Community Involvement

Applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by a Statement of Community Involvement.

Reason: To ensure that the views of the local community including young people are taken into account in further design development of the scheme, including its design and the provision of community facilities in accordance with policies G1, C1, C2, C3 and DM1 of the Camden Local Plan 2017 and the Council's Statement of Community Involvement.

21 (RM16) Reserved Matters – Community Safety Strategy

Applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by a Community Safety Strategy. The proposals will thereafter be constructed and maintained in line with the approved Community Safety Strategy.

Reason: To ensure safe and efficient access, to achieve good design and protect amenities and to ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment on community safety, in accordance with policies A1 and C5 of the Camden Local Plan 2017.

22 (RM17) Reserved Matters – Basements

Relevant applications (or groups of related applications) for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by details of basement floorspace including layout, design, access, the provision of plant and ventilation and an updated Basement Impact Assessment. The basement space so permitted shall only be used for purposes ancillary to the primary purposes permitted for the relevant buildings including the storage of plant equipment, building services and other ancillary storage.

The proposals will thereafter be constructed and maintained in line with the approved basement details.

Reason: To ensure a comprehensive and sustainable development, to ensure safe and efficient access, to achieve good design and protect amenities in accordance with the assessment and conclusions of the Environmental Impact Assessment and in accordance with the requirements of policies D1, T2, T4, A1 and A5 of the Local Plan 2017.

23 (RM18) Reserved Matters – BRE ‘Site Layout and Planning’

Applications (or groups of related applications) for approval of Reserved Matters submitted pursuant to this permission relating to each development plot and the landscaping of the public realm or open space (including courtyard areas), shall be accompanied by a report setting out the level of compliance with the BRE ‘Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2022’, or the superseding BRE guidance standards that will be achieved.

Reason: To ensure sufficient daylight and sunlight to the proposed dwellings, neighbouring dwellings and the proposed open space, in accordance with policies A1 and A2 of the Camden Local Plan 2017.

24 (RM19) Reserved Matters – Total Floorspace

The total floorspace of the outline phases shall not exceed a maximum of 76,520sqm.

Reason: To ensure a comprehensive and sustainable development, to achieve regeneration and integration and to ensure that the development complies with the outline permission and the Environmental Impact

Assessment, in accordance with policies G1, H1, C1, C2, C3, C4, E1, E2, TC1, TC2, TC4 of the Camden Local Plan 2017.

25 (RM20) Reserved Matters – Private Amenity Space

Relevant applications (or groups of related applications) for approval of Reserved Matters shall be accompanied by a report setting out details of private amenity space, demonstrating compliance with the approved plans and documents.

The proposals will thereafter be constructed and maintained in line with the approved private amenity space details.

Reason: To ensure a comprehensive and sustainable development, to achieve regeneration and integration and to ensure that the development complies with the outline permission and the Environmental Impact Assessment, in accordance with policies H1, H2, H4, H6 and H7 of the Camden Local Plan 2017.

26 (RM21) Reserved Matters – Noise

A Noise Assessment shall be provided as part of each Reserved Matters application demonstrating that noise levels within the residential units will meet the relevant policy standards. Details shall take account of noise from:

- existing and proposed plant, machinery and equipment;
- road and rail networks;
- neighbouring residential properties; and
- neighbouring non-residential properties.

Reason: To ensure a comprehensive and sustainable development, to achieve regeneration and integration and to ensure that the development complies with the outline permission and policy A1 of the Camden Local Plan 2017 and the Amenity CPG.

27 (RM22) Reserved Matters – Class E floorspace

The Class E (a), (c), (d), (e), (f) and (g) floorspace shall be provided as part of each Reserved Matters application only in accordance with the floorspace figures and uses as set out in Table 9 of the approved Development Specification.

Reason: To ensure a comprehensive and sustainable development, to achieve regeneration and integration and to ensure that the development complies with the outline permission and the Environmental Impact Assessment, in accordance with policies G1, C1, C2, C3, C4, E1, E2, A1, TC1, TC2 and TC4.

28 (RM23) Reserved Matters – Wind microclimate statement

Relevant applications (or groups of related applications) for approval of Reserved Matters shall be accompanied a Wind Microclimate Statement (WMS) confirming that the wind microclimate effects remain as assessed, or improved, and are compliant with the Environmental Statement (ES). If any wind mitigation measures are required full details shall be provided in the WMS. If the results are worse than the ES conclusions, then a supplementary or addendum ES shall be provided which assesses any new or different impacts.

The proposals will thereafter be constructed and maintained in line with the approved mitigation measures.

Reason: To ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment, in accordance with policy A1 of the Camden Local Plan 2017.

29 (RM24) Reserved Matters – Landscape details (public realm and public open space)

For each Reserved Matters application (or groups of related applications), full details of the public realm associated with that phase shall be provided that comprise details of (where relevant):

- hard and soft landscaping;
- planting plans, including details of replacement and new tree (species and sizes);
- play space specification;
- means of enclosure;
- safety and security features;
- details of accessibility; and
- details of how the urban greening factor has been maximised.

Such details shall include details of any proposed replacement planting and post planting maintenance, earthworks including grading, mounding and other changes in ground levels. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area and sustainability objectives in accordance with the requirements of policies A2, A3, C5, C6, CC2, CC3 and D1 of the Camden Local Plan 2017 and London Plan policy G5 and D8.

30 (RM25) Reserved Matters – Landscape details (private open space)

For each Reserved Matters application (or groups of related applications) full details of the private amenity areas (including courtyard spaces) associated with that phase shall be provided that comprise details of (where relevant):

- hard and soft landscaping;
- planting plans, including details of replacement and new trees (species and sizes);
- play space specification;
- means of enclosure;
- safety and security features;
- details of accessibility; and
- details of how the urban greening has been maximised.

Such details shall include details of any proposed replacement planting and post planting maintenance, earthworks including grading, mounding and other changes in ground levels. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area and sustainability objectives in accordance with the requirements of policies A2, A3, C5, C6, CC2, CC3 and D1 of the Camden Local Plan 2017.

31 (RM26) Reserved Matters – Tree Protection measures

For each Reserved Matters application (or groups of related applications) full details of the tree protection measures shall be submitted on a plot-by-plot basis.

The development shall thereafter be constructed in accordance with the approved tree protection measures.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the Camden Local Plan 2017.

32 (RM27) Reserved Matters – Cycle parking

Relevant applications (or groups of related applications) for approval of Reserved Matters for each development plot or group of plots shall be accompanied by details of long stay and short stay cycle parking including details of electric bike parking and how it meets London Plan 2021 and London Cycle Design Standards. All such facilities shall be provided in accordance with the details thus approved and maintained and retained thereafter.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, London Plan policy T5 and CPG Transport.

33 (RM28) Reserved Matters - Fire Statement and Evacuation Strategy

Relevant applications (or groups of related applications) for approval of Reserved Matters for each plot or group of plots shall be accompanied by a Fire Statement.

The Fire Statement shall be produced by an independent third party suitably qualified assessor and shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how final provision will be made within the site to enable fire appliances to gain access to the building. This shall include a fire and evacuation strategy to take account of any current or emerging standards, including managing assisted evacuation within the building.

The Fire Statement will be subject to referral to the HSE Planning Gateway 1 if the buildings on that plot or group of plots are a 'relevant building' as defined by the Building Safety Act 2022. The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure the development provides for the safety of all building users and the highest standards of fire safety in accordance with Policy D5 and D12 of the London Plan.

34 (RM29) Reserved Matters submission – Green/blue roofs

For each Reserved Matters application (or groups of related applications) full details of the green/blue roofs shall be submitted to demonstrate how the provision of blue/green roofs has been maximised.

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

35 (RM30) Reserved Matters submission – Urban Greening Factor (UGF)

For each Reserved Matters application (or groups of related applications) details of the UGF scores shall be submitted to demonstrate how the UGF has been maximised.

Reason: To ensure the development will increase green cover, is sustainable, improves drainage and promotes biodiversity in line with Camden Local Plan policies CC2, CC3, A2 and A3 and London Plan policy G5 and D8.

36 (RM31) Reserved Matters submission – Ecological Enhancements

For each Reserved Matters application (or groups of related applications) details of the bird and bat boxes and other ecological enhancement measures as appropriate, shall be submitted which demonstrate the opportunities to enhance biodiversity and habitat on site have been maximised. The measures across the site shall include, at a minimum, eight bat boxes, thirty bird boxes and the installation of bee bricks and insect nest boxes, with measures maximised on site. Each submission should include an update on progress of these installations.

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

37 (RM32) Reserved Matters submission – SuDS:

For each Reserved Matters application (or groups of related applications), details of SuDS in accordance with the London Plan drainage hierarchy

should be provided. The development 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. Specifically, the finished floor level (FFL) should be higher than the estimated 100-year pluvial flood level and should not displace pluvial flood water off site. In addition, the development should achieve greenfield runoff rates or the stated runoff rate for each Plot as detailed under Table 8 of the Sustainable Drainage Strategy [Revision P03, 01/10/2025] w. The system shall thereafter be installed, retained and maintained in accordance with the approved maintenance plan, with confirmation provided regarding who will own the maintenance of the implemented SuDS features. The applicant should also follow Adept guidance to determine whether a Flood Risk Emergency Plan is required for each phase and submitted that as part of each reserved matters application.

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 Camden Local Plan and London Plan Policies G5 and D8.

(RM33) Reserved Matters – Renewables

For each Reserved Matters application (or groups of related applications) a renewables feasibility assessment for on a plot-by-plot basis shall be submitted with the aim of maximising the provision of energy via air source heat pumps, solar photovoltaics or other renewables as appropriate within that plot.

Reason: To ensure the development maximises the opportunities for renewable energy and is sustainable in line with Camden Local Plan policy CC1 and London Plan policy SI 2.

(RM34) Reserved Matters - Lighting Strategy

For each Reserved Matters application (or groups of related applications) a Detailed Lighting Strategy for that plot (or group of plots) shall be submitted. The submitted details for each plot will incorporate any changes necessary to any detailed strategies already approved, and shall include details of:

- a) all external lighting to buildings.
- b) all external lighting to public open spaces, public realm and private spaces.
- c) luminance levels of all external lighting.
- d) direction and light-spill of all external lighting.

e) a programme for maintenance of the lighting.

Reason: To ensure the development minimises the opportunities for crime and anti-social behaviour, ensures community safety, creates an inclusive environment and minimises impact on biodiversity and the natural environment, in accordance with policy D1, A2, A3, C5 and C6 of the Camden Local Plan 2017 and policies D5, D8 and D11 of the London Plan 2021.

38 (RM35) Reserved Matters – Whole Life Carbon

Each application (or groups of related applications) for Reserved Matters shall be accompanied by a detailed Whole Life-Cycle Carbon Statement in line with the GLA's Whole Life-Cycle Assessment Guidance. The statement shall adhere to the principles set out in the outline Whole Life-Cycle Carbon Statement. The development shall be carried out in accordance with the details so approved.

Reason: To encourage waste reduction and the sustainable management of waste in accordance with policies CC5 of the Camden Local Plan 2017 and Policy SI 7 of the London Plan 2021.

39 (RM36) Biodiversity – Biodiversity Gain Plan

For each Reserved Matters application (or groups of related applications) an overall biodiversity gain plan shall be submitted that provides an update on site-wide progress of the securing of statutory biodiversity net gain requirements. The overall biodiversity gain plan shall be prepared in accordance with the preliminary ecological appraisal and draft biodiversity metric (unless otherwise agreed first in writing).

Reason: In order to protect and enhance biodiversity in accordance with Policy A3 of the Camden Local Plan 2017 and in order to ensure that biodiversity net gain is achieved.

40 (RM37) Reserved Matters – Finished floor levels

For each reserved matters application, details of SuDS in accordance with the London Plan drainage hierarchy should be provided. The development 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.

Specifically the Finished Floor Level (FFL) should be higher than the estimated 100-year pluvial flood level and should not displace pluvial flood water off site. In addition the development should achieve greenfield runoff rates or the stated runoff rate for each Plot as detailed under Table 8 of the Sustainable Drainage Strategy [Revision P03, 01/10/2025] which shall be submitted to and approved by the Local Planning Authority. The system shall thereafter be retained and maintained in accordance with the approved maintenance plan, with confirmation provided regarding who will own the maintenance of the implemented SuDS features. The applicant should also follow Adept guidance to determine whether a Flood Risk Emergency Plan is required for subsequent phases.

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.

DETAILED DEVELOPMENT (PHASE 1 ONLY)

41 (D1) Phase 1 – Materials details

The details of the following shall be submitted to and approved in writing by the Local Planning Authority before any work is commenced on the relevant part of the development:

- a) 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);
- b) Details of all windows, canopies, ventilation grills, external doors and boundary treatments;
- c) Details including materials of all balconies, balustrades and appropriate privacy measures to minimise overlooking;
- d) Plan, elevation and section drawings, including fascia, cornice, pilasters and glazing panels of new shopfronts;
- e) Details, including samples, of landscaping to all external areas;
- f) Details of lighting within the public realm and fixed to buildings, to include location, design, specification, fittings and fixtures;
- g) Details of landscaping features and plant species to be incorporated within the blocks and their surroundings; and
- h) Details of the ecological enhancements to be integrated into the buildings.

The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

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

42 (D2) Phase 1 – Full scale sample panel

A full-scale sample panel of one whole bay for each of the residential buildings hereby approved (Buildings A1 and D1) shall be provided on site and approved in writing by the Local Planning Authority before the relevant parts of the works are commenced and the development shall be carried out in accordance with the approval given. The approved panel shall be retained on site until the work has been completed or control bay built and used for this purpose instead

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

43 (D3) Phase 1 – Location and provision of wheelchair housing

Notwithstanding the approved plans for internal layouts of the phase 1 development, prior to above ground works, plans showing the final location, layout, and design of all the following units for the phase shall be submitted to and approved by the Local Planning Authority:

Wheelchair adaptable units to comply with Part M4(3)(2)(a) of the Building Regulations; and

Adapted wheelchair accessible units to comply with Part M4(3)(2)(b) of the Building Regulations.

The three wheelchair accommodation units under Part M4(3)(2)(b) shall thereafter be provided in accordance with the approved plans and relevant regulations Building Regulations Part M.

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policies H1 and C6 of the Camden Local Plan 2017.

44 (D4) Phase 1 – Part M4(2) Adaptable Housing

All residential units, unless otherwise specified as a M4(3) unit (wheelchair adaptable and wheelchair accessible units shall be designed and constructed in accordance with Building Regulations Part M4(2).

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policies H1 and C6 of the Camden Local Plan 2017.

45 (D5) Phase 1 – Wind mitigation measures

Prior to occupation of each development plot within phase 1 full details of wind mitigation measures for the ground floor, balconies and roof terraces shall be submitted to and approved in writing by the Local Planning Authority.

The proposals will thereafter be constructed and maintained in line with the approved mitigation measures.

Reason: To ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Statement, in accordance with policy A1 of the Camden Local Plan 2017.

46 (D6) Phase 1 – Phase-wide Landscape Strategy

Prior to commencement of above ground works for Phase 1 of the development hereby permitted, a Phase-wide Landscape Strategy for that phase shall be submitted to and approved in writing by the Local Planning Authority. This shall include a play strategy, including types of play equipment and surfaces (as well as shading of play space) and timing for installation and delivery of the relevant areas, including any temporary landscaping and play space.

The Phase-wide Landscape Strategy shall be used to inform the Detailed Landscape Strategy prepared for each development plot within Phase 1.

Reason: To ensure that the development achieves a high quality of cohesive landscaping which contributes to the visual amenity and character of the area and sustainability objectives in accordance with the requirements of policies A2, A3, C5, C6, CC2, CC3, and D1 of the Camden Local Plan 2017.

47 (D7) Phase 1 – Landscape details (public realm and public open space)

For each development plot in Phase 1, prior to commencement of the relevant part of the development full details for the permanent and temporary public realm associated with that plot comprising:

- hard and soft landscaping;
- planting plans, including details of tree species and sizes
- play space specification;
- means of enclosure;
- safety and security features; and
- details of accessibility.

Shall be submitted to and approved by the Local Planning Authority in writing. Such details shall include details of any proposed replacement planting and post planting maintenance, earthworks including grading, mounding and other changes in ground levels. The relevant part of the

works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area and sustainability objectives in accordance with the requirements of policies A2, A3, C5, C6, CC2, CC3 and D1 of the Camden Local Plan 2017.

48 (D8) Phase 1 – Landscape details (private open space)

For each development plot in Phase 1, prior to commencement of the relevant part of the development full details for the private amenity areas associated with that plot comprising:

- hard and soft landscaping;
- planting plans, including details of tree species and sizes;
- play space specification;
- means of enclosure;
- safety and security features; and
- details of accessibility.

Shall be submitted to and approved by the Local Planning Authority in writing. Such details shall include details of any proposed replacement planting and post planting maintenance, earthworks including grading, mounding and other changes in ground levels. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area and sustainability objectives in accordance with the requirements of policies A2, A3, C5, C6, CC2, CC3 and D1 of the Camden Local Plan 2017.

49 (D9) Phase 1 – Tree Protection measures

Prior to the commencement of demolition/construction works on each development plot on the Phase 1 site, tree protection measures shall be installed in accordance with the approved Tree Survey, Arboricultural Impact Assessment and Method Statement dated April 2025. The protection shall then remain in place for the duration of works on that development plot and recommendations made in the method statement followed, unless otherwise agreed in writing by the local authority.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the Camden Local Plan 2017.

50 (D10) Phase 1 – Green/blue roofs

Prior to commencement of each relevant plot of above-ground development in Phase 1, full details in respect of the blue/ green roof in the area indicated on the approved roof plan shall be submitted to and approved in writing by the Local Planning Authority. Details of the blue/green roof provided shall include: catchment area, storage volume, drainage rate, species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long-term viability of the green/blue roof, as well as details of its maintenance programme. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

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

51 (D11) Phase 1 – Bird and bat boxes

Prior to commencement of above ground works for each development plot in Phase 1, a plan showing details of bird and bat box locations and types and indication of species to be accommodated in that plot shall be submitted to and approved in writing by the Local Planning Authority.

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

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

52 (D12) Phase 1 – SuDS: Evidence of Installation

Prior to occupation of each development plot in Phase 1 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. The name of the management company responsible for the maintenance of the system should be provided to the Local Planning Authority.

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 Camden Local Plan Policies and London Plan policy G5 and D8.

53 (D13) Phase 1 – Waste and recycling storage to be implemented

The waste and recycling storage shown on the approved plans and documents shall be provided for each of the residential and non-residential uses within a plot, prior to the occupation of the relevant use in that block. It shall thereafter be retained for the duration of the development for its designated use.

Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management of waste and to safeguard the visual amenities of the in accordance with policies CC5, D1 and TC4 of the Camden Local Plan 2017, and Policy SI 7 of the London Plan 2021.

54 (D14) Phase 1 – Whole Life Carbon

Prior to the stages outlined below an updated version of the Whole Life Carbon Assessment must be submitted to and approved in writing by the Local Planning Authority:

- (a) Prior to commencement of any work on site including all works of deconstruction and demolition.
- (b) Prior to commencement of any construction works.

Whole life carbon should be minimised where feasible. Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 806kgCO₂e/m² and/or Whole Life Carbon (A1-C4) above 1191kgCO₂e/m², which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. Work must not commence on site (as appropriate pursuant parts (a) and (b) above) until the Council has approved the updated assessment you have sent us.

Works shall then be carried out, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

Reason: To ensure the development minimises carbon emissions throughout its whole life cycle and optimises resource efficiency in accordance with Policy SI2 in the London Plan 2021 and Policy CC1 of the Camden Local Plan.

55 (D15) Phase 1 – Whole Life Carbon (post-construction)

Prior to the first occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to ZeroCarbonPlanning@london.gov.uk and SustainabilityPlanning@camden.gov.uk, along with any supporting evidence as per the guidance.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Camden Local Plan policies CC1, CC2, CC3, and CC4, and London Plan policies, SI1, SI2, SI3, SI4, SI5 and SI7.

56 (D16) Phase 1 – Circular Economy (Waste)

Prior to occupation of each development plot, the likely destination of all waste streams and confirmation that the destination landfill has capacity in respect of the waste from that plot shall be submitted to and approved by the Local Planning Authority (in consultation with the GLA).

Reason: To encourage waste reduction and the sustainable management of waste in accordance with policies CC5 of the Camden Local Plan 2017 and Policy SI 7 of the London Plan 2021.

57 (D17) Phase 1 – Circular Economy - post-completion report

Prior to occupation of each development plot, a Circular Economy post-completion report for that plot shall be submitted to and approved (in consultation with the GLA) in writing by the Local Planning Authority.

Reason: To encourage waste reduction and the sustainable management of waste in accordance with policies CC5 of the Camden Local Plan 2017 and Policy SI 7 of the London Plan 2021.

58 (D18) Phase 1 – Air source heat pumps

Prior to occupation of each development plot, details, drawings and data sheets showing the location and carbon saving of the air source heat pumps and associated equipment to be installed, shall have been submitted to and approved in writing by the Local Planning Authority. The measures shall include the installation of meters 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 equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development maximises the opportunities for renewable energy, minimises the impact on climate change and is sustainable in line with Camden Local Plan policy CC1 and London Plan policy SI 2.

59 (D19) Phase 1 – Photovoltaic cells

Prior to first occupation of the development hereby approved evidence showing that Solar PV has been maximised and details of the location of at least 101 panels covering 179m² for A1 and 47 panels covering 83m² for D1 with energy generation capacity (at least 31.8kWp for A1 and 14.8 for D1) and associated equipment installed on the building in accordance with the approved details as part of the development as well as details of the maintenance programme 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. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems.

Reason: To ensure the development maximises the opportunities for renewable energy, minimises the impact on climate change and is sustainable in line with Camden Local Plan policy CC1 and London Plan policy SI 2.

60 (D20) Phase 1 – Rain/grey water harvesting

Prior to commencement of development other than site clearance & preparation, details of rainwater/greywater recycling proposals should be submitted to the Local Planning Authority and approved in writing. The

development shall thereafter be constructed in accordance with the approved details.

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

61 (D21) Phase 1 – Green roof details

Prior to commencement of above-ground development, full details in respect of the green roof in the area indicated on the approved roof plan shall be submitted to and approved by the Local Planning Authority. Details of the green roof provided shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long-term viability of the green roof, as well as details of the maintenance programme for the green roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: To ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the Camden Local Plan 2017.

62 (D22) Phase 1 – Cycle parking

Prior to first occupation of each development plot details of long and short stay bicycle parking including details of electric bike parking shall be submitted to the Local Planning Authority for its written approval. Thereafter the development should be completed in accordance with the approved detailed and maintained and retained as such.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, the London Plan policy T5 and CPG Transport.

63 (D23) Phase 1 – Fire safety

The Phase 1 detailed part of the development must be implemented in accordance with the provisions of the Stage 3 Fire Strategy documents for both Block A1 and Block D1 as submitted with the application.

Reason: To ensure the development provides for the safety of all building users and the highest standards of fire safety in accordance with Policy D5 and D12 of the London Plan.

64 (D24) Phase 1 – Urban greening factor

Prior to the first occupation of the development on Phase 1 full details of the urban greening factor proposals for the development shall be submitted to and approved in writing by the Council. The proposals should demonstrate that steps have been taken to maximise the greening factor achievable on the site.

Reason: In accordance with the urban greening objectives of Policy G5 of the London Plan

65 (D25) Phase 1 – Lighting strategy

Prior to the commencement of development on Phase 1 hereby approved, a Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Lighting Strategy shall be used to inform the Detailed Lighting Strategy prepared for each Reserved Matters submission.

Reason: To ensure the development minimises the opportunities for crime and anti-social behaviour, ensures community safety, creates an inclusive environment and minimises impact on biodiversity and the natural environment, in accordance with policy D1, A2, A3, C5 and C6 of the Camden Local Plan 2017 and policy D5, D8 and D11 of the London Plan 2021.

66 (D26) Phase 1 – Basement impact assessment

The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment Revision 3 dated October 2025 (as reviewed by BIA Audit by Campbell Reith Rev. F1 dated November 2025) hereby approved, which conform that at the detailed design stage the damage impact assessment would be limited to Burland Category 1.

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 and A5 of the London Borough of Camden Local Plan 2017.

67 (D27) Phase 1 – ASHP cooling turned off

Prior to first use of any air source heat pump hereby approved within Phase 1, the active cooling function shall be disabled on the factory setting and the air source heat pump shall be used for the purposes of heating only.

Reason: To ensure the proposal is energy efficient and sustainable in accordance with policy CC2 of the London Borough of Camden Local Plan 2017.

68 (D28) Phase 1 – Gate to be closed

Prior to first occupation of the Phase 1 development the passageway to the rear of Block A1 shall be gated and secured.

Reason: To ensure the development is safe and secure in accordance with Camden Local Plan policy C5.

MASTERPLAN (ALL PHASES)

69 (M1) Phasing Plan

Prior to the commencement of development for each plot an updated Construction Phasing Document shall be submitted to and approved in writing by the Council. Thereafter the construction phasing of the development may be varied from time to time following resubmission to and approval in writing by the Council.

In the event the updated Construction Phasing Document is different to the Indicative Construction Phasing Document (0WKTE-AHMM-XX-XX-RP-PL046 Rev. 01) and the changes are likely to result in new or different significant environmental impacts to those assessed at the time of the determination of the planning application then such Construction Phasing Document shall be accompanied by an Environmental Statement or Supplemental Environmental Statement in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The development shall thereafter be carried out in accordance with the updated Construction Phasing Document and subject to the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 applying to any such amended or updated Construction Phasing Document.

Reason: To ensure a comprehensive and sustainable development and to achieve regeneration, integration and good design in accordance the Environmental Impact Assessment, in accordance with policies G1, A1, D1 and D2 of the Camden Local Plan 2017.

70 (M2) Fire vehicle access arrangements

Prior to the commencement of development on any part of the masterplan site, the Fire Appliances Access Arrangements for occupied buildings on or around the site shall be submitted to and approved in writing by the Local Planning Authority.

The Fire Vehicle Access Arrangements shall demonstrate how provision will be made within and around the masterplan site to enable fire appliances to gain access to any occupied buildings during construction.

The Fire Appliances Access Arrangements document shall be reviewed and updated to include each building constructed through this permission prior to its occupation, and prior to first commencing development on a plot or phase of part of the

masterplan site. The development and any interim access arrangements during construction shall be carried out and provided for in accordance with the approved details.

Reason: To ensure the development, both during construction and as completed, provides appropriate access for fire appliances, the safety of all building users and the highest standards of fire safety in accordance with Policy D5 and D12 of the London Plan.

71 (M3) Removal of permitted development rights

Notwithstanding the provisions of Part 3 of the Schedule of the Town and Country Planning (Use Classes) Order, 2015, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the Class E uses hereby approved shall not be used for any activity within sub use class (b).

Reason: To ensure that the uses approved come forward in line with the permission in accordance with policies G1, C1, C2, C3, C4, E1, E2, A1, TC1, TC2 and TC4 of the Camden Local Plan 2017.

72 (M4) External fixtures

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

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

73 (M5) Removal of deemed consent for advertisements on buildings

Notwithstanding Part 2 of the Town and Country Planning (Control of Advertisements) Regulations 2007, or any provision equivalent, deemed consent for adverts on new buildings is removed.

Reason: To ensure an attractive urban environment free from clutter in accordance with policy D1 of the Camden Local Plan 2017.

74 (M6) Enabling works

Details of the Enabling Works, including layout, designs, and specifications shall be submitted to and approved in writing by the Local Planning Authority before commencement of those works. All works shall be carried out in accordance with the details as approved.

Reason: To ensure a comprehensive, sustainable and integrated development, facilitate regeneration and ensure safe and efficient access and to ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment, in accordance with policies A1 and T4 of the Camden Local Plan 2017.

75 (M7) Major utilities infrastructure

Details of all major utilities' infrastructure (including substations and other permanent structures and excluding temporary structures) including the consent of relevant utility companies to those works, shall be submitted to and approved in writing by the Local Planning Authority prior to any works taking place in relation to such structures. All works shall be carried out in accordance with the details as approved.

Reason: To ensure a comprehensive, sustainable and integrated development, facilitate regeneration and ensure safe and efficient access and to ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment, in accordance with policies A1, CC3 and T4 of the Camden Local Plan 2017 and policy D2 and SI 5 of the London Plan.

76 (M8) Noise – plant etc.

Prior to commencement of above ground works for each development plot, details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/ equipment will be lower than the lowest existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. Approved details shall be implemented prior to occupation of the development plot by plot and thereafter be permanently maintained and retained.

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

77 (M9) Machinery/Plant in permanent situ

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

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

78 (M10) Road Traffic Noise – Internal

Prior to commencement of above ground works of each development plot, a scheme shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that all habitable rooms exposed to external road traffic noise in excess of 55dBA Leq 16 hour [free field] during the day [07.00 to 23.00 hours] or 45dBA 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 35dBA Leq 16 hour during the day and 30dBA Leq 8 hour at night. The submitted 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 thereafter be permanently retained.

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

79 (M11) Road Traffic Noise – External

Prior to commencement of above ground works of each development plot, a scheme has been submitted to and approved in writing by the Local

Planning Authority to provide that the maximum day time noise level in outdoor living areas exposed to external road traffic noise shall not exceed 50 dBA Leq 16 hour [free field]. The scheme of noise mitigation as approved shall be constructed in its entirety prior to the first occupation of any dwelling and shall be retained thereafter in perpetuity.

Reason: To ensure that the amenities of future occupiers are protected.

80 (M12) Railway Vibration

Prior to commencement of above ground works of each development plot a scheme shall be submitted to and approved in writing by the Local Planning Authority to provide that the dwellings are designed and constructed so as to ensure that vibration dose values do not exceed 0.4m/s^{1.75} between 07.00 and 23.00 hours, and 0.26m/s^{1.75} between 23.00 and 07.00 hours, as calculated in accordance with BS 6472-1:2008, entitled "Guide to Evaluation of Human Exposure to Vibration in Buildings", [1Hz to 80Hz].

No dwelling shall be occupied until the approved anti-vibration measures have been installed to that property in accordance with the approved details. The approved measures shall thereafter be permanently retained.

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

81 (M13) Mechanical Ventilation

Prior to commencement of above-ground development for all relevant parts of the development 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, railway lines and the generator flue or any other emission sources, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

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

82 (M14) Separation of noise sensitive rooms in neighbouring flats

Prior to commencement of above ground works of each development plot, a scheme shall be submitted to and approved in writing by the Council, of

an enhanced sound insulation value $D_{nT,w}$ [and $L'_{nT,w}$] 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 above bedroom of separate dwelling]. Approved details shall be implemented prior to occupation of the development plot by plot and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise in accordance with the requirements of policy A1 and A4 of the Camden Local Plan.

83 (M15) Separation of commercial and noise sensitive premises

Prior to occupation of each development plot details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ ceiling/ walls separating any commercial part(s) of the development from dwellings or other noise sensitive premises. Details shall demonstrate that the sound insulation value $D_{nT,w}$ [and $L'_{nT,w}$] is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the 'Good' criteria of BS8233:2014 within the dwellings/ noise sensitive premises. Approved details shall be implemented prior to occupation of the development plot by plot and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ adjacent dwellings/noise sensitive premises is not adversely affected by noise in accordance with the requirements of policy A1 and A4 of the Camden Local Plan.

84 (M16) Basement suitable qualified engineer

Prior to the commencement of each development plot, details of a suitably qualified chartered engineer with membership of the appropriate professional body shall have been appointed to inspect, check for compliance with 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.

Reason: To ensure a comprehensive and sustainable development, to achieve good design and protect amenities in accordance with the assessment and conclusions of the Environmental Impact Assessment and in accordance with the requirements of policies D1, A1 and A5 of the Camden Local Plan 2017.

85 (M17) Diesel or oil back-up generators

Prior to the commencement of above ground works for any relevant part of the development details of the proposed Emergency Diesel Generator Plant (or any alternative means of back-up power generation, if feasible) and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The flue/exhaust from the generator should be located away from air inlet locations. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.

Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with policy A1 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.

86 (M18) Air Quality information

At least 3 months prior to commencement of each phase, an air quality assessment report, written in accordance with the relevant current guidance, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be at least "Air Quality Neutral" and an air quality neutral assessment for both buildings and transport shall be included in the report. The assessment shall assess the current baseline situation in the vicinity of the proposed development. The report shall include all calculations and baseline data and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations. An assessment should be made of the construction dust risk and appropriate mitigation proposed and implemented. An Air Quality positive assessment should be provided. If required a scheme for air pollution design solutions or mitigation measures based on the findings of the report shall be submitted to and approved in writing by the Local Planning Authority prior to development. This shall include mitigation for when air quality neutral transport and building

assessments do not meet the benchmarks or if mitigation is not adequate then an air quality neutral offset payment may be agreed.

The approved design or mitigation scheme shall be constructed and maintained in accordance with the approved details.

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

87 (M19) Air Quality dust monitoring

No demolition, excavation, or other development shall commence on any development plot until real time dust monitors appropriate to the dust risk of the plot have been installed and the following have been complied with:

- a) prior to installing monitors for the related development plot, full details of the air quality monitors have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance.
- b) A confirmation email shall be sent to airquality@camden.gov.uk no later than five days after the monitors have been installed in line with the approved details.
- c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

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

Reason: To mitigate the impact of dust emissions from development on air quality in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policy A1 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.

88 (M20) Non road-mobile machinery (NRMM)

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

Reason: To ensure that air quality is not adversely affected by the development in accordance with policy A1 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.

89 (M21) Network Rail

The development hereby permitted shall not be commenced on a relevant development plot until detailed design and method statements demonstrating that there is no impact on Network Rail infrastructure have been submitted to and approved (in consultation with Network Rail) in writing by the Local Planning Authority. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To ensure that the development does not impact on existing transport infrastructure, in accordance with London Plan 2021 policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

90 (M22) Piling Method Statement

No piling shall take place until a Piling Method Statement for each relevant phase (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: To ensure the protection of underground sewerage utility infrastructure and management of the water environment in accordance with Camden Local Plan policy CC3.

91 (M23) Thames Water

The development shall not be occupied until confirmation for each phase has been provided that either:

- (1) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or
- (2) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.

Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: To ensure the adequate provision of water infrastructure to meet the developments needs and to protect the water environment from harm in accordance with policy CC3 and A1 of the Camden Local Plan 2017 and policy D2 and SI 5 of the London Plan 2021.

92 (M24) Water efficiency

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation of each development plot, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

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

93 (M25) Land Contamination Risk Assessment

Part A:

No development shall commence on any development plot until an updated desk study (with walkover completed) is submitted to and approved in writing by the Local Planning Authority.

Part B:

No development shall commence on any development plot until a site investigation is undertaken for that plot to which it belongs, and the findings are submitted to and approved in writing by the Local Planning Authority. The site investigation should assess all potential risks identified by the desktop study for that plot 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 the latest published Land Contamination Risk Management government guidance or superseding guidance (LCRM) and by a competent person.

Part C:

No development shall commence on any development plot until a Remediation Method Statement for that plot to which it belongs is submitted to and approved in writing by the Local Planning Authority. This strategy 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 and by a competent person.

Part D:

Within six weeks of the completion of any remediation, a verification report demonstrating that the remediation as outlined in the Remediation Strategy has been completed should be submitted to the Local Planning Authority for approval in writing. 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 and waste management documentation. All works must be carried out in compliance with LCRM and by a competent person.

Reason: To safeguard future users or occupiers of this site and the wider environment from risks associated with contaminants which may be present in the land and to ensure that the development can be carried out safely without unacceptable risk to workers, neighbours and other offsite receptors, that any work has been carried out effectively and the environmental risks have been satisfactorily managed, in accordance with policies G1, D1, A1, and DM1 of the Camden Local Plan 2017.

94 (M26) Secured by Design

- (a) Prior to above ground construction works for each plot evidence that the plans can achieve secured by design accreditation must be submitted to and approved in writing (in consultation with the Designing Out Crime Officer) by the Local Planning Authority.
- (b) Prior to first occupation of each plot evidence that the buildings will achieve secured by design accreditation to silver award must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development minimises the opportunities for crime and anti-social behaviour and ensures community safety in accordance with policy D1 and C5 of the Camden Local Plan 2017 and policy and D11 of the London Plan 2021.

95 (M27) Reuse and recycling of demolition waste

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

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

96 (M28) Photovoltaic Cells

Prior to commencement of above ground works for each phase, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells / energy generation capacity as a minimum to meet the proposals in table 4.2 of the Energy and Sustainability Statement, May 2025 and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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

(M29) SUDS system details

The sustainable drainage system as approved (Sustainable Drainage Strategy Revision P03, 01/10/2025) shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not

occur in any part of a building or in any utility plant susceptible to water and to achieve a proposed runoff rate of 3 l/s for Plots A1 and D1, and 26.5 l/s for the entire site area. The system shall include 160m² green roofs, 325m² blue roofs, 120m² permeable paving, water butts, rain gardens and attenuation tanks, as stated in the approved drawings and shall thereafter be retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the Camden Local Plan 2017.

97 (M30) Biodiversity – Biodiversity Gain Plan

Prior to the commencement of development on each plot a biodiversity gain plan shall be submitted to and approved by the Local Planning Authority. The biodiversity gain plan shall be prepared in accordance with the preliminary ecological appraisal and draft biodiversity metric (unless otherwise agreed first in writing).

Reason: In order to protect and enhance biodiversity in accordance with Policy A3 of the Camden Local Plan 2017 and in order to ensure that biodiversity net gain is achieved.

98 (M31) Biodiversity – Habitat Management and Monitoring Plan

Prior to the commencement of development on each plot a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the Biodiversity Gain Plan, shall be submitted to and approved by the Local Planning Authority. The HMMP shall include:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the Local Planning Authority.

Reason: In order to protect and enhance biodiversity in accordance with Policy A3 of the Camden Local Plan 2017 and in order to ensure that biodiversity net gain is achieved.

99 (M32) Biodiversity – completion of enhancements

Prior to first occupation of each plot:

- (a) the habitat creation and enhancement works set out in the approved HMMP have been completed; and
- (b) a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.

Reason: In order to protect and enhance biodiversity in accordance with Policy A3 of the Camden Local Plan 2017 and in order to ensure that biodiversity net gain is achieved.

39. INFORMATIVES

100

Construction and demolition works and associated activities at the development, audible beyond the boundary of the site should not be carried out other than between the hours of 07:00 – 18:00 Monday to Friday daily, 08:00 – 13:00 on Saturdays and at no other times, including Sundays and Public/Bank Holidays, unless otherwise agreed with the Environmental Health Officer

101

At least 21 days prior to the commencement of any site works, all occupiers surrounding the site should be notified in writing of the nature and duration of works to be undertaken. The name and contact details of a person responsible for the site works should be made available for enquiries and complaints for the entire duration of the works and updates of work should be provided regularly. Any complaints should be properly addressed as quickly as possible.

102

No waste materials should be burnt on site of the development hereby approved.

103

All waste materials and rubbish associated with demolition and/or construction should be contained on site in appropriate containers which, when full, should be promptly removed to a licensed disposal site.

104

The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

105

Please read Thames Water's guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near their pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes>. Should you require further information please contact Thames Water. Email:

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

The developer can request information to support the discharge Thames Water conditions by visiting the Thames Water website at thameswater.co.uk/preplanning.

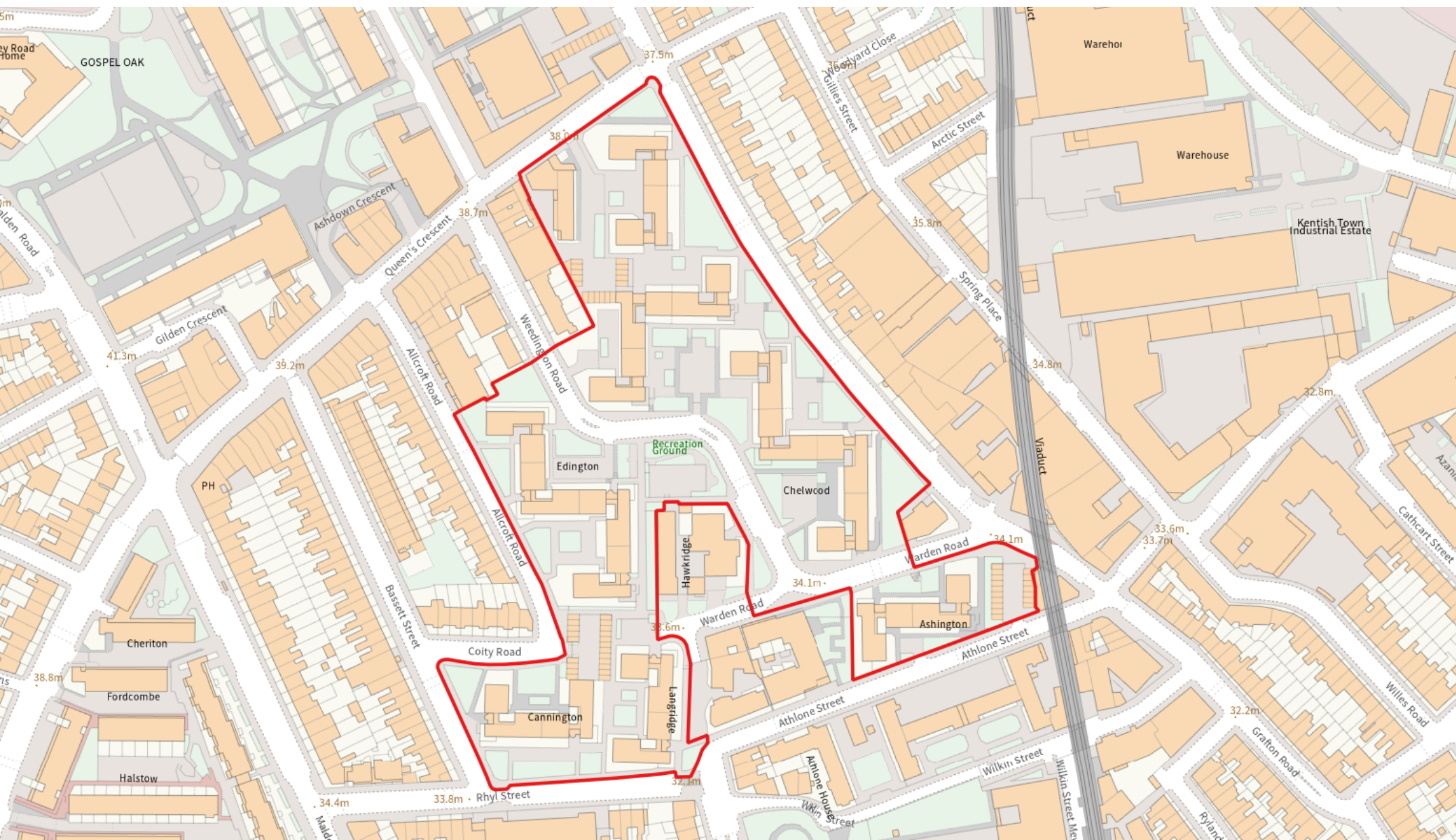
106

The biodiversity gain plan as requested above must include: information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;

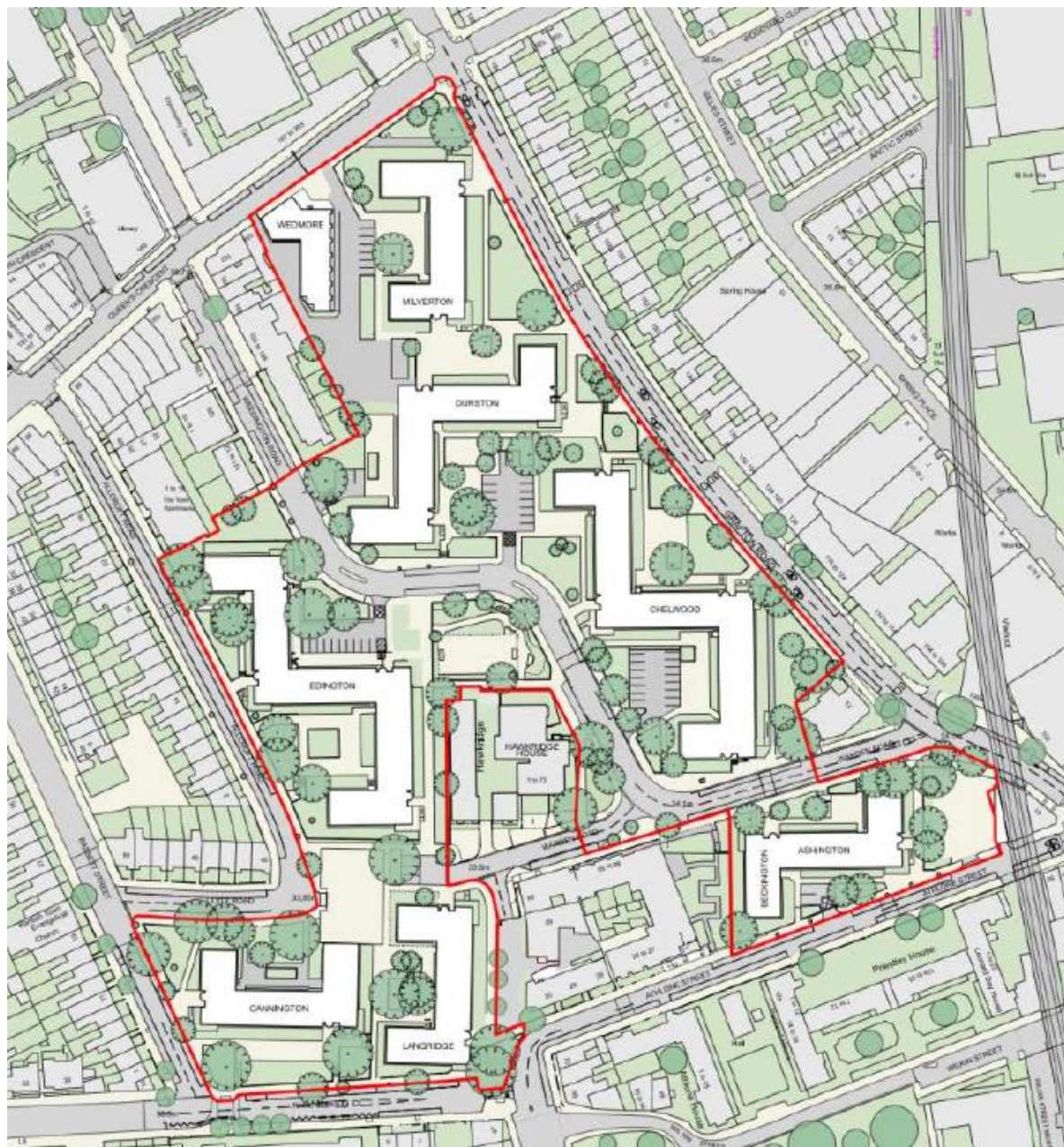
- (a) the pre-development biodiversity value of the onsite habitat;
- (b) the post-development biodiversity value of the onsite habitat;
- (c) any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- (d) any biodiversity credits purchased for the development; and
- (e) any such other matters as the Secretary of State may by regulations specify.

107

When calculating the post-development biodiversity value of a habitat, the planning authority can only take into account an increase in biodiversity value post-development where it is satisfied that the habitat creation or enhancements delivering the increase will be maintained for at least 30 years after the development is completed and where this is secured either by a planning condition, planning obligation, or conservation covenant.









1 Queen's Crescent



2 Grafton Road terrace housing



4 Weedington Road



5 Athlone Street Estate



6 Rhyl Street housing estate



8 Bassett terrace housing



9 Allcroft Road terrace housing



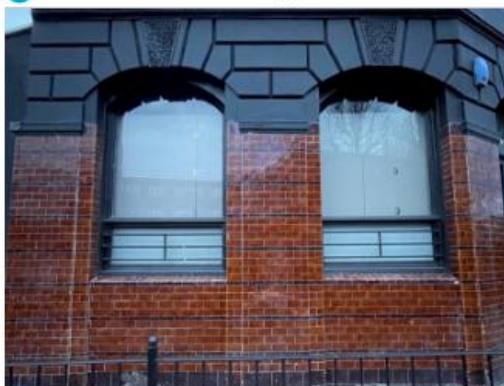
10 Rhyl School



11 Hawkridge House



12 Athlone Street Railway Bridge

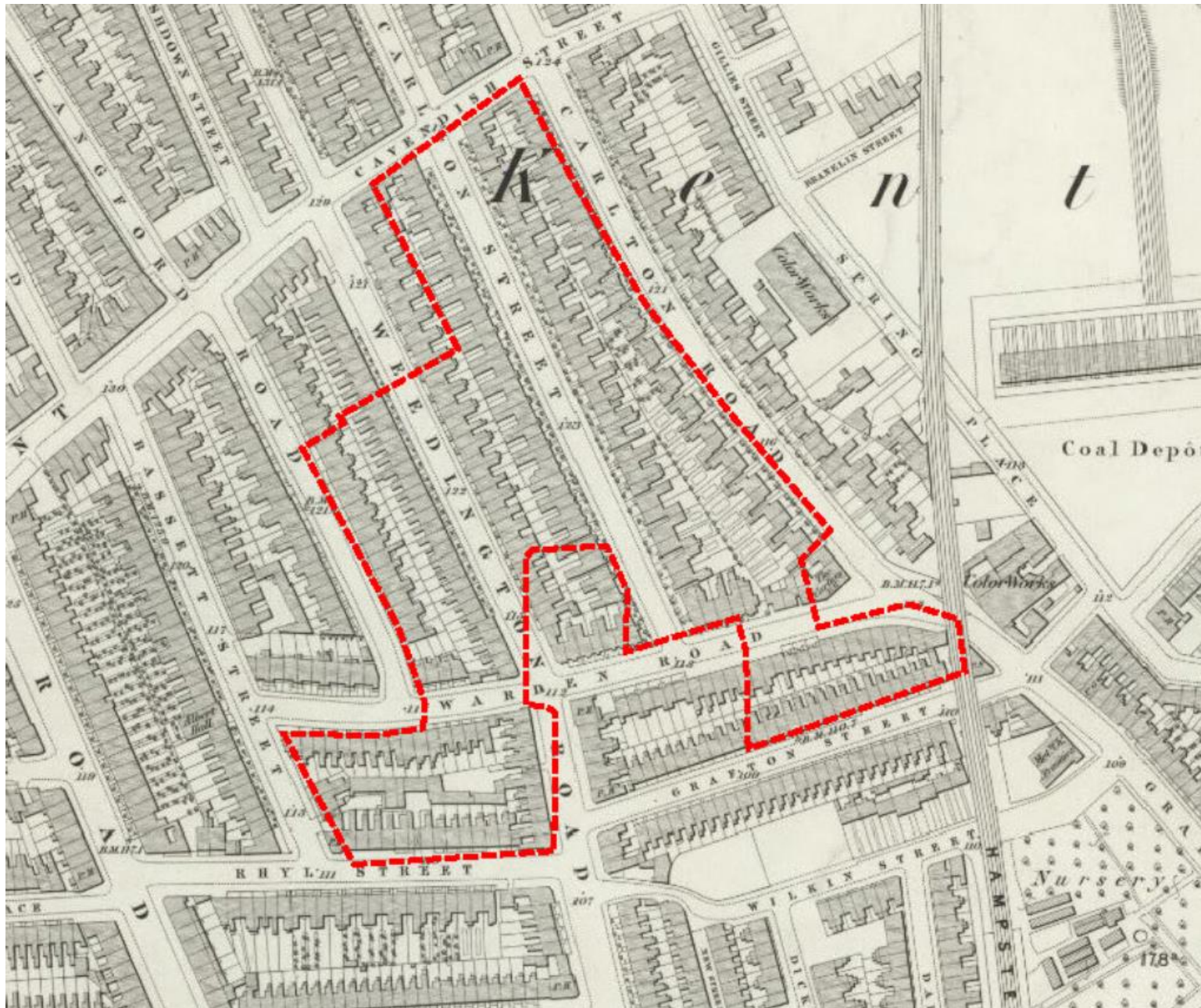


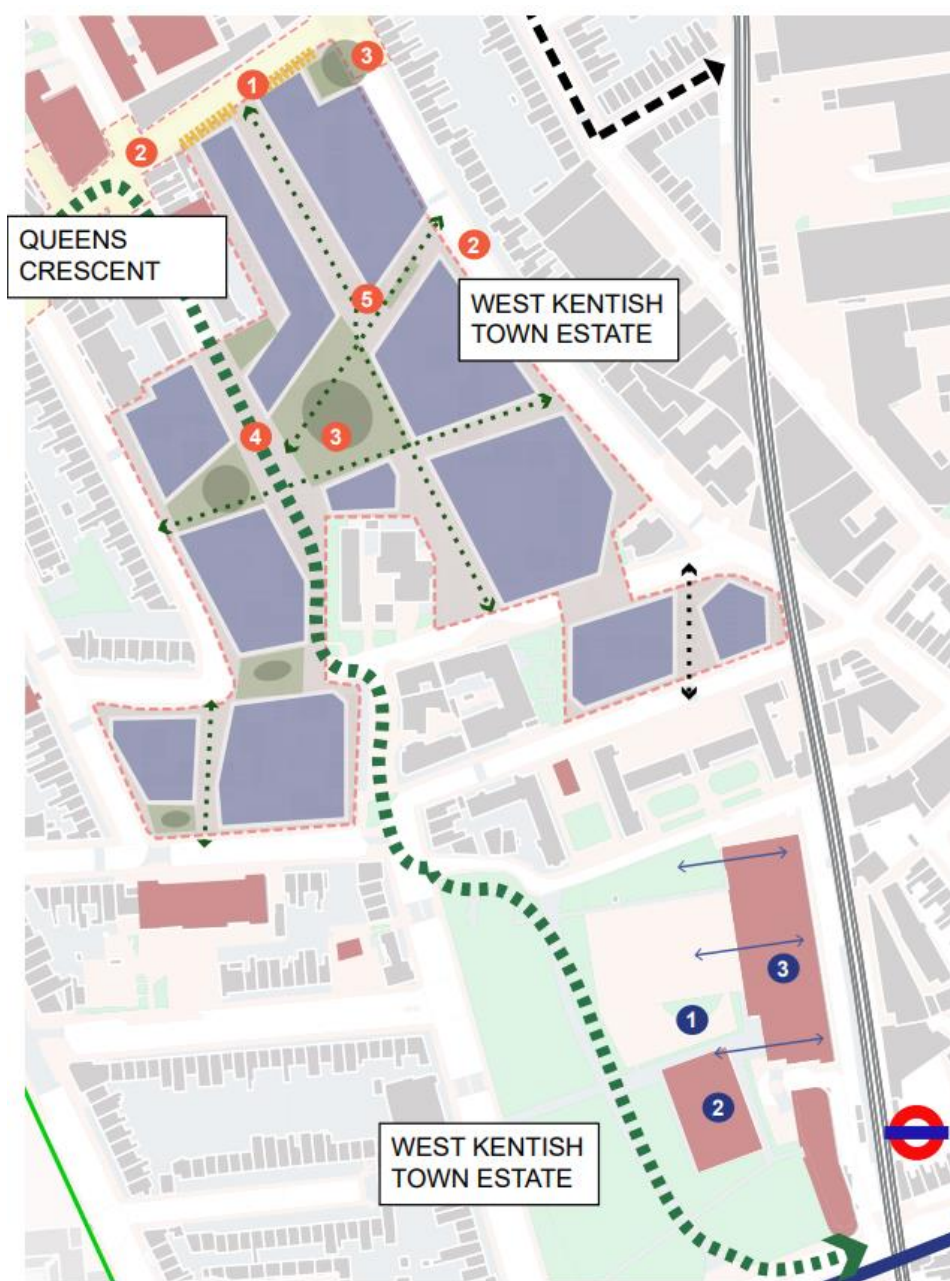
13 Glazed tiles to The Carlton



14 Queen's Crescent housing above Library







WEST KENTISH TOWN ESTATE

- 1 Use development of West Kentish Town Estate to create a strong and more active frontage to Queens Crescent with space for health, community and/or commercial uses
- 2 Improvements to adjoining streets
- 3 Play and green spaces for the whole community
- 4 Improve north/south route for pedestrians to better link Queens Crescent with Talacre Town Green, Gospel Oak station and Lismore circus
- 5 New pedestrian routes linking into wider street network to make walking and cycling easier and safer

TALACRE TOWN GREEN

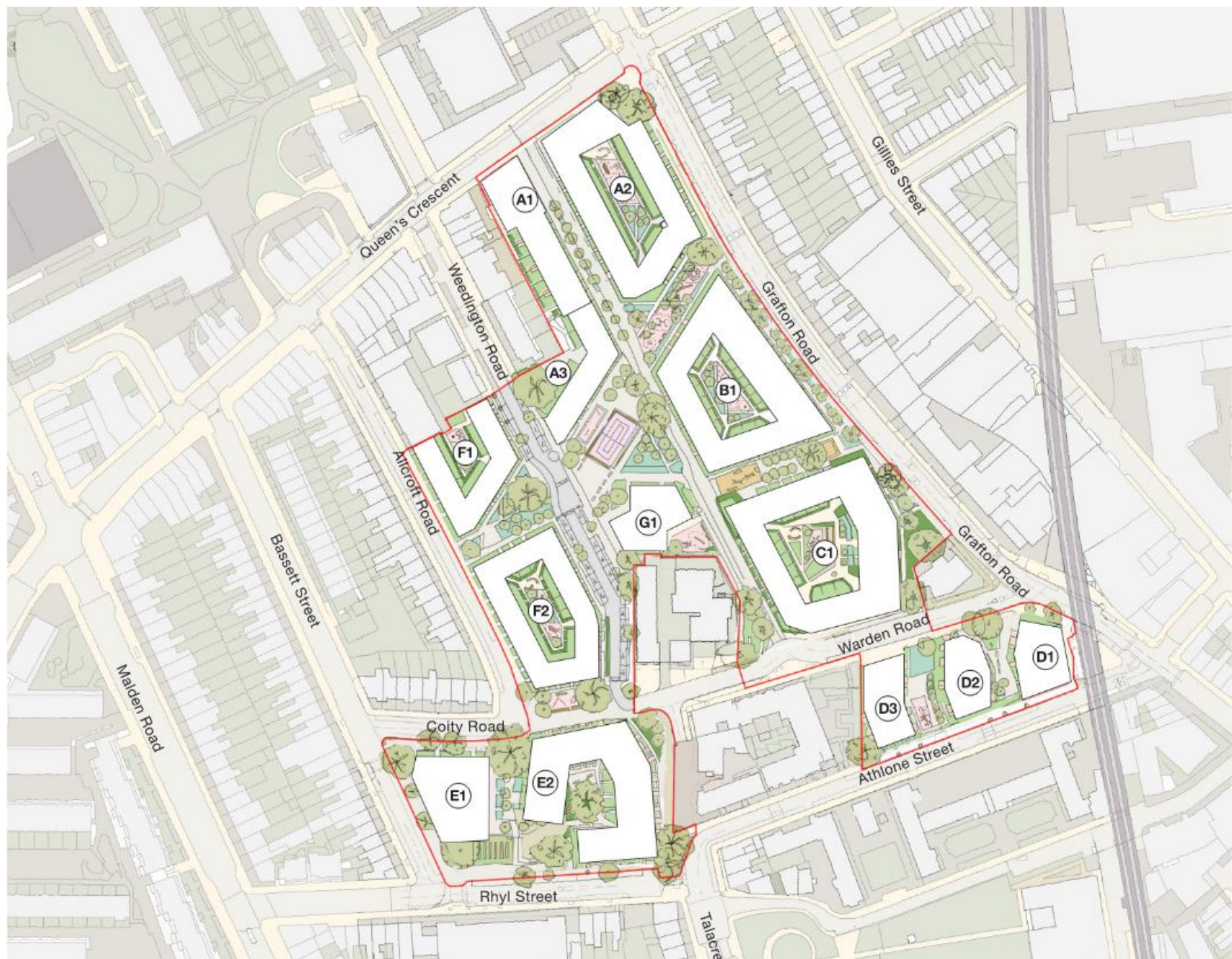
- 1 Refurbish playground to improve facilities for a range of ages
- 2 Explore opportunities to improve free youth offer, with potential to repurpose concrete court and surrounding space for wheel park and multi-sports area
- 3 Invest in sports centre to improve offer and better integrate centre facilities with the park and its routes through.

Key

- Illustrative zones where potential new housing might be located
- Local services and community facilities
- Potential areas for upgraded and new green and open spaces
- Queens Crescent
- Introduce more active frontages
- New and improved pedestrian green links



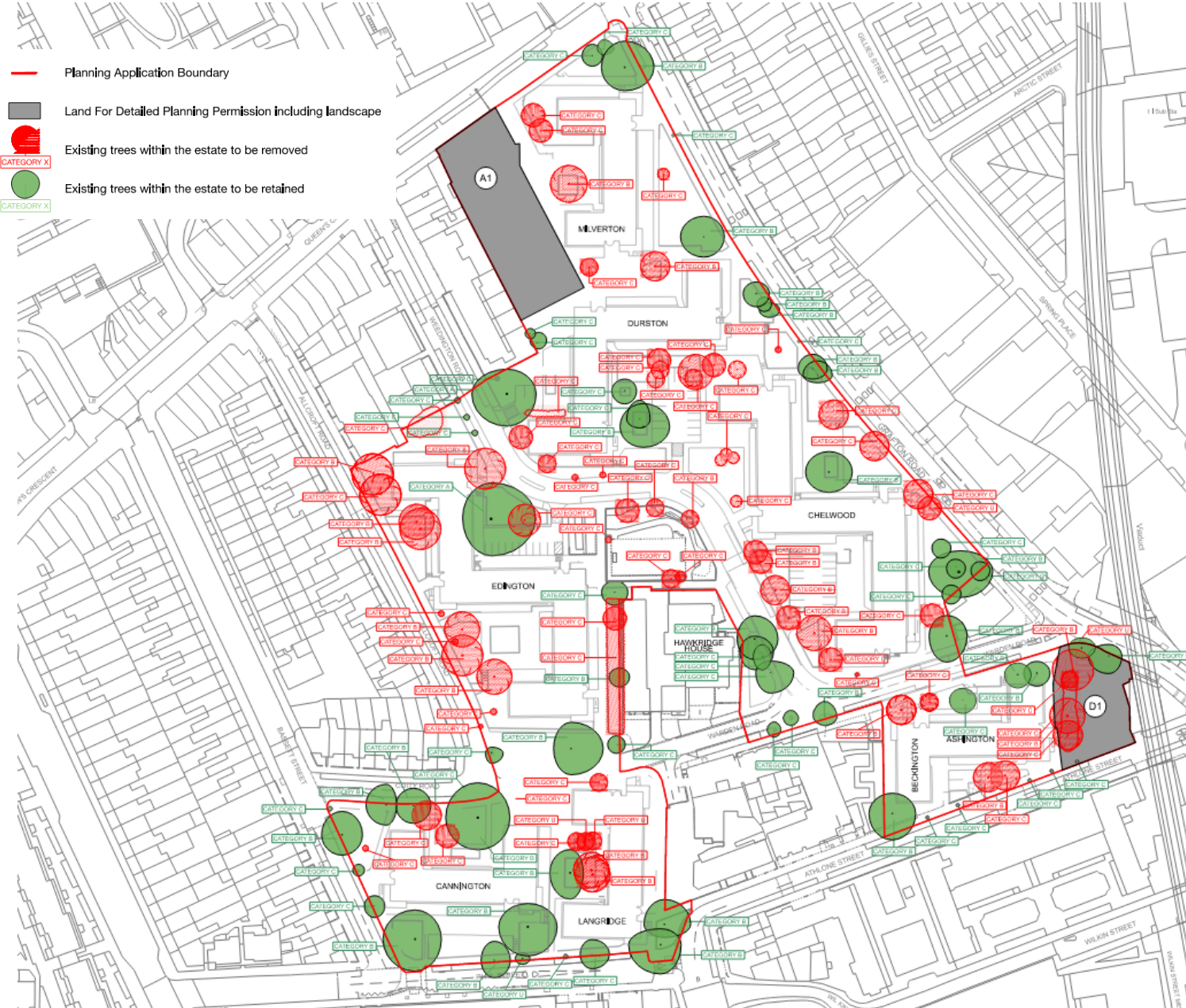












A cat. A Plane tree



A cat. A Beech tree

Key

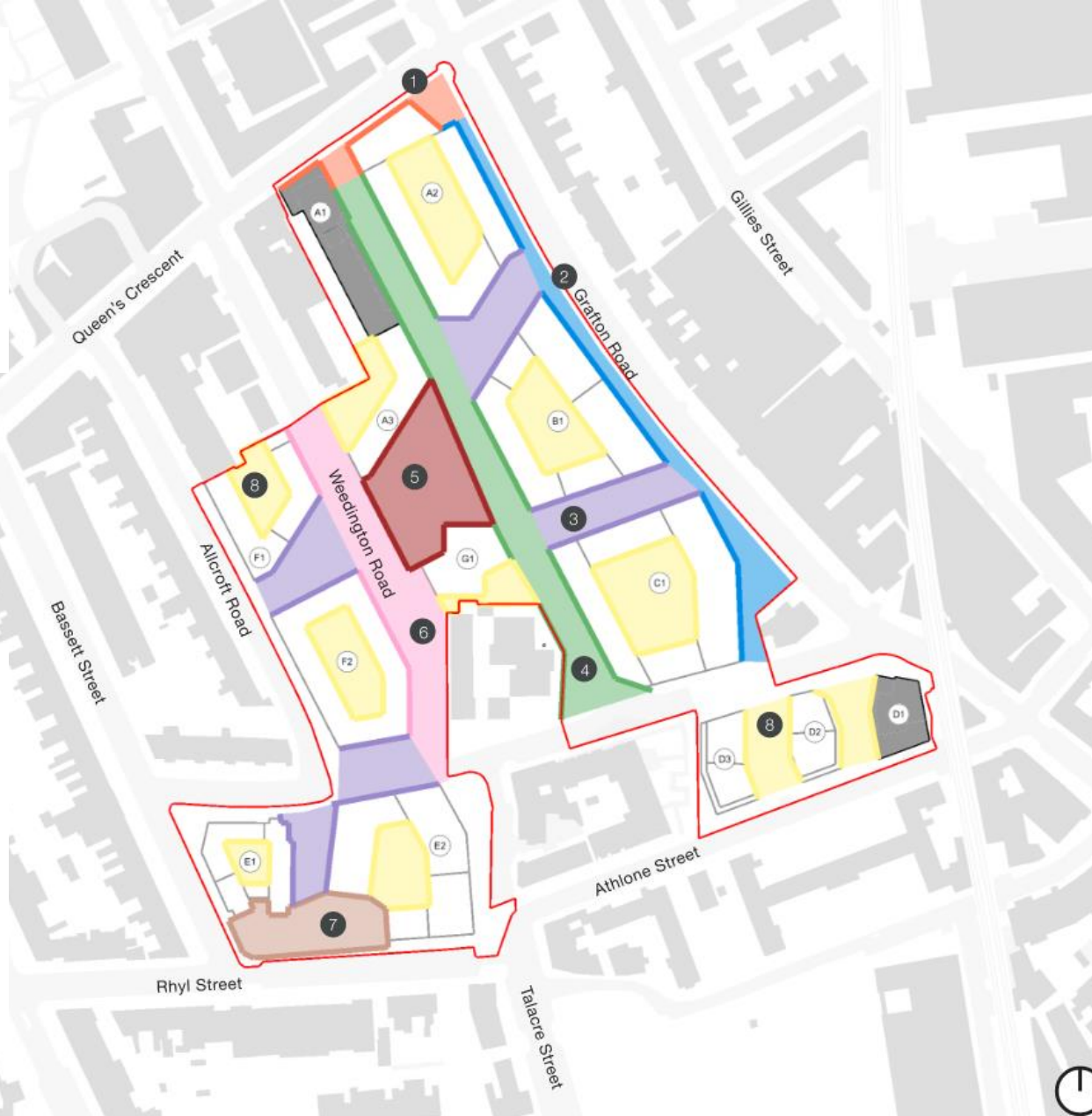
- Primary public space
- Secondary public space
- Rhyl Corner public space
- Communal spaces
- Central spine



- 1 Queen's Crescent
- 2 Grafton Road
- 3 Public Pocket Space
- 4 Central Spine
- 5 Central Public Space
- 6 Weedington Road
- 7 Rhyl Corner
- 8 Courtyards

Key

- Planning Application Boundary
- Queen's Crescent
- Grafton Road
- Public Pocket Space
- Central Spine
- Central Public Space
- Weedington Road
- Rhyl Corner
- Courtyards



Queen's Crescent is located to the north of the West Kentish Town Estate development boundary and is defined by the vibrant street market and the eclectic frontage along the road. Buildings along this road are characterised with retail units at ground floor and residential uses above.

Characteristics

Primary brickwork: Buff brick, London Stock brick

Accents: Ground level, entrances, fenestrations and building corners

Accent colours: White and cream

Accent materials: Reconstituted stone and masonry



Illustrative Key Plan of Queen's Crescent



Grafton Road is defined by the large courtyard plots and the green edge towards the street, establishing a sympathetic relationship with the Victorian houses and small scale business plots opposite.

New green links from east to west are created lead from Grafton Road into the Central Public Space through playful and lush corridors.

Primary brickwork: Gradients of light grey, buff and brown brick

Accents: Main entrances and ground floor level

Accent colours: Contrasting

Accent materials: Feature tiling, textured materials



Illustrative Key Plan of Grafton Road



The Public Pocket Space conditions are created between buildings, of which have an intimate relationship with existing roads, namely; Grafton Road, Allcroft Road, Weedington Road, Warden Road, Coity Road and Rhyl Street.

These pocket spaces are defined by the residential character of the surrounding buildings and will provide a fine-grained public amenity space with a playful design.

Primary brickwork: In coherence with adjoining plot buildings.

Accents: Doors and balconies

Accent colours: Contrasting, textured materials



Illustrative Key Plan of Pocket Square



Key

1. car free informal street and servicing access
2. main footpath through to Grafton Road
3. short stay bike parking
4. natural play space
5. 5-11 year old play space
6. outdoor fitness area
7. rain garden
8. secondary pedestrian path



Pedestrianised area with planting



Imaginative play area



Creative surfacing and furniture



Natural play space



Outdoor fitness station

The Central Spine is defined by the new linear public space, which runs north to south and through the large Central Public Spaces. It will offer a high quality outdoor space with characterful planting and furniture, becoming a local destination.

The Central Spine is the main public route through the heart of the Masterplan and acts as a hinge connecting all the key spaces and allowing occasional vehicular access from north to south across the estate.

Primary brickwork: Buff and beige brick

Accents: Datum levels, brick piers, balconies

Accent colours: To match adjoining buildings

Accent materials: Patterned brickwork, textured materials



Illustrative Key Plan of Central Spine



This space provides the largest extent of public amenity in the new scheme and is designed to be the heart of the public realm.

Primary brickwork: Oranges and red brick

Accents: Ground floor, brick piers, balconies

Accent colours: mid-dark tone

Accent materials: Patterned brickwork and terracotta tiles

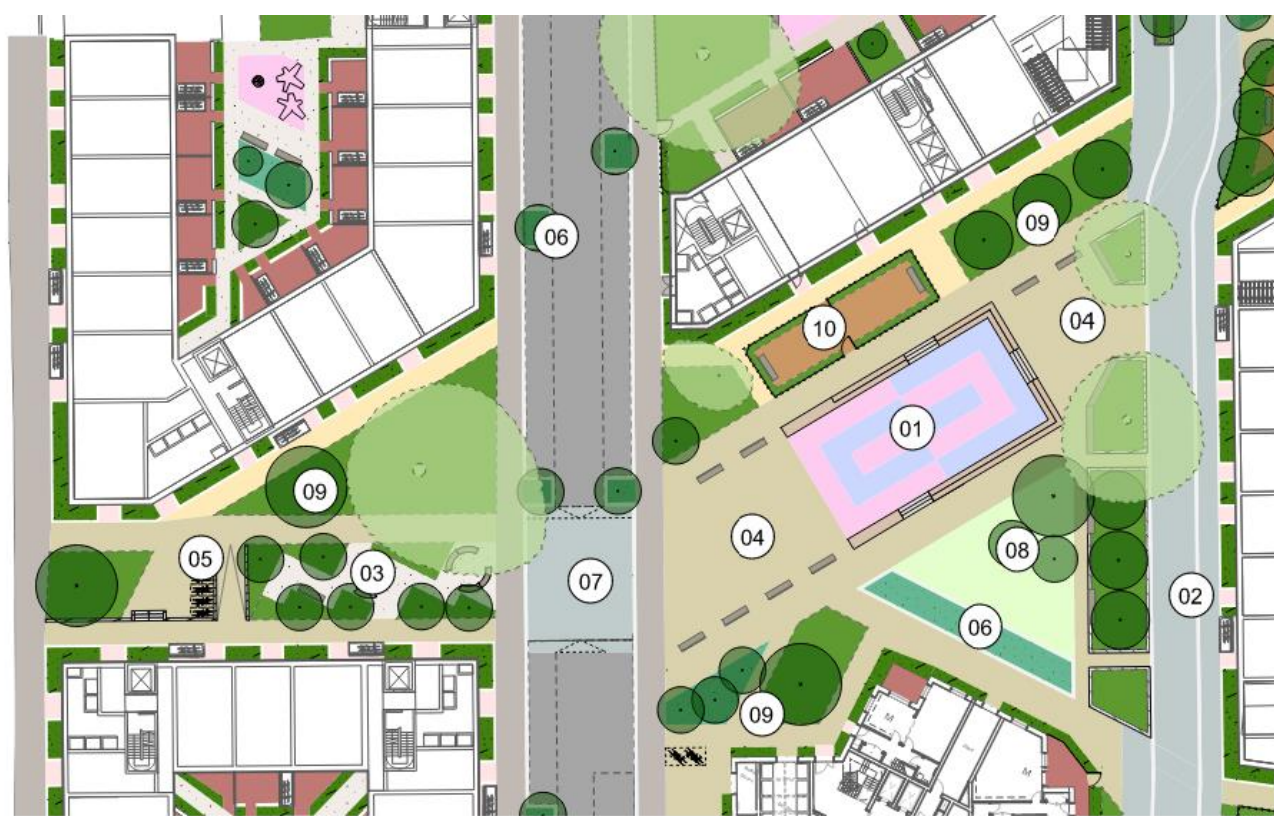


Illustrative Key Plan of Central Public Space



Key

1. multi-purpose play in square with seating
2. car free informal street and servicing access
3. seating and amenity planting
4. main public squares
5. short stay bike parking
6. rain gardens
7. raised table crossing on Weedington Road
8. central lawn area
9. ornamental planting and biodiverse mix
10. doorstep play space



Large public square



Public seating space under trees



Tiered seating and sunken pitch



Public space atmosphere



Areas for socialising

The Weedington Road edge responds to the quiet setting along the western frontage and is characterised by Public Pocket Squares opening in key locations, to allow permeability through the Central Public Square from west to east.

Weedington Road is designed to allow unobstructed vehicular traffic to the public and will form the main vehicular route through the estate.

Primary brickwork: Buff and brown bricks

Accents: window lintels and sills and window surrounds

Accent colours: light contrasting

Accent materials: Brickwork and reconstituted stone



Illustrative Key Plan of Weedington Road



Rhyl Corner complements the quieter and more intimate streetscape condition to south of the Site. These plots respond to the slightly detached location from the main Site and seeks to establish a dialogue with the residential and educational facilities nearby, in particular with Rhyl Primary School and Talacre Gardens.

Primary brickwork: Orange and red bricks

Accents: Datum levels, fenestration surrounds and building corners

Accent colours: White and cream

Accent materials: Brickwork and reconstituted stone



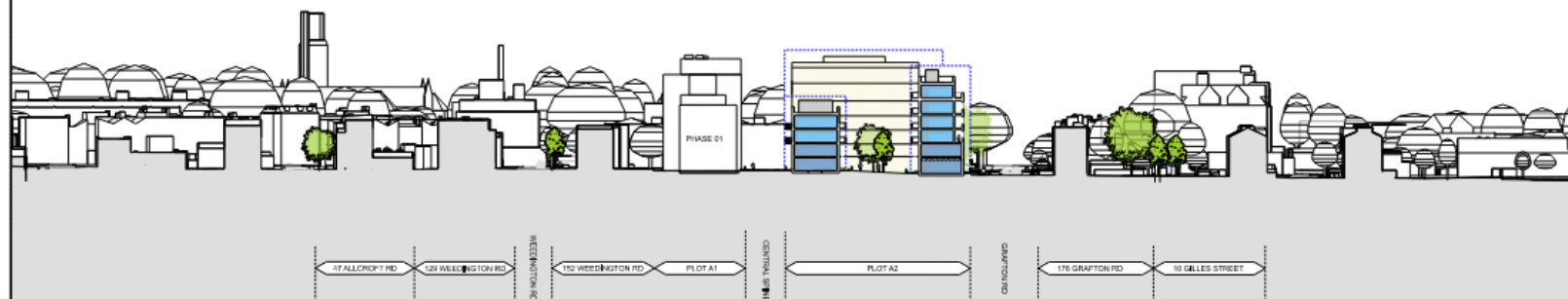
Illustrative Key Plan of Rhyl Corner



PROPOSED SITE SECTIONS - SHORT SECTION A:A



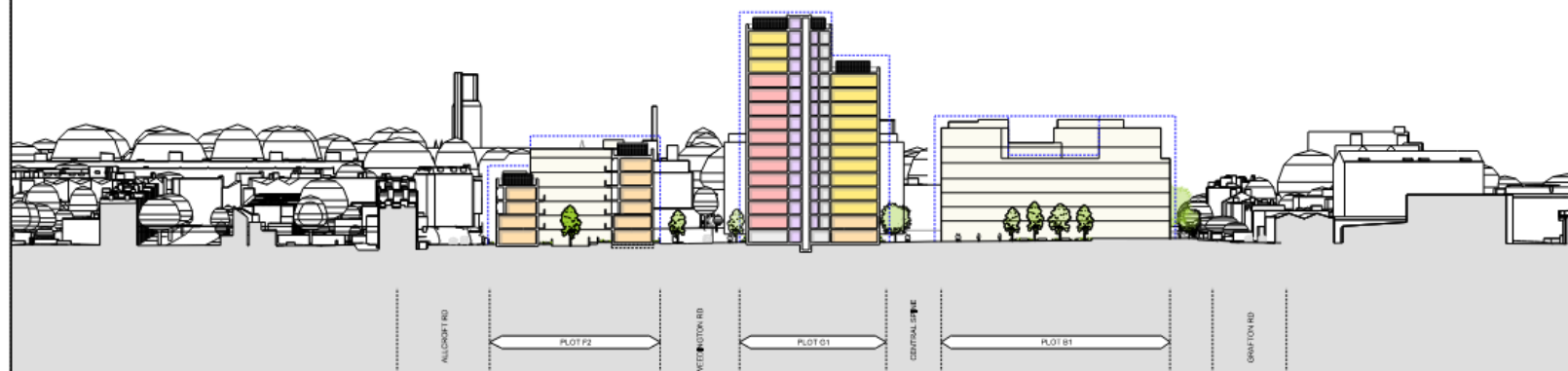
PLEASE NOTE: THE MAXIMUM PARAMETER
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DESIGN CODE THAT CONTROL HOW DEVELOPMENT
FOR THE OUTLINE PERMISSION MUST COME FORWARD



PROPOSED SITE SECTIONS - SHORT SECTION D:D

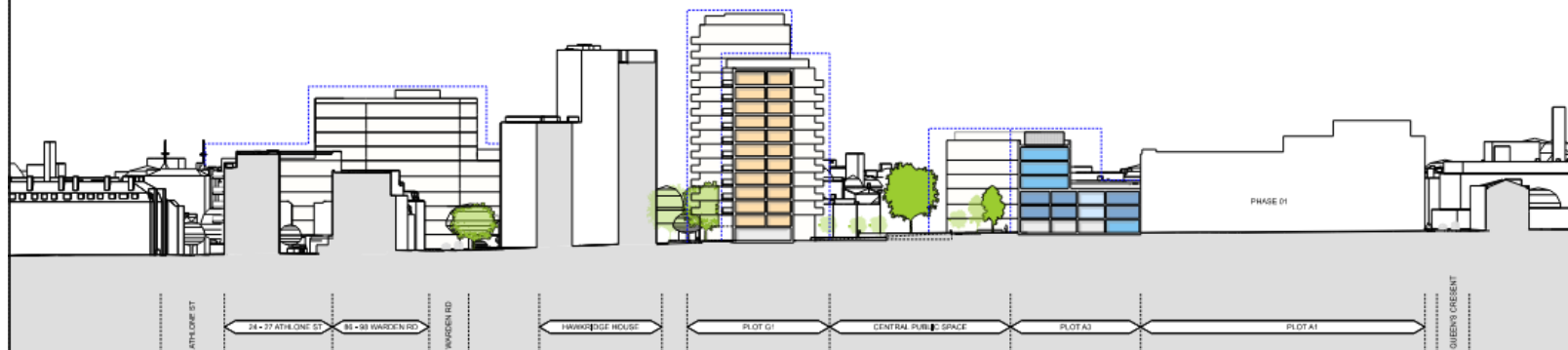


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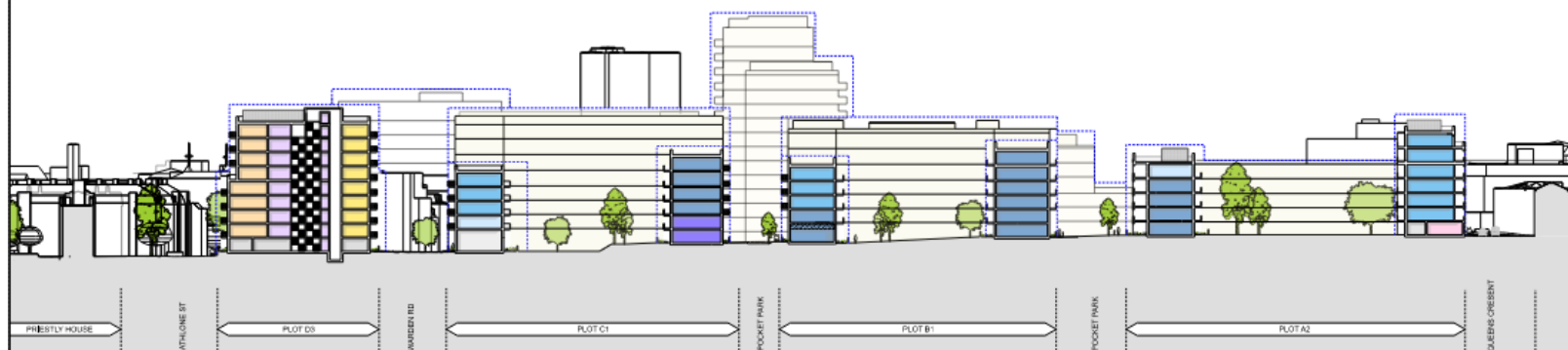


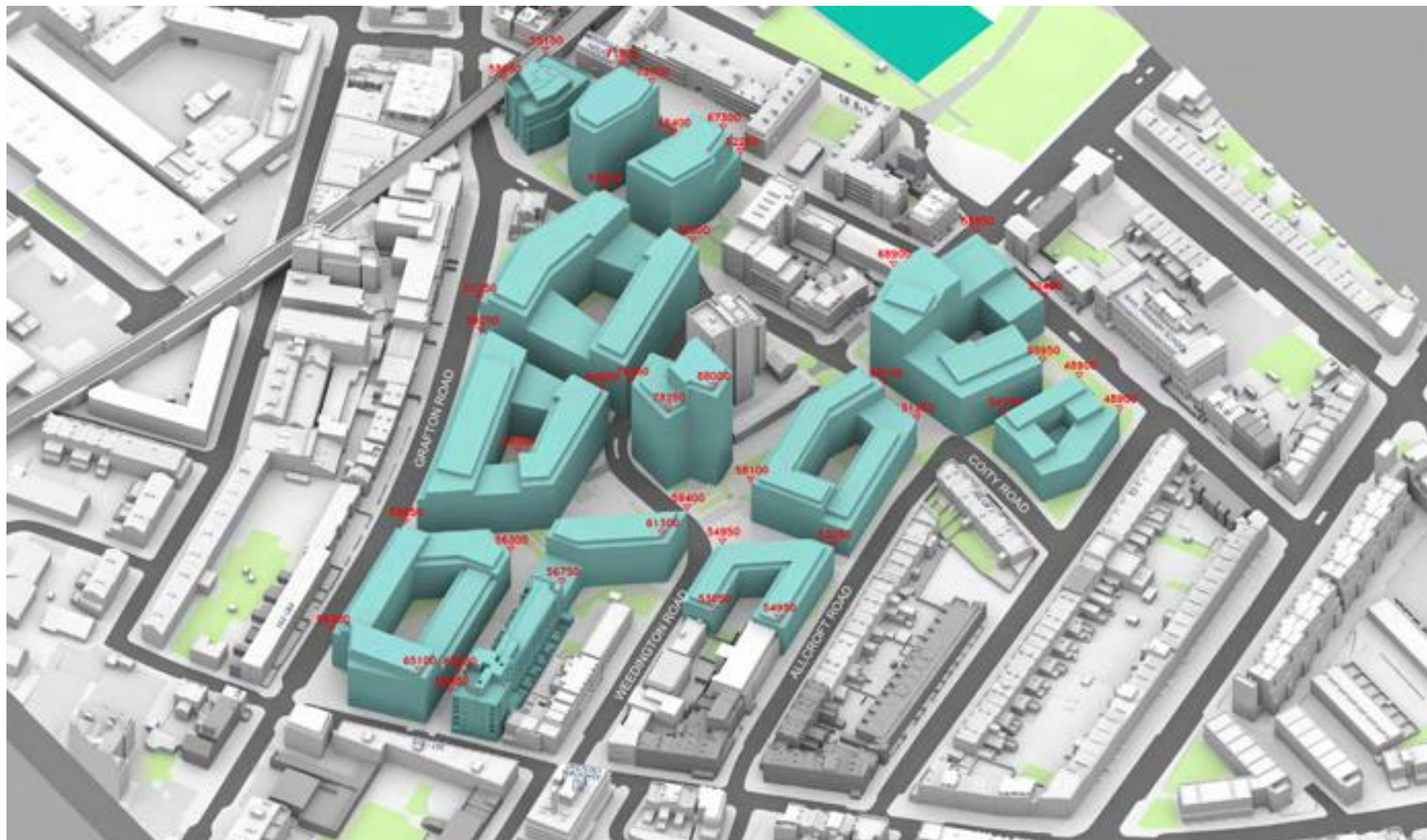


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FOR THE OUTLINE PERMISSION MUST COME FORWARD







VP 1 - Grafton Road (North)



VP 2 - Grafton Road (North)



VP 3 - Queen's Crescent (Eastern end)



VP 4 - Grafton Road - Junction with Holmes Road



VP 5 - Holmes Road - Close to junction of Cathcart Street



VP 6 - Grafton Road (South) - Close to Inkerman Road



VP 7 - Grafton Road (South) - Close to junction with Wilkin St.



VP 8 - Prince of Wales Rd - Entrance to Talacre Town Green



VP 9 - Talacre Town Green



VP 10 - Talacre - Pedestrian entrance Talacre Town Green



VP 11 - Malden Road - Junction with Rhyl Street



VP 12 - Bassett Street - Junction with Coity Road



VP 13 - Queen's Street - Junction with Allcroft Road



VP 14 - Queen's Crescent - Western End



VP 15 - Platform of Kentish Town West Station



VP 16 - Grafton Road - Close to the Carlton



VP 17 - LVMF View 2B.1 - London Parliament Hill



VP 18 - GLVMF 2A.1 Parliament Hill Summit to St Paul's.



VP 19 - Junction of Grafton Road/Queen's Crescent Looking West and South



VP 20 - Grafton Road - Looking South



VP 21 - Junction of Grafton Road / Warden Road Looking



VP 22 - Athlone Street Looking East



VP 23 - Allcroft Road Looking South



VP 24 - Queen's Crescent



VP 25 - Talacre Road near to the Junction, Wilkin Street



VP 26 - Rhyl Street









VP 27 - Bassett Street Looking South Towards School

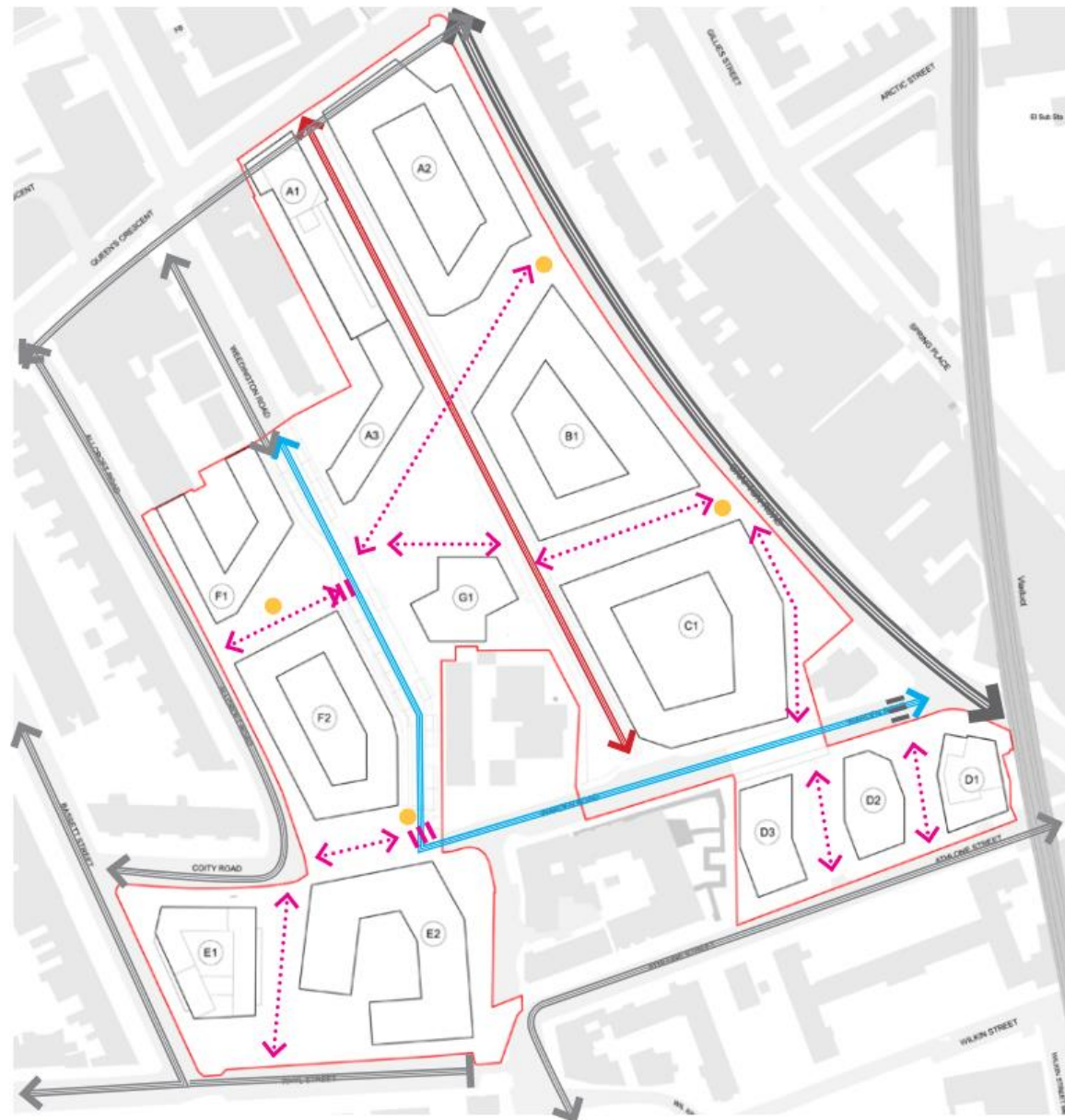


VP 28 - From the Junction of Weedington Road and Queen's Crescent



Proposed Illustrative Masterplan Tenure Distribution

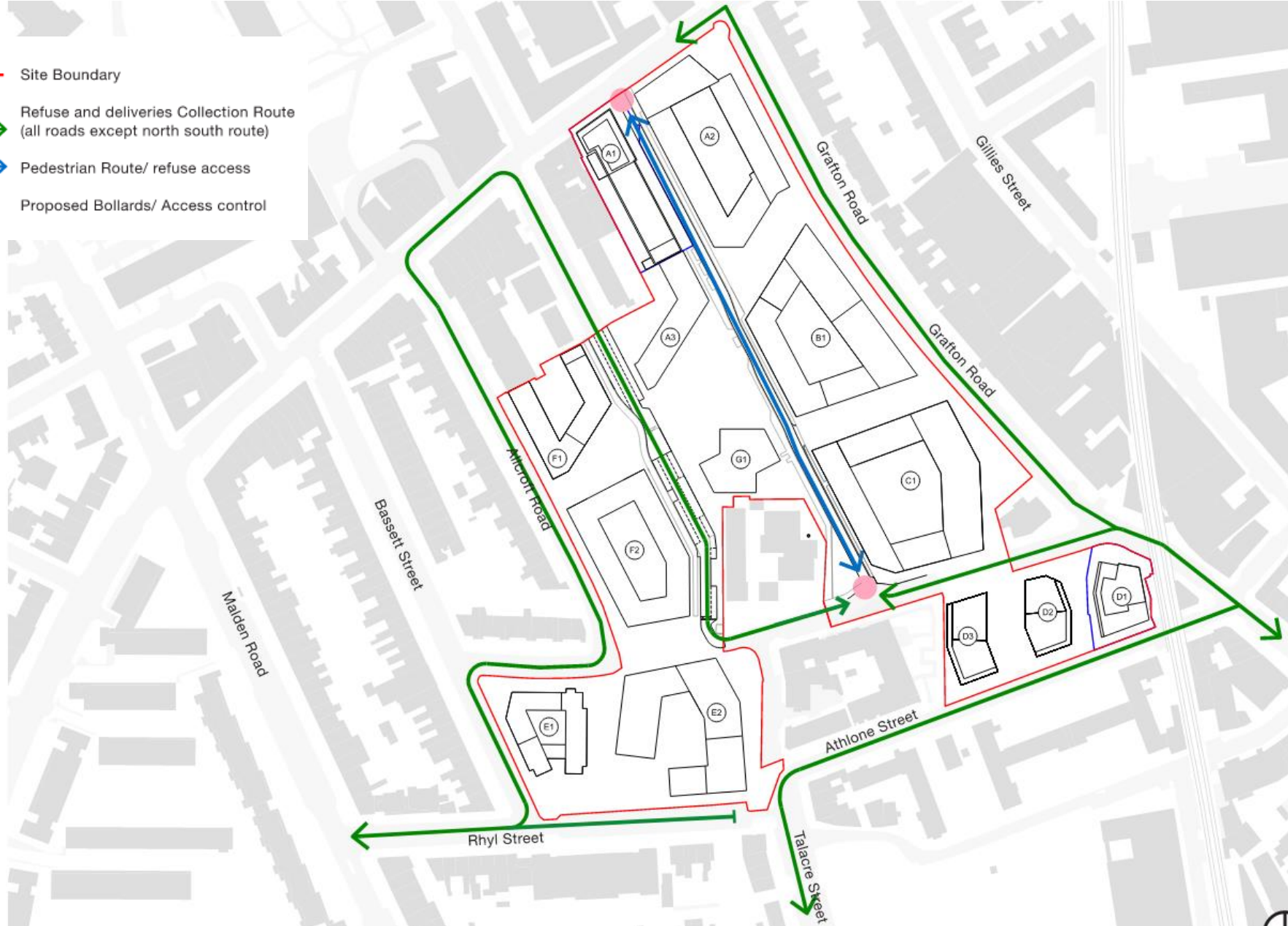
- Key**
-  primary vehicular route outside red line
 -  vehicular routes outside red line
 -  informal street - pedestrian with occasional vehicles
 -  primary vehicular route on site
 -  pedestrian-only routes
 -  visitors cycle parking

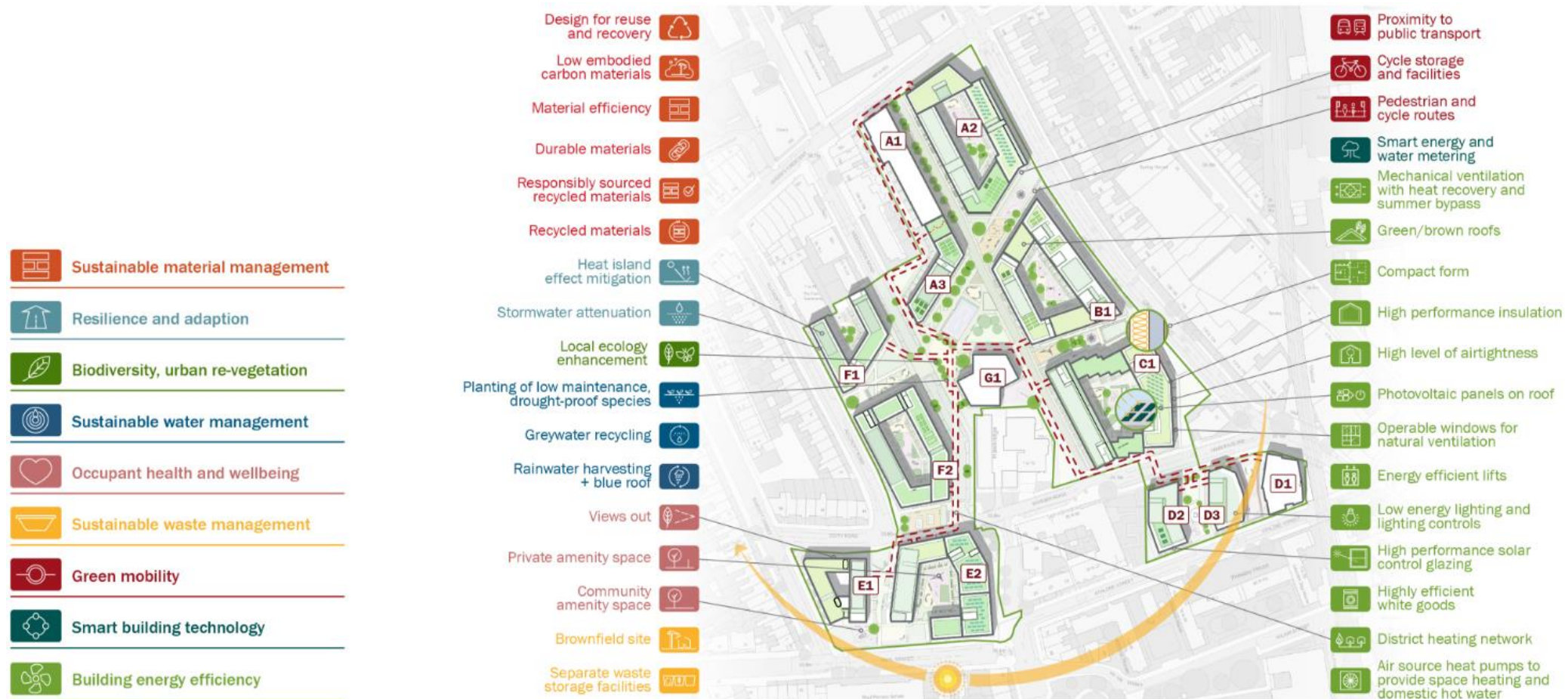


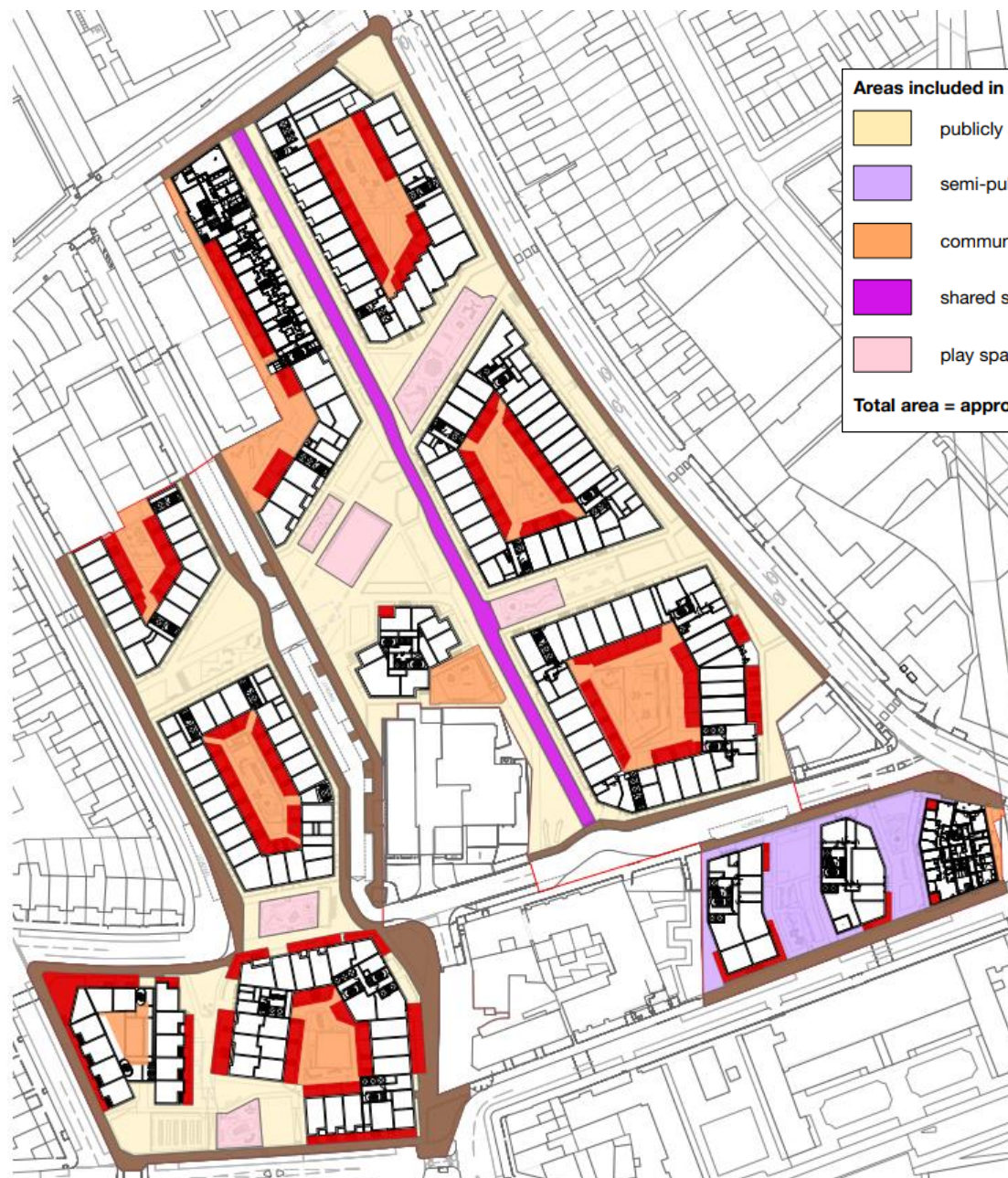
Proposed Cycles and Vehicular routes






Key

- Site Boundary
- Refuse and deliveries Collection Route
(all roads except north south route)
- Pedestrian Route/ refuse access
- Proposed Bollards/ Access control







Areas included in POS:	
	publicly accessible open space = approx 8788 sqm
	semi-public realm = approx 1197 sqm
	communal space (gated for residents) = approx 3400 sqm
	shared surface = approx 817 sqm
	play space in public realm = approx 1200 sqm
Total area = approx 15402 sqm	







Site Section 01 - Queens Crescent Elevation



Site Section 02 - Pedestrian Street Elevation



Ground Floor Plan

ground and first floors, accessible through the street-level residential entrances. Levels 2 to 4 are reached via a secondary core, connected by a walkway at the rear of each level. This design ensures that these upper levels are linked to provide an alternative means of escape from both ends of the building in case of emergency.



First Floor Plan

Key

- 1 Bed
- 2 Bed
- 3 Bed
- 4 Bed
- Bike Store
- Bin Store
- Commercial Unit
- Cleaners
- Plant Rooms



Third Floor Plan



Second Floor Plan

ground and first floors, accessible through the street-level residential entrances. Levels 2 to 4 are reached via a secondary core, connected by a walkway at the rear of each level. This design ensures that these upper levels are linked to provide an alternative means of escape from both ends of the building in case of emergency.



First Floor Plan

Key

- 1 Bed
- 2 Bed
- 3 Bed
- 4 Bed
- Bike Store
- Bin Store
- Commercial Unit
- Cleaners
- Plant Rooms



Third Floor Plan



Second Floor Plan



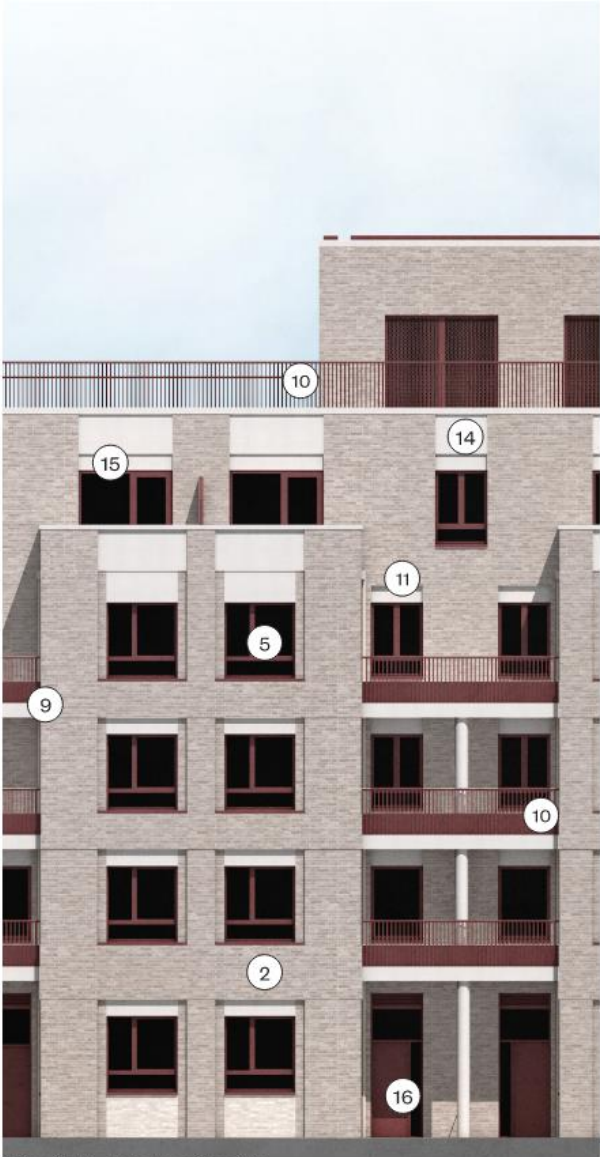




4. Bay Study - Queens Crescent commercial unit



5. Bay Study - main residential entrance

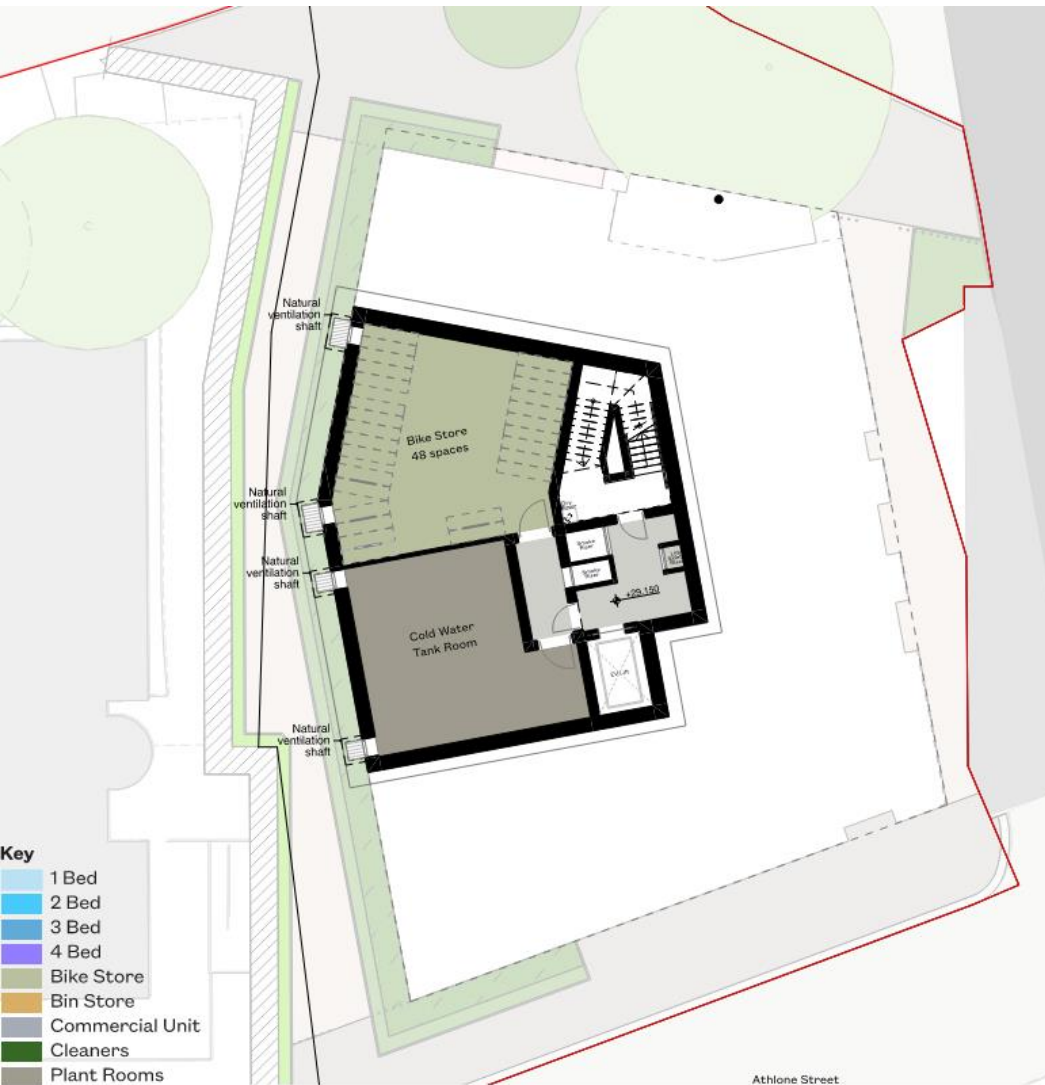


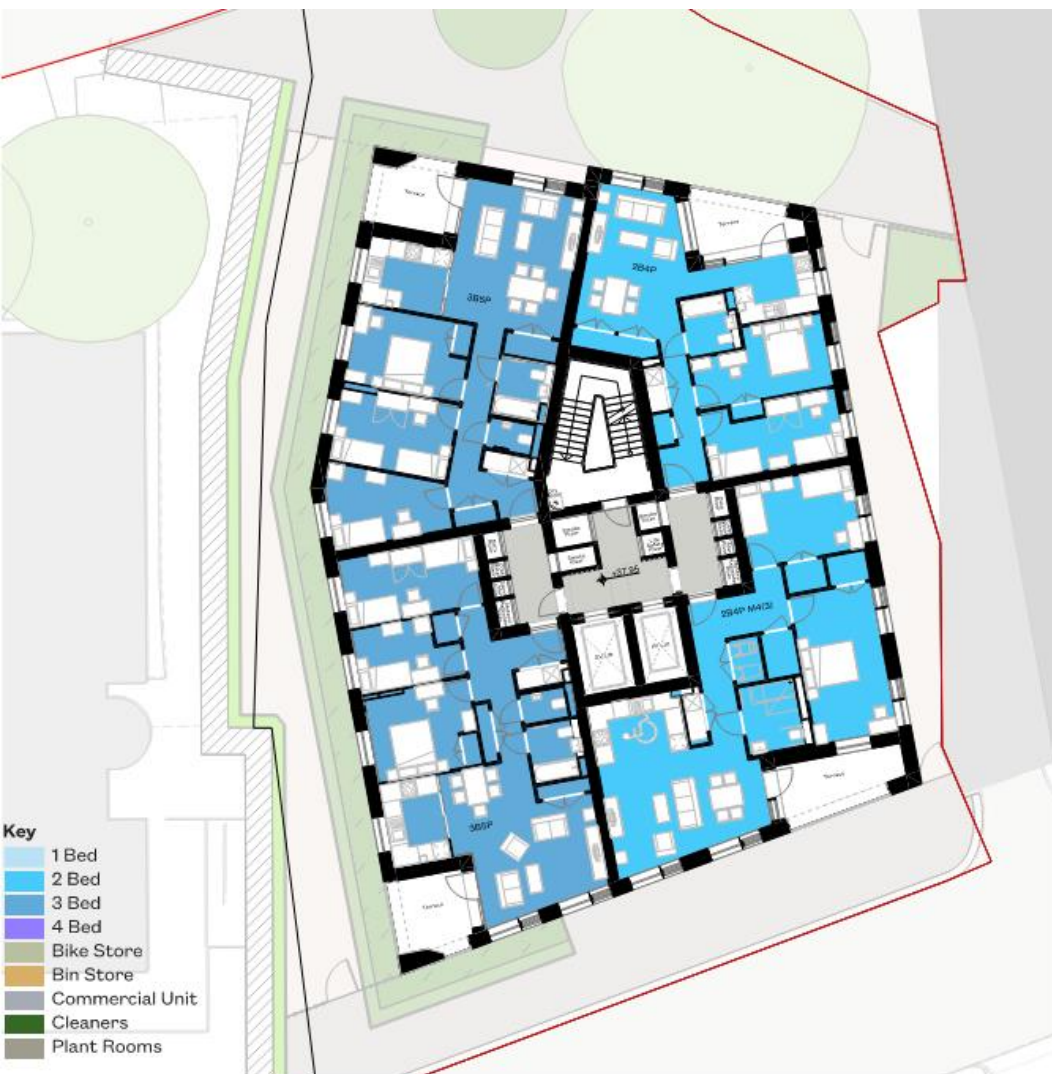
6. Bay Study - Pedestrian Street 01



7. Bay Study - Pedestrian Street 02











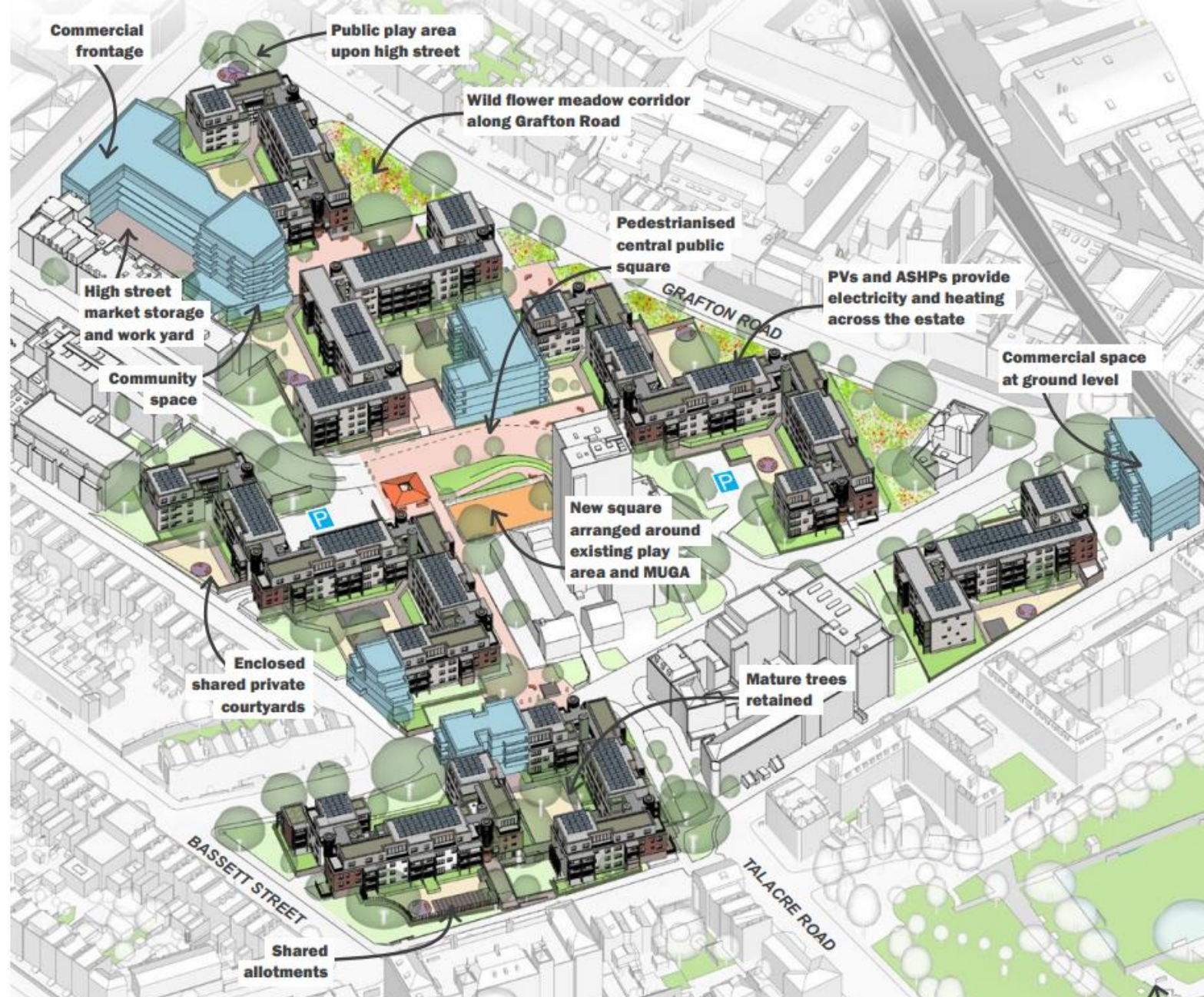








6. Bay Study - secondary entrance





West Kentish Town Estate

Independent Viability Review

Prepared on behalf of the London
Borough of Camden

18 August 2025

Planning Reference: 2025/2667/P



215a High Street, Dorking RH4 1RU
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 undertake a review of a Financial Viability Assessment ('FVA') prepared by Newmark Gerald Eve LLP ('Newmark') on behalf of the London Borough of Camden Community Investment Programme ('the Applicant') in connection with a planning application for the redevelopment of the above site.
- 1.2 The site comprises an existing housing estate extending c. 3.8 hectares. It comprises of eight residential buildings, a commercial unit, a hard-standing car park, green areas, and play spaces. The residential buildings on the site are typically three to four storeys in height and, in total, comprise 316 residential units. Of these 316 units, 263 are for social rent tenure and are managed by the Council (the Applicant), and the remaining 53 units have been purchased using Right to Buy. It is noted in the planning submission that the residential flats were built in the 1960s to address post-war housing needs but now fall short of modern housing standards.
- 1.3 Whilst the estate is primarily residential in nature, the immediate area includes a variety of properties and services, such as a mix of retail and other commercial buildings, Kentish Town West Overground station, and residential properties. The site is not located within a conservation area and does not contain any listed buildings. However, there are several conservation areas immediately surrounding the site, as well as nearby locally and nationally listed buildings.
- 1.4 We previously assessed the viability of a pre-application submission for the redevelopment of this site. We reported to the Council in July 2023. Since the pre-application stage, the proposals have been updated, and a hybrid planning application has now been submitted for a part full and part outline planning consent comprising:

Detailed Application

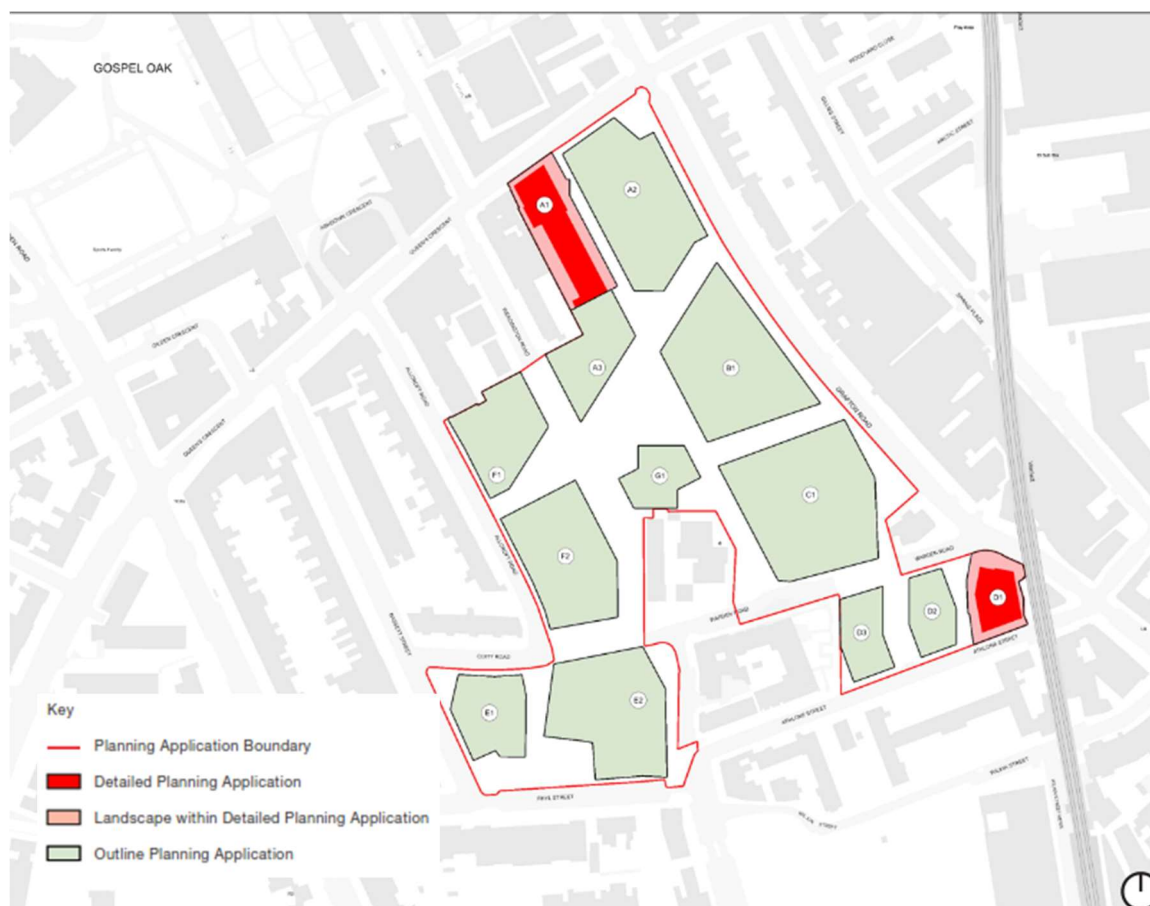
'Detailed planning permission for Development Plots A1 and D1 including demolition of any above ground structures, and erection of new buildings for use as residential dwellings (Class C3) and flexible commercial, business and service space (Class E), together with landscaping, public realm, cycle parking, highway works, infrastructure and other works associated with those Development Plots;

Detailed planning permission for a scheme of temporary hard and soft landscaping adjacent to Development Plots A1 and D1 and associated works; and,

Outline Application

Outline planning permission for a phased, development with all matters reserved for Development Plots A2, A3, B1, C1, D2, D3, E1, E2, F1, F2 and G1 including demolition of all existing above ground structures within those Plots and erection of new buildings to provide residential dwellings (Class C3) and flexible commercial, business and service space (Class E) together with new pathways, play space, cycle and disabled parking, hard and soft landscaping, highway works, infrastructure, and other works associated with those Development Plots in accordance with the Development Specification.'

- 1.5 We have included an illustration below of the detailed and outline elements, which has been taken from the Design and Access Statement dated 6th June 2025.



- 1.6 We note that the existing affordable units on site will need to be re-provided as per the London Plan Policy H8:

“Demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.”

- 1.7 The scheme proposes 856 units, of which 326 (32,910 sq m / 354,240 sq ft) will be affordable. This equates to a 39.6% affordable housing provision on a gross floorspace basis and 38.1% on a unit number basis. This means that the proposed scheme will re-provide the existing 253 social rented units and provide an additional 73 social rented units. This is an uplift from the existing provision of 11.7% on number of units and 25.2% in terms of total floor space.
- 1.8 Policy H4 of the Camden Local Plan has a 50% affordable housing target for developments with capacity for 25 or more additional dwellings. The tenure mix guide seeks a 60/40 tenure split in favour of social or affordable rented homes. This 50% target is also in line with the London Plan target for public sector land. We note that the current proposals fall short of the policy targets for 50% affordable housing.
- 1.9 The basis of our review is an FVA prepared by Newmark, dated June 2025, which concludes that the scheme currently shows a deficit of approximately £30.5 million and therefore the scheme cannot viably provide any additional affordable housing. It is not clear from the FVA what the maximum viable level of affordable housing is on Newmark's figures.
- 1.10 We have downloaded documents available on the Council's planning website.
- 1.11 We have received a live version of the Argus appraisal included in Newmark's report as well as a growth modelling appraisal.
- 1.12 We have assessed the cost and value inputs within the financial appraisal in order to determine whether the scheme can viably make any affordable housing contributions.
- 1.13 We have searched the Council's planning website and have identified the following recent planning applications relating to the site:

2024/4887/P: "EIA Addendum to earlier request for scoping opinion (ref. 2022/5281/P) under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works."

- 1.14 The advice set out in this report is provided in the context of negotiating planning obligations and therefore in accordance with PS1 of the RICS Valuation – Global Standards 2025, the provisions of VPS1–6 are not of mandatory application. Accordingly, this report should not be relied upon as a Red Book Valuation. The Valuation Date for this Viability Review is the date

of this report, as stated on the title page. This Viability Review has been undertaken in accordance with the Terms & Conditions provided to the Council and with any associated Letters of Engagement and should only be viewed by those parties that have been authorised to do so by the Council.

- 1.15 This Viability Review adheres to the RICS Professional Statement on Financial Viability in Planning (published May 2019). In accordance with this Statement, we refer you to our standard terms and conditions which incorporate details of our Quality Standards Control & Statement on Limitation of Liability/ Publication.

2.0 Summary Table

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

Input	Newmark	BPS	Comments	
Income				
Open Market Sales	£348,935,000 (£9,833psm/£961psf)	£348,935,000 (£9,833psm/£961psf)	Agreed	
Affordable Housing	£54,206,262 (£2,131psm/£198psf)	£54,206,262 (£2,131psm/£198psf)	Accept (valuation required)	
Commercial	£659,680 (£4,311psm/£401psf)	£659,680 (£4,311psm/£401psf)	Agreed	
Grant Funding	£81,143,777	£81,143,777	Accept (subject to review)	
Expenditure				
Benchmark Land Value	£1	£1	Agreed	
Build Costs	£289,677,193	£289,677,193	Agreed	
Contingency	5%	5%	Agreed	
Professional Fees	10%	10%	Agreed	
OMS Marketing & Agent Fees	3%	3%	Agreed	
OMS Legal Fees	0.5%	0.5%	Agreed	
Commercial Letting Agent and Legal Fees	15%	15%	Agreed	
Commercial Sales Agent Fees	1%	1%	Agreed	
Leaseholder Buyback	£37,972,000	£37,972,000	Ambiguous (info required)	
S106 & CIL	£21,777,358	£21,777,358	Ambiguous (Council to confirm)	
Finance	7%	7%	Agreed	
Profit: OMS Affordable Housing Commercial	17.5% 6% 15%	17.5% 6% 15%	Agreed	
Development Timeframes				
Pre-construction Period	21-weeks	21-weeks		Agreed
Construction Period	922-weeks	922-weeks		Agreed
Pre-Sales / Rate pcm	50% / 5 units	50% / 5 units	Agreed	
Viability Position	-£30.5m	-£30.5m	Agreed	
Actual Profit	8.45%	8.45%	Agreed	

3.0 FVA Checklist

- 3.1 On the 24th of July 2025 we sent Newmark a request to provide the following information to assist with our review of the FVA. The table below summarises the documentation received at the date of this submission.

Proposed Development	
Application plans	Downloaded
Accommodation schedule	Provided
Measurements for the proposed scheme (GIA/NIA)	Provided
Design and Access statement	Downloaded
Planning Statement	Downloaded
Detailed design specification	Downloaded
Details of secured grant funding	Not provided
Recent transactional evidence to support their GDV assumptions	Mostly provided
Modelling used to generate values (Affordable Housing)	Not provided
Modelling used to generate values (Residential/ Commercial)	Provided
Construction	
A detailed cost plan	Provided
Development programme	Provided
Appraisals	
Copy of the live Argus appraisals	Provided

4.0 Conclusions And Recommendations

Applicant Position

- 4.1 We have reviewed the FVA prepared by Newmark on behalf of the Applicant which concludes that the proposed scheme generates a profit deficit of -£30.5m against a profit target of £64.6m. On this basis Newmark conclude that the scheme cannot viably provide any additional affordable housing.

Benchmark Land Value

- 4.2 As the scheme is an estate regeneration project we have agreed with Newmark that a nil value should be adopted.

Development Value

- 4.3 The scheme includes 856 units, of which 530 units (381,966 sq ft NIA) are for private tenure and 326 (273,769 sq ft NIA) are affordable housing. The scheme also includes the provision of two commercial units totalling 1,647 sq ft.
- 4.4 We have reviewed the information provided by Newmark in support of their Open Market Sales values and commercial values and we have also undertaken our own research into recent transactions in the local area. We are of the view that the values proposed are in line with current market expectations.
- 4.5 The scheme includes 326 affordable housing units, all of which will be provided as social rented tenure. This includes the reprovion of the existing 253 units on site.
- 4.6 We have not been provided with a copy of Newmark's valuation and therefore cannot comment at this stage. We have cross checked their average value of £198 psf against other recent schemes in the area and find it to be at the lower end of our expectations. We have provisionally adopted this figure pending a copy of the valuation.

Development Costs

- 4.7 Our Cost Consultant, Neil Powling, has reviewed the Cost Plan for the proposed scheme prepared by AireyMiller, dated 12 May 2025, and concludes under 1.3 of their report that:
- "The Applicants costs are higher than our adjusted benchmark in total by £1,636,812; this equates to 0.55%. We therefore consider the Applicant's costs to be reasonable."*
- 4.8 We have also reviewed the other costs outlined within the FVA and consider them to be broadly reasonable.

Appraisal Results & Recommendations

- 4.9 We have been provided with a live version of the Argus appraisal included in Newmark's report to which we have applied our amendments. These amendments are outlined in the table included at Section 2.
- 4.10 The appraisal compares the scheme values and cost to determine a profit output. This is then compared to the profit target to benchmark viability. We have also appraised the scheme on this basis to provide a like for like position.
- 4.11 We report the following viability positions:

Scheme	Profit Output	Profit Target	Surplus/Deficit
Proposed (Phase 1-8 Grant)	£34.1m (8.45% on GDV)	£64.6m (16% on GDV)	-£30.5m
Proposed (Phase 1-2 Secured Grant only)	-£25.5m (-6.32% on GDV)	£64.6m (16% on GDV)	-£90.1m

- 4.12 We therefore conclude that the scheme cannot viably deliver any further affordable housing contributions. We recommend that the scheme should be subject to review mechanisms in order that the viability can be assessed over the lifetime of the development.

Sensitivity Analysis/Growth Modelling

- 4.13 We have carried out sensitivity analysis and growth modelling in order to test what movements would be required to cost and values in order for the scheme to be viable. This can be found at Appendix 4.
- 4.14 The sensitivity analysis indicates that private sales and construction costs would need to increase by 2.5% and decrease by 5% respectively for the scheme to become viable.
- 4.15 As mentioned in section 7.25 to 7.28 of our report we also modelled the viability assuming 80% of grant is received upfront for each phase and 20% upon completion as opposed to the 50/50 approach assumed by Newmark. However, this still produces a deficit of -£20.8m.
- 4.16 The growth modelling indicates that in order for the scheme to breakeven, private sales values would need to increase by 0.6% each year. This represents a c. 11.7% growth rate over the lifetime of the scheme. We consider growth at this level to be achievable, particularly given that this is a large-scale regeneration project.

5.0 Principles Of Viability Assessment

- 5.1 Development appraisals work to derive a residual value. This approach can be represented by the formula below:

$$\begin{aligned} &\text{Gross Development Value} - \text{Development Costs (including Developer's Profit)} \\ &= \text{Residual Value} \end{aligned}$$

- 5.2 The residual value is then compared to a benchmark land value. Existing Use Value (EUV) and Alternative Use Value (AUV) are standard recognised approaches for establishing a land value as they help highlight the apparent differences between the values of the site without the benefit of the consent sought.
- 5.3 The rationale for comparing the scheme residual value with an appropriate benchmark is to identify whether it can generate sufficient money to pay a realistic price for the land whilst providing a normal level of profit for the developer. In the event that the scheme shows a deficit when compared to the benchmark figure the scheme is said to be in deficit and as such would be unlikely to proceed.
- 5.4 Development appraisals can also be constructed to include a fixed land value and fixed profit targets. If an appropriate benchmark is included as a fixed land value within a development appraisal this allows for interest to be more accurately calculated on the Benchmark Land Value, rather than on the output residual value. By including fixed profit targets as a cost within the appraisal, programmed to the end of development so as not to attract interest payments, the output represents a 'super' profit. This is the profit above target levels generated by the scheme which represents the surplus available towards planning obligations.
- 5.5 This Viability Review report adheres to the RICS Professional Statement on Financial Viability in Planning: Conduct and Reporting (published May 2019). In accordance with this Statement, Section 8 below incorporates details of our Quality Standards Control & Statement on Limitation of Liability/ Publication. This report has been prepared according to the Professional Statement's requirement for objectivity and impartiality, without interference and with reference to all appropriate available sources of information. Where information has not been obtainable, we have stated this expressly in the body of the report.

6.0 Benchmark Land Value

- 6.1 The site extends 3.8 hectares and comprises of an existing housing estate consisting of 263 social rented dwellings and 53 privately owned leaseholder properties. The estate is managed by the Council.
- 6.2 Newmark state in their report that the buildings on site require significant modernisation to bring them in line with present day standards. The existing housing stock is noted to fall short of modern standards, lacking suitably sized, energy-efficient, safe, and accessible homes that support residents' well-being. Furthermore, there are ongoing issues with the concrete construction of the blocks, leading to crumbling, failing ceilings and stairs, cold bridging, damp, condensation, and mould in homes.
- 6.3 Whilst we have not been provided with further detail on the condition of the buildings, we understand that the Council have commissioned reports which have informed them of the "challenges associated with retrofitting the estate".
- 6.4 We understand that the Council carried out an appraisal of different regeneration options, including part or full refurbishment of the existing estate. However, following resident feedback, a S105 consultation, and a 93% resident vote in favour of complete redevelopment, the Council's preferred option is for a full regeneration of the estate. This decision was driven by the objective to demolish existing dwellings that "no longer meet contemporary living standards" and replace them with new housing designed to meet current demands.
- 6.5 In light of the above, Newmark do not consider it appropriate to include a land value in the context of an estate regeneration scheme and therefore adopt a nominal BLV of £1 within their assessment.
- 6.6 Typically, with estate regeneration projects, the BLV is agreed at a nil value. This is usually because the existing stock is nearing the end of its operational life with accrued maintenance costs exceeding the value of the property as affordable housing.
- 6.7 In addition, and in the view of plan policies, the land value should reflect the requirement to re-provide the affordable units currently onsite and therefore would realistically result in a negative land value on the basis that the costs of reprovision exceed the value of the properties as affordable housing.
- 6.8 If the site is sold as a development site, it is reasonable to assume that, as with the current scheme, this would entail demolition of the existing buildings on site. This means that in accordance with the London Plan – Policy H8:

“Demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.”

- 6.9 The requirement to replace the existing affordable housing is embedded as a cost in the value of the land when considering the site as a development opportunity. In that the value generated by affordable housing is generally accepted to fall below its cost of development, this requirement acts as a very significant drag on land value. Consequently, the value of the site for redevelopment on this basis must be seen as negative.
- 6.10 Including a Benchmark Land Value in this instance would mean that the appraisal effectively provides scope for the existing site owner to secure both a significant land receipt but also securing an entirely new replacement estate entirely replacing the existing estate, effectively at a cost subsidised by private development. This effectively provides the landowner with the potential to double the value of the existing asset.
- 6.11 Moreover, the cost of the leaseholder buybacks has been included in Newmark’s appraisal as a cost to the scheme. It would be unreasonable to include a positive BLV for these units as well as the buyback costs within the appraisal as this would effectively be double counting.
- 6.12 On this basis we agree to a figure of £1 as the Benchmark Land Value.

7.0 Development Values

- 7.1 The residential element of the proposed scheme, as sought by the planning application, is for 856 residential units, of which 530 units (381,966 sq ft NIA) are for private tenure and 326 (273,769 sq ft NIA) are affordable housing. We have illustrated the proposed accommodation in the table below.

Phase	Plot	1B Flat	2B Flat	3B Flat	2B Maisonette	3B Maisonette	Total Units
1	D1	0	1	3	0	0	4
2	D2	20	18	6	1	0	45
3	D3	21	21	0	0	3	45
4	B1	30	32	2	0	8	72
5	G1	28	27	8	1	3	67
6	C1	36	30	3	0	6	75
7	E1, E2	49	45	12	19	16	141
8	F1, F2	28	26	7	19	1	81
TOTALS	-	212	200	41	40	37	530

- 7.2 We note that whilst detailed design specifications for the units have not yet been finalised, a specification commensurate with other Local Authority schemes has been assumed.
- 7.3 Additionally, all properties are said to benefit from private amenity in the form of a garden, balcony or terrace. On the site there will also be a range of open spaces including play areas, public and communal courtyards and gardens.

Open Market Sales ('OMS') Residential Values

- 7.4 On behalf of Newmark, JLL have undertaken a residential Red Book Valuation of the proposed development. JLL have provided a detailed schedule of Market Values on a unit-by-unit basis for the private residential units. We have summarised their proposed values with averages in the table below:

Type	Units	Bed(s)	Average NSA (sq ft)	JLL's average value	JLL's average value £/psf
Flat	212	1	538	£540,071	£1,003
Flat	200	2	709	£681,875	£964
Flat	41	3	881	£844,634	£964
Maisonette	40	2	850	£755,750	£889
Maisonette	37	3	1004	£897,432	£894
TOTAL	530	-	363,192	£348,935,000	£961
381,966 sq ft (NIA) / £914 psf based on NIA					

- 7.5 To arrive at their values, JLL have provided a number of comparable schemes. They first identify 6 new-build developments on the Molior database, which include:
- Eeko, Agar Grove (NW1 9SS)
 - The Tipton, 19-37 Highgate Road (NW5 1LB)
 - Verdica, Belmont Street (NW1 8HF)
 - The Clay Yard, 33 Liddell Road / Maygrove Road (NW6 2EW)
 - West Hampstead Central, 156 West End Lane (NW6 1SD)
 - Camden Goods Yard, Chalk Farm Road (NW1 8AA)
- 7.6 We comment that from these schemes, JLL have predominantly shared current asking prices, with the exception of Eeko, to which they have provided both asking prices and 10 achieved prices from 2025 which they received from the marketing agent. Overall, it is worth highlighting that asking prices do not always reflect achieved prices and as such should be considered with caution.
- 7.7 In addition to the new-build evidence, JLL also present several second-hand asking prices which have been provided with limited description. Due to the lack of detail provided for these asking prices, noting that even the property types are not shared, we do not consider that any significant inference can be drawn from them to support an indicative value for the proposed development.
- 7.8 From JLL's evidence, Eeko is considered the strongest comparable scheme as it is a development just 1.1 miles from the site and is also being developed by the London Borough of Camden. Therefore, a similar specification and amenity provision is expected by JLL, which we consider to be a reasonable assumption. The achieved prices from 2025 average £595,004 (£951 psf) for 1-bed units of c. 627 sq ft and £723,975 (£945 psf) for 2-bed units of c. 766 sq ft. We have also included historic achieved prices for this development at Appendix 3. The historic achieved prices reflect a lower price with 1 and 2 bed units achieving prices per sq ft of £887 and £810, respectively. However, it would be expected that values have increased since the date of these transactions (2022).
- 7.9 From the other schemes, JLL highlight that The Tipton is the nearest scheme, being just 0.8 miles from the site. However, they consider that due to the superior specification and amenity provided at the development, the subject scheme would expect its values to fall slightly lower. A similar case is presented by JLL for the other remaining schemes, those being Verdica, The Clay Yard, West Hampstead Central and Camden Goods Yard.

- 7.10 We have undertaken our own research into the transactions presented by JLL in an attempt to identify achieved pricing data and we have also searched the area surrounding the subject site to identify any additional market evidence. Our research can be found at Appendix 3.
- 7.11 First, we comment that whilst reservations and sales have taken place at The Tipton, Verdica and The Clay Yard, the achieved values are not yet available on Molior or the Land Registry. We note; however, that JLL is the marketing agent for Verdica and should be able to provide evidence of achieved values at the scheme.
- 7.12 For West Hampstead Central, we identified 48 achieved prices which show average unit sizes for 1 and 2 bed flats of 547 sq ft and 883 sq ft. The achieved prices were £645,939 (£1,180 psf) and £1,005,719 (£1,132 psf). We agree with JLL that this scheme is superior to the subject due its high quality and specification.
- 7.13 As part of another instruction, we have previously been provided with achieved values for exchanged units at Block A (The Regent) of Camden Goods Yard but expect values at the subject scheme to fall well below these due to the premium developer (Berkeley Homes), higher specification, and slightly superior location. Details of these exchanged prices have not been included within this report as the data was provided on a confidential basis, but the Council are privy to the information.
- 7.14 In our research, we have also identified achieved values for the estate development Neos, which was developed by the Council. Average achieved values at this scheme were £511,121 (£939 psf), £693,746 (£885 psf), and £844,075 (£881 psf) for one, two, and three bed flats respectively. We consider this a very strong comparable as it is a neighbouring estate redevelopment, situated less than half a mile from the subject. However, Neos is a much smaller infill development on an existing estate, whereas the proposed scheme will see an estate wide regeneration therefore offering better placemaking and amenities. We would therefore expect values to be close, but slightly higher, for those at the proposed scheme.
- 7.15 Generally, we have found that the values proposed by JLL are broadly reasonable, as all the average values fall just above those at Neos, which we consider to be a key comparable. Similarly, the values proposed also align closely with JLL's key comparable, Eeko.
- 7.16 As a further cross check, our pre-application assessment in 2023, agreed an overall average of £892 psf.. According to the Land Registry, average prices for flats and maisonettes in Camden have increased by 5.22% over the period. A 5.22% increase would bring the average to £938 psf, further supporting that the figure proposed is within an acceptable range.

- 7.17 It is worth highlighting that the delivery of the project will take place over an 18.5 year programme with a total of 8 phases. We expect sales values to increase over the phases as the wider regeneration effects of the development are realised, this is typically referred to as a 'regeneration premium'. We note that a regeneration premium is distinct and separate from general property price growth. We consider it essential that the scheme is subject to review mechanisms in order that the private values are kept under review.

Ground Rents

- 7.10 The Leasehold Reform (Ground Rent) Act 2022 is now in force. Now the act is in force, any ground rent demanded as part of a new residential long lease cannot be for any more than a peppercorn (no financial value). Therefore, ground rents should no longer be included as a future revenue stream for planning & viability purposes. We understand the act covers single 'dwellings' and will therefore capture student and retirement accommodation providing they are occupied or intended to be occupied as single dwellings throughout England and Wales.
- 7.11 We therefore consider the omission of capitalised ground rents as being a reasonable assumption.

Parking

- 7.12 The proposed development will be completely car-free for new residents.

Affordable Residential Values

- 7.20 The affordable housing provision for the proposed scheme is outlined in the table below:

Tenure	Total Units	NIA (sq ft)	Newmark's Capital Value	Newmark's Value per unit	Newmark's £psf
Social Rented	326	273,769	£54,206,262	£166,277	£198

- 7.21 The existing site comprises 253 social rented dwellings. To adhere to Policy H8 of the London Plan, these units must be re-provided within the proposed scheme.
- 7.22 The Council's planning policy (H4) has a 50% affordable housing target for developments with capacity for 25 or more additional dwellings. The tenure mix guide seeks a 60/40 tenure split in favour of social or affordable rented homes. This 50% target is also in line with the London Plan target for public sector land. We note that the current proposals fall short of the policy targets for 50% affordable housing and does not align with the tenure mix guide. However, Newmark state that GLA officers are in support of the 100% allocation to social rent for the affordable tenure.

- 7.23 We have contacted Newmark to request a live copy of their affordable housing modelling used to calculate their values. This was not provided to us, and we are therefore unable to accurately review the assumptions and inputs used to reach the values in the table above. We request that copies of the valuations are provided to us for review.
- 7.24 Pending receipt of this information, we have cross-checked Newmark's average per sq ft values against other recent estate regeneration schemes we have assessed and our pre-application stage assessment of the scheme. We consider Newmark's figure to be on the lower end of our expectations but within a reasonable range; however, we withhold acceptance of their figures until a live valuation is provided.

Grant Funding

- 7.25 Newmark have been advised that £20,383,777 of grant funding has been secured for Phase 1 and £27,440,000 has been secured for Phase 2. For Phases 3 to 8, grant has not yet been secured and consequently Newmark have assumed a grant rate of £170,000 per social unit. Therefore, a total grant of £81,143,777 has been included within Newmark's proposed appraisal.
- 7.26 As grant funding for phases 3 to 8 have not yet been secured, Newmark have also tested an appraisal which removes all grant from these phases. It ultimately shows that if grant funding is not forthcoming, it would negatively impact the scheme's viability.
- 7.27 In our pre-application stage review we requested that full detail of the grant funding should be provided to us once agreed with the GLA, and this includes full details regarding the receipts of this grant funding to ensure it is accurately reflected within the cashflow.
- 7.28 We note from Newmark's appraisal that 50% of the grant is assumed at the start of construction and the remaining 50% at the end of construction for each phase. In our experience of other estate regeneration schemes we are aware that in many cases a significant proportion of the grant is received upfront, prior to construction, which we note would positively impact on cashflow and thus overall viability. We are also aware from the GLA on another estate regeneration we are currently assessing that grant is typically paid 80% at the start of construction and 20% at the end of construction. This again would positively impact cashflow and we have therefore sensitivity tested the appraisal on this basis to model its impact.
- 7.29 We have adopted the £81,143,777 stated by Newmark, however, we consider this matter should be kept under close review.

Commercial Valuation

- 7.30 The proposed scheme also includes a small provision of commercial space on the ground floor of Blocks A1 and A2 that measures 624 sq ft and 1,023 sq ft on a NIA basis, totalling 1,647 sq ft.
- 7.31 Newmark have estimated a rental value of £30 psf for both units (£18,720pa and £30,690pa, respectively) and have capitalised both at a yield of 7%. A combined 12-month void and rent-free assumption has also been made for the respective units. We note that Newmark have not provided any comparable evidence to support their estimated rents, yields and other assumptions. We would expect a comparable analysis to support the inputs adopted.
- 7.32 We have sought to identify any additional transactions in the surrounding area to test whether the value and assumptions adopted by Newmark are reasonable. Our research can be attached in Appendix 3.
- 7.33 We have identified units in the surrounding area ranging from 486 sq ft to 2,540 sq ft, with rents between £27.56 psf and £84.51 psf. We note that the higher rents were achieved by units located very close to railway stations, on roads expected to have more footfall. From our research, we consider 74 Queens Crescent (£34.98 psf / 486 sq ft) to be the most relevant comparable, noting it is one of the only properties we found within very close proximity to the subject (about 300 metres from the centre of the estate). It is a slightly smaller unit than what is proposed in the subject scheme, and we therefore consider Newmark's estimated rental value to be within a reasonable range, although at the lower end of our expectations.
- 7.34 We also found that leases were typically agreed on 10-year terms and that marketing voids ranged between 3 and 11 months. No evidence has been identified for rent-free assumptions; however, we would usually expect a rent-free period of several months to be reasonable for a new build retail property assuming shell fit out and a 10 year lease term. We therefore accept Newmark's combined void and rent-free assumption for the subject units of 12 months.
- 7.35 As for yield evidence, we note that there is limited evidence in the immediate surrounding area. However, we identified 3 relevant sales and 1 marketed property. The transacted properties show capital values between £308 psf and £507 psf. We note capital values on the upper end of this range are located near to Chalk Farm underground station and consequently we would expect the subject to achieve slightly inferior values per sq ft.
- 7.36 We also identified 9 Campdale Road, which is currently being marketed and is slightly further from the subject in an inferior location. This property reflects a yield of 8%. The closest

comparable found was 10 Malden Road, which is 0.3 miles from the estate and achieved a capital value of £308 psf. As the subject units will be newly built a higher value is expected.

- 7.37 Overall, having reviewed the evidence we consider Newmark's yield of 7% to be broadly reasonable given that it reflects a capital value of £401 psf, which falls within our identified range of values.
- 7.38 We are therefore satisfied with Newmark's assessment of the commercial element and have adopted their value of £659,680 for this element of the scheme.

8.0 Development Costs

Construction Costs

- 8.1 Our Cost Consultant, Neil Powling, has analysed the build cost plan for the proposed scheme prepared by AireyMiller, dated 12 May 2025, and concludes that:

“The Applicants costs are higher than our adjusted benchmark in total by £1,636,812; this equates to 0.55%. We therefore consider the Applicant’s costs to be reasonable.”

- 8.2 Mr Powling’s full cost report can be found at Appendix 1.

Additional Costs

- 8.3 Newmark have applied the following additional cost assumptions:

- Professional fees of 10%
- Commercial Letting Agent Fees of 10%
- Commercial Letting Legal Fees of 5%
- Commercial Sales Agent Fees of 1%
- Private Residential Marketing Allowance of 2%
- Private Residential Sales Agent fees of 1%
- Private Residential Legal Fees of 0.5%
- Affordable Sales Agent Fees of £50,000 per phase
- Affordable Legal Fees of 0.5%

- 8.4 Generally, we accept that these percentages are reasonable. We note that we would generally not expect the private residential disposal fees to exceed 3% but given the marginal difference we have accepted Newmark’s fees in this instance.

- 8.5 Newmark have included a £300,000 cost to provide temporary landscaping across the site whilst phases are being completed. No evidence has been provided to support this figure. Given that this is a nominal figure in the context of the total scheme costs we have kept it in the appraisal but request that further detail is provided.

- 8.6 CIL charges have been calculated by Newmark’s Planning Team as £13,934,184 for Borough CIL and £3,519,685 for MCIL2 amounting to a total CIL charge of £17,453,869. S106 costs are noted as £4,323,489. We request that the Council verify these amounts. Pending verification from the Council we have adopted Newmark’s figures for the purposes of this report.

- 8.7 Buyback costs have also been factored into Newmark's appraisal at a total of £37,972,000. This sum has been estimated by Ardent Management Limited for all of the residential leasehold properties on the existing site. The Property Cost Estimate (PCE) includes the market value estimates of leasehold interests, loss payments, acquisition costs and all other potential disturbance and reinvestment costs on the assumption that the Council may acquire these interests using compulsory purchase powers through a Compulsory Purchase Order (CPO).
- 8.8 The PCE adopted is commercially sensitive and has not been provided. It is noted that as these units are split across different phases and therefore will be purchased at different stages throughout the development. At this stage we do not have sufficient means to interrogate this figure. We suggest that this cost is subject to review mechanisms whereby the actual incurred costs can be evidenced on an open book basis. BPS have agreed this approach on other estate regeneration schemes in London.
- 8.9 Finance has been included in Newmark's appraisal at 7% assuming that the scheme is 100% debt financed. We consider this finance allowance reasonable and in line with what we have seen recently agreed on many other similar scale schemes.

Profit

- 8.10 The developer profit target adopted by Newmark for the private residential element of the scheme is 17.5% on GDV and then 6% on GDV for the affordable housing. The commercial element has a profit target of 15% on GDV. Combined, this equates to a blended target of 16% on GDV.
- 8.11 We consider these profit targets to be broadly acceptable though note that we have recently agreed a lower affordable housing target of 4% on a number of estate regenerations. This is because for schemes of this nature, the affordable housing purchaser (e.g. Council / RP) is known, thus reducing the risks involved with securing an RP.

Development Timeframes and Sales Assumptions

- 8.12 Newmark have adopted a pre-construction period of 21 weeks and a construction period of 922 weeks. A breakdown of their development timescales are as follows:

Period	Dates
Phase 0b Demolition	April 2026 – September 2026 (21 weeks)
Phase 1 Construction	August 2026 – November 2028 (111 weeks)
Phase 2 Construction	November 2028 – June 2031 (126 weeks)
Phase 3 Construction	June 2031 – September 2033 (113 weeks)
Phase 4 Construction	September 2033 – January 2036 (113 weeks)

Phase 5 Construction	October 2035 – January 2038 (113 weeks)
Phase 6 Construction	December 2037 – February 2040 (107 weeks)
Phase 7 Construction	February 2040 – May 2042 (117 weeks)
Phase 8 Construction	May 2042 – September 2044 (122 weeks)
Completion	September 2044
Total Programme	18 Years 6 Months

- 8.13 Our Cost Consultant has reviewed the programme for each phase with reference to the BCIS duration indicator and finds these timeframes to be broadly reasonable. We note that BPS are not programme experts and whilst we can cross-check the timescales for each phase using the BCIS Duration Calculator, we recommend that the Council seek the advice of a programme expert to ensure that the timescales are realistic.
- 8.14 Newmark have adopted a pre-sales rate of 50% and a sales rate assumption of 5 units per month. We have reviewed these assumptions in the light of the evidence set out in the table below and consider them to be reasonable.

Scheme	Sales Analysis Summary
Verdica	Blocks A and B achieved roughly 40% and 50% off-plan sales. Since completion in Q4 2024 sales seem to have slowed with only four further units sold at Block A and 2 sold at Block B. The scheme is yet to sell out.
Neos	Neos managed to sell c. 68% of units off-plan and following completion in Q2 2023 managed to sell on average 1.47 units per month, with all units sold by Q3 2024.
Agar Grove - Eeko	Blocks I, J, K and L managed to sell around 45% of private units off-plan, with post-completion sales averaging approximately 2.5 units per month.
Camden Goods Yard	Block A is due to complete between Q4 2025 and Q1 2026 and has already achieved c. 50% off-plan sales.

- 8.15 For the affordable units, Newmark state that the affordable housing is likely to be sold using a 'Golden Brick' method, with quarterly staged payments throughout the build programme. We consider their cashflow assumptions to be broadly reasonable but reserve the right to revisit the assumption should new information come forward regarding the method of sale.

9.0 Author Sign Off

- 9.1 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.
- 9.2 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.
- 9.3 The following persons have been involved in the production of this report:

Tom. N

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Graduate Surveyor
RICS Membership no. 6912177
For and on behalf of
BPS Chartered Surveyors

August 2025

Madison Thomas

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RICS Registered Valuer
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For and on behalf of
BPS Chartered Surveyors

Appendix 1: Build Cost Report

Project: West Kentish Town Estate

2025/2667/P

1 SUMMARY

- 1.1 The allowance for contingencies is 5% which we consider reasonable. The allowance for risk of 5% in the estimate has not been included in the appraisal construction cost and a separate allowance of 5% made – there is no double counting.
- 1.2 The estimate includes a 5% provision for main contractor's design fee; this sum has been omitted from the construction cost in the appraisal and an allowance of 10% for professional fees included.
- 1.3 The results of our benchmarking are provided in the table at 3.16 below. The Applicants costs are higher than our adjusted benchmark in total by £1,636,812; this equates to 0.55%. We therefore consider the Applicant's costs to be reasonable.
- 1.4 The pre-construction period allowed by the Applicant for demolitions is 21 weeks. We have provided a comparison of the Applicant's durations of the eight phases to BCIS durations in the table at 3.19 below. The aggregate of all phases is a total 922 weeks compared to the aggregate BCIS of 932 weeks. We consider the pre-construction period reasonable and the durations also reasonable. The overall programme from start to completion is 948 weeks; there is therefore no provision for overlapping of the phases.
- 1.5 The areas included in the appraisal are consistent with the areas in the estimate. The costs show a shortfall (under-allowance) in the appraisal of £523,951 compared to the estimate. The discrepancy appears to relate to the costs in Blocks D3 and E1.

2 METHODOLOGY

- 2.1 The objective of the review of the construction cost element of the assessment of economic viability is to benchmark the Applicant's costs against RICS Building Cost Information Service (BCIS) average costs. We use BCIS costs for benchmarking because it is a national and independent database. Many companies prefer to benchmark against their own data which they often treat as confidential. Whilst this is understandable as an internal exercise, in our view it is insufficiently robust as a tool for assessing viability compared to benchmarking against BCIS. A key characteristic of benchmarking is to measure performance against external data. Whilst a company may prefer to use their own internal database, the danger is that it measures the company's own projects against others of its projects with no external test. Any inherent discrepancies will not be identified without some independent scrutiny.

- 2.2 BCIS average costs are provided at mean, median and upper quartile rates (as well as lowest, lower quartile and highest rates). We generally use mean or occasionally upper quartile for benchmarking. The outcome of the benchmarking is little affected, as BCIS levels are used as a starting point to assess the level of cost and specification enhancement in the scheme on an element-by-element basis. BCIS also provide a location factor compared to a UK mean of 100; our benchmarking exercise adjusts for the location of the scheme. BCIS Average cost information is available on a default basis which includes all historic data with a weighting for the most recent, or for a selected maximum period ranging from 5 to 40 years. We generally consider both default and maximum 5-year and also 30-year average prices. We have previously considered 5-year data more likely to reflect current regulations, specification, technology and market requirements, but because of reduce sample sizes in the last 5 years we consider the default values the most appropriate for benchmarking.
- 2.3 BCIS average prices are available on an overall £ per sqm and for new build work on an elemental £ per sqm basis. Rehabilitation/conversion data is available on an overall £ per sqm and on a group element basis i.e., substructure, superstructure, finishings, fittings and services – but is not available on an elemental basis. A comparison of the applicants elemental costing compared to BCIS elemental benchmark costs provides a useful insight into any differences in cost. For example: planning and site location requirements may result in a higher-than-normal cost of external wall and window elements.
- 2.4 If the application scheme is for the conversion, rehabilitation or refurbishment of an existing building, greater difficulty results in checking that the costs are reasonable, and the benchmarking exercise must be undertaken with caution. The elemental split is not available from the BCIS database for rehabilitation work; the new build split may be used instead as a check for some, but certainly not all, elements. Works to existing buildings vary greatly from one building project to the next. Verification of costs is helped greatly if the cost plan is itemised in reasonable detail thus describing the content and extent of works proposed.
- 2.5 BCIS costs are available on a quarterly basis – the most recent quarters use forecast figures; the older quarters are firm. If any estimates require adjustment on a time basis, we use the BCIS all-in Tender Price Index (TPI).
- 2.6 BCIS average costs are available for different categories of buildings such as flats, houses, offices, shops, hotels, schools etc. The Applicant's cost plan should ideally keep the estimates for different categories separate to assist more accurate benchmarking. However, if the Applicant's cost plan does not distinguish different categories, we may calculate a blended BCIS average rate for benchmarking based on the different constituent areas of the overall GIA.
- 2.7 To undertake the benchmarking, we require a cost plan prepared by the applicant; for preference in reasonable detail. Ideally the cost plan should be prepared in BCIS elements. We usually have to undertake some degree of analysis and rearrangement before the applicant's elemental costs can be compared to BCIS elemental benchmark figures. If a further level of detail is available showing the build-up to the elemental totals it facilitates the review of specification and cost allowances in determining adjustments to benchmark levels. An example might be fittings that show an allowance for kitchen fittings, bedroom wardrobes etc that is in excess of a normal BCIS benchmark allowance.

- 2.8 To assist in reviewing the estimate we require drawings and (if available) specifications. Also, any other reports that may have a bearing on the costs. These are often listed as having being used in the preparation of the estimate. If not provided we frequently download additional material from the documents made available from the planning website.
- 2.9 BCIS average prices per sqm include overheads and profit (OHP) and preliminaries costs. BCIS elemental costs include OHP but not preliminaries. Nor do average prices per sqm or elemental costs include for external services and external works costs. Demolitions and site preparation are excluded from all BCIS costs. We consider the Applicants detailed cost plan to determine what, if any, abnormal and other costs can properly be considered as reasonable. We prepare an adjusted benchmark figure allowing for any costs which we consider can reasonably be taken into account before reaching a conclusion on the applicant's cost estimate.
- 2.10 We undertake this adjusted benchmarking by determining the appropriate location adjusted BCIS average rate as a starting point for the adjustment of abnormal and enhanced costs. We review the elemental analysis of the cost plan on an element-by-element basis and compare the Applicants total to the BCIS element total. If there is a difference, and the information is available, we review the more detailed build-up of information considering the specification and rates to determine if the additional cost appears justified. If it is, then the calculation may be the difference between the cost plan elemental £/m² and the equivalent BCIS rate. We may also make a partial adjustment if in our opinion this is appropriate. The BCIS elemental rates are inclusive of OHP but exclude preliminaries. If the Applicant's costings add preliminaries and OHP at the end of the estimate (as most typically do) we add these to the adjustment amounts to provide a comparable figure to the Applicant's cost estimate. The results of the elemental analysis and BCIS benchmarking are generally issued as a PDF but upon request can be provided as an Excel spreadsheet.
- 2.11 We have considered the duration of the construction period by reference to the average duration calculation resulting from use of the BCIS Duration Calculator, and if we consider appropriate have drawn attention to any significant divergence between the Applicant's duration and the BCIS calculation. The duration is expected to be the result of a programme in appropriate detail for the stage of the project that should be prepared by a specialist in the field. We consider our experience of construction and duration sufficient for benchmarking comparisons using BCIS, but do not possess the appropriate qualifications and experience for undertaking a more detailed examination of the construction duration.

3 GENERAL REVIEW

- 3.1 We have been provided with and relied upon the Financial Viability Assessment Report Number P01 issued June 2025 by Newmark together with Appendix 4 the Order of Cost Estimate Stage 3 Rev 14 issued 12 May 2025 by Airey Miller - Base 1Q2025.
- 3.2 We have also downloaded a number of files from the planning web site.
- 3.3 The information we require to undertake the cost benchmarking process outlined in section 2 is a reasonably detailed cost estimate in elemental detail with each element separately costed, with separate sub-totals in accordance with the BCIS/NRM rules of measurement, preferably presented as an elemental summary,

and supported by a sufficiently detailed build-up to indicate the proposed specifications. If fit-out is separated in the estimate it too should be in similar elemental detail.

- 3.4 The Order of Cost Estimate received is in an elemental format with full supporting detail to Blocks A1 & D1 but in elemental summary form only for the remaining blocks. There is reasonable supporting detail for Blocks A1 & D1.
- 3.5 The base date of the estimate is 1Q2025. Our benchmarking uses current BCIS data which is on a current tender firm price basis. The BCIS all-in Tender Price Index (TPI) for 1Q2025 is 399 (Provisional) and for 3Q2025 403 (Forecast).
- 3.6 The Assumptions and Basis of Estimate has been scheduled. There is no design information identified and no basis for structural or services sources listed.
- 3.7 The estimate includes an allowance of 15% for preliminaries. The allowance for overheads and profit (OHP) is 6%. We consider both of these allowances reasonable.
- 3.8 The allowance for contingencies is 5% which we consider reasonable. The allowance for risk of 5% in the estimate has not been included in the appraisal construction cost and a separate allowance of 5% made – there is no double counting. All the % figures are based on a calculation of a conventional arrangement of the sums in the analysis.
- 3.9 The estimate includes a 5% provision for main contractor's design fee; this sum has been omitted from the construction cost in the appraisal and an allowance of 10% for professional fees included.
- 3.10 We have extracted the cost information provided by the Applicant into a standard BCIS/NRM format to facilitate our benchmarking.
- 3.11 Sales have been included in the Appraisal at average figures of £914/ft² (Net Sales Area).
- 3.12 We have downloaded current BCIS data for benchmarking purposes including a Location Factor for Camden of 128 that has been applied in our benchmarking calculations.
- 3.13 We have adopted the same GIA used in the Applicant's estimate; we assume this to be the GIA calculated in accordance with the RICS Code of Measurement 6th Edition 2007.
- 3.14 The development comprises 14 blocks of flats predominantly above 6 storeys; BCIS average cost data is given in steps: 1-2 storey, 3-5 storey, 6 storey or above. We have benchmarked all construction as flats 6 storey or above.
- 3.15 The results of our benchmarking are provided in the table at 3.16 below.

3.16

	Applicant	BCIS	Difference	
	£/m ²	£/m ²	£/m ²	£
A1	3,394	3,433	38	146,113

A2	3,485	3,534	49	409,378
A3	3,444	3,672	228	677,478
B1 Social	3,139	3,365	226	1,269,276
B1 Market	3,559	3,508	-51	-342,295
C1 Social	3,148	3,347	198	1,521,187
C1 Market	3,583	3,534	-49	-336,162
D1	3,035	3,294	259	752,052
D2	3,601	3,535	-66	-302,170
D3	3,501	3,433	-68	-285,481
E1 Social	4,622	4,310	-312	-139,903
E1 Market	3,663	3,535	-128	-362,637
E2	3,637	3,576	-61	-673,149
F1 Social	3,379	3,574	194	323,662
F1 Market	3,949	3,871	-78	-91,219
F2	3,773	3,688	-85	-466,182
G1	3,541	3,472	-69	-463,136
TOTAL				1,636,812

3.17 The Applicants costs are higher than our adjusted benchmark in total by £1,636,812; this equates to 0.55%. We therefore consider the Applicant's costs to be reasonable.

3.18 The pre-construction period allowed by the Applicant for demolitions is 21 weeks. We have provided a comparison of the Applicant's durations of the eight phases to BCIS durations in the table at 3.19 below. The aggregate of all phases is a total 922 weeks compared to the aggregate BCIS of 932 weeks. We consider the pre-construction period reasonable and the durations also reasonable. The overall programme from start to completion is 948 weeks; there is therefore no provision for overlapping of the phases.

		Applicant	BCIS		
Phase		Wks	Avg	90% low	90% high
Demolitions		21			
1	24,039,305	111	95	86	104

2	50,480,947	126	112	100	124
3	27,384,262	113	98	89	108
4	45,754,475	113	109	98	122
5	26,294,484	113	97	88	107
6	53,628,316	107	113	101	126
7	57,680,724	117	115	103	128
8	34,106,596	122	103	93	113
Infrastructure	5,341,896				
TOTAL	324,711,005	922	842	758	932

- 3.20 The areas included in the appraisal are consistent with the areas in the estimate. The costs show a shortfall (under-allowance) in the appraisal of £523,951 compared to the estimate. The discrepancy appears to relate to the costs in Blocks D3 and E1.

BPS Chartered Surveyors

Date: 30th July 2025

West Kentish Town Estate
Elemental analysis & BCIS benchmarking

	GIA m²		83,132		3,826		8,388		2,970		5,626		6,698		7,667		6,839		2,905		4,597		4,186	
	Total		A1		A2 Social		A3 Social		B1 Social		B1 Market sale		C1 Social		C1 Market		D1		D2		D3		E1 Soc	
	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²
Demolitions 2.1%	4,904,331	59	442,745	116	478,116	57	176,062	59	315,056	56	375,088	56	429,352	56	382,984	56	165,000	57	257,432	56	234,416	56	25,144	
1 Substructure	27,237,236	328	1,199,225	313	2,625,444	313	944,460	318	1,789,068	318	2,129,964	318	2,438,106	318	2,174,802	318	1,043,305	359	1,461,846	318	1,331,148	318	142,782	
2A Frame	17,627,630	212	820,700	215	1,828,584	218	567,270	191	1,102,696	196	1,460,164	218	1,502,732	196	1,490,902	218	570,700	196	1,002,146	218	912,548	218	88,004	
2B Upper Floors	14,213,673	171	626,865	164	1,501,452	179	433,620	146	843,900	150	1,198,942	179	1,150,050	150	1,224,181	179	455,900	157	822,863	179	749,294	179	67,350	
2C Roof	12,395,399	149	597,080	156	1,333,692	159	382,239	129	669,494	119	1,064,982	159	912,373	119	1,087,401	159	346,225	119	730,923	159	665,574	159	64,117	
2D Stairs	4,593,847	55	175,000	46	463,018	55	139,590	47	270,048	48	348,296	52	368,016	48	355,628	52	140,000	48	239,044	52	217,672	52	86,794	
2E External Walls	23,120,435	278	1,111,580	291	2,820,884	336	659,194	222	1,299,606	231	1,897,142	283	1,948,185	254	1,907,124	279	672,550	232	1,342,324	292	1,222,312	292	146,244	
2F Windows & External Doors	15,739,309	189	638,490	167	1,541,295	184	447,876	151	838,274	149	1,413,278	211	1,182,366	154	1,443,029	211	431,700	149	969,967	211	883,246	211	80,281	
2G Internal Walls & Partitions	19,644,649	236	906,632	237	1,987,956	237	703,890	237	1,333,362	237	1,587,426	237	1,817,079	237	1,620,843	237	630,980	217	1,089,489	237	992,082	237	106,413	
2H Internal Doors	5,035,372	61	219,720	57	486,504	58	151,470	51	292,552	52	435,370	65	398,684	52	444,535	65	150,200	52	298,805	65	272,090	65	23,347	
2 Superstructure	112,370,314	1,352	5,096,067	1,332	11,963,385	1,426	3,485,149	1,173	6,649,932	1,182	9,405,600	1,404	9,279,485	1,210	9,573,643	1,400	3,398,255	1,170	6,495,561	1,413	5,914,818	1,413	662,551	
3A Wall Finishes	3,607,288	43	125,320	33	276,804	33	109,890	37	213,788	38	321,504	48	291,346	38	328,272	48	127,300	44	220,656	48	200,928	48	17,062	
3B Floor Finishes	10,182,098	122	436,345	114	956,232	114	311,850	105	607,608	108	877,438	131	828,036	108	895,909	131	311,445	107	602,207	131	548,366	131	48,492	
3C Ceiling Finishes	7,151,926	86	324,860	85	712,980	85	252,450	85	489,462	87	582,726	87	667,029	87	594,993	87	202,895	70	399,939	87	364,182	87	39,063	
3 Internal Finishes	20,941,312	252	886,525	232	1,946,016	232	674,190	227	1,310,858	233	1,781,668	266	1,786,411	233	1,819,174	266	641,640	221	1,222,802	266	1,113,476	266	104,617	
4 Fittings	9,741,309	117	329,000	86	721,368	86	270,270	91	528,844	94	904,230	135	720,698	94	923,265	135	271,635	94	620,595	135	565,110	135	42,206	
5A Sanitary Appliances	1,662,640	20	76,520	20	167,760	20	59,400	20	112,520	20	133,960	20	153,340	20	136,780	20	58,100	20	91,940	20	83,720	20	8,980	
5B Services Equipment (kitchen, laundry)																								
5C Disposal Installations	2,075,330	25	95,650	25	209,700	25	71,280	24	140,650	25	167,450	25	191,675	25	170,975	25	72,625	25	114,925	25	104,650	25	11,225	
5D Water Installations	2,490,990	30	114,780	30	251,640	30	86,130	29	168,780	30	200,940	30	230,010	30	205,170	30	87,150	30	137,910	30	125,580	30	13,470	
5E Heat Source	2,490,990	30	114,780	30	251,640	30	86,130	29	168,780	30	200,940	30	230,010	30	205,170	30	87,150	30	137,910	30	125,580	30	13,470	
5F Space Heating & Air Treatment	4,893,968	59	210,430	55	469,728	56	201,960	68	393,820	70	368,390	55	536,690	70	376,145	55	203,350	70	252,835	55	230,230	55	31,430	
5G Ventilating Systems, smoke extract & control	2,181,750	26	95,650	25	209,700	25	86,130	29	168,780	30	167,450	25	230,010	30	170,975	25	87,150	30	114,925	25	104,650	25	13,470	
5H Electrical Installations (power, lighting, emergency lighting, standby generator, UPS, PV Panels)	9,246,622	111	432,920	113	1,014,612	121	317,790	107	618,860	110	736,780	110	843,370	110	752,290	110	326,570	112	505,670	110	460,460	110	49,390	
5I Fuel Installations																								
5J Lift Installations	7,532,285	91	306,080	80	671,040	80	237,600	80	495,088	88	589,424	88	628,694	82	590,890	86	232,400	80	459,700	100	435,344	104	131,333	
5K Protective Installations (fire fighting, dry & wet risers, sprinklers, lightning protection)	2,490,990	30	114,780	30	251,640	30	86,130	29	168,780	30	200,940	30	230,010	30	205,170	30	87,150	30	137,910	30	125,580	30	13,470	
5L Communication Installations (burglar, panic alarm, fire alarm, cctv, door entry, public address, data cabling, tv/satellite, telecommunication systems, leak detection, induction loop)	2,490,990	30	114,780	30	251,640	30	86,130	29	168,780	30	200,940	30	230,010	30	205,170	30	87,150	30	137,910	30	125,580	30	13,470	
5M Special Installations - (window cleaning, BMS, medical gas)	9,557,558	115	394,150	103	905,904	108	191,565	65	284,676	51	951,116	142	387,950	51	971,138	142	120,000	41	652,774	142	594,412	142	19,756	
5N BWIC with Services and fire stopping	2,600,140	31	120,098	31	268,416	32	123,552	42	168,780	30	207,638	31	230,010	30	212,009	31	87,150	30	142,507	31	129,766	31	13,470	
Service connections + comms/landlord	127,936	2	127,936	33		0		0		0		0		0		0		0		0		0		
5O Management of commissioning of services																								
5 Services	49,842,189	600	2,318,554	606	4,923,420	587	1,633,797	550	3,058,294	544	4,125,968	616	4,121,779	538	4,201,882	614	1,535,945	529	2,886,916	628	2,645,552	632	332,934	
6A Site Works	15,208,630	183	202,599	53	1,324,572	158	1,207,700	407	835,134	148	835,134	125	1,025,999	134	1,025,999	150	121,033	42	634,224	138	225,888	54	392,046	
6B Drainage	596,393	7	17,575	5		0		0		0		0		0		0	11,718	4		0		0		
6C External Services	1,166,265	14	141,271	37		0		0		0		0		0		0	24,993	9		0		0		
6D Minor Building Works	40,000	0	20,000	5		0		0		0		0		0		0	20,000	7		0		0		
6 External Works 7.6%	17,011,287	205	381,445	100	1,324,572	158	1,207,700	407	835,134	148	835,134	125	1,025,999	134	1,025,999	150	177,744	61	634,224	138	225,888	54	392,046	
SUB TOTAL	242,047,979	2,912	10,653,561	2,785	23,982,321	2,859	8,391,628	2,825	14,487,186	2,575	19,557,652	2,920	19,801,830	2,583	20,101,749	2,939								

West Kentish Town Estate
Elemental analysis & BCIS benchmarking

	GIA m²	449		2,838		11,088		1,667		1,167		5,485		6,736		83,132		LF100	LF128
		ial	E1 Market	E2	F1 Social	F1 Market	F2	G1	Infrastructure										
		£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£	£/m²	£/m²
Demolitions 2.1%		56	158,928	56	620,928	56	93,352	56	65,352	56	307,160	56	377,216	56					
1 Substructure		318	902,484	318	3,984,362	359	530,106	318	371,106	318	1,744,230	318	2,424,798	360				182	233
2A Frame		196	618,684	218	2,417,184	218	326,732	196	254,406	218	1,195,730	218	1,468,448	218				162	207
2B Upper Floors		150	508,002	179	1,984,752	179	250,050	150	208,893	179	981,815	179	1,205,744	179				94	120
2C Roof		143	451,242	159	1,762,992	159	198,373	119	185,553	159	872,115	159	1,071,024	159				111	142
2D Stairs		193	265,637	94	686,125	62	100,020	60	60,684	52	328,003	60	350,272	52				34	44
2E External Walls		326	828,696	292	3,237,696	292	385,077	231	289,649	248	1,601,620	292	1,750,552	260				251	321
2F Windows & External Doors		179	598,818	211	2,339,568	211	248,383	149	246,237	211	1,157,335	211	1,279,166	190				104	133
2G Internal Walls & Partitions		237	672,606	237	2,627,856	237	395,079	237	276,579	237	1,299,945	237	1,596,432	237				89	114
2H Internal Doors		52	184,470	65	720,720	65	86,684	52	75,855	65	356,525	65	437,840	65				56	72
2 Superstructure		1,476	4,128,155	1,455	15,776,893	1,423	1,990,398	1,194	1,597,856	1,369	7,793,088	1,421	9,159,478	1,360	0	0		901	1,153
3A Wall Finishes		38	136,224	48	532,224	48	63,346	38	56,016	48	263,280	48	323,328	48				87	111
3B Floor Finishes		108	371,778	131	1,452,528	131	180,036	108	152,877	131	718,535	131	882,416	131				72	92
3C Ceiling Finishes		87	246,906	87	964,656	87	145,029	87	101,529	87	477,195	87	586,032	87				48	61
3 Internal Finishes		233	754,908	266	2,949,408	266	388,411	233	310,422	266	1,459,010	266	1,791,776	266	0	0		207	265
4 Fittings		94	383,130	135	1,496,880	135	156,698	94	157,545	135	740,475	135	909,360	135				79	101
5A Sanitary Appliances		20	56,760	20	221,760	20	33,340	20	23,340	20	109,700	20	134,720	20				33	42
5B Services Equipment (kitchen, laundry)																		22	28
5C Disposal Installations		25	70,950	25	277,200	25	41,675	25	29,175	25	137,125	25	168,400	25				17	22
5D Water Installations		30	85,140	30	332,640	30	50,010	30	35,010	30	164,550	30	202,080	30				38	49
5E Heat Source		30	85,140	30	332,640	30	50,010	30	35,010	30	164,550	30	202,080	30				48	61
5F Space Heating & Air Treatment		70	156,090	55	609,840	55	116,690	70	64,185	55	301,675	55	370,480	55				114	146
5G Ventilating Systems, smoke extract & control		30	70,950	25	277,200	25	50,010	30	29,175	25	137,125	25	168,400	25				22	28
5H Electrical Installations (power, lighting, emergency lighting, standby generator, UPS, PV Panels)		110	312,180	110	1,219,680	110	183,370	110	128,370	110	603,350	110	740,960	110				107	137
5I Fuel Installations																		8	10
5J Lift Installations		293	249,744	88	953,568	86	173,368	104	112,032	96	592,380	108	673,600	100				43	55
5K Protective Installations (fire fighting, dry & wet risers, sprinklers, lightning protection)		30	85,140	30	332,640	30	50,010	30	35,010	30	164,550	30	202,080	30				20	26
5L Communication Installations (burglar, panic alarm, fire alarm, cctv, door entry, public address, data cabling, tv/satellite, telecommunication systems, leak detection, induction loop)		30	85,140	30	332,640	30	50,010	30	35,010	30	164,550	30	202,080	30				26	33
5M Special Installations - (window cleaning, BMS, medical gas)		44	463,445	163	1,574,496	142	80,683	48	182,285	156	778,870	142	1,004,338	149				42	54
5N BWIC with Services and fire stopping		30	87,978	31	343,728	31	50,010	30	36,177	31	170,035	31	208,816	31				15	19
Service connections + comms/landlord		0		0		0		0		0		0		0					
5O Management of commissioning of services																			
5 Services		742	1,808,657	637	6,808,032	614	929,186	557	744,779	638	3,488,460	636	4,278,034	635	0	0		555	710
6A Site Works		873	392,046	138	1,443,837	130	533,226	320	533,226	457	1,443,837	263	624,450	93	2,407,680	29			
6B Drainage		0		0		0		0		0		0		0	567,100	7			
6C External Services		0		0		0		0		0		0		0	1,000,000	12			
6D Minor Building Works		0		0		0		0		0		0		0		0			
6 External Works 7.6%		873	392,046	138	1,443,837	130	533,226	320	533,226	457	1,443,837	263	624,450	93	3,974,780	48		0	0
SUB TOTAL		3,791	8,528,308	3,005	33,080,340	2,983	4,621,377	2,772	3,780,286	3,239	16,976,260	3,095	19,565,112	2,905	3,974,780	48		1,924	2,463
7 Preliminaries 15%		569	1,279,246	451	4,962,051	448	693,207	416	567,043	486	2,546,439	464	2,934,767	436	596,217	7			
Overheads & Profit 6%		262	588,453	207	2,282,543	206	318,875	191	260,840	224	1,171,362	214	1,349,993	200	274,260	3			
SUB TOTAL		▲ 4,622	10,396,007	▲ 3,663	40,324,934	▲ 3,637	5,633,459	▲ 3,379	4,608,169	▲ 3,949	20,694,061	▲ 3,773	23,849,872	▲ 3,541	4,845,257	58		1,924	2,463
Design Development risks		116	259,900	92	1,058,530	95	140,836	84	115,204	99	543,219	99	626,059	93	127,188	2			
Construction risks		116	259,900	92	1,058,530	95	140,836	84	115,204	99	543,219	99	626,059	93	127,188	2			
Employer change risks - combined say 5% (design fee below line)																			
Employer other risks		-195	-414,000	-146		0		0		0		0		0		0			
TOTAL		4,657	10,501,808	3,700	42,441,994	3,828	5,915,131	3,548	4,838,577	4,146	21,780,499	3,971	25,101,990	3,727	5,099,633	61			
Main contractors design fee 4.8% - 5% if before contingency		233	525,090	185	2,016,247	182	295,757	177	241,929	207	1,034,703	189	1,192,494	177	242,263	3			
TOTAL		4,890	11,026,898	3,885	44,458,241	4,010	6,210,888	3,726	5,080,506	4,353	22,815,202	4,160	26,294,484	3,904	5,341,896	64			
		4,890		3,885		4,010		3,726		4,353		4,160		3,904		64			
							11,291,394												
Benchmarking		2,717		2,717		2,717		2,717		2,717		2,717		2,717					
Add demolitions			56		56		56		56		56		56						
Add external works			138		130		320		457		263		93						
Add additional cost of substructure			85		126		85		85		85		127						
Add additional cost of frame & upper floors			69		69		18		69		69		69						
Add additional cost of roof			17		17				17		17		17						
Add additional cost of external walls & windows			49		49				5		49								
Add additional cost of internal walls			123		123		123		123		123		123						
Add additional cost of fittings			34		34				34		34		34						
Allow additional cost of services inc sustainability, protective & commun			100		100		100		100		100		100						
			671		704		702		946		796		619						
Add prelims 15%			101		106		105		142		119		93						
Add OHP 6%		1,593	46	818	49	859	48	856	65	1,153	55	970	43	754					
Total adjusted benchmark exc contingency and fees		▼ 4,310		▼ 3,535		▼ 3,576		▼ 3,574		▼ 3,871		▼ 3,688		▼ 3,472					
Difference		312		128		61		- 194		78		85		69					
Applicant overall slightly in excess of benchmark		139,903		362,637		673,149		- 323,662		91,219		466,182		463,136					

Appendix 2: Glossary

Term	Definition (links provided for further information)
Actual Developer Return (or profit)	As opposed to target return, the actual return is what developers are due to receive from a development scheme.
Affordable Rent:	Affordable rent is rent that is set at up to 80% of market rent (including service charges). Includes SR, LAR and DMR housing.
Social Rent (SR)	Social rent is usually rent that is paid to registered providers and local authorities. It is low-cost rent that is set by a government formula.
London Affordable Rent (LAR)	London Affordable Rent (LAR) homes are rented by social landlords with rents capped at benchmark levels published by the Greater London Authority. They are lower than the 80% per cent of market rents at which affordable rents can be charged. The London Plan
Discounted Market Rent (DMR)	Usually at 80% or less of open market rent, or to LAR levels.
Alternative Use Value (AUV)	Ultimately, AUV considers other options for a property to ascertain the highest value and best use for the land. There's usually more than one thing that can be done to release value in a site, and it's logical that the landowner should consider all avenues before bringing a scheme forward. Government guidance allows viability assessors to consider the alternative use value of a building as a benchmark, provided this relates to a lawful use which complies with the adopted development plan. This alternative use can therefore be: <ul style="list-style-type: none"> - a legal permitted change of use or development (which does not require planning permission) - an existing planning permission (for example a smaller scheme) - or a proposal which fully complies with all development plan policies. Existing Use Value remains the preferred method of assessing BLV under PPG and AUV use is limited by a number of specific conditions. NPPG
Benchmark Land Value (BLV)	The benchmark land value (BLV) is the hypothetical land value used to assess planning viability; it does not include hope value. Established based on either the existing use value (EUV) or the Alternative Use Value (AUV) of the land and may include a Landowner Premium. NPPG
Construction Costs	Total build costs associated with the development.
Build to Rent (BTR)	Build to Rent is a property development that is designed with the sole intention of appealing to the rental market as opposed to long-term home ownership. The London Plan
Co-Living	the practice of living with other people in a group of homes that include some shared facilities (typically shared working, leisure spaces and kitchens). The London Plan
Community Infrastructure Levy (CIL)	The Community Infrastructure Levy (CIL) is a levy on development that councils across the country, are implementing. It helps to pay for local infrastructure including schools, paths, parks, open spaces and healthcare facilities.
Developer Return (or profit)	The amount or percentage return retained or retainable by the developer. NPPG
Developer return on cost	The amount of developer Return expressed as a percentage of Build Costs. NPPG
Developer return on GDV	The amount of Developer Return expressed as a percentage of GDV. NPPG
Development Appraisal	A financial appraisal of a development. It is normally used to calculate either the residual site value or the residual development profit, but it can be used to calculate other outputs. RICS Development Valuation
Existing Use Value (EUV)	What property or land is worth in its current form. In other words, the hypothetical price that it can be sold for on the open market, assuming it will only be used for the existing use for the foreseeable future and that no capital works will be undertaken. It excludes hope value for redevelopment. NPPG
Extra Care	The term 'extra care' housing is used to describe developments that comprise self-contained homes with design features and support services available to enable self-care and independent living.
Fair Value	'The price that would be received to sell an asset, or paid to transfer a liability, in an orderly transaction between market participants at the measurement date.' (This definition derives from international Financial Reporting Standards IFRS 13.) The Red Book

Gross Development Value (GDV)	The value of a development once construction has been completed, or the total sum of the sales values for the finished development. NPPG
Gross External Area (GEA)	Broadly speaking the whole area of a building taking each floor into account, including the thickness of the external walls. Most similar to IPMS 1. Code of Measuring Practice IPMS
Gross Internal Area (GIA)	Broadly speaking the whole enclosed area of a building taking each floor into account and excluding the thickness of the external walls. Most similar to IPMS 2. Code of Measuring Practice IPMS
Ground Rent	An additional amount which many people who own leasehold properties must pay. It's charged by a "landlord", although the more accurate term is perhaps "freeholder" – the person who owns the land, and ultimately owns the lease. No longer applied on new dwellings.
House of Multiple Occupation (HMO)	A property shared by at least 3 people who are not from 1 'household' (for example a family) and share facilities like the bathroom and kitchen. You must have a licence if you're renting out a large HMO in England or Wales. Your property is defined as a large HMO if all of the following apply: <ul style="list-style-type: none"> it is rented to 5 or more people who form more than 1 household. some or all tenants share toilet, bathroom, or kitchen facilities. at least 1 tenant pays rent (or their employer pays it for them) The London Plan
Internal Rate of Return (IRR)	The rate of interest (expressed as a percentage) at which all future project cash flows (positive and negative) will be discounted in order that the net present value (NPV) of those cash flows, including the initial investment, be equal to zero. IRR can be assessed on both gross and net of finance. RICS Development Valuation
Shared Ownership (SO)	The purchaser pays a mortgage on the share they own and pays a subsidised rent to a housing association on the remaining share. The purchaser has the option to increase their share during their time in the property via a process known as 'staircasing', and in most cases can staircase all the way to 100%. It is a form of intermediate housing.
London Living Rent (LLR)	London Living Rent is a type of intermediate affordable housing for Londoners to build up savings to buy a home. London Living Rent provides rented homes on stable tenancies, with rents based on a third of local household incomes. It is a form of intermediate housing. The London Plan
ITZA	ITZA is surveyor-abbreviation meaning 'area in terms of Zone A'. Totalling the Zone A equivalent of each zone (i.e. Zone B/2, Zone C/4 etc) and expressing the total in terms of Zone A is a method of analysing rents. Code of Measuring Practice
Landowner Premium	The premium (or the 'plus' in EUV+) is a component of benchmark land value. It is the amount (if any) above existing use value (EUV) that goes to the landowner and reflects an incentive for the landowner to dispose of the land for development. NPPG
Market Value	The estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's length transaction, after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion. The Red Book
National Planning Policy Framework (NPPF)	The revised National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied. National Planning Policy Framework
Net Internal Area (NIA)	Broadly speaking the usable area within a building measured to the face of the internal finish of perimeter or party walls, excluding corridors and WCs etc and taking each floor into account. Most similar to IPMS 3. Code of Measuring Practice IPMS
Net Sales Area (NSA)	Net Sales Area is the GIA of a new or existing residential dwelling, including basements, mezzanines, galleries and hallways, but excluding garages, conservatories, balconies, outbuildings, terraces and restricted height areas under 1.5m. Code of Measuring Practice
Net Lettable Area (NLA)	As above, expressing the area to be rentalised. Code of Measuring Practice
Planning Obligations	Planning obligations are legal obligations entered into to mitigate the impacts of a development proposal. This is usually via s106 agreement. Planning obligations run with the land, are legally binding and enforceable. They can include affordable housing, infrastructure contributions, CIL etc.
NPPG	The National Planning Practice Guidance adds further context to the National Planning Policy Framework (NPPF) and it is intended that the two documents should be read together. Plan makers must have regard to national policies and advice contained in the guidance when developing their plans. The guidance is also a 'material consideration' when taking decisions on planning applications. This means that if a local policy is deemed out of date, local authorities may be directed by the national guidance's requirements.
Open Market Sale (OMS)	Housing that is to be sold at Market Value.

Residual Value	The amount remaining once the gross development cost of a project is deducted from its gross development value (GDV) and an appropriate return has been deducted. RICS Development Valuation
Retirement Living	A retirement village or development built specifically for older adults - often those aged 55, 60 or 65 and over. They come with a range of superb facilities and can offer on-site care.
RICS	Royal Institution of Chartered Surveyors.
Target Developer Return (or profit)	The target profit required by the developer. NPPG
The Red Book	The Red Book is issued by RICS and details mandatory practices for RICS members undertaking valuation services. It also offers a useful reference resource for valuation users and other stakeholders. The Red Book
Zoning	In retail property valuation, Zoning is the area closest to the street and the most valuable area of retail, with the value decreasing with distance from the frontage: Zone B is the next 6 metres and then Zone C until the entire depth of the retail area is allocated into a zone. Anything after Zone C is usually delegated as the remainder (of space). Code of Measuring Practice

The above definitions are indicative only and are not to be relied upon. Professional advice should always be sought.

Appendix 3: BPS Comparable Evidence

New-build Residential Sales Evidence

Agar Grove Estate - Eeko, NW1 0RG

Additional evidence for one of JLL's comparable schemes

Bed(s)	Average price paid	Average size (SF)	Average £ per SF	Sale completed
1	£645,939	547	£1,180	01/2022 – 05/2022
2	£1,005,719	883	£1,132	

West Hampstead Central, NW6 1BR

Additional evidence for one of JLL's comparable schemes

Bed(s)	Average price paid	Average size (SF)	Average £ per SF	Sale completed
1	£563,775	635	£887	10/2024 – 12/2024
2	£737,500	910	£810	

Neos (Maitland Park Estate), NW3 2EH

This Council led development North of Camden Town aims to provide 118 units with green landscaping surrounding the building. Units will benefit from balconies/winter gardens and good transport links, being just an 8 minutes' walk from the nearest underground station. No parking is provided as part of this development. The scheme is also just under a half mile from the subject site meaning locational benefits would be similar.

Bed(s)	Average price paid	Average size (SF)	Average £ per SF	Sales completed
1	£511,121	544	£939	2023/2024
2	£693,746	783	£885	
3	£844,075	958	£881	

Commercial/Retail Rental Evidence

Location	Date	Size (SQFT)	Rent (per SQFT)	Description
50-51 Chalk Farm Rd	01/01/2024	875	£35,000 £40 psf	This retail unit is located along Chalk Farm Road, several minutes walk from Chalk Farm underground station and approximately 0.6 miles from the subject's location. We would expect a slightly lower rent as we expect less footfall in the estate compared to Chalk Farm Road, especially upon completion of Camden Goods Yard.
187 Kentish Town Rd	12/05/2025	2,540	£70,000 £27.56 psf	The commercial unit is located half a mile from the subject. It was leased by a gym for a 15-year term with 5 yearly upward only rent reviews. This building was recently refurbished to house flats on the upper floors. We note gyms typically achieve lower rents due to their community benefits.
74 Queens Crescent	21/01/2025	486	£17,000 £34.98 psf	This unit is located just 0.2 miles from the subject and has been let on a 10-year term after having been on the market for 3 months. We consider this comparable very relevant given its close proximity to the subject as a similar foot traffic would be expected.
59 Chalk Farm Rd	23/10/2024	710	£60,000 £84.51 psf	This retail property is located just a few minutes' walk from Chalk Farm underground station and is approximately 0.6 miles from the subject. Due to its positioning near to the station we expect much higher footfall in this area and therefore expect a far lower rent for the subject space.
289-291 Kentish Town Rd	23/08/2024	2,465	£100,000 £40.57 psf	This retail space is located just a few minutes' walk from Kentish Town station and c. 0.5 miles from the subject and was recently let to the FR group for a term of 15 years after having been on the market for 11 months. We consider a lower rent would be achieved in the subject's area given that it would expect less footfall.

Commercial/Retail Investment Evidence

Address	Date	Yield (NIY)	Price achieved Capital value psf Size (NIA)	Comments
78-79 Chalk Farm Rd	25/10/2023	N/A	£1.25m £424 psf 2,951 sq ft	A bar/nightclub unit located along Chalk Farm Road, approximately 0.6 miles from the subject. The property is in average condition but is in a far superior location. However, the property was vacant at sale reducing its value.
10 Malden Rd	30/06/2025	N/A	£655,000 £308 psf 2,128 sq ft	This retail unit is located just 0.3 miles south of the estate, sharing a very comparable location. The property is presented in average condition, and we therefore expect a slightly higher capital value psf for the subject.
88 Haversto ck Hill	28/02/2024	N/A	£317,000 £507 psf 625 sq ft	This retail unit is in very good condition and is located c. 0.6 miles from the subject. However, we note that it is a 6-minute walk from Chalk Farm station. Overall, we expect a slightly lower capital value per sq ft.
9 Campdal e Rd	Listed on 31/10/2024	8%	Unknown Unknown 805 sq ft	This restaurant unit is c. 1.3 miles from the subject in Islington and is located in a mostly residential area, not in immediate proximity of any stations.

Appendix 4: BPS Appraisals

West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

Development Appraisal
BPS Surveyors
18 August 2025

APPRAISAL SUMMARY**BPS SURVEYORS**
West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

Appraisal Summary for Merged Phases 1 2 3 4 5 6 7 8

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
P1 Social Rent	48	43,529	198.00	179,557	8,618,742
P1 Private Sale	4	3,724	861.98	802,500	3,210,000
P2 Social Rent	82	70,848	198.00	171,072	14,027,904
P2 Private Sale	45	32,851	875.47	639,111	28,760,000
P3 Social Rent	33	25,542	198.00	153,252	5,057,316
P3 Private Sale	45	30,408	927.88	627,000	28,215,000
P4 Social Rent	57	49,632	198.00	172,406	9,827,136
P4 Private Sale	72	51,968	898.34	648,403	46,685,000
P5 Private Sale	67	47,813	946.40	675,373	45,250,000
P6 Social Rent	81	65,800	198.00	160,844	13,028,400
P6 Private Sale	75	52,302	907.52	632,867	47,465,000
P7 Social Rent	5	4,672	198.00	185,011	925,056
P7 Private Sale	141	103,936	918.74	677,234	95,490,000
P8 Private Sale	81	58,964	913.44	664,938	53,860,000
P8 Social Rent	<u>20</u>	<u>13,756</u>	198.00	136,184	<u>2,723,688</u>
Totals	856	655,745			403,143,242

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
P1 Commercial / Community	1	624	30.00	18,720	18,720	18,720
P2 Commercial / Community	1	1,023	30.00	30,690	30,690	30,690
Totals	2	1,647			49,410	49,410

Investment Valuation**P1 Commercial / Community**

Market Rent	18,720	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	249,933

P2 Commercial / Community

Market Rent	30,690	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	409,746

Total Investment Valuation**659,680****GROSS DEVELOPMENT VALUE****403,802,922**

Purchaser's Costs		(44,858)	
Effective Purchaser's Costs Rate	6.80%		(44,858)

NET DEVELOPMENT VALUE**403,758,063****Additional Revenue**

P1 GLA/HE Grant	20,383,777	
P2 GLA/HE Grant	27,440,000	
P3 GLA/HE Grant	5,610,000	
P4 GLA/HE Grant	9,690,000	
P6 GLA/HE Grant	13,770,000	
P7 GLA/HE Grant	850,000	
P8 GLA/HE Grant	3,400,000	
	81,143,777	

NET REALISATION**484,901,840**

APPRAISAL SUMMARY**BPS SURVEYORS**

West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme
OUTLAY

ACQUISITION COSTS

Fixed Price	1		
Fixed Price		1	
			1
Agent Fee	1.00%	0	
Legal Fee	0.50%	0	
			0

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost	
P1 Construction Works	72,398	301.17	21,804,357	
P2 Construction Works	139,769	327.60	45,787,708	
P3 Construction Works	77,026	322.47	24,838,331	
P4 Construction Works	132,654	312.85	41,500,658	
P5 Construction Works	72,506	328.94	23,849,872	
P6 Construction Works	157,099	309.63	48,642,463	
P7 Construction Works	154,731	338.12	52,318,116	
P8 Construction Works	89,544	345.48	30,935,688	
Totals	895,727 ft²		289,677,193	
Contingency		5.00%	14,726,123	
S106			4,323,489	
CIL			17,453,868	
				326,180,673

Other Construction

P1 Infrastructure Costs			1,453,577	
P2 Infrastructure Costs			484,526	
P3 Infrastructure Costs			484,526	
P4 Infrastructure Costs			484,526	
P5 Infrastructure Costs			484,526	
P6 Infrastructure Costs			484,526	
P7 Infrastructure Costs			484,526	
P8 Infrastructure Costs			484,526	
				4,845,259

PROFESSIONAL FEES

Professional Fees	10.00%	29,452,245	
			29,452,245

MARKETING & LETTING

Marketing	2.00%	6,978,700	
Letting Agent Fee	10.00%	4,941	
Letting Legal Fee	5.00%	2,471	
			6,986,112

DISPOSAL FEES

Sales Agent Fee	1.00%	3,495,947	
Affordable Housing Disposal Fee		600,000	
Affordable Housing Disposal Fee		100,000	
Sales Legal Fee	0.50%	2,018,790	
			6,214,737

Additional Costs

Third Party Costs		19,052,000	
Third Party Costs		2,610,000	
Meanwhile Use		300,000	
P1 Building Safety Levy		18,949	
P2 Building Safety Levy		200,245	
P3 Building Safety Levy		182,340	
Third Party Costs		11,800,000	
P4 Building Safety Levy		291,765	
P5 Building Safety Levy		293,420	
P6 Building Safety Levy		297,907	

**West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme**

Third Party Costs	7,120,000	
P7 Building Safety Levy	606,612	
P8 Building Safety Levy	289,761	
		43,062,999

FINANCE

Debit Rate 7.000%, Credit Rate 0.000% (Nominal)		
Total Finance Cost		34,024,672

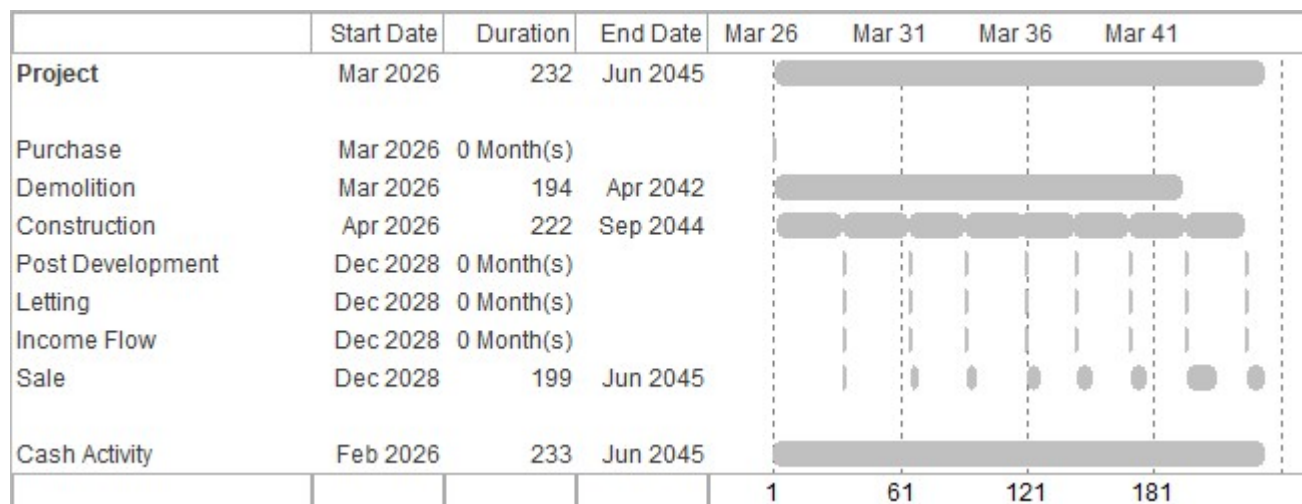
TOTAL COSTS
450,766,697
PROFIT
34,135,143
Performance Measures

Profit on Cost%	7.57%
Profit on GDV%	8.45%
Profit on NDV%	8.45%
Development Yield% (on Rent)	0.01%
Equivalent Yield% (Nominal)	7.00%
Equivalent Yield% (True)	7.32%
IRR% (without Interest)	9.56%
Rent Cover	690 yrs 10 mths
Profit Erosion (finance rate 7.000)	1 yr 1 mth

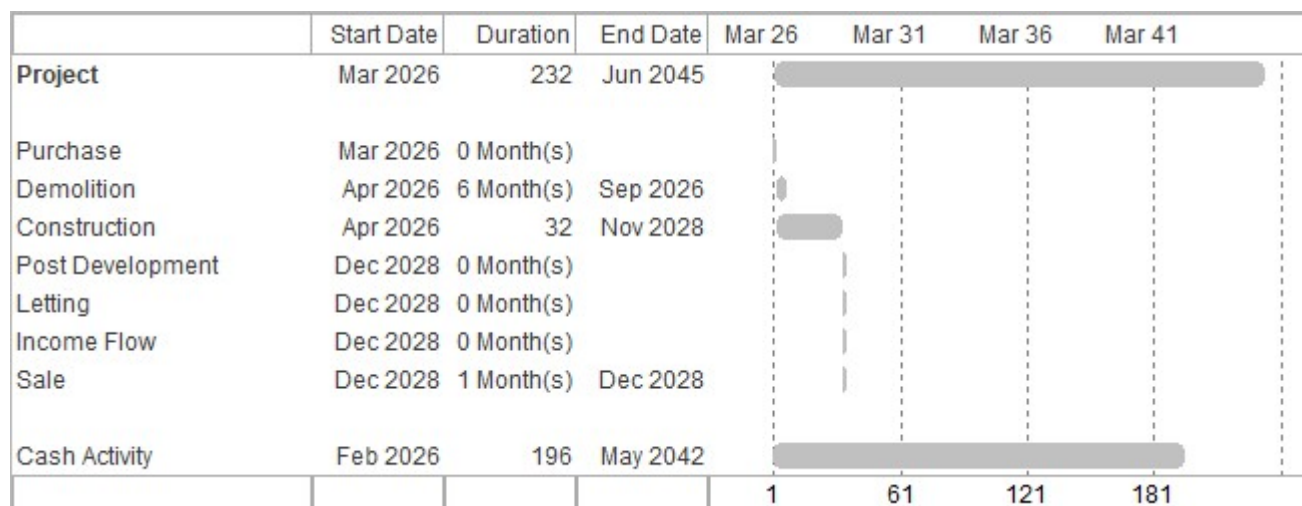
West Kentish Town Estate Financial Viability Appraisal Proposed Scheme

Project Timescale	
Project Start Date	Mar 2026
Project End Date	Jun 2045
Project Duration (Inc Exit Period)	232 months

All Phases

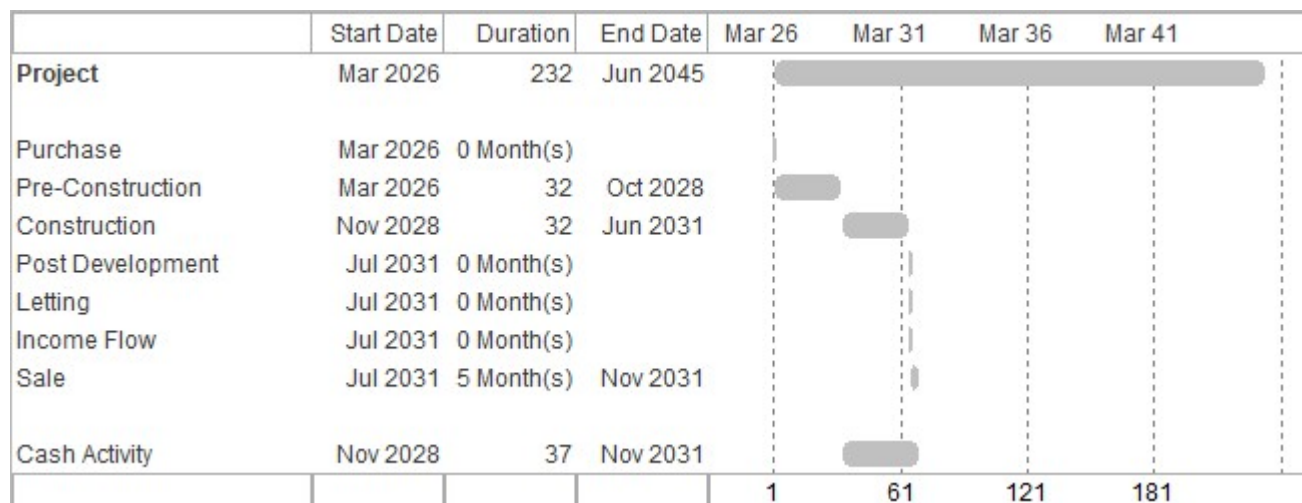


1. Phase 1

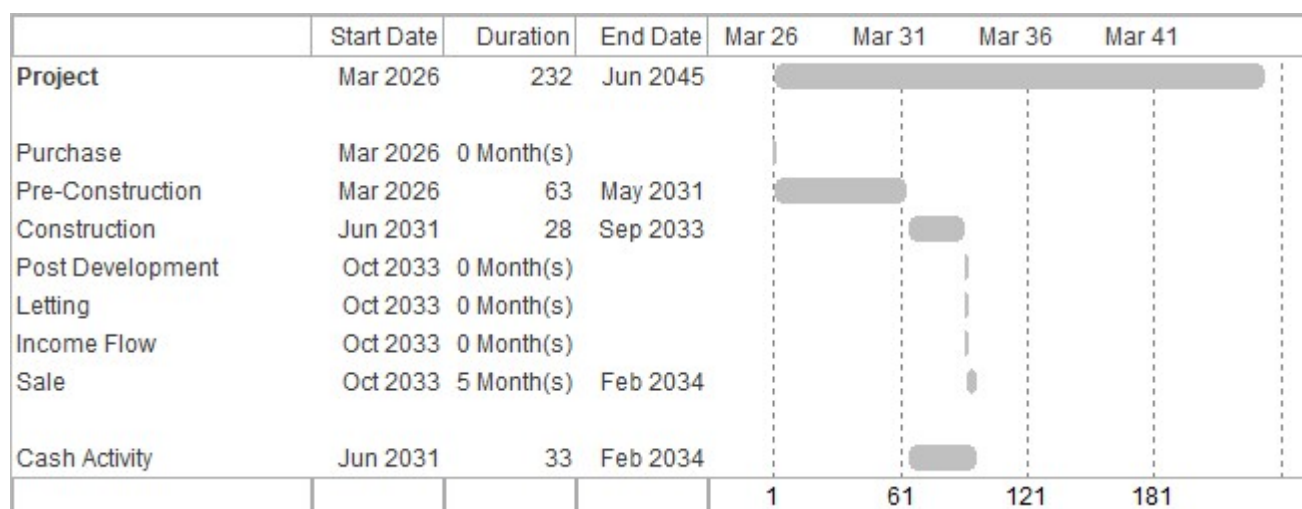


West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

2. Phase 2

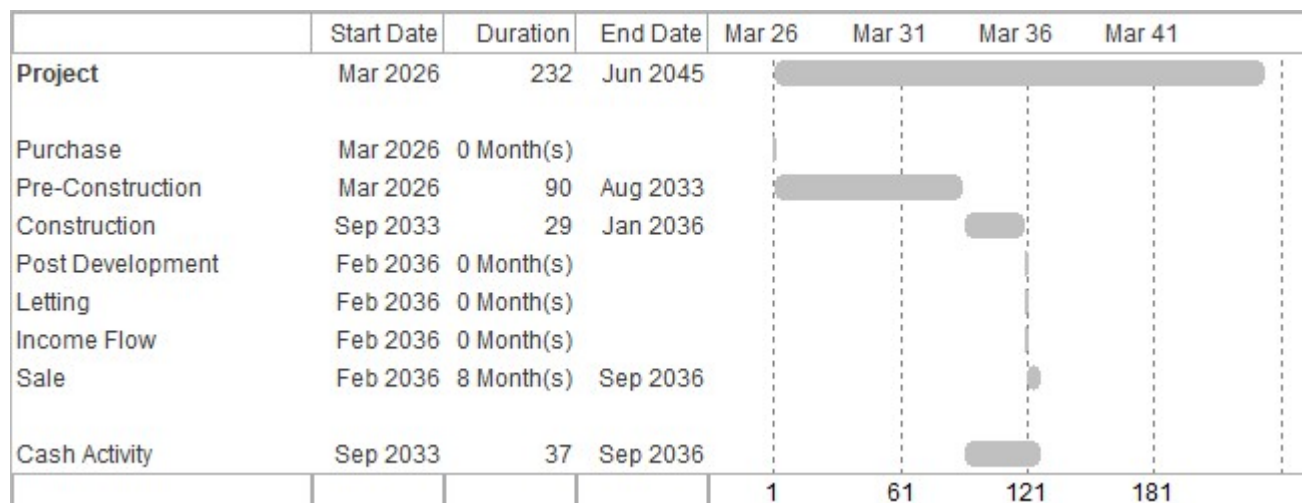


3. Phase 3

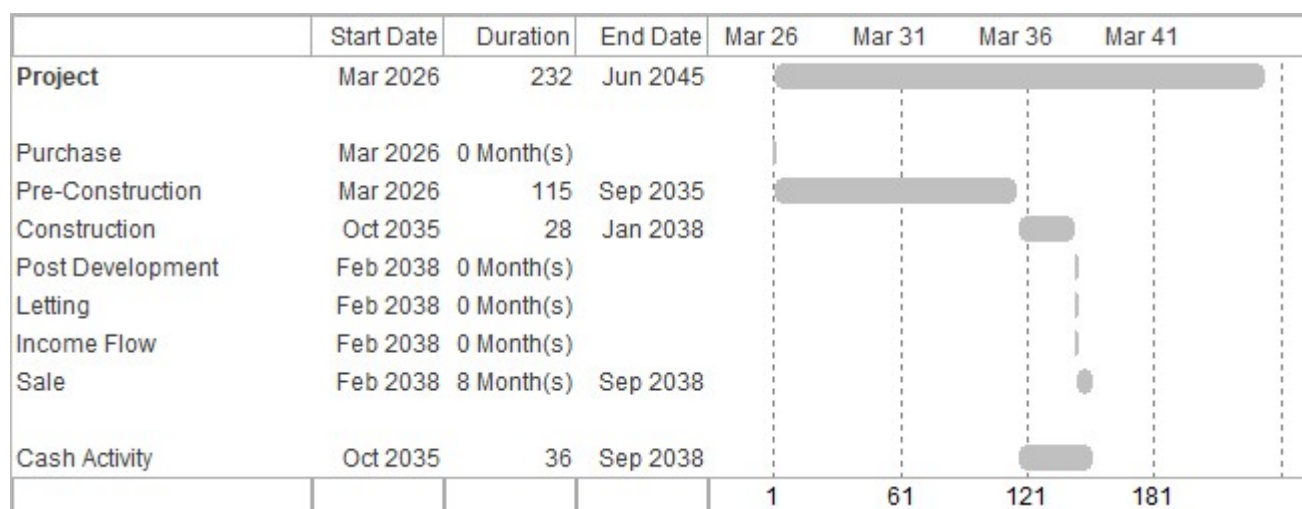


West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

4. Phase 4

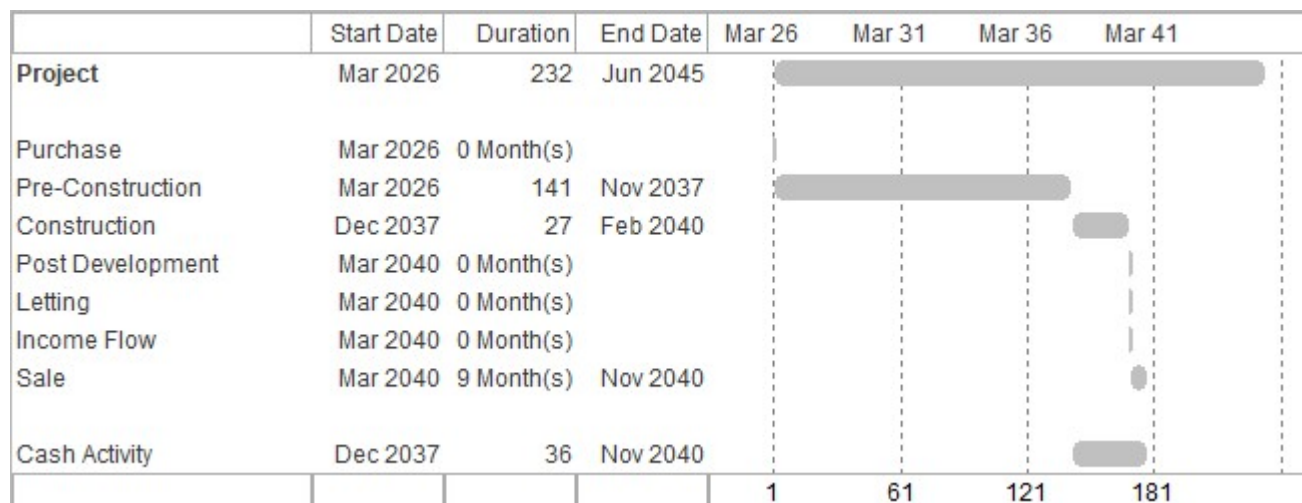


5. Phase 5

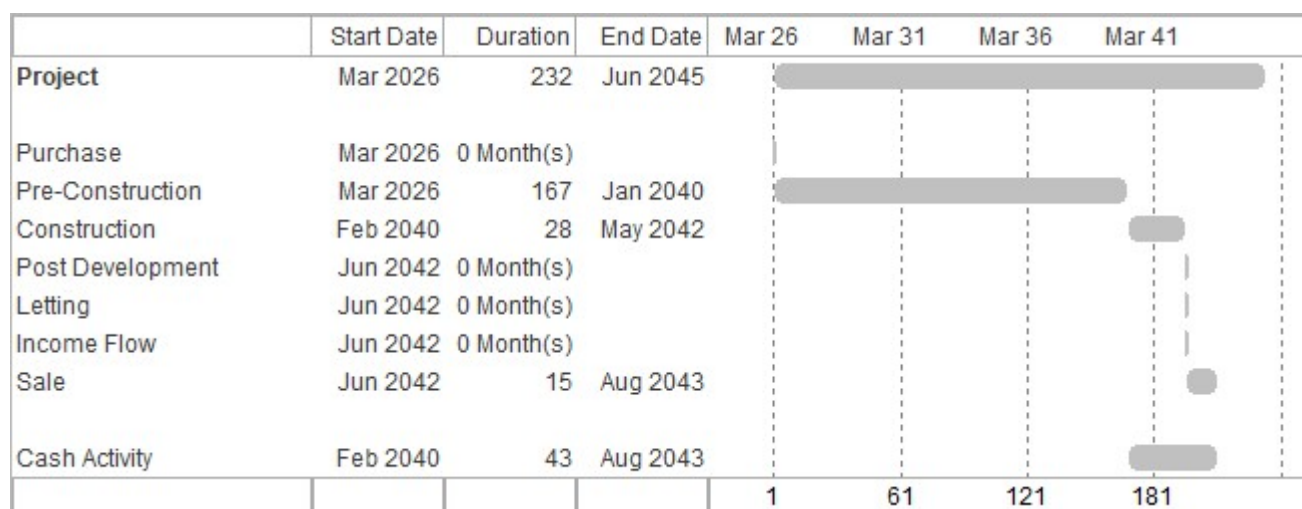


West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

6. Phase 6

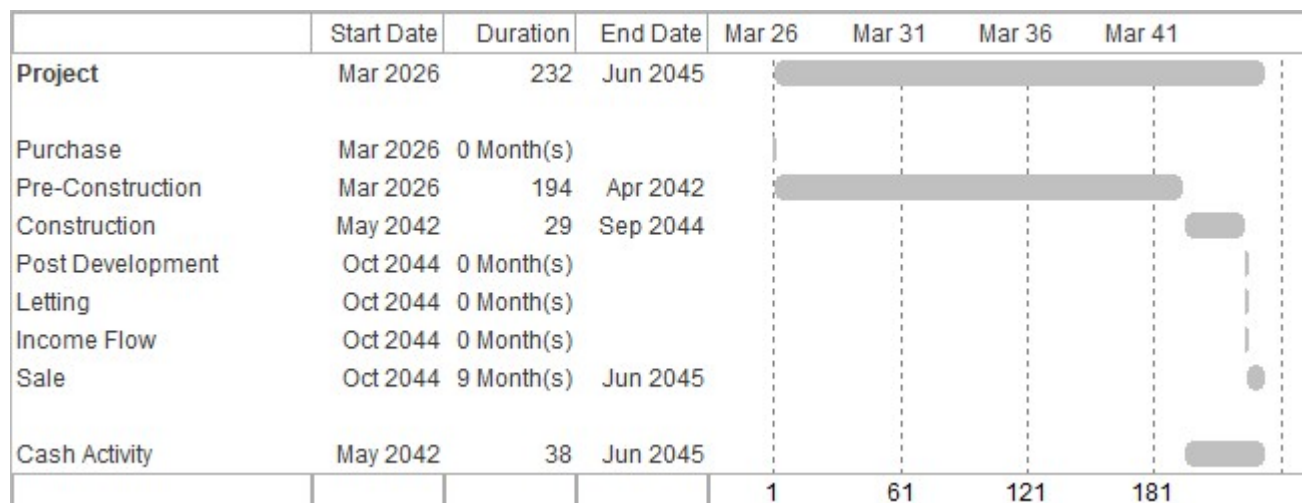


7. Phase 7



West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

8. Phase 8



**West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme**

Table of Profit Amount and Profit on GDV%

Sales: Gross Sales					
Construction: Rate /ft²	-5.000%	-2.500%	0.000%	+2.500%	+5.000%
-5.000%	£40,161,890 10.395%	£51,889,406 13.134%	£62,946,925 15.589%	£73,599,108 17.841%	£83,875,696 19.911%
-2.500%	£24,562,708 6.358%	£37,196,833 9.415%	£49,248,474 12.196%	£60,530,804 14.673%	£71,419,336 16.954%
0.000%	£8,531,626 2.208%	£21,454,291 5.430%	£34,135,143 8.453%	£46,463,980 11.263%	£58,017,029 13.773%
+2.500%	-£7,926,494 -2.052%	£5,308,601 1.344%	£18,313,111 4.535%	£31,041,381 7.525%	£43,574,091 10.344%
+5.000%	-£24,432,133 -6.324%	-£11,183,497 -2.831%	£2,065,140 0.511%	£15,148,941 3.672%	£27,947,618 6.634%

Sensitivity Analysis : Assumptions for Calculation

Sales: Gross Sales

Original Values are varied by Steps of 2.500%.

Heading	Phase	Amount	No. of Steps
P2 Private Sale	2	£28,760,000	2.00 Up & Down
P3 Private Sale	3	£28,215,000	2.00 Up & Down
P4 Private Sale	4	£46,685,000	2.00 Up & Down
P5 Private Sale	5	£45,250,000	2.00 Up & Down
P6 Private Sale	6	£47,465,000	2.00 Up & Down
P7 Private Sale	7	£95,490,000	2.00 Up & Down
P8 Private Sale	8	£53,860,000	2.00 Up & Down
P1 Private Sale	1	£3,210,000	2.00 Up & Down

Construction: Rate /ft²

Original Values are varied by Steps of 2.500%.

Heading	Phase	Rate	No. of Steps
P1 Construction Works	1	£301.17	2.00 Up & Down
P2 Construction Works	2	£327.60	2.00 Up & Down
P3 Construction Works	3	£322.47	2.00 Up & Down
P4 Construction Works	4	£312.85	2.00 Up & Down
P5 Construction Works	5	£328.94	2.00 Up & Down
P6 Construction Works	6	£309.63	2.00 Up & Down
P7 Construction Works	7	£338.12	2.00 Up & Down
P8 Construction Works	8	£345.48	2.00 Up & Down

West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme - 80% grant upfront

Development Appraisal
BPS Surveyors
18 August 2025

APPRAISAL SUMMARY**BPS SURVEYORS**

West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme - 80% grant upfront

Appraisal Summary for Merged Phases 1 2 3 4 5 6 7 8

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
P1 Social Rent	48	43,529	198.00	179,557	8,618,742
P1 Private Sale	4	3,724	861.98	802,500	3,210,000
P2 Social Rent	82	70,848	198.00	171,072	14,027,904
P2 Private Sale	45	32,851	875.47	639,111	28,760,000
P3 Social Rent	33	25,542	198.00	153,252	5,057,316
P3 Private Sale	45	30,408	927.88	627,000	28,215,000
P4 Social Rent	57	49,632	198.00	172,406	9,827,136
P4 Private Sale	72	51,968	898.34	648,403	46,685,000
P5 Private Sale	67	47,813	946.40	675,373	45,250,000
P6 Social Rent	81	65,800	198.00	160,844	13,028,400
P6 Private Sale	75	52,302	907.52	632,867	47,465,000
P7 Social Rent	5	4,672	198.00	185,011	925,056
P7 Private Sale	141	103,936	918.74	677,234	95,490,000
P8 Private Sale	81	58,964	913.44	664,938	53,860,000
P8 Social Rent	<u>20</u>	<u>13,756</u>	198.00	136,184	<u>2,723,688</u>
Totals	856	655,745			403,143,242

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
P1 Commercial / Community	1	624	30.00	18,720	18,720	18,720
P2 Commercial / Community	1	1,023	30.00	30,690	30,690	30,690
Totals	2	1,647			49,410	49,410

Investment Valuation**P1 Commercial / Community**

Market Rent	18,720	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	249,933

P2 Commercial / Community

Market Rent	30,690	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	409,746

Total Investment Valuation**659,680****GROSS DEVELOPMENT VALUE****403,802,922**

Purchaser's Costs		(44,858)	
Effective Purchaser's Costs Rate	6.80%		(44,858)

NET DEVELOPMENT VALUE**403,758,063****Additional Revenue**

P1 GLA/HE Grant	20,383,777	
P2 GLA/HE Grant	27,440,000	
P3 GLA/HE Grant	5,610,000	
P4 GLA/HE Grant	9,690,000	
P6 GLA/HE Grant	13,770,000	
P7 GLA/HE Grant	850,000	
P8 GLA/HE Grant	3,400,000	
	81,143,777	

NET REALISATION**484,901,840**

APPRAISAL SUMMARY**BPS SURVEYORS**

West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme - 80% grant upfront
OUTLAY

ACQUISITION COSTS

Fixed Price	1		
Fixed Price		1	
			1
Agent Fee	1.00%	0	
Legal Fee	0.50%	0	
			0

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
P1 Construction Works	72,398	301.17	21,804,357
P2 Construction Works	139,769	327.60	45,787,708
P3 Construction Works	77,026	322.47	24,838,331
P4 Construction Works	132,654	312.85	41,500,658
P5 Construction Works	72,506	328.94	23,849,872
P6 Construction Works	157,099	309.63	48,642,463
P7 Construction Works	154,731	338.12	52,318,116
P8 Construction Works	89,544	345.48	30,935,688
Totals	895,727 ft²		289,677,193
Contingency		5.00%	14,726,123
S106			4,323,489
CIL			17,453,868
			326,180,673

Other Construction

P1 Infrastructure Costs		1,453,577	
P2 Infrastructure Costs		484,526	
P3 Infrastructure Costs		484,526	
P4 Infrastructure Costs		484,526	
P5 Infrastructure Costs		484,526	
P6 Infrastructure Costs		484,526	
P7 Infrastructure Costs		484,526	
P8 Infrastructure Costs		484,526	
			4,845,259

PROFESSIONAL FEES

Professional Fees	10.00%	29,452,245	
			29,452,245

MARKETING & LETTING

Marketing	2.00%	6,978,700	
Letting Agent Fee	10.00%	4,941	
Letting Legal Fee	5.00%	2,471	
			6,986,111

DISPOSAL FEES

Sales Agent Fee	1.00%	3,495,947	
Affordable Housing Disposal Fee		600,000	
Affordable Housing Disposal Fee		100,000	
Sales Legal Fee	0.50%	2,018,790	
			6,214,737

Additional Costs

Third Party Costs		19,052,000	
Third Party Costs		2,610,000	
Meanwhile Use		300,000	
P1 Building Safety Levy		18,949	
P2 Building Safety Levy		200,245	
P3 Building Safety Levy		182,340	
Third Party Costs		11,800,000	
P4 Building Safety Levy		291,765	
P5 Building Safety Levy		293,420	
P6 Building Safety Levy		297,907	

West Kentish Town Estate**Financial Viability Appraisal****Proposed Scheme - 80% grant upfront**

Third Party Costs	7,120,000	
P7 Building Safety Levy	606,612	
P8 Building Safety Levy	289,761	
		43,062,999

FINANCE

Debit Rate 7.000%, Credit Rate 0.000% (Nominal)	
Total Finance Cost	24,343,975

TOTAL COSTS**441,086,001****PROFIT****43,815,840****Performance Measures**

Profit on Cost%	9.93%
Profit on GDV%	10.85%
Profit on NDV%	10.85%
Development Yield% (on Rent)	0.01%
Equivalent Yield% (Nominal)	7.00%
Equivalent Yield% (True)	7.32%
IRR% (without Interest)	11.11%
Rent Cover	886 yrs 9 mths
Profit Erosion (finance rate 7.000)	1 yr 4 mths

West Kentish Town Estate
Financial Viability Appraisal
Reduced Grant Scenario Scheme

Development Appraisal
BPS Surveyors
18 August 2025

APPRAISAL SUMMARY**BPS SURVEYORS**

West Kentish Town Estate
Financial Viability Appraisal
Reduced Grant Scenario Scheme

Appraisal Summary for Merged Phases 1 2 3 4 5 6 7 8

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
P1 Social Rent	48	43,529	198.00	179,557	8,618,742
P1 Private Sale	4	3,724	861.98	802,500	3,210,000
P2 Social Rent	82	70,848	198.00	171,072	14,027,904
P2 Private Sale	45	32,851	875.47	639,111	28,760,000
P3 Social Rent	33	25,542	198.00	153,252	5,057,316
P3 Private Sale	45	30,408	927.88	627,000	28,215,000
P4 Social Rent	57	49,632	198.00	172,406	9,827,136
P4 Private Sale	72	51,968	898.34	648,403	46,685,000
P5 Private Sale	67	47,813	946.40	675,373	45,250,000
P6 Social Rent	81	65,800	198.00	160,844	13,028,400
P6 Private Sale	75	52,302	907.52	632,867	47,465,000
P7 Social Rent	5	4,672	198.00	185,011	925,056
P7 Private Sale	141	103,936	918.74	677,234	95,490,000
P8 Private Sale	81	58,964	913.44	664,938	53,860,000
P8 Social Rent	<u>20</u>	<u>13,756</u>	198.00	136,184	<u>2,723,688</u>
Totals	856	655,745			403,143,242

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
P1 Commercial / Community	1	624	30.00	18,720	18,720	18,720
P2 Commercial / Community	1	1,023	30.00	30,690	30,690	30,690
Totals	2	1,647			49,410	49,410

Investment Valuation**P1 Commercial / Community**

Market Rent	18,720	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	249,933

P2 Commercial / Community

Market Rent	30,690	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	409,746

Total Investment Valuation**659,680****GROSS DEVELOPMENT VALUE****403,802,922**

Purchaser's Costs		(44,858)	
Effective Purchaser's Costs Rate	6.80%		(44,858)

NET DEVELOPMENT VALUE**403,758,063****Additional Revenue**

P1 GLA/HE Grant	20,383,777	
P2 GLA/HE Grant	27,440,000	
		47,823,777

NET REALISATION**451,581,840****OUTLAY****ACQUISITION COSTS**

Fixed Price	1	
Fixed Price		1

West Kentish Town Estate
Financial Viability Appraisal
Reduced Grant Scenario Scheme

Agent Fee	1.00%	0	1
Legal Fee	0.50%	0	
			0

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost	
P1 Construction Works	72,398	301.17	21,804,357	
P2 Construction Works	139,769	327.60	45,787,708	
P3 Construction Works	77,026	322.47	24,838,331	
P4 Construction Works	132,654	312.85	41,500,658	
P5 Construction Works	72,506	328.94	23,849,872	
P6 Construction Works	157,099	309.63	48,642,463	
P7 Construction Works	154,731	338.12	52,318,116	
P8 Construction Works	<u>89,544</u>	345.48	<u>30,935,688</u>	
Totals	895,727 ft²		289,677,193	
Contingency		5.00%	14,726,123	
S106			4,323,489	
CIL			17,453,868	
				326,180,673

Other Construction

P1 Infrastructure Costs			1,453,577	
P2 Infrastructure Costs			484,526	
P3 Infrastructure Costs			484,526	
P4 Infrastructure Costs			484,526	
P5 Infrastructure Costs			484,526	
P6 Infrastructure Costs			484,526	
P7 Infrastructure Costs			484,526	
P8 Infrastructure Costs			484,526	
				4,845,259

PROFESSIONAL FEES

Professional Fees	10.00%	29,452,245	
			29,452,245

MARKETING & LETTING

Marketing	2.00%	6,978,700	
Letting Agent Fee	10.00%	4,941	
Letting Legal Fee	5.00%	2,471	
			6,986,111

DISPOSAL FEES

Sales Agent Fee	1.00%	3,495,947	
Affordable Housing Disposal Fee		600,000	
Affordable Housing Disposal Fee		100,000	
Sales Legal Fee	0.50%	2,018,790	
			6,214,737

Additional Costs

Third Party Costs		19,052,000	
Third Party Costs		2,610,000	
Meanwhile Use		300,000	
P1 Building Safety Levy		18,949	
P2 Building Safety Levy		200,245	
P3 Building Safety Levy		182,340	
Third Party Costs		11,800,000	
P4 Building Safety Levy		291,765	
P5 Building Safety Levy		293,420	
P6 Building Safety Levy		297,907	
Third Party Costs		7,120,000	
P7 Building Safety Levy		606,612	
P8 Building Safety Levy		289,761	
			43,062,999

FINANCE

West Kentish Town Estate

Financial Viability Appraisal

Reduced Grant Scenario Scheme

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

Total Finance Cost

60,370,174

TOTAL COSTS

477,112,199

PROFIT

(25,530,359)

Performance Measures

Profit on Cost% -5.35%

Profit on GDV% -6.32%

Profit on NDV% -6.32%

Development Yield% (on Rent) 0.01%

Equivalent Yield% (Nominal) 7.00%

Equivalent Yield% (True) 7.32%

IRR% (without Interest) 4.83%

Rent Cover -516 yrs -8 mths

Profit Erosion (finance rate 7.000) N/A

West Kentish Town Estate
Financial Viability Appraisal
Growth Model

Development Appraisal
BPS Surveyors
18 August 2025

APPRAISAL SUMMARY**BPS SURVEYORS****West Kentish Town Estate
Financial Viability Appraisal
Growth Model****Appraisal Summary for Merged Phases 1 2 3 4 5 6 7 8****Currency in £****REVENUE**

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales	Adjustment
P1 Social Rent	48	43,529	198.00	179,557	8,618,742	0
‡ P1 Private Sale	4	3,724	861.98	802,500	3,210,000	53,243
P2 Social Rent	82	70,848	198.00	171,072	14,027,904	0
‡ P2 Private Sale	45	32,851	875.47	639,111	28,760,000	949,810
P3 Social Rent	33	25,542	198.00	153,252	5,057,316	0
‡ P3 Private Sale	45	30,408	927.88	627,000	28,215,000	1,326,770
P4 Social Rent	57	49,632	198.00	172,406	9,827,136	0
‡ P4 Private Sale	72	51,968	898.34	648,403	46,685,000	2,901,329
‡ P5 Private Sale	67	47,813	946.40	675,373	45,250,000	3,391,609
P6 Social Rent	81	65,800	198.00	160,844	13,028,400	0
‡ P6 Private Sale	75	52,302	907.52	632,867	47,465,000	4,203,030
P7 Social Rent	5	4,672	198.00	185,011	925,056	0
‡ P7 Private Sale	141	103,936	918.74	677,234	95,490,000	9,944,413
‡ P8 Private Sale	81	58,964	913.44	664,938	53,860,000	6,399,706
P8 Social Rent	<u>20</u>	<u>13,756</u>	198.00	136,184	<u>2,723,688</u>	<u>0</u>
Totals	856	655,745			403,143,242	29,169,911

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
P1 Commercial / Community	1	624	30.00	18,720	18,720	18,720
P2 Commercial / Community	1	1,023	30.00	30,690	30,690	30,690
Totals	2	1,647			49,410	49,410

Investment Valuation**P1 Commercial / Community**

Market Rent	18,720	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	249,933

P2 Commercial / Community

Market Rent	30,690	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	409,746

Total Investment Valuation**659,680****GROSS DEVELOPMENT VALUE****432,972,833**

Purchaser's Costs	(44,858)
Effective Purchaser's Costs Rate	6.80%
	(44,858)

NET DEVELOPMENT VALUE**432,927,975****Additional Revenue**

P1 GLA/HE Grant	20,383,777
P2 GLA/HE Grant	27,440,000
P3 GLA/HE Grant	5,610,000
P4 GLA/HE Grant	9,690,000
P6 GLA/HE Grant	13,770,000
P7 GLA/HE Grant	850,000
P8 GLA/HE Grant	3,400,000
	81,143,777

NET REALISATION**514,071,752**

APPRAISAL SUMMARY**BPS SURVEYORS**

West Kentish Town Estate
Financial Viability Appraisal
Growth Model
OUTLAY

ACQUISITION COSTS

Fixed Price	1		
Fixed Price		1	
			1
Agent Fee	1.00%	0	
Legal Fee	0.50%	0	
			0

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
P1 Construction Works	72,398	301.17	21,804,357
P2 Construction Works	139,769	327.60	45,787,708
P3 Construction Works	77,026	322.47	24,838,331
P4 Construction Works	132,654	312.85	41,500,658
P5 Construction Works	72,506	328.94	23,849,872
P6 Construction Works	157,099	309.63	48,642,463
P7 Construction Works	154,731	338.12	52,318,116
P8 Construction Works	<u>89,544</u>	345.48	<u>30,935,688</u>
Totals	895,727 ft²		289,677,193
Contingency		5.00%	14,726,123
S106			4,323,489
CIL			17,453,868
			326,180,673
Other Construction			
P1 Infrastructure Costs			1,453,577
P2 Infrastructure Costs			484,526
P3 Infrastructure Costs			484,526
P4 Infrastructure Costs			484,526
P5 Infrastructure Costs			484,526
P6 Infrastructure Costs			484,526
P7 Infrastructure Costs			484,526
P8 Infrastructure Costs			484,526
			4,845,259

PROFESSIONAL FEES

Professional Fees	10.00%	29,452,245	29,452,245
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MARKETING & LETTING

Marketing	2.00%	7,562,098	
Letting Agent Fee	10.00%	4,941	
Letting Legal Fee	5.00%	2,471	
			7,569,510

DISPOSAL FEES

Sales Agent Fee	1.00%	3,787,646	
Affordable Housing Disposal Fee		600,000	
Affordable Housing Disposal Fee		100,000	
Sales Legal Fee	0.50%	2,164,640	
			6,652,286

Additional Costs

Third Party Costs		19,052,000	
Third Party Costs		2,610,000	
Meanwhile Use		300,000	
P1 Building Safety Levy		18,949	
P2 Building Safety Levy		200,245	
P3 Building Safety Levy		182,340	
Third Party Costs		11,800,000	
P4 Building Safety Levy		291,765	
P5 Building Safety Levy		293,420	
P6 Building Safety Levy		297,907	

APPRAISAL SUMMARY**BPS SURVEYORS**
West Kentish Town Estate
Financial Viability Appraisal
Growth Model

Third Party Costs	7,120,000	
P7 Building Safety Levy	606,612	
P8 Building Safety Levy	289,761	
		43,062,999

FINANCE

Debit Rate 7.000%, Credit Rate 0.000% (Nominal)	
Total Finance Cost	26,688,581

TOTAL COSTS**444,451,554****PROFIT****69,620,198****Performance Measures**

Profit on Cost%	15.66%
Profit on GDV%	16.08%
Profit on NDV%	16.08%
Development Yield% (on Rent)	0.01%
Equivalent Yield% (Nominal)	7.00%
Equivalent Yield% (True)	7.32%
IRR% (without Interest)	12.15%
Rent Cover	N/A
Profit Erosion (finance rate 7.000)	2 yrs 1 mth

‡ Inflation/Growth applied

Growth on Sales

		Ungrown	Growth	Total
P1 Private Sale	Private Resi Growth at 0.600%	3,210,000	53,243	3,263,243
P2 Private Sale	Private Resi Growth at 0.600%	28,760,000	949,810	29,709,810
P3 Private Sale	Private Resi Growth at 0.600%	28,215,000	1,326,770	29,541,770
P4 Private Sale	Private Resi Growth at 0.600%	46,685,000	2,901,329	49,586,329
P5 Private Sale	Private Resi Growth at 0.600%	45,250,000	3,391,609	48,641,609
P6 Private Sale	Private Resi Growth at 0.600%	47,465,000	4,203,030	51,668,030
P7 Private Sale	Private Resi Growth at 0.600%	95,490,000	9,944,413	105,434,413
P8 Private Sale	Private Resi Growth at 0.600%	53,860,000	6,399,706	60,259,706

**West Kentish Town Estate
Financial Viability Appraisal
Growth Model**

Net Sales

8,618,742
3,263,243
14,027,904
29,709,810
5,057,316
29,541,770
9,827,136
49,586,329
48,641,609
13,028,400
51,668,030
925,056
105,434,413
60,259,706
2,723,688
432,313,153

West Kentish Town Estate

Addendum Report 1

Prepared on behalf of the London
Borough of Camden

Issued: 15 October 2025

Planning Reference: 2025/2667/P



215a High Street, Dorking RH4 1RU

www.bps-surveyors.co.uk

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 Temporary landscaping costs 5

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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 Newmark Gerald Eve ('Newmark') letter dated September 2025. This BPS Addendum follows on from our report of the 18 August 2025 which was issued in response to Newmark's Financial Viability Assessment ('FVA') dated June 2025, prepared on behalf of the London Borough of Camden Community Investment Programme ('the Applicant') in connection with the redevelopment of the above site.
- 1.2 This addendum should therefore be read in conjunction with the above reports.
- 1.3 We concluded in our previous report that the proposals produced a deficit of -£30.5m, which aligns with Newmark's conclusion. However, we considered the following inputs ambiguous and requested further information:
- Affordable residential values
 - Grant funding cashflow
 - Temporary landscaping cost
 - Vacant possession costs
 - Building safety levy costs
- 1.4 Having considered Newmark's latest comments, the following table summarises our **current** respective positions:

Input	Newmark June 2025	BPS August 2025	Newmark September 2025	BPS October 2025	Comments
Income					
Open Market Sales	£348,935,000 (£9,833psm/£961 psf)	£348,935,000 (£9,833psm/£961 psf)	£348,935,000 (£9,833psm/£961 psf)	£348,935,000 (£9,833psm/£961 psf)	Agreed
Affordable Housing	£54,206,262 (£2,131psm/£198 psf)	£54,206,262 (£2,131psm/£198 psf)	£54,206,262 (£2,131psm/£198 psf)	£58,039,028 (£2,282psm/£212 psf)	Disagreed – Updated from an ambiguous position due to new information.
Commercial	£659,680 (£4,311psm/£401 psf)	£659,680 (£4,311psm/£401 psf)	£659,680 (£4,311psm/£401 psf)	£659,680 (£4,311psm/£401 psf)	Agreed
Grant Funding	£81,143,777	£81,143,777	£81,143,777	£81,143,777	Agreed (subject to review)
Expenditure					

Benchmark Land Value	£1	£1	£1	£1	Agreed
Build Costs	£289,677,193	£289,677,193	£289,677,193	£289,677,193	Agreed
Contingency	5%	5%	5%	5%	Agreed
Professional Fees	10%	10%	10%	10%	Agreed
OMS Marketing & Agent Fees	3%	3%	3%	3%	Agreed
OMS Legal Fees	0.5%	0.5%	0.5%	0.5%	Agreed
Commercial Letting Agent and Legal Fees	15%	15%	15%	15%	Agreed
Commercial Sales Agent Fees	1%	1%	1%	1%	Agreed
Leaseholder Buyback	£37,972,000	£37,972,000	£37,972,000	£37,972,000	Ambiguous (info required)
Building Safety Levy	£2,180,999	£2,180,999	£1	£1	Agreed
Temporary Landscaping	£300,000	£300,000	£1	£1	Agreed
S106 & CIL	£21,777,358	£21,777,358	£21,777,358	£21,777,358	Ambiguous (Council to confirm)
Finance	7%	7%	7%	7%	Agreed
Profit: OMS Affordable Housing Commercial	17.5% 6% 15%	17.5% 6% 15%	17.5% 6% 15%	17.5% 6% 15%	Agreed
Development Timeframes					
Pre-construction Period	21-weeks	21-weeks	21-weeks	21-weeks	Agreed
Construction Period	922-weeks	922-weeks	922-weeks	922-weeks	Agreed
Pre-Sales / Rate pcm	50% / 5 units	50% / 5 units	50% / 5 units	50% / 5 units	Agreed
Grant Funding Cashflow	50% @ construction start 50% @ construction end	50% @ construction start 50% @ construction end	75% @ construction start 25% @ construction end	75% @ construction start 25% @ construction end	Agreed
Viability Position	-£30.5m	-£30.5m	-£17.9m	-£10.7m	Disagreed
Actual Profit	8.45%	8.45%	11.51%	13.24%	Disagreed

1.5 Our updated conclusions are as follows:

- We have now received enough supporting information to model affordable housing values. In our modelling we found Newmark's estimate to be below our estimate. Our figure of £212 psf reflects a 7.07% increase on affordable values.
- We previously maintained Newmark's grant funding cashflow timings which were 50% at the start of construction and 50% at completion. With guidance from the GLA and in line with most recent funding guidance we have adjusted our appraisal to show a 75%/25% allowance.
- Newmark were unable to evidence the temporary landscaping cost amount and have now reduced the amount to a nominal £1. We have similarly omitted it from our appraisal.
- It was identified that the Council's CIP team classifies as an exempt person and therefore building safety levy costs can be removed from the appraisal.
- Following the implementation of the above changes to our appraisal, we find that the scheme is still in deficit by £10.7m.

1.6 The revisions in Table 1.4 reflect updates to our assumptions on affordable housing sales values, grant timing, temporary landscaping costs, and building safety levy costs.

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

2.0 Response to Newmark

Open Market Sale residential sales values

- 2.1 While we have agreed with Newmark's OMS residential figures, we consider it essential that the scheme is subject to review mechanisms in order that these values are kept under review.

Affordable residential values

- 2.2 The scheme proposes 326 social rented affordable housing units. We were previously unable to assess Newmark's affordable residential values as we were not provided with a live copy of their affordable housing modelling or a sufficiently detailed accommodation schedule. We have since been provided with Newmark's affordable housing pricing model.
- 2.3 Having used our own bespoke affordable housing valuation model we find that a capital value per square foot of £212 is reasonable for the social rent units. This reflects a c. 7.07% increase on the figure proposed by Newmark.

Grant funding cashflow

- 2.4 Our initial review considered Newmark's assumption of 50% grant being receivable at the start of construction and 50% at the end of construction for each phase to be unreasonable. We therefore adjusted this input to reflect 80% at the start of construction and 20% at the end of construction as this is something we have seen on another estate regeneration we recently assessed.
- 2.5 Newmark have adjusted their assumption to assume 75% is received at the start on site and 25% is received at completion as informed by the GLA's review of this scheme. We find this position to be within a reasonable tolerance of our previous figures and we have therefore adjusted our position to align with GLA's recommendation and therefore agree with Newmark's new position.

Temporary landscaping costs

- 2.6 Newmark's appraisal includes a £300,000 cost to provide temporary landscaping across the site whilst phases are being completed. In our initial review we adopted this figure due to its nominal impact on the scheme's viability, but we requested evidence to support the input. Newmark have stated that this figure is a best estimate and cannot be accurately factored into the cost plan yet. They have since reduced this cost to a notional £1 figure, noting that they wish to keep it within the appraisal to ensure that temporary works can be reflected in future review mechanisms when the costs become known. We consider this approach reasonable and have agreed this within our appraisal.

Vacant possession costs

- 2.7 The Property Cost Estimate (PCE) figures have not been provided by Newmark as they claim they are commercially sensitive; however, Newmark have offered a meeting in which these costs can be presented and reviewed. Any request for redaction of information submitted by the Applicant should be minimised, specific and justified, and submitted directly to the Council. We maintain our suggestion that this cost is subject to review mechanisms whereby the actual incurred costs can be evidenced on an open book basis.

Building safety levy costs

- 2.8 The GLA commented that the Council's CIP team may qualify as an exempt person. Newmark comment that the Applicant has reviewed this internally and confirmed that they would qualify. We have therefore agreed on the removal of this cost.

3.0 Author Sign Off

- 3.1 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.
- 3.2 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.
- 3.3 The following persons have been involved in the production of this report:



Tom Nankivell
Graduate Surveyor
RICS Membership no. 6912177
For and on behalf of
BPS Chartered Surveyors



Clare Jones, MRICS
RICS Registered Valuer
RICS Membership no. 0095561
For and on behalf of
BPS Chartered Surveyors

October 2025

Appendix 1: Argus Appraisal

West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

Development Appraisal
BPS Surveyors
15 October 2025

APPRAISAL SUMMARY**BPS SURVEYORS****West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme****Appraisal Summary for Merged Phases 1 2 3 4 5 6 7 8**

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
P1 Social Rent	48	43,529	212.00	192,253	9,228,148
P1 Private Sale	4	3,724	861.98	802,500	3,210,000
P2 Social Rent	82	70,848	212.00	183,168	15,019,776
P2 Private Sale	45	32,851	875.47	639,111	28,760,000
P3 Social Rent	33	25,542	212.00	164,088	5,414,904
P3 Private Sale	45	30,408	927.88	627,000	28,215,000
P4 Social Rent	57	49,632	212.00	184,596	10,521,984
P4 Private Sale	72	51,968	898.34	648,403	46,685,000
P5 Private Sale	67	47,813	946.40	675,373	45,250,000
P6 Social Rent	81	65,800	212.00	172,217	13,949,600
P6 Private Sale	75	52,302	907.52	632,867	47,465,000
P7 Social Rent	5	4,672	212.00	198,093	990,464
P7 Private Sale	141	103,936	918.74	677,234	95,490,000
P8 Private Sale	81	58,964	913.44	664,938	53,860,000
P8 Social Rent	<u>20</u>	<u>13,756</u>	<u>212.00</u>	<u>145,814</u>	<u>2,916,272</u>
Totals	856	655,745			406,976,148

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
P1 Commercial / Community	1	624	30.00	18,720	18,720	18,720
P2 Commercial / Community	1	1,023	30.00	30,690	30,690	30,690
Totals	2	1,647			49,410	49,410

Investment Valuation**P1 Commercial / Community**

Market Rent	18,720	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	249,933

P2 Commercial / Community

Market Rent	30,690	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	409,746

Total Investment Valuation**659,680****GROSS DEVELOPMENT VALUE****407,635,828**

Purchaser's Costs		(44,858)
Effective Purchaser's Costs Rate	6.80%	
		(44,858)

NET DEVELOPMENT VALUE**407,590,969****Additional Revenue**

P1 GLA/HE Grant	20,383,777
P2 GLA/HE Grant	27,440,000
P3 GLA/HE Grant	5,610,000
P4 GLA/HE Grant	9,690,000
P6 GLA/HE Grant	13,770,000
P7 GLA/HE Grant	850,000
P8 GLA/HE Grant	3,400,000
	81,143,777

NET REALISATION**488,734,746****OUTLAY****ACQUISITION COSTS**

Fixed Price	1		
Fixed Price		1	
			1
Agent Fee	1.00%	0	
Legal Fee	0.50%	0	

**West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme**

0

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost	
P1 Construction Works	72,398	301.17	21,804,357	
P2 Construction Works	139,769	327.60	45,787,708	
P3 Construction Works	77,026	322.47	24,838,331	
P4 Construction Works	132,654	312.85	41,500,658	
P5 Construction Works	72,506	328.94	23,849,872	
P6 Construction Works	157,099	309.63	48,642,463	
P7 Construction Works	154,731	338.12	52,318,116	
P8 Construction Works	<u>89,544</u>	345.48	<u>30,935,688</u>	
Totals	895,727 ft²		289,677,193	
Contingency		5.00%	14,726,123	
S106			4,323,489	
CIL			17,453,868	326,180,673
Other Construction				
P1 Infrastructure Costs			1,453,577	
P2 Infrastructure Costs			484,526	
P3 Infrastructure Costs			484,526	
P4 Infrastructure Costs			484,526	
P5 Infrastructure Costs			484,526	
P6 Infrastructure Costs			484,526	
P7 Infrastructure Costs			484,526	
P8 Infrastructure Costs			484,526	4,845,259
PROFESSIONAL FEES				
Professional Fees		10.00%	29,452,245	29,452,245
MARKETING & LETTING				
Marketing		2.00%	6,978,700	
Letting Agent Fee		10.00%	4,941	
Letting Legal Fee		5.00%	2,471	6,986,112
DISPOSAL FEES				
Sales Agent Fee		1.00%	3,495,947	
Affordable Housing Disposal Fee			600,000	
Affordable Housing Disposal Fee			100,000	
Sales Legal Fee		0.50%	2,037,955	6,233,902
Additional Costs				
Third Party Costs			19,052,000	
Third Party Costs			2,610,000	
Third Party Costs			11,800,000	
Third Party Costs			7,120,000	40,582,000
FINANCE				
Debit Rate 7.000%, Credit Rate 0.000% (Nominal)				
Total Finance Cost				20,466,385
TOTAL COSTS				434,746,576
PROFIT				53,988,170

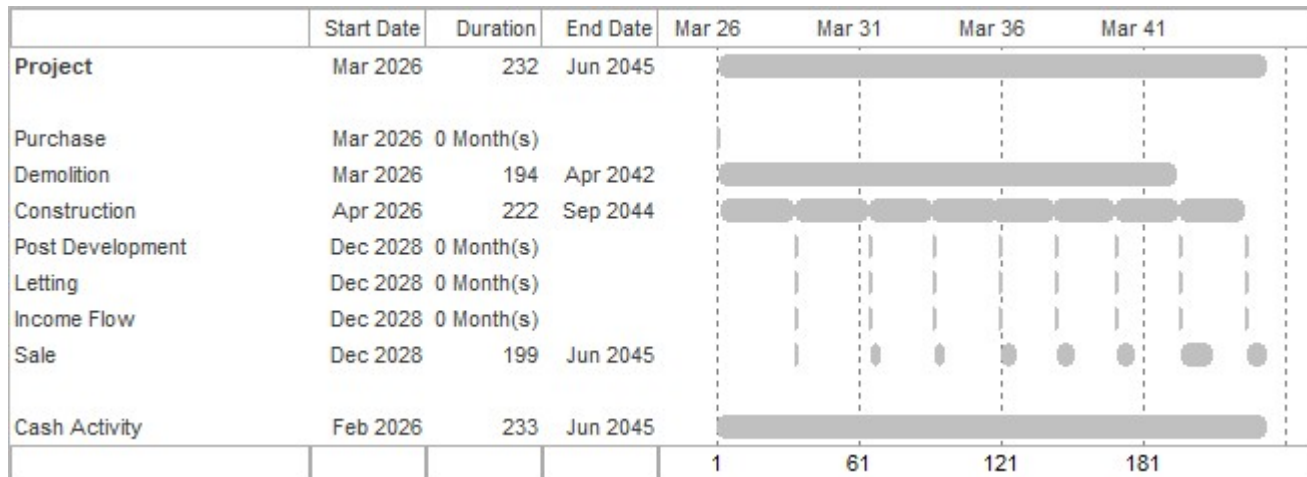
Performance Measures

Profit on Cost%	12.42%
Profit on GDV%	13.24%
Profit on NDV%	13.25%
Development Yield% (on Rent)	0.01%
Equivalent Yield% (Nominal)	7.00%
Equivalent Yield% (True)	7.32%
IRR% (without Interest)	12.28%
Rent Cover	N/A
Profit Erosion (finance rate 7.000)	1 yr 8 mths

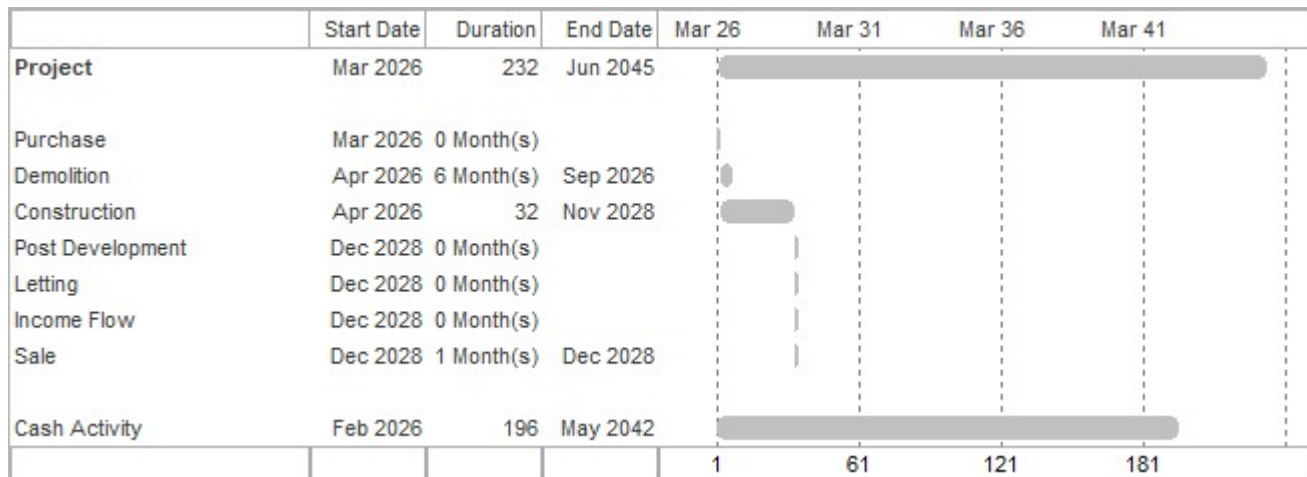
West Kentish Town Estate Financial Viability Appraisal Proposed Scheme

Project Timescale	
Project Start Date	Mar 2026
Project End Date	Jun 2045
Project Duration (Inc Exit Period)	232 months

All Phases

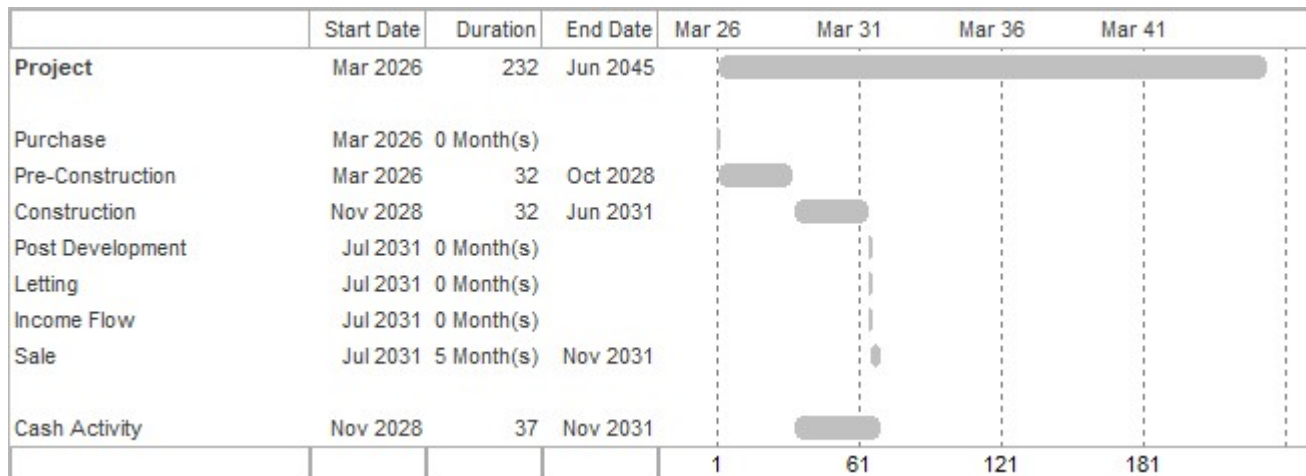


1. Phase 1

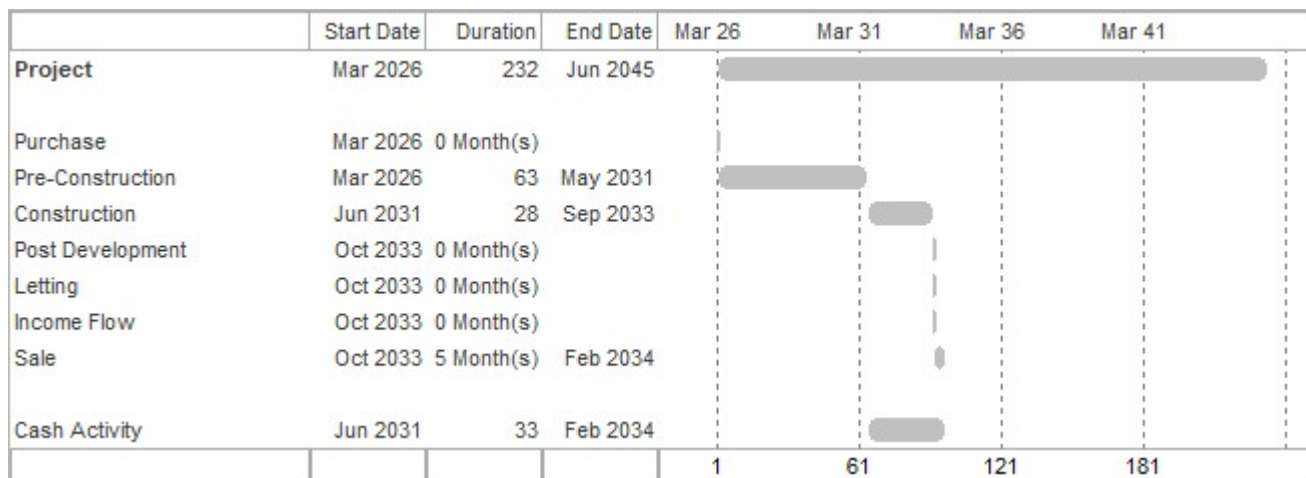


**West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme**

2. Phase 2



3. Phase 3

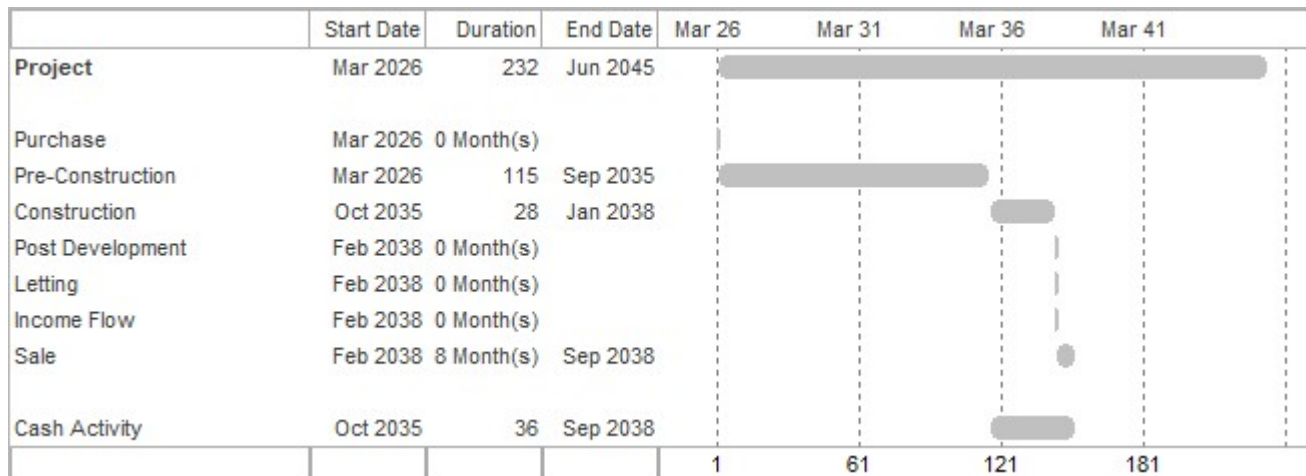


4. Phase 4

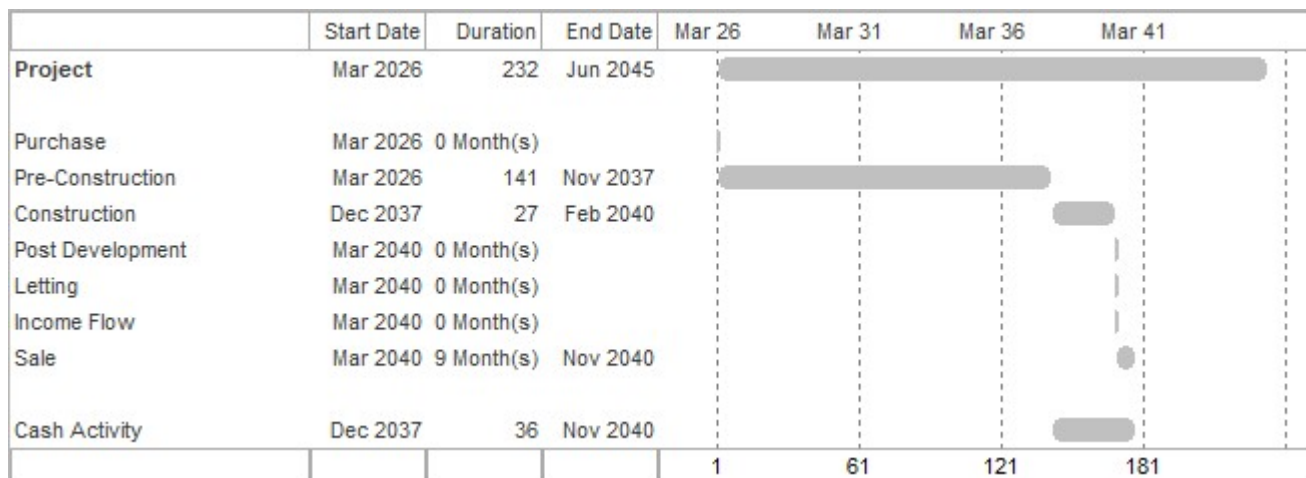


**West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme**

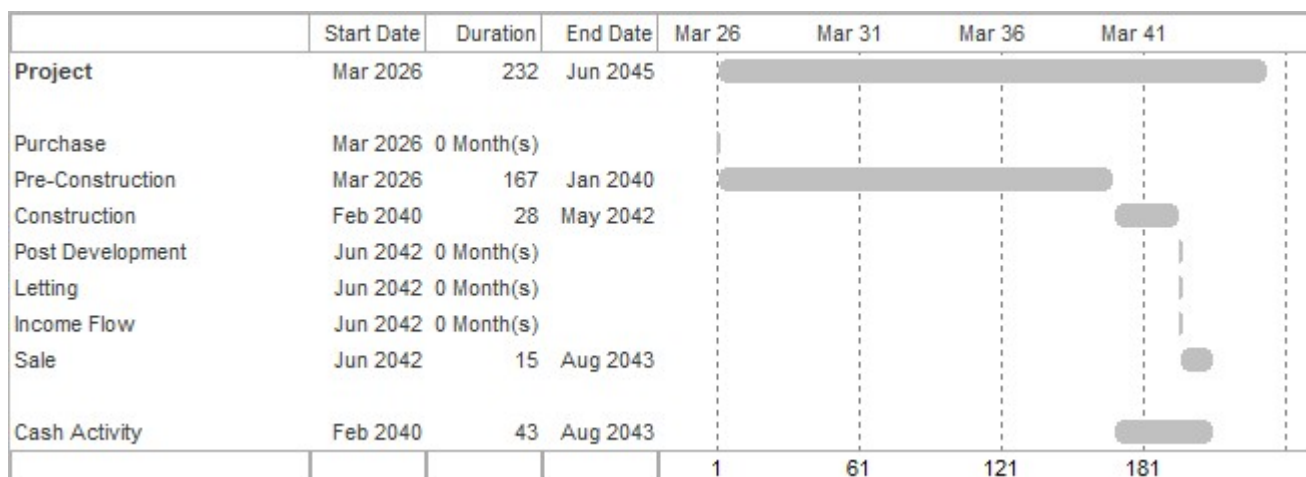
5. Phase 5



6. Phase 6

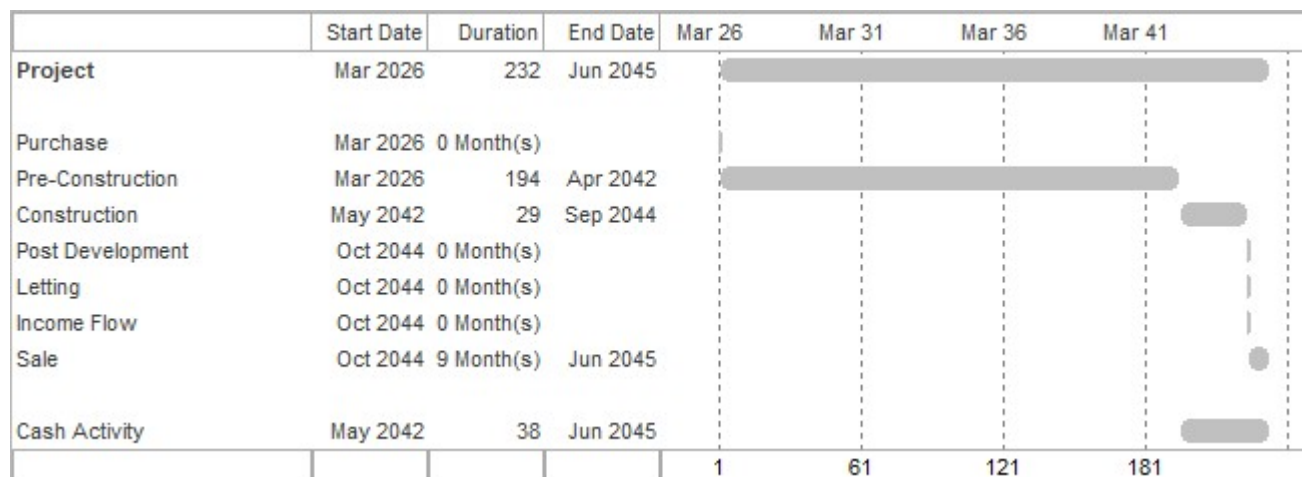


7. Phase 7



West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme

8. Phase 8



**West Kentish Town Estate
Financial Viability Appraisal
Proposed Scheme**

Table of Profit Amount and Profit on GDV%

Sales: Gross Sales						
Construction: Rate /ft²	-5.000%	-2.500%	0.000%	+2.500%	+5.000%	+7.500%
-5.000%	£58,497,713 14.992%	£68,884,693 17.268%	£78,961,651 19.371%	£88,841,608 21.338%	£98,487,120 23.169%	£107,860,858 24.864%
-2.500%	£45,197,081 11.583%	£56,288,101 14.110%	£66,945,125 16.423%	£77,186,683 18.538%	£87,190,694 20.511%	£97,029,024 22.367%
0.000%	£30,227,964 7.747%	£42,567,909 10.671%	£53,988,170 13.244%	£64,840,357 15.573%	£75,288,039 17.711%	£85,444,715 19.697%
+2.500%	£14,441,375 3.701%	£27,213,161 6.822%	£39,762,151 9.754%	£51,572,049 12.386%	£62,598,459 14.726%	£73,281,979 16.893%
+5.000%	-£1,815,869 -0.465%	£11,336,275 2.842%	£24,196,860 5.936%	£36,843,528 8.849%	£48,975,593 11.521%	£60,274,469 13.894%
+7.500%	-£18,258,309 -4.679%	-£5,015,280 -1.257%	£8,186,934 2.008%	£21,128,482 5.075%	£33,821,091 7.956%	£46,217,939 10.654%

Sensitivity Analysis : Assumptions for Calculation

Sales: Gross Sales

Original Values are varied by Steps of 2.500%.

Heading	Phase	Amount	No. of Steps
P2 Private Sale	2	£28,760,000	2.50 Up & Down
P3 Private Sale	3	£28,215,000	2.50 Up & Down
P4 Private Sale	4	£46,685,000	2.50 Up & Down
P5 Private Sale	5	£45,250,000	2.50 Up & Down
P6 Private Sale	6	£47,465,000	2.50 Up & Down
P7 Private Sale	7	£95,490,000	2.50 Up & Down
P8 Private Sale	8	£53,860,000	2.50 Up & Down
P1 Private Sale	1	£3,210,000	2.50 Up & Down

Construction: Rate /ft²

Original Values are varied by Steps of 2.500%.

Heading	Phase	Rate	No. of Steps
P1 Construction Works	1	£301.17	2.50 Up & Down
P2 Construction Works	2	£327.60	2.50 Up & Down
P3 Construction Works	3	£322.47	2.50 Up & Down
P4 Construction Works	4	£312.85	2.50 Up & Down
P5 Construction Works	5	£328.94	2.50 Up & Down
P6 Construction Works	6	£309.63	2.50 Up & Down
P7 Construction Works	7	£338.12	2.50 Up & Down
P8 Construction Works	8	£345.48	2.50 Up & Down