

Address:	180 Arlington Road and 14 Parkway London NW1 7HL and NW1 7AA		2
Application Number(s):	2025/4055/P	Officer: Sofie Fieldsend	
Ward:	Camden Town		
Date Received:	15/09/2025		
Proposal:	Demolition of the existing buildings and adaptation of existing Parkway frontage. Erection of a mixed-use development consisting of leisure / cultural use (Sui Generis and/or Class F1 and/or Class E) at basement and ground floor level, affordable housing units (Class C3), purpose built student accommodation units (Sui Generis), retail at ground floor level (Class E), and associated works.		
Background Papers, Supporting Documents and Drawing Numbers: <p>Existing Drawings:</p> <p>24006-AHMM-XX-XX-DR-A-PL000 rev P01; 24006-AHMM-XX-XX-DR-A-PL001 rev P01; 24006-AHMM-XX-B1-DR-A-PL090 rev P01; 24006-AHMM-XX-00-DR-A-PL010 rev P01; 24006-AHMM-XX-01-DR-A-PL011 rev P01; 24006-AHMM-XX-02-DR-A-PL012 rev P01; 24006-AHMM-XX-03-DR-A-PL013 rev P01; 24006-AHMM-XX-04-DR-A-PL014 rev P01; 24006-AHMM-XX-RF-DR-A-PL015 rev P01; 24006-AHMM-XX-XX-DR-A-PL020 rev P01; 24006-AHMM-XX-XX-DR-A-PL021 rev P01; 24006-AHMM-XX-XX-DR-A-PL022 rev P01; 24006-AHMM-XX-XX-DR-A-PL023 rev P01; 24006-AHMM-XX-XX-DR-A-PL030 rev P01; 24006-AHMM-XX-XX-DR-A-PL031 rev P01;</p> <p>Demolition Drawings:</p> <p>24006-AHMM-XX-B1-DR-A-PL290 rev P01; 24006-AHMM-XX-00-DR-A-PL210 rev P01; 24006-AHMM-XX-01-DR-A-PL211 rev P01; 24006-AHMM-XX-02-DR-A-PL212 rev P01; 24006-AHMM-XX-03-DR-A-PL213 rev P01; 24006-AHMM-XX-04-DR-A-PL214 rev P01; 24006-AHMM-XX-RF-DR-A-PL215 rev P01; 24006-AHMM-XX-XX-DR-A-PL220 rev P01; 24006-AHMM-XX-XX-DR-A-PL221 rev P01; 24006-AHMM-XX-XX-DR-A-PL222 rev P01; 24006-AHMM-XX-XX-DR-A-PL223 rev P01; 24006-AHMM-XX-XX-DR-A-PL230 rev P01; 24006-AHMM-XX-XX-DR-A-PL231 rev P01;</p> <p>Proposed Drawings:</p> <p>24006-AHMM-XX-XX-DR-A-PL080 rev P01; 24006-AHMM-XX-B1-DR-A-PL099 rev P01; 24006-AHMM-XX-00-DR-A-PL100 rev P02; 24006-AHMM-XX-01-DR-A-PL101 rev P02; 24006-AHMM-XX-02-DR-A-PL102 rev P03; 23038-AHMM-ZZ-03-DR-A-PL103 rev P03; 23038-AHMM-ZZ-04-DR-A-PL104 rev P03; 24006-AHMM-XX-05-DR-A-PL105 rev P03; 24006-AHMM-XX-06-DR-A-PL106 rev P03; 24006-AHMM-XX-07-DR-A-PL107 rev P01; 24006-AHMM-XX-08-DR-A-PL108 rev P01; 24006-AHMM-XX-00-DR-A-PL901 rev P02; 24006-AHMM-XX-XX-DR-A-PL200 rev P02; 24006-AHMM-XX-XX-DR-A-PL201 rev P03; 24006-AHMM-XX-XX-DR-A-PL202 rev P02; 24006-AHMM-XX-XX-DR-A-PL203 rev P02; 24006-AHMM-XX-XX-DR-A-PL300 rev P03; 24006-AHMM-XX-XX-DR-A-PL301 rev P02; 24006-AHMM-XX-XX-DR-A-PL302 rev P03.</p> <p>Documents:</p>			

Design and Access Statement dated Sept 2025 by AHMM; Design and Access Statement Addendum dated 21 Oct 2025 by AHMM; Design and Access Statement Addendum dated 19 Nov 2025 by AHMM; Design and Access Statement Addendum dated 21 Nov 2025 by AHMM; Stage 2 Access Statement dated Oct 2025 by David Bonnet Associates; Affordable Housing Statement dated Oct 2025 by Newmark; Air Quality Assessment dated Nov 2025 by RSK; Arboricultural Impact Assessment dated 3 Sept 2025 by SES; Basement Impact Assessment dated 19 Nov 2025 by RBG; Geotechnical Desk Study Report dated 31 Oct 2024 by RBG; Ground Movement and Building Damage Assessment dated 19 Nov 2025 by RBG; Preliminary Roost Assessment & Bat Emergence Report dated Aug 2025 by Assystem; Biodiversity Net Gain Assessment Exemption Letter dated 15 Aug 2025 by SES; Circular Economy Statement, prepared by Sweco; Condition and Feasibility dated September 2025, prepared by Sweco; Outline CEMP dated September 2025, prepared by RSK; Phase 1 desk study dated July 2025 by Leap Environmental; Substitution covering letter dated 23 Oct 2025 by Newmark; Internal Daylight and Sunlight Assessment Report dated 20 Oct 2025 by GIA; Daylight, Sunlight and Overshadowing Report & Appendices dated 15 2025 by GIA; Delivery, Servicing and Waste Management Plan dated Nov 2025 by Caneparo Associates; Dust Management Plan dated Nov 2025 by RSK; Preliminary Ecological Appraisal dated June 2025 by SES; Economic Regeneration and Employment and Skills Strategy dated Sept 2025 by Volterra; Energy, Sustainability and Overheating Assessment dated Sept 2025 by Sweco; Fire Statement dated 17 Oct 2025 by Arup; Flood Risk Assessment and Drainage Strategy Report and associated drawings/appendices dated 31 Oct 2025 by RBG; Flood Risk Emergency Plan dated 31 Oct 2025 by RBG; Rapid Health Impact Assessment dated Sept 2025 by RSK; Landscape Statement by Turkington Martin; Noise and Vibration Impact Assessment dated 5 Sept 2025 by Sandy Brown; Town Planning Statement dated Sept 2025 by Newmark; Statement of Community Involvement dated Sept 2025 by LCA; Draft Student Management Plan dated Aug 2025 by Homes for Students; Heritage, Townscape and Visual Impact Assessment dated Sept 2025 by The Townscape Consultancy; Transport Assessment dated Sept 2025 by Caneparo Associates; Framework BREEAM Travel Plan dated Sept 2025 by Caneparo Associates; and Whole Life Carbon Assessment, prepared by Sweco.

RECOMMENDATION SUMMARY:

Grant conditional 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 Section 106 Legal Agreement.**

Applicant:

Applicant
Camden Vision Limited

Agent:

Newmark
One Fitzroy
6 Mortimer Street
London
W1T 3JJ

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Sui Generis and/or Class F1 and/or Class E	Leisure / Cultural Space (including Cinema and Bingo Hall)	6,976 sqm	1,123 sqm	- 5,853 sqm
Sui Generis	Student accommodation with ancillary facilities	0	8,275 sqm	+ 8,275 sqm
C3	Dwellings (affordable)	0	5,709 sqm	+ 5,709 sqm
Class E	Commercial/retail	0	81 sqm	+81 sqm
Total	All uses	6,976 sqm	15,188 sqm	+8,212 sqm

Proposed housing mix and tenure						
Tenure	Studio	1 bed	2 bed	3 bed	4 bed	Total
Market	0	0	0	0	0	0
Social-affordable rent	0	4	12	8	3	27
Intermediate rent	0	3	19	0	0	22
Total homes	0	7	31	8	3	49

Parking/Cycle Parking details				
Type	Existing spaces	Proposed long stay	Proposed short stay	Difference
Car parking	0	0	0	0
Cycle parking (residential)	0	95	0	+95
Cycle parking (Student)	0	184	0	+184
Cycle parking (non-residential)	0	2	0	+ 2

EXECUTIVE SUMMARY

- a) The proposed redevelopment of the site seeks to deliver a high-quality mixed-use scheme comprising a Purpose Built Student Accommodation (PBSA) block, affordable residential homes, flexible leisure/cultural space and commercial/retail. The scheme will transform a partially vacant and underused brownfield site, previously occupied by a bingo hall and currently a cinema, into a sustainable development aligned with Camden's and London's strategic planning objectives.
- b) The key benefits of the scheme are the delivery 244 high-quality student accommodation bedspaces and 49 affordable homes, helping meet Camden's need for housing in the form of student and affordable housing. This contributes positively to Camden's housing targets under the Housing Delivery Test, where the borough's delivery performance remains below target, and should be given significant weight. The proposal provides 39.15% on-site affordable housing provision by habitable rooms.
- c) The scheme supports economic development and the Camden Town Town Centre by introducing a high-quality flexible space for leisure or cultural use (1,123 sqm GIA) and an enhanced employment and training package of benefits for Camden residents.
- d) The development complies with local and regional climate and sustainability policies. Whilst the Council seeks the reuse of existing buildings where possible, in this case demolition of the existing buildings is considered to be acceptable in order to optimise the site, refurbishment would be very challenging and could not deliver the same range of uses and would not provide comparable public benefits. The proposed building incorporates sustainable design measures, including green roofs, high energy efficiency standards, and air-source heat pumps (ensuring the development is air quality neutral). The site-wide total carbon reduction is a 40% improvement over the baseline, with zero carbon met through a carbon offset contribution of £158,660. There is a commitment to biodiversity through carefully designed courtyard landscaping and extensive green roofs.
- e) The site is within the Camden Town Conservation Area, and close to statutorily and locally listed buildings, notably Arlington House and terraced properties on Gloucester Road. Some harm to the significance of the Camden Town Conservation Area is identified, this is primarily due to the loss of historical and distinct features of the original building being demolished which are not replicated in the replacement, as well as from the scale of the student block core visible over the Parkway buildings. However, the harm is less than substantial and at the lower end of the scale.. The overall impact has been mitigated and level of harm reduced through a sensitive design approach and a careful material selection to respond to the local townscape character. Officers are satisfied that, in line with the NPPF, the identified heritage harm is outweighed by the significant public benefits of the proposal, particularly in addressing housing needs, a notable provision of affordable housing, and regenerating a brownfield site, making effective use of the land.

- f) Some concerns were raised during consultation, particularly regarding the height, loss of the cinema foyer (which is internal and not protected) and potential noise and disturbance and proposed mix of uses having a detrimental impact on the local community. However, these impacts have been carefully considered and mitigated through robust management strategies secured via planning conditions and obligations, and conditions securing the final detailed design and noise insulation.
- g) Considering the overall planning balance, the scheme complies with the development plan as a whole. It delivers substantial housing and economic benefits, promotes sustainability, regenerates an underused site, and appropriately addresses heritage, amenity, and environmental considerations. Accordingly, it is recommended that planning permission be granted subject to conditions and the completion of a Section 106 Agreement.
- h) The scheme complies with the development plan as a whole and is recommended for approval.

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

Environmental Impact Assessment (EIA):

A screening opinion for the proposal was provided by the Council on 05/08/2025 confirming the development did not constitute EIA development under the EIA Regulations 2017. An EIA is therefore not applicable to the development.

1. SITE AND BACKGROUND

Designations

- 1.1 The following are the most relevant designations or constraints:

Designation	Details
Town Centre (TC)	Camden Town
Conservation Area	Camden Town
PTAL (Public transport accessibility)	6b
Contaminated sites	Contaminated sites potential
CMP priority area	HS2 corridor

Table 1 - Site designations and constraints

Description

- 1.2 The site is 0.292 hectares and consists of two interlinked existing buildings, 180 Arlington Road and 14 Parkway. 180 Arlington Road comprises the former Mecca Bingo Hall at basement level, facing Arlington Road and Inverness Street, as well as a historic fly tower facing Inverness Street.. 14 Parkway is an existing three storey building facing Parkway. The buildings were originally designed by architect W.E Trent as a single cinema building (part of the Gaumont Picture Company) but following the subdivision of the original cinema building in the 1960s, the Site now functions as two separate buildings.



Figure 1 – The existing site: Aerial View

- 1.3 180 Arlington Road was formerly occupied by Mecca Bingo as a Bingo Hall (Sui Generis) and is currently vacant. 14 Parkway is currently occupied by the Odeon and is being used as a cinema (Sui Generis) – Odeon are due to vacate the Site in March 2026, leaving the whole site vacant. The existing buildings include large blank and inactive frontages along Inverness Street and the corner of Arlington Road.
- 1.4 The site falls within the Camden Town conservation area. The site is within the Parliament Hill oak tree to Palace of Westminster viewing corridor (Protected Vista 2A.1).
- 1.5 The site is also situated in Camden Town Town Centre. The site is bounded by Camden High Street to the east, Parkway to the south, Arlington Street to the west, and Inverness Street to the north.
- 1.6 The site is served by numerous bus routes in Camden Town and frequent London Underground Northern Line services from Camden Town Station; Camden Road London Overground Station, served by the Mildmay Line is also located approximately 700 metres north-east of the site. Overall, it has an excellent PTAL of 6B, where 0 is lowest and 6B is the highest.

2. THE PROPOSAL

- 2.1 The proposal is for the demolition of the buildings with the retention of the façade on the Parkway frontage. Erection of a mixed-use development consisting of leisure / cultural use (flexible Sui Generis and/or Class F1 and/or Class E) at basement and ground floor level, self-contained affordable homes (Class C3), purpose built student accommodation units (Sui Generis), retail at ground floor level (Class E), and associated works.
- 2.2 The student housing comprises a combination of 244 private studio rooms (1b1p), together with communal ancillary student facilities at first to third-floor level. A total of 28 rooms will be wheelchair accessible for disabled students.
- 2.3 The 49 affordable homes include 7 x 1-beds; 31 x 2-beds; 8 x 3-beds and 3 x 4-beds. Twenty seven (27) homes (55%) will be for social-affordable rent (Low Cost Rent) and 22 homes (45%) for intermediate rent based on the number of affordable units. There will be 3 wheelchair accessible homes in the social-affordable rent tenure.
- 2.4 There is currently no end user confirmed for the leisure cultural use.

Revisions

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

Affordable Housing

- The number of affordable homes has been increased from 48 to 49 units, with the additional unit being allocated for social-affordable rent.
- Improved mix of units provided.
- Layouts adjusted within the duplex units to locate all bedrooms on the same floor to improve family suitability and accessibility.
- Revised layouts for the wheelchair accessible homes.

Design

- Design refinements to the plant enclosures and PBSA core were received following discussions with officers. The revisions aim to improve the relationship of these features with the building in terms of their form and materiality, and reduce identified heritage harm.
- The PBSA core which is visible from Parkway, has been simplified to look cleaner and more consistent, while adding details that make the street level more interesting. These changes help the building fit better into the surrounding area and create a better interface for the public realm.
- Sketches have been included in a revised design and access addendum to illustrate further potential design development of these elements post-planning. The final details will be secured by condition 6.

3. RELEVANT HISTORY

The site

180 Arlington Road

- 3.1 **2023/4355/P** - Use of the basement, ground, and first floors of the site for interactive entertainment which includes immersive theatre and associated ancillary bar space (Sui Generis). The proposed use would operate with a 350-person capacity or 950-person capacity, depending on which format of show is in operation at that point in time. - **Pending final decision (Presented at Planning Committee in December 2023 and June 2024 - Resolution to grant subject to the S106 being signed).**
- 3.2 **2017/2321/P** – External alterations to building including new entrances to both street elevations and addition of plant equipment on northeastern side elevation. **Granted 29/06/2017.**
- 3.3 **3760** – The change of use of the Odeon Theatre, 14 Parkway, Camden, (with the exception of the first floor) from Cinema, (Class XVIII) to Bingo Hall (Class XIX). **Granted 31/07/1967.**

14 Parkway

- 3.4 **2003/1570/P** - Alterations to main cinema entrance, to include the tiling of walls either side and canopy above.- **Granted 13/10/2003**
- 3.5 **PE9800909** - Retention of entrance doors and fabric screen to front elevation. – **Granted 25/01/1999**
- 3.6 **J11/17/38/35281** - Shop front alterations involving relocation of existing doorway. – **Granted 14/12/1982**

The area

100 and 100a Chalk Farm Road

- 3.7 **2024/0479/P** - Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works. - **Granted 27/11/2024**

33 - 35 Jamestown Road

- 3.8 **2024/4953/P** - Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus five storeys and sixth-floor plant room with flexible commercial (Class E) on the ground floor and a

residential (Class C3) block over the ground plus five storeys. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works. – **Granted 30/7/25**

4. CONSULTATION

Statutory consultees

4.1 Greater London Authority (GLA)

Land use principles and affordable housing:

- Support redevelopment of brownfield site for housing.
- Request nominations agreement for PBSA. Any non-compliance with this policy will form part of the planning balance at Stage 2.
- Request restrict occupation of PBSA to full time students.
- GLA officers accept the approach of the affordable housing offer being provided as wholly C3 housing.

Officer response:

- Land use principles are noted.
- The application offers a hybrid model in meeting affordable housing, as on-site housing is provided in the form of on-site residential. As such, there is no affordable student housing and it is not proposed that the student bedrooms have a nomination agreement. The Council note that the GLA accept that any non-compliance in this regard will form part of the planning balance at stage 2.
- The affordable element will be secured as self-contained homes and these will be subject to a nominations agreement in the s106 agreement.
- Restrictions on occupation in term time and outside of term time will be secured under the s106 agreement.

Urban design and heritage:

- Acceptance of the overall massing and height subject to further design refinements including final materials.
- Development will cause less than substantial harm (low to middle level) to the Camden Town Conservation Area.
- Identifies less than substantial harm (very low) to the listed buildings in close proximity to the site.

Officer response:

- *This is acknowledged and an assessment of height and impact on heritage assets has been carried out in the 'Urban Design' and 'Heritage' sections of the report. A condition about materials and the final detailed designed has been attached.*
- *The less than substantial harm to the Camden Town Conservation area has been set out in the planning balance section.*

- *The Council's Conservation Team does not consider harm to the listed buildings in close proximity.*

Transport: Obligations should secure:

- Improvements in line with the Active Travel Zone (ATZ) findings.
- Car free.
- Disabled parking contribution.
- Cycle parking contribution (and details to be secured by planning condition).
- Delivery, Servicing and Waste Plan (DSWP).
- Construction Logistics Plan (CLP).
- Travel Plan.

Officer response:

- *See 'Transport' section of the report.*
- *Planning obligations secure all of the requests above, with the exception that the CLP which is covered by the Construction Management Plan (CMP) secured as a planning obligation.*
- *A cycle parking condition is attached.*

Sustainable infrastructure and environment:

- Revised energy statement to address issues of cooling and overheating.
- Carbon offset payment should be secured by S106 legal agreement.
- A condition should be secured requiring the applicant to submit a Whole life carbon (WLC) post-construction assessment.
- UGF should be explored to increase it to 0.4 and justification should be provided otherwise.
- Could meet water efficiency and consumption, subject to mitigation measures / conditions relating to water consumption being secured.
- Clarification is required regarding air quality modelling, monitoring data, dust risk assessment and back-up generators. Need to secure mitigation conditions.

Officer response:

- *Ongoing discussion has taken place between the GLA and the officers around energy efficiency and sustainability with improvements and further clarifications proposed such as cooling/overheating that can be dealt with at Stage 2.*
- *Revised air quality information was received.*
- *WLC post-construction assessment, UGF improvements, water consumption/efficiency, backup generators and dust monitoring are secured by planning conditions.*
- *An obligation secures the carbon offset payment.*

4.2 Transport for London

- Trip generation - It is considered that the proposal would not result in significant local public transport service impact.
- Travel plan - should be secured by S106 legal agreement
- Healthy streets - an Active Travel Zone assessment has been undertaken and contributions would be supported towards improvements to Inverness Street at the site's northern frontage, to address existing known safety/ security concerns.
- Cycle parking - number of pre-loaded bikes needs to be clarified. These and the design and access, in line with Policy T5 and London Cycle Design Standards (LCDS), should be secured by condition. However no on-site short-stay cycle parking is proposed citing site constraints and existing spare capacity for on-street cycle spaces in the vicinity of the site. Camden Council should decide whether to secure further on-street cycle parking provision.
- Car free and contribution towards disabled parking bay should be secured
- Construction should be managed by obligation.

Officer response:

- *S106 obligations are secured for the following that have been requested – Travel Plan, PCE contribution, car free and CMP.*
- *All cycle provision including long-term commercial secured by condition and the off site short stay cycle parking contribution will be secured by a S106 obligation.*

4.3 Health and Safety Executive - Planning Gateway 1

- The fire statement indicates that the adopted fire safety design standards are British Standards 9991 and 9999. They have assessed the application accordingly.
- Following a review of the information provided with this consultation, they are content with the fire safety design, to the extent that it affects land use planning considerations.
- They've highlighted that the below does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority:
- Means of escape: The fire statement indicates that one escape staircase will discharge into a ground floor leisure area and proposes a fire curtain to provide separation. This is noted and will be subject to later regulatory assessment. Where active fire safety systems are proposed, fire safety design guidance recommends the provision of a 'what if' study; and advises that an assessment of 'what if' events should be made to identify system failures or foreseeable events that might have a significant

influence on the outcome of the study. This may include fire safety system failures, management failures and workmanship failures.

- Means of escape – Leisure centre: It is not clear from the proposed ground floor plan that a fire exit can be reached from all areas of the leisure within a suitable travel distance. This will be subject to regulatory assessment at the building control stage. However, this is likely to be achievable without affecting land use planning considerations.

Historic England

- 4.4 Historic England does not object to the proposals but recommends that further design work is undertaken to mitigate the impact of the proposed core element of the student housing on the Camden Town Conservation Area. We recommend that the identified harm from these works is balanced against any public benefits, in accordance with the above policies and guidance.

Officer response: Further work has been undertaken to the core during the lifetime of this application. Further refinement and the final details of the staircore are secured by condition. See urban design, heritage and planning balance sections.

20th Century Society

- 4.5 The Twentieth Century Society welcomes proposals for this site. We acknowledge that the cinema's auditorium has been much changed and there is little heritage value left within this part of the building.

While we welcome the proposed retention, restoration and reinterpretation of the original cinema façade on Parkway, we would like to raise concerns about the demolition of the original entrance foyer. This is the only part of the remaining 1937 Gaumont Palace cinema and it should be seen as an important heritage asset despite not being formally listed.

As the Design and Access Statement states in Section 6.30: 'The proposed foyer along Parkway, featuring a contemporary interpretation of the original 1930s Streamline Moderne cinema foyer, would provide an elegant reception and public café space, with access to the lift lobby via turnstiles and fob-controlled doors at the rear. The design represents a respectful response to the Site's heritage.'

The original historic foyer should be incorporated into any new scheme rather than demolished and replicated. We see this as a lost opportunity to celebrate the heritage of the cinema building and to retain an important part of Camden's history within the new proposals.

Officer response: *The site is identified as a non-designated heritage asset. It is located within the conservation area which is a designated heritage asset. It is agreed that the foyer makes an important contribution to the significance of the site, and it is visible from the public highway. The Council is unable to protect its loss as the building is not listed, however the Council has negotiated a new foyer which would also make a positive contribution. See heritage section and the Council have secured details of the new foyer by condition.*

4.6 Historic Building and Places

- While there is no objection to the principle of redevelopment of the auditorium, HB&P are concerned about the design of the building and unnecessary loss of the foyer and frontage building to Parkway.
- The cinema was constructed in 1937 to replace a previous entertainment venue, the Royal Park Hall, which had in turn replaced the Royal Alexandra Theatre, Camden's first large scale entertainment venue. The connection to entertainment on this site is important to the history and development of Camden. The cinema building is considered a positive building and a focal point within the Camden Town Conservation Area Appraisal.
- HB&P acknowledge the existing cinema auditorium has been much altered and subdivided and has little heritage value and welcome the inclusion of a replacement facility within this scheme. The opportunity to reactivate the frontage to Inverness Street is also a positive outcome. However, HB&P object to the complete demolition of the narrow part of the building containing the foyer that faces Parkway. The foyer is relatively intact and in the same form as it was when it opened in 1937, with its modern streamline decorative scheme still present. The new development sits behind this section of the building and the historic foyer could readily be incorporated rather than demolished and replicated. Given the other street frontages to the site, retaining the foyer structure would not be an impediment to access for construction, but it would save and reuse an important part of Camden's entertainment and cinematic history.
- This element be omitted from the scheme and amended plans are submitted that reflect its retention.

Officer response: *See officer response to the 20th Century Society above.*

4.7 Thames Water

- No objection subject to conditions on piling and water capacity. They have also requested an informative reminding the applicant that a Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer.

Officer response:

- *Conditions and informatives have been attached as requested. They are conditions 10 and 11.*

4.8 Cadent Gas

- No objection but requested an informative regarding their assets be attached be attached

Officer response:

- *Informative attached.*

Councillors or MPs

4.9 Cllr Richard Cotten

- Redevelopment is welcomed but concerns summarised below:
- Use - Oversupply of student housing in the area and undersupply of affordable housing impacting on the community as they are transient residents.
- Proposed entertainment use will be for late night venue not for longer term residents.
- Scale - height too tall, will appear out of character in the street.

4.10 Cllr Pat Callaghan

- Principle of site redevelopment welcomed by concerns about:
- More social housing required than student accommodation. Want residents to invest in the community.
- Over saturation of late night entertainment venues impacting on residents quality of life.
- Scale – Taller than buildings in close proximity, would appear out of character with the area.

Officer response:

- *Support for the principle of redevelopment noted.*
- *There is a demonstrable need for housing, and this includes student housing.*
- *The affordable housing provision complies with the development plan and exceeds the policy target of 35% set out in the threshold approach.*
- *Please refer to the 'Land use' and 'Affordable housing' and sections of the report.*
- *During the course of the application the affordable housing offer was increased to provide 49 units and improve the mix of units, both are welcomed and seen as an enhancement to the development.*
- *The scheme provides 49 permanent residential units on a site that currently has no housing and this seen a positive benefit put forward with the other mix of uses on the site.*

- *No occupier has yet been selected for the leisure/cultural space, re-provision of a leisure use on the site is welcomed and accords with planning policy.*
- *Scale – the proposed height and mass of the buildings is considered to be acceptable. See urban design section*

Local groups

4.11 Camden Town CAAC

- No objection in principle to the development with the exception of the following summarised elements:
- Scale and massing on the corner of Arlington Road and Inverness Street.
- Inset balconies out of keeping with the character of the Conservation Area
- Student use oversaturation in the area.
- Noise from rooftop will harm neighbours.
- Concerns PBSA floorplates cannot be converted into permanent housing in the future.
- Insufficient number of affordable housing units proposed.
- Leisure/cultural space is not required.
- Mix of uses does not support community cohesion and need in the area.

Officer response:

- *Massing - As outlined above, the proposed housing block is taller than the existing building. However, in the context of Arlington Road and environs the proposed height, scale and massing is not considered to harm the character and appearance of the conservation area. The less than substantial harm to the conservation area arises from the substantial loss of the existing building (non-designated heritage asset) and the impact of the proposed student housing lift shaft on the Parkway side of the site. Parts of the site are already taller than the probation building and there is a C19th complex of buildings on the street which are of considerable height (Arlington House). The point about the recessed balconies is noted but it is difficult to see how adequate residential amenity could be provided without them as protruding balconies would reduce the number of affordable homes provided due to requiring the whole building to be set back from the pavement. See Urban Design and heritage sections of the report.*
- *Use - Please refer to the 'Land use' and 'Affordable housing' and sections of the report.*
- *During the course of the application the affordable housing offer was increased to provide 49 units and improve the mix of units, both are welcomed and seen as an enhancement to the development.*

- *No occupier has yet been selected for the leisure/cultural space, re-provision of a leisure use on the site is welcomed and accords with planning policy.*
- *The scheme provides 49 permanent residential units on a site that currently has no housing and this seen a positive benefit put forward with the other mix of uses on the site.*

4.12 Albert Street North Residents Association

- Oversaturation of student use in the area. Need more affordable family homes.
- Pressure on transport infrastructure.
- Height and massing out of character with Conservation area and nearby listed buildings.

Officer response:

- *See officer response to CAAC above as the concerns outlined are the same.*
- *TFL raised no concerns about pressure on public infrastructure.*

4.13 The Cinema Theatres Association:

- Complete loss of the cinema with the exception of the parkway façade - Cinema foyer should be retained.
- Restoration of parkway façade welcomed.

Officer response:

- *The See officer response to the 20th Century Society above.*

Adjoining occupiers

- 4.6 Four sites notice were displayed, with one each on Arlington Road, 14 Parkway, Inverness Street and Camden High Street. The notices were displayed on 24.09.25 until 18.10.25 and the application was advertised in the local paper on 25.09.25 (expiring 19.10.25).

In support

- 4.7 At least 26 letters of support were received. These can be summarised as follows:
- Affordable housing is much needed in the area – supports local community.
 - Purpose built student accommodation will free up private sector rentals in the area.
 - Restoration of parkway frontage seen as a positive.
 - Active frontages will improve safety and contribute to vitality of the area.
 - Regeneration of the site welcomed and will help the local community and economy.
 - Increased foot traffic to Inverness Street Market welcomed.

In objection

- 4.8 Objections were received from at least 5 local households. The objections received by the Council are on the Council's website. The key issues raised are summarised as follows:

Use:

- Student housing use too much in the area already and they are transient population which does not create a cohesive social environment.
- More family housing should be provided instead.
- More affordable housing should be provided on the site.
- Low-cost housing for public sector workers should be provided instead.
- Entertainment use concerned that this will not target the local community and could lead to noise and anti-social behaviour through the numbers it could attract.
- Concerns a gig use would not be suitable due to attracting large numbers of people and as it could sell alcohol.

4.9 *Officer response:*

- *Policy supports the provision of student housing and C3 homes for which there is a need. The scheme includes nearly 40% affordable housing of which 11 are larger units (3bed+) for families. Planning policy requires the re-provision of the leisure use on this site which is in a town centre location. Measures are proposed to protect the amenity of residents.*
- *Please refer to the 'Land use' and 'Affordable housing' and sections of the report for more detail.*

Height/Mass

- Height on Inverness street and building mass is seen as bulky and out of scale which will impact on character of the conservation area and setting of nearby listed buildings.

Officer response:

- *The proposed housing block is taller than the existing building. However, in the context of Arlington Road and environs the proposed height, scale and massing is not considered to harm the character and appearance of the conservation area.*
- *The less than substantial harm to the conservation area arises from the substantial loss of the existing building (non-designated heritage asset) and the impact of the proposed student housing lift shaft on the Parkway side of the site. Parts of the site are already taller than the probation building and there is a C19th complex of buildings on the street which are of considerable height (Arlington House*
- *See Urban Design and heritage sections of the report for more detail.*

Amenity:

- Concerns about noise levels and air quality.
- Concerns about construction.
- Noise from the leisure/cultural use.

Officer response:

Please refer to the 'Land Use' (specifically the proposed cultural leisure use), 'Impact on neighbouring amenity', 'Safety and security' and 'Transport' (specifically on Construction Management Plan) sections of the report. A construction management plan will be secured by a S106 legal agreement.

Inverness Market

- Concerns new entrances on Inverness Street will not work with the market's layout.

Officer response: *See 'Land Use' section and its paragraph on 'Impact on Adjacent Street Market'*

Transport:

- Pressure on local transport and the tube.
- Concerns additional car parking spaces will be required.

Officer response:

- The site has Public Transport Accessibility Level (PTAL) rating of 6b (excellent), which means it is easily accessible by public transport. TfL have raised no concerns about capacity on the local public transport network in relation to the proposed development.
- The scheme is secured as car free by a S106 legal agreement, future occupiers will not be able to apply for an on-street car parking permits and no car parking is proposed on site.

5. POLICY

National and regional policy and guidance

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

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

[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 SD1 Opportunity Areas](#)

[Policy SD6 Town centres and high streets](#)

[Policy SD7 Town centres: development principles and Development Plan Documents](#)

[Policy SD8 Town centre network](#)

[Policy SD9 Town centres: Local partnerships and implementation](#)

[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 H7 Monitoring of affordable housing](#)

[Policy H9 Ensuring the best use of stock](#)

[Policy H10 Housing size mix](#)

[Policy H12 Supported and specialised accommodation](#)

[Policy H15 Purpose-built student accommodation](#)

[Policy H16 Large-scale purpose-built shared living](#)

[Policy S1 Developing London's social infrastructure](#)

[Policy S2 Health and social care facilities](#)

[Policy S4 Play and informal recreation](#)

[Policy E1 Offices](#)

[Policy E2 Providing suitable business space](#)

[Policy E9 Retail, markets and hot food takeaways](#)

[Policy E10 Visitor infrastructure](#)

[Policy E11 Skills and opportunities for all](#)

[Policy HC1 Heritage conservation and growth](#)

[Policy HC3 Strategic and Local Views](#)

[Policy HC4 London View Management Framework](#)

[Policy HC5 Supporting London's culture and creative industries](#)

[Policy HC6 Supporting the night-time economy](#)

[Policy HC7 Protecting public houses](#)

[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 8 Waste capacity and net waste self-sufficiency](#)
[Policy SI 12 Flood risk management](#)
[Policy SI 13 Sustainable drainage](#)
[Policy SI 17 Protecting and enhancing London's waterways](#)
[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](#)
[Public London Charter LPG](#)
[Large scale purpose built shared living LPG](#)
[Affordable Housing and Viability SPG](#)
[Housing SPG](#)
[Play and Informal Recreation SPG](#)
[Social Infrastructure 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 H9 Student housing](#)
[Policy H10 Housing with shared facilities](#)
[Policy C1 Health and wellbeing](#)
[Policy C3 Cultural and leisure facilities](#)
[Policy C5 Safety and security](#)
[Policy C6 Access for all](#)
[Policy E1 Economic development](#)
[Policy E2 Employment premises and sites](#)
[Policy A1 Managing the impact of development](#)
[Policy A2 Open space](#)
[Policy A3 Biodiversity](#)
[Policy A4 Noise and vibration](#)
[Policy A5 Basements](#)
[Policy D1 Design](#)
[Policy D2 Heritage](#)
[Policy D3 Shopfronts](#)
[Policy CC1 Climate change mitigation](#)
[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC4 Air quality](#)
[Policy CC5 Waste](#)
[Policy TC1 Quantity and location of retail development](#)
[Policy TC2 Camden's centres and other shopping areas](#)
[Policy TC4 Town centre uses](#)
[Policy TC6 Markets](#)
[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](#)
[Community uses, leisure and pubs - January 2021](#)
[Design - January 2021](#)
[Developer Contribution CPG - March 2019](#)
[Employment sites and business premises - January 2021](#)
[Energy efficiency and adaptation - January 2021](#)

[Housing - January 2021](#)
[Planning for health and wellbeing - January 2021](#)
[Public open space - January 2021](#)
[Student housing CPG - March 2019](#)
[Town centres and retail - January 2021](#)
[Transport - January 2021](#)
[Trees CPG - March 2019](#)
[Water and flooding CPG - March 2019](#)

Other guidance:

[Planning Statement - Intermediate Housing Strategy and First Homes \(2022\)](#)
[Camden Town Conservation Area appraisal and management strategy \(2007\)](#)

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 Camden 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.

6. ASSESSMENT

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

7	LAND USE
8	AFFORDABLE HOUSING
9	HOUSING MIX
10	QUALITY AND ACCESSIBILITY OF PROPOSED HOUSING

11	IMPACT ON NEIGHBOURING AMENITY
12	CONTAMINATED LAND
13	HEALTH IMPACT
14	URBAN DESIGN
15	HERITAGE
16	BASEMENT IMPACT
17	ENERGY AND SUSTAINABILITY
18	WATER, FLOOD RISK AND DRAINAGE
19	AIR QUALITY
20	TRANSPORT AND HIGHWAYS
21	PUBLIC OPEN SPACE
22	NATURE CONSERVATION, LANDSCAPE, AND BIODIVERSITY
23	REFUSE AND RECYLING
24	EMPLOYMENT AND TRAINING
25	FIRE SAFETY
26	COMMUNITY INFRASTRUCTURE LEVY
27	CONCLUSION – PLANNING PERMISSION
28	RECOMMENDATIONS
29	LEGAL COMMENTS
	CONDITIONS
	INFORMATIVES

7. LAND USE

General principles

- 7.1 This section deals solely with matters of land use and considers their compliance with the development plan. The proposed development is for the demolition of all existing buildings and structures on the site (with the exception of the Parkway façade) and redevelopment to provide three main uses: purpose-built student accommodation with ancillary facilities (Sui Generis), permanent self-contained affordable housing (Class C3) and a cultural/leisure space (flexible SG/F1/E). A separate commercial Class E unit would be provided at ground floor level. The final use class of cultural/leisure

space will depend on the future occupier once it is known but it will be restricted to a cultural/leisure use if SG. The nature of the use and the occupier will be controlled through a cultural/leisure use management plan secured by S106 legal agreement.

7.2 The existing and proposed land uses are as follows:

Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Sui Generis and/or Class F1 and/or Class E	Leisure / Cultural Space (including Cinema and Bingo Hall)	6,976	1,123	- 5,853
Sui Generis	Student accommodation with ancillary facilities	0	8,275	+ 8,275
C3	Dwellings (affordable)	0	5,709	+ 5,709
Class E	Commercial/retail	0	81	+81
Total	All uses	6,976	15,188	+8,212

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

7.3 The proposals involve an intensification of the site to optimise capacity through a design-led approach, as promoted by policy D3 of the London Plan. The policy requires development to make the best use of land in terms of both form and land use, responding to the site's context and capacity for growth. Assessment of the acceptability of a demolition and rebuild approach is discussed in detail in the Energy & Sustainability section of the report, whilst design considerations are discussed in the Urban Design section.

7.4 Policy G1 of the Camden Local Plan (CLP) states that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure, and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. It seeks to support development that makes best use of its site, taking into account a range of factors including quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility. The policy expects a mix of uses where appropriate including an element of self-contained housing. In terms of where the most significant growth is expected, part f of the policy directs development to highly accessible locations including Camden Town Centre.

7.5 In response to G1, a mix of uses is proposed including self-contained housing. Further, the site is highly accessible by public transport with a PTAL rating of 6b.

- 7.6 Subject to the assessment of additional planning considerations, which will be covered in later sections of the report, the principle of site intensification to provide a mix of uses including student accommodation, affordable housing and flexible commercial space is strongly supported by officers and complies with national, regional and local planning policy.

Loss of bingo Hall and Cinema (Sui Generis) use

- 7.7 The existing leisure and cultural offering on site consists of a cinema and vacant former bingo hall with a floorspace of 6,976 sqm. Mecca Bingo left the site at the end of 2024, and the cinema operator intends to vacate the site in March 2026.
- 7.8 Camden Local Plan Policy C3 (Cultural and leisure facilities) seeks to protect cultural and leisure uses where there is demonstrable demand and realistic prospect of continued operation. In this case, it is considered that both the bingo hall and cinema no longer meet these criteria.
- 7.9 The bingo hall as set out above has already ceased operation some time ago. There was a planning application on this part of the site for an interactive entertainment use (with resolution to grant subject to a s106 legal agreement being signed), but it was not brought forward. The cinema operator is soon to vacate the site to focus on other existing stock within north London including its Holloway Road site. There has been no evidence of sustained demand for this type of use in the area and no existing operators who wish to stay on at the site nor new occupiers to take the existing units.
- 7.10 A key part of this appears to be the size and quality of the existing building. Current demand for cinema space tends to be for small efficient boutique spaces, or larger multiplex spaces, with Odeon focussing their portfolio on their larger sites. The existing building is large with an awkward and inefficient layout, making it suitable for very few occupiers who could take the entire space. In addition, the low-quality condition of the building would require significant investment to repurpose the site for a new occupier and this would be seen as a major barrier to attract future occupiers. The layout and floorspace make it difficult to also adapt it for a wide range of new alternative uses. Therefore, there would be a very limited pool of future occupiers who could take a space of this scale and poor layout that requires costly investment.
- 7.11 Some cultural/leisure use floorspace will still exist on the site within the new development, although on a smaller scale of 1,123 sqm. The site is in a prime town centre location and it is considered that the development will be able to offer a higher quality flexible format that can accommodate a larger range of occupiers. The end user has not yet been selected, but the final use will be decided once an operator is selected. In addition, it is considered that the retention of the Parkway façade for the student entrance is a benefit and

references the historic cultural and entertainment use of the site. The proposed recreated foyer within the student entrance on Parkway will be visible from the street and its final detailed design will be seen as a benefit.

- 7.12 It is considered that the loss of the bingo hall and cinema is justified along with a reduction in floorspace, as there will be no current occupiers lost, and there is limited realistic prospect of reoccupation in their current form for the reasons outlined above. Re-providing a still sizable and meaningful leisure/cultural space in a more viable, higher quality and flexible form, with the building referencing its historic cinema past is seen as a benefit when balancing it with the scheme making a significant contribution to the Council's priority land use of housing, including student and affordable housing.

Proposed student housing (Sui Generis)

- 7.13 The predominant use of the proposal is Purpose-Built Student Accommodation (PBSA) provided as a combination of 244 private studio rooms together with communal ancillary student facilities and amenity space at fifth floor level. PBSA is defined by the London Plan as housing dedicated, at least in term time, to full-time students.
- 7.14 London Plan Policy H15 requires boroughs to ensure that local and strategic need for purpose-built student accommodation is addressed, and that it contributes to a mixed and inclusive neighbourhood. It sets out that there is an established need for 3,500 bed spaces annually over the London Plan period (2021-2031) (equating to 35,000 bed spaces over the plan period). It encourages Boroughs to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration schemes.
- 7.15 The London Plan recognises that London's higher education providers make a significant contribution to London's economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, whether in Purpose Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not separate or in addition to this need.
- 7.16 In recognition of the housing need met by student accommodation, its development contributes towards the Borough's Housing Delivery Test. The contribution of 244 student homes to the Borough's housing supply should be given significant weight.
- 7.17 At a local level, policy H9 of the CLP seeks a supply of student housing to meet or exceed Camden's target of 160 additional places per year and will

support the development of student housing in line with the criteria set out in the policy:

- It does not involve the net loss of 2 or more self-contained homes and will not prejudice the Council's ability to meet the target of 1038 additional self-contained homes per year given the 244 student homes provided alongside 49 affordable self-contained homes.
- The site is not allocated for self-contained housing and the PBSA complies with relevant standards.
- There are many higher education institutions that are easily accessible from the application site, including those in Central London and King's Cross.
- The proposal provides standard and larger private studios incorporating the DDA Accessible rooms. This is considered acceptable given the spatial constraints of the site.
- The application offers a hybrid model in meeting affordable housing requirements, instead of affordable student rooms, on-site Class C3 housing is provided in the form of affordable homes and these will be subject to the usual nominations agreement. In view of this the private student bedrooms will not be subject a nomination agreement with a higher education institution and this is considered acceptable on balance. Whilst this conflicts with London Plan policy, the GLA have not objected and confirmed that they will balance this issue in their stage 2 assessment.
- The site has excellent public transport accessibility with a wide range of local shops and services nearby.
- The proposal contributes to creating a mixed, inclusive and sustainable community and amenity impacts can be managed. The development is in Camden Town ward. Appendix B of CPG Student Housing reports that 8% of residents are full time students (based on 2011 Census data) and ranks Camden Town 9th out of the Borough's 18 wards (where 1 = highest student share). As some consultation responses highlight, there is other student accommodation in the area but Camden Town is a dense urban area with a diverse community, to which the student population contributes, helping to support the local economy and relax demand on the general housing rental market. The proposed development is not considered to lead to a harmful concentration of students. Furthermore, the PBSA will be managed by an accredited PBSA manager ensuring impacts on amenity can be carefully managed. A draft Student Management Plan (SMP) has been submitted with the application and a full SMP will be secured by s106 agreement.

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

- 7.19 The supporting text of policy H9 (para 3.262) recognises there are often concerns around student housing by the established local community, for example around noise disturbance and community cohesion. CPG Student Housing requires a draft Student Management Plan (SMP) to be submitted with any proposal for student housing. This is to ensure the health and wellbeing of students but also to mitigate potential impact of the development on neighbours and the local area. A draft plan has been submitted by Homes for Students, an established student management company. The plan covers the proposed approach to travel and deliveries; safety and security of students; day-to-day management processes including welfare, anti-social behaviour, operations and maintenance. The plan seeks to establish a working relationship with local tenants and residents' associations and local community organisations. They would propose to meet regularly to discuss and address issues surrounding shared interests. The scheme would include comprehensive CCTV installation together with a security presence on site. A controlled electronic entry system will operate.
- 7.20 A full, more detailed and bespoke **Student Management Plan will be secured by s106 agreement** once the accommodation provider is on board. To align with Agent of Change principles, it will include provision for the inclusion in prospective students' contracts that the leisure/cultural use on the lower levels and the similar uses found nearby at the Good Mixer and Jazz Cafe are noise generating uses and to make full use of the building's soundproofing measures.
- 7.21 The applicant intends that the accommodation will be used outside of term time. This accords with *CPG Student Housing* and *LPG Purpose-built Student Accommodation* which recognises how temporary use of otherwise empty accommodation ensures blocks remain active throughout the year as well as helping to keep costs down for students. The CPG sets out that the Council will use a **Non-student Management Plan secured by s106 agreement** to secure the nature of alternative use, ensure that it does not disrupt occupation by students who wish to let their place for the entire academic year; duration of non-student lettings for no more than 14 weeks in any academic year.

Proposed self-contained residential (Use Class C3)

- 7.22 Forty-nine self-contained C3 residential homes are proposed, equating to a floorspace of 5,685 sqm. All homes would be affordable, split across social-affordable rent (55%) and intermediate rent tenures (45%). Given the hybrid approach, the amount of affordable housing will be assessed in the 'Affordable housing' section of the report. Standard of accommodation, housing mix and accessibility are discussed in the relevant sections of the report.

- 7.23 Policy H1 regards self-contained housing as the priority land use of the Local Plan. [London Plan Policy H1 and Table 4.1](#), set a 10-year housing target for Camden of 10,380 additional homes from 2019/20 to 2028/29. To ensure housing targets are met, Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through development plans and planning decisions.
- 7.24 Student housing is residential floorspace and therefore the requirements of Policy H2 (mixed use policy) do not apply.
- 7.25 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.
- 7.26 The presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and great weight should be given to the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.
- 7.27 The well-connected town centre location is suitable for housing. Policy TC2 supports the development of housing within centres where this does not prejudice the town centre function and the ability of the ground floor to be used for town centre uses. The surrounding character is mixed use with commercial uses at ground floor level and residential above on Inverness Street and Parkway, whereas Arlington Road is more residential in character. The proposed affordable housing and their entrance would be accessed off Arlington Road. This location reflects the character of the area and would be situated away from the main shopping frontages. It would therefore not have a harmful impact on the town centre function.
- 7.28 As such, the provision of 49 self-contained and affordable homes is strongly supported, particularly in helping to meet affordable housing need.

Proposed Leisure/Cultural Use and retail use

- 7.29 Camden Local Plan policy TC1 states that new shopping and related town centre uses will be focussed in existing centres and identifies significant additional provision in the Town Centre of Camden Town.
- 7.30 The proposal includes 1,123sqm of flexible cultural and leisure use (Class Sui Generis and/or Class F1 and/or Class E use) at ground floor and basement level. It would be accessed off Inverness Street and have a large

open frontage which would bring activation to the street as the current building has a long blank façade which has been subject to anti-social behaviour (ASB) issues. Maintaining a cultural/leisure use would help to bring better engagement between the site and Inverness Street which can be achieved by providing appropriate town centre uses opening on to the street. The commercial use (Class E) would also have the ability to re-provide an element of the previous employment use on site.

- 7.31 While there is no current occupier attached for the spaces, the Council's Culture team have been in discussions with the applicant to find potential occupiers who have the right fit for the location and the cultural/leisure space. A condition is attached to ensure sufficient noise insulation between this use and the residential properties (Condition 16), protecting both the proposed uses in that space, and surrounding residential uses. **A s106 planning obligation will also secure the use and management of the space** including opening times and its programme when an occupier is found. This would be done in co-ordination with the Council's Culture team. It is considered that both of these will help ensure that the space can attract high quality future occupiers who are not to the detriment to amenity of neighbouring occupiers.

- 7.32 The 81sqm retail/commercial Class E unit is proposed at ground floor on the corner of Inverness Street and Arlington Road. It is considered that this use would reflect the character of the area and would be appropriate in this town centre location.

Agent of change and impact of uses

- 7.33 The development plan and NPPF all highlight the importance of the Agent of Change principle, ensuring that new uses introduced in the area do not result in unreasonable restrictions on existing and proposed uses – particularly the cultural/leisure use at the lower levels, as well as established uses like the Good Mixer and the Jazz Café.
- 7.34 The London Plan categorises Camden Town as a Major Town Centre with an NT1 night-time economy classification (Ref 23 in Table A1.1 of the London Plan). This means it is of international or national significance. LP policy SD8 says Major Town Centres should focus on higher density employment, leisure and residential development, having regard to night-time economy roles. LP policy HC6 supports the night-time economy by protecting evening and night-time cultural venues such as those mentioned above. These points are emphasised in LP policy D13, as well as the Camden Local Plan, which stresses the importance of Agent of Change.
- 7.35 The proposed residential uses – both the affordable housing and the PBSA – will be new noise-sensitive development right next to the leisure cultural

uses outlined above, and in a town centre location with an important focus on night-time economy uses.

- 7.36 In line with the policies, the scheme has been designed separating new noise-sensitive development where possible from existing and proposed noise-generating businesses and uses through distance, screening, internal layout, soundproofing, insulation and other acoustic design measures. The PBSA will have a management plan which will support the **Agent of Change clause also secured by s106 agreement**, notifying occupiers of the potential noise impacts, and of the robust noise insulation that has been designed into the scheme to ensure risk of complaints is minimised.

Impact on Adjacent Street Market

- 7.37 The site is located adjacent to the Inverness Street market which operates Monday to Sunday. Policy TC2 of the Local Plan states that the Council will support Camden's markets and policy TC4 states that the impact on markets shall be considered as part of new town centre development. Policy TC6 states that markets in Camden will be protected and promoted.
- 7.38 The proposed development has taken into account the existing neighbouring street market on Inverness Street. The market caters specifically to providing souvenirs, fashion, and street food and the proposed leisure/cultural and retail units have been designed to complement and not replicate the character and activities of the market.
- 7.39 The new units within the development are expected to enhance the existing leisure/cultural and retail offer through providing high quality units adjacent to the market. The ground floor units would have a fairly typical contemporary commercial design that allows for a flexible range of activities, such as a shop unit, café or small restaurant be accommodated. The proposal will introduce residential use, retail and re-provide a leisure/cultural floorspace, which should act to attract more pedestrians and other potential customers into the local area markets.
- 7.40 The inverness frontage of the site currently has a long blank inactive frontage and the market stalls have moved from their designated pitch allocations due to recent anti-social behaviour issues. The image below illustrates the current arrangement with some stalls pushed against the blank façade of the site in order to avoid dead spaces without surveillance between the plots and the blank wall. This current arrangement would obstruct access into the new entrances to the cultural/leisure space and to the new active frontages.

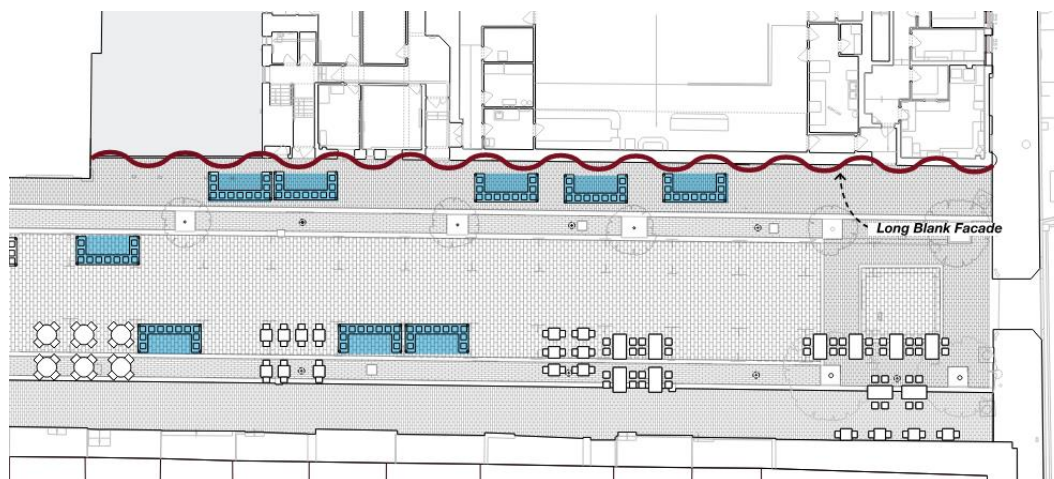


Figure 2: Current layout of the market stalls (not in the consented designated pitch areas)

The consented pitch allocations are shown in the image below with the stalls in a more central location. This is the arrangement that would allow the new frontages of the development to be accessed. Current stall alignment against the bingo hall wall is part of a joint Council/Police initiative to reduce ASB and drug-related activity previously occurring in CCTV blind spots. The new active frontages would also ensure no dead space between the plots and the building frontage reducing the chance of anti-social behaviour.



Figure 3: Designated layout of the market stalls

7.41 The Council's Markets Team has been consulted on this application and while they have not objected to the development in principle they have raised some potential impacts on the operation of the market. These are summarised as follows:

- Safety and Anti-Social Behaviour (ASB) - Relocation of stalls away from the bingo wall could reintroduce ASB, which could deter traders and customers, leading to reduced income and potential market decline.
- Active frontages onto Inverness Street - Creating an active entrance may require removal of market pitches, reducing revenue.

- Waste Management - Development may generate significant waste and could result in higher cleaning costs for the market. Waste collection access via the market could result in anti-social behaviour/security risks.
- 7.42 They also note that the gap between the stalls and the wall of the development on Inverness Street needs to allow for central access for emergency vehicle access.
- 7.43 As explained above, the existing blank frontage of the site has encouraged ASB in this location and that some of the stalls have been moved from their stall place markets to be pushed against the blank wall to try and mitigate the issues. The designing out Crime Officer was consulted on the scheme, who has advised that the activation of the ground floor including the proposed corner retail unit will help increase natural surveillance onto this section of the road. This alongside any installed CCTV (details secured by condition 6) in this location for formal surveillance will help further discourage anti-social behaviour.
- 7.44 In regards, to the new activation of the Inverness Street façade resulting in a loss of market pitches the submitted Design and Access Statement (DAS) sets out that the new culture/leisure entrance does not require the removal of market pitches. It goes further to suggest two alternative stall layouts from the current condition that the markets team could explore in the future, both of which retain the full number of market pitches. The first of these scenarios places the pitches in their already approved and demarked locations. The second scenario is an aspirational scenario with the stalls back-to-back in the centre of the street that could benefit Inverness Street and the market. However, both the development and Inverness Street market can operate without having to rely on the aspirational layout. Officers do not consider that the development will harm the market's ability to function in this location.
- 7.45 A delivery, servicing and waste management plan (DSWMP) document was submitted and during the course of the application has been revised with input from the Council's waste officer. It sets out that collections for the PBSA element that the student management team to transfer bins to a holding area within the back of house and substation access area, with waste then collected by collection operatives and transferred to the awaiting vehicle on Arlington Road. The final strategy and collection frequencies will be agreed as part of the **final DSWMP which is secured by a S106 legal agreement**. It is also noted that this principle of the servicing arrangement from the yard on Inverness Street is as per the existing situation for the building.
- 7.46 In addition, the Site Management Team will monitor the site boundaries for any fly-waste of litter and will collect and process any materials within the boundary of the property; this will include recycling this material where possible/appropriate. It is considered that the new proposed managed

solution will help mitigate this concern along with the management plans put in place.

- 7.47 In regards, to the need to allow for access to emergency vehicles, the designated original layout shown in figure 3 will allow for this. The Markets team are responsible for ensuring that their stall layout allows for this and officers consider that this is feasible with the proposed development.
- 7.48 The applicant has expressed that they will continue to work closely with the Camden Markets team and other stakeholders to ensure an appropriate strategy is in place that include emergency vehicle access. A **Markets Strategy will be secured by a S106 planning obligation to ensure the developer engages with the Council's Markets team** around Inverness Market in terms of interim arrangements during construction, the final arrangement post construction and ensuring that emergency access is maintained.
- 7.49 As such, it is expected that the proposed development would not be of detriment to the existing street market on Inverness Street, and any impacts will be carefully managed.

Land use conclusion

- 7.50 The proposal supports Camden's strategic priorities, particularly housing delivery, while ensuring cultural uses remain part of the site. It would provide much-needed affordable housing and student accommodation, for which there is an identified need. The proposed new homes and student accommodation, within a sustainable location on brownfield land, would contribute to the strategic objectives of the development plan and the borough's housing supply. This housing provision complies with the development plan and the NPPF in land-use terms and has been given significant weight.
- 7.51 The loss of cultural/leisure space is mitigated by the provision of a reduced quantum of high-quality cultural/leisure space within the proposal which will provide employment opportunities for local people. This use is suitable for the town centre location. The space and future occupier will be carefully controlled through conditions and S106 planning obligations designed to minimise disruption to local residents. A small retail unit would be welcomed in its proposed location and promote an active frontage within the town centre.
- 7.52 The Inverness Street Market will not be negatively impacted by the development and the activation of the Inverness Street elevation is seen as a benefit to help address ASB in this area.
- 7.53 The land uses are supported and in line with the development plan with respect to land use.

8. AFFORDABLE HOUSING

Affordable housing requirements

- 8.1 Camden Local Plan policy H4 and the Housing CPG seek provision of affordable housing. Where the uplift in residential floorspace has the capacity for 10 or more new homes (assuming 100sqm per home on average), the council expects affordable housing to be provided on site, subject to viability.
- 8.2 Policy H5 of the London Plan then sets out the threshold approach for major development proposals, which is 35% for private sector land by habitable room. This threshold determines whether an application can follow the “fast track route” with no viability assessment.

Affordable student rooms

- 8.3 Criteria (g) of Policy H9 states that student housing developments should have an undertaking in place to provide housing for students at one or more specific education institutions or otherwise provide a range of accommodation that is affordable to the student body.
- 8.4 Where a proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body in accordance with criterion (g), the Council will expect the development to provide an appropriate amount of affordable housing for general needs, having regard to Policy H4, Maximising the supply of affordable housing.
- 8.5 The applicant is not providing any of the student bedrooms as Affordable Student Accommodation. The student accommodation would not have an undertaking to provide housing for students at one or more specific educational institutions. Still, the s106 would ensure that all occupants of the PBSA must attend a higher education institution within Camden or adjoining boroughs.
- 8.6 The applicant's approach is to provide the on-site affordable element as self-contained residential housing (Class C3) housing for general needs under policy H4. The Mayor's PBSA LPG sets out under para 2.5.3 that while PBSA need should be addressed in line with policy H15, the inclusion of conventional (Class C3) housing on larger sites, may nonetheless be acceptable and even desirable as part of pursuing mixed and inclusive neighbourhood objectives and may be particularly relevant where C3 housing delivery is relatively poor.
- 8.7 Given the Borough's need for self-contained housing, and particularly affordable housing, officers welcome the proposed approach which provides on-site affordable self-contained homes which meet the affordable housing floorspace target. This is based on the maximum viable amount with the policy target of 50% per Local Plan Policy H4 (equivalent to London Plan

policies H15 and H5), subject to the fast track 35% target in the threshold approach.

Affordable self-contained homes

- 8.8 The 49 affordable homes include 27 homes (55.1%) for social-affordable rent and 22 homes (44.9%) for intermediate rent, based on NIA. This closely aligns to the preferred tenure split for affordable homes in the development plan of 60% social-affordable and 40% intermediate rent.
- 8.9 The NPPF stipulates that a Registered Provider (RP) should manage affordable housing for rent and remain affordable for future eligible households. The Council has agreed an Approved Strategic Partner List and requires affordable housing to be transferred to a partner on the list. CPG Housing recommends that developers involve a provider from the earliest stages of housing design to ensure the homes meet the requirements. A s106 agreement will be used to ensure that the developer will select a housing provider from the approved list (and will be subject to the Council's written approval) and that occupation of market homes (in this case, the student housing) will not take place until the affordable homes have been transferred to the provider.
- 8.10 The developer has not yet selected an affordable housing partner but have had interest from three RPs. The s106 will stipulate the need for the Registered Provider to be on the Council's approved list.
- 8.11 The site will deliver 49 self-contained affordable residential units with 157 affordable habitable rooms which equates to 39.15% affordable housing in terms of habitable rooms, 40.3% in terms of GIA and 46.1% in terms of NIA. The London Plan bases the 35% requirement on the number of habitable rooms and the development would exceed this fast-track target which is welcomed. Given this, there would not be a requirement for a payment in lieu, or a viability assessment.
- 8.12 The **affordable housing and tenures would be secured by s106 legal agreement**. As such, the affordable housing provision, whilst not affordable student housing, is secured as general needs affordable housing that meets the fast-track requirement, in line with the requirements of the London Plan and the Local Plan.

9. HOUSING MIX

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

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

Table 3 - Dwelling Size Priorities (Local Plan Table 1)

- 9.2 The CLP priorities table above shows the higher priorities for **Social Affordable Rented homes** are for 2 and 3-bed homes, with medium demand for 4-bed or more. More than half the Social Affordable Rented homes proposed in the scheme are 2-bed homes and 3-bed homes which can accommodate families. Together, 2 and 3-bed homes make up around 74% of the homes. This is set out in the table below, showing a balanced mix that contributes to the LP priorities.

Home size	Number proposed	Proportion of homes
1-bed	4	15%
2-bed	12	44%
3-bed	8	30%
4-bed	3	11%
Total	27	100%

Table 4 - Dwelling mix summary for Social Affordable Rented homes

- 9.3 The CLP priorities table above shows the priorities for **Intermediate Affordable homes** are for 1-bed homes, with medium demand for 2-bed. All the Intermediate rent units are either 1 or 2 bed homes, with the majority being allocated for 2 beds which are medium demand. This is set out in the table below, showing a balanced mix that contributes to the LP priorities.

Home size	Number proposed	Proportion of homes
1-bed	3	14%
2-bed	19	86%
3-bed	0	0%
Total	22	100%

Table 5 - Dwelling mix summary for Intermediate Rented homes

- 9.4 The proposed mix of intermediate rented homes attract high and medium priority respectively. The size of the floorplates affords to larger homes (2-beds) to ensure that the units can be dual aspect rather than single aspect 1 beds in this location. The majority of the 2-beds are designed for 4 people so

are well-suited to the sharer market or smaller families. The mix is broadly consistent with the Local Plan Dwelling Size Priorities with 100% of Intermediate Rent homes targeting the high or medium priority homes.

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

10. QUALITY OF PROPOSED HOUSING

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

Self-contained Housing

Design and layout

- 10.5 Part of the design-led approach to delivering effective high-density housing is about ensuring the development does not compromise the size and layouts of units, ensuring high quality homes across the scheme. CLP policy H6 confirms that new residential development should conform to the

Nationally Described Space Standards, and this is reflected in LP policy D6 which sets the same minimum space standards in Table 3.1 of the London Plan 2021. The relevant excerpt from the table is reproduced below.

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

- 10.6 All the residential homes in the detailed scheme meet or exceed the minimum standards. The new homes would have good floor to ceiling heights (around between 2.3 and 2.5 metres) and good room sizes. They are well laid out with a simple and rational plan form. All flats have a balcony and access to private communal amenity space.
- 10.7 CLP policy A2 states developments should seek opportunities for providing private amenity space, and LP policy D6 says that 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- 10.8 The balconies range from 5sqm to 12sqm, depending on the unit size, and ensure a good depth and width of 1.5m or more, with all homes meeting the LP policy requirements.
- 10.9 The homes all have their own secure front door. The four 4-bed duplex homes will have a front door that leads to the street. Flats are served by residential cores with two staircases and three lifts. The cores provide access to secure lobbies leading to street and communal amenity space. Communal amenity spaces are also provided allowing shared space for residents which can be used flexibly.
- 10.10 Overall, the proposed homes and amenity space comply with policy and would result in a high-quality development and provision for future occupiers.

Dual aspect units

- 10.11 LP policy D6 says the number of dual aspect homes should be optimised. The policy does however support a design-led approach where single aspect units are considered a more appropriate design solution to meet the requirements of Policy D3 - Optimising site capacity through the design-led approach. It can be acceptable where it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 10.12 All the affordable homes would be dual aspect which is welcomed.

Daylight and sunlight

Methodology

- 10.13 The internal daylight/sunlight report applies the relevant BRE guidelines to the proposed units. 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 make a balanced judgement.
- 10.14 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 if the resulting scheme would provide acceptable living standards.
- 10.15 The BRE guidance uses Climate Based Daylight Modelling (CBDM) to assess the light for proposed development. This methodology is a complex simulation of actual daylight levels but has targets that are generally more difficult to achieve in an urban context than older BRE guidelines.
- 10.16 The recommended CBDM methodology is based on the British Standard 'Daylight in Buildings' (BS EN17037). The council supports use of Spatial Daylight Autonomy (sDA) to measure daylight, and Sunlight Exposure (SE) targets to measure sunlight. The British Standard contains guidance on interior daylighting for buildings across Europe but also has a UK National Annex with alternative sDA targets for dwellings in the UK. The council supports the use of these simpler alternative illuminance targets to take account of our denser context.
- 10.17 The submitted report uses the following metrics in its assessment of proposed accommodation in line with BRE guidance and British Standard:
- **Illuminance method** – minimum illuminance levels (lux). **Median Daylight Illuminance** is the median value of daylight illuminance (in lux)

within a room over the course of a year, considering daylight only (no artificial lighting).

- Recommended targets: 100 lux in living rooms, 50 lux bedrooms, , and 150lux in kitchens. Between 100 lux and 150 lux can be used for combined living/kitchen/dining room.
- **Daylight Factor method** - the illuminance at a point on the reference plane in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. The CIE standard overcast sky is used, and the ratio is usually expressed as a percentage.”
- **Sunlight Exposure (SE)** – A prediction of how many hours of sunlight the centre of a window receives on 21 March (spring equinox).
- The guidance says a habitable room in the home (preferably the main living space) should receive at least 1.5 hours of sunlight.
- **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.

Assessment

- 10.18 For daylight, the results show that 44% of the 187 habitable residential rooms will meet or exceed their recommended levels of MDI (Median daylight Illuminance). This rises to 57% when focusing on the living rooms and LKDs only, the design and layout of the development has prioritised daylight in these key spaces.
- 10.19 The sunlight results show that 100% of the proposed habitable rooms meeting the 1.5 hours of sunlight criteria.
- 10.20 The BRE guidance recommends that for an amenity area to be adequately sunlit throughout the year, at least 50% of its space should receive two or more hours of sunlight on the 21st March (spring equinox).
- 10.21 The areas tested are the courtyard amenity area at level 1 and the play space at level 7. On March 21st, both spaces will fall below the BRE equinox target due to their location (39% for the playspace and 19% for the courtyard). The play space is surrounded by solid walls that create additional shading. However, it is noted that this playspace area would see the recommended 2 hours of sunlight for 50% of its space just 13 days later, on 3rd April and will benefit from excellent levels of sunlight during the warmer months when it is most likely to be used.

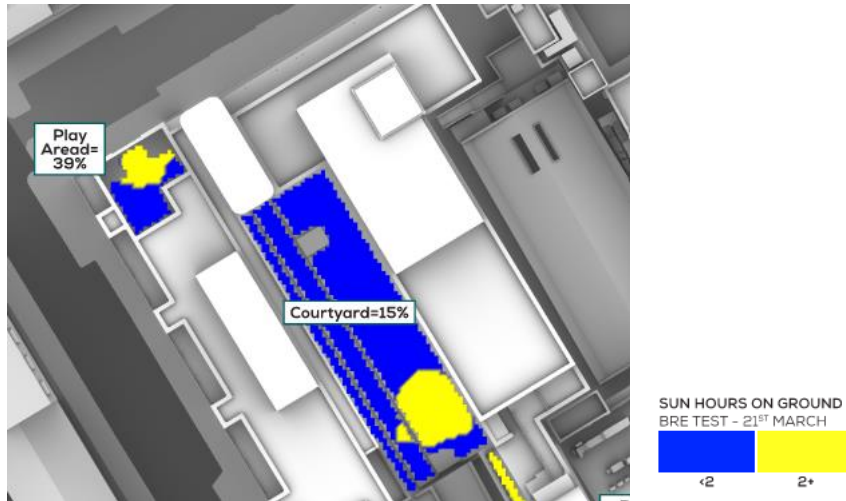


Figure 4: Image showing the sun on ground BRE test for the 21st March for the play area and courtyard outdoor amenity spaces (taken from the daylight/sunlight report)

- 10.22 It is acknowledged that courtyard schemes tend to have lower levels of sunlight due to their enclosed nature and shading from neighbouring buildings. As shown in figure xx above, the courtyard will only receive 15% on March 21st which is below the BRE guidance of 50%. However, the courtyard space will see higher levels of sunlight during the summer months, with most of the space seeing more than 2 hours of sunlight on the summer solstice on 21st June as shown in the image below.

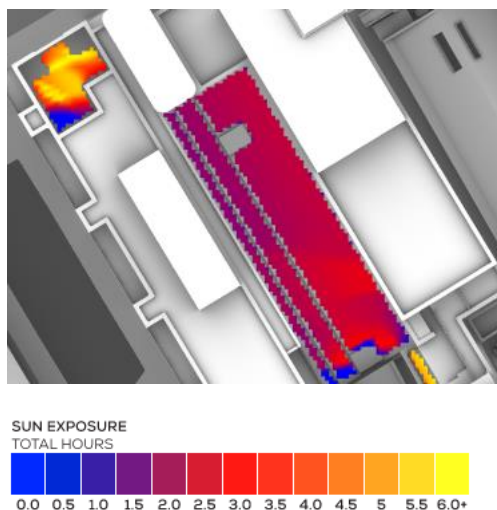


Figure 5: Image showing the total hours of sun exposure during 21st June for the play area and courtyard outdoor amenity spaces (taken from the daylight/sunlight report)

10.23 It is accepted on this development that there are limited other locations for amenity spaces of this scale and on balance with benefits of the scheme including the council's priority of housing delivery that in this instance the amenity spaces are acceptable.

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

Outlook and privacy

10.25 There are adequate separation distances to neighbouring windows within the development of 12.5m-14m with a deck access in between the majority of the units as shown in image xx and existing properties. Each unit will have its own inset balcony that creates shelter and a sense of privacy. There are no outlook or privacy issues for future occupiers.

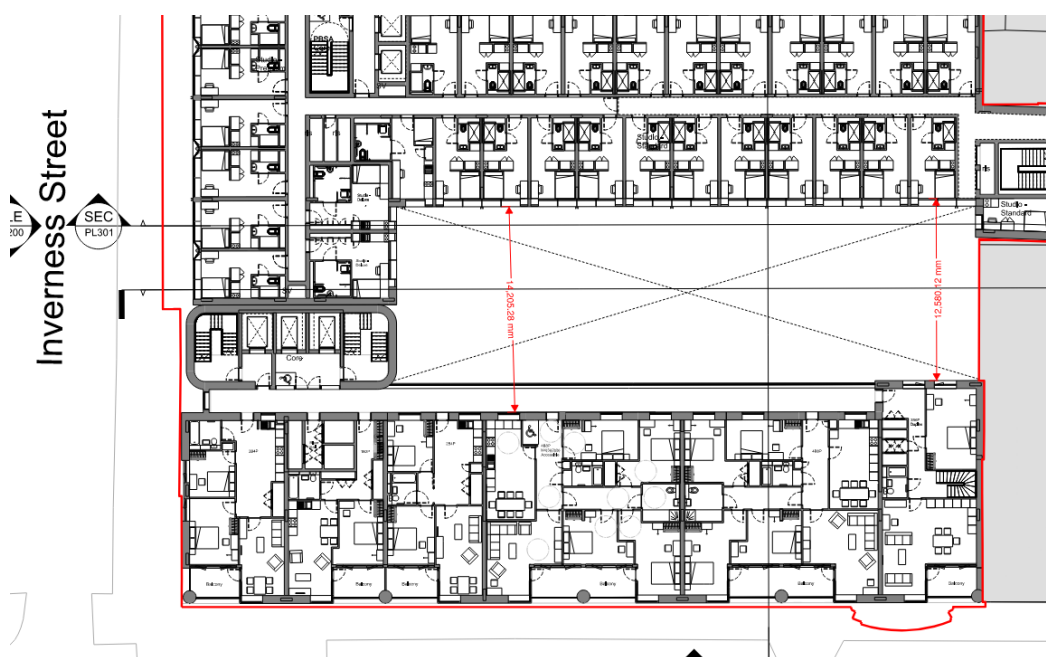


Image xx: Typical floor plan showing the separation distances between the residential units.

External amenity space

10.26 CLP policy A2 states developments should seek opportunities for providing private amenity space, and LP policy D6 says that 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should

be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

- 10.27 All units will have access to their own private amenity spaces. The balconies range from 7sqm to 15sqm, depending on the unit size, and ensure a good depth and width of 1.5m or more, with all units meeting the LP policy requirements.
- 10.28 In addition to the private amenity space, communal amenity space will be provided. A podium garden with a communal seating area and play space is proposed at Level 1. At Level 7, an internal communal pavilion is proposed which sits alongside an elevated play terrace. Access to these spaces is restricted to the residents of the self-contained (affordable) housing.
- 10.29 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 homes

- 10.30 The flats have been designed to a high standard of accessible and inclusive design, and 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). There is level access in the development and lifts within each block. There is level access to the communal and outdoor courtyard space.
- 10.31 The proposed homes 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 rented homes where the council will have nominations.
- 10.32 Out of the 49 homes, 5 would be M4(3) accessible apartments which is 10%. These are a 4B8P, 3B6P and 3x 2B4P units at 2-6th floor levels. Three are social-affordable homes and the remaining are intermediate units.
- 10.33 The amount of accessible housing delivered by the scheme has a notable positive impact on disabled residents (disability being a protected characteristic – see note at the front of the committee pack on the Public Sector Equality Duty).
- 10.34 A condition would be attached to secure the provision of the accessible and wheelchair dwellings (condition 40).

Quality of student accommodation

- 10.35 The Purpose-Built Student Accommodation (PBSA) would comprise a range of 244 private studio rooms (including 28 wheelchair adaptable units).
- 10.36 The PBSA is entered through a communal lobby directly on to Parkway. The ground floor includes an internal secure cycle store. Upper floors contain studios (containing ensuite bathrooms alongside kitchenette, study and sleeping spaces). The 1st -3rd floors contain communal amenities for the residents. No dual aspect units are proposed but this is not a policy requirement for student accommodation and would be very challenging to achieve for a high-density development comprising small unit sizes. Rooms and windows where there are close proximities have been offset from those opposite as far as possible to reduce overlooking and maximise outlook.
- 10.37 There is no policy requirement for private amenity space, but the residents would have access to a student only south-facing communal terrace on the 5th floor.
- 10.38 In daylight terms, the majority would have good lighting with only 65 of the 244 rooms assessed (26%) not achieving a BRE compliant target value of 150 lux (established by the Planning Inspectorate as an appropriate target for student rooms and apartments). An additional 10 rooms would achieve at least the 100 lux level recommended for bedrooms (on the basis that studios are likely to function primarily as bedrooms, with the communal amenity spaces providing for activities such as study).
- 10.39 Of these remaining 55 rooms, 4 would have very poor daylight with less than a 15 lux value. The rooms receiving the lowest levels of daylight are located at 1st to 3rd floor in the 'knuckle' of the building on inward facing elevations where light is blocked by adjacent massing. Taking the student housing as a whole, there is a relatively small level of non-compliance. All students would have access to rooftop amenity spaces which have very good levels of daylight, as well as communal rooms to the facing onto Parkway.



Figure 6: Example location of low lux rooms at 1st floor.

- 10.40 For sunlight exposure, the results indicate that 37% of rooms will receive the recommended levels of sunlight on 21st March. Where the target is not met, these are to rooms served by windows facing predominantly east or west where sunlight is more restricted. However, as demonstrated by the daylight results, a much larger proportion of rooms will benefit from good levels of daylight, meaning that some rooms will rely more on diffuse light rather than direct sunlight.
- 10.41 Whilst the starting point for quality of student accommodation is always to achieve the best possible, it has to be recognised that the student population is transient – students will occupy their rooms for a relatively short period of time and for most, only during term time. Nonetheless, the standard of accommodation is acceptable on balance, especially taking into account the town centre location and impacts largely arising from the bold and innovative design (see Urban Design section).
- 10.42 Although there may be a conflict with some rooms, most rooms would receive good levels of light and the accommodation overall would be acceptable and in accordance with the development plan.

Noise and vibration

- 10.43 A noise report was submitted as part of this application. Two plant enclosures are proposed at roof level. A back up generator is also proposed on site encase of emergency.
- 10.44 The new homes and student accommodation are in a busy town centre, so there would be the potential for some noise and disturbance. Camden Town is known for its night-time activities, and the agent of change principle means it is important to ensure the protection of the ongoing operation of such uses, especially the Good Mixer and Jazz Cafe next to the site, as well as the proposed leisure/cultural use and other night-time economy uses in the area. As such adequate noise insulation and management will be needed to comply with the agent of change principle as emphasised in the draft site allocation, LP policy D13, and CLP policies A1 and A4, subject to conditions.
- 10.45 The Council's environmental health officer has requested conditions for sound insulation between residential units, residential units and leisure/cultural use and emergency plant and generators (Conditions 16 and 33)
- 10.46 Noise from plant within and on top of buildings would be conditioned in terms of noise levels, and there would be a requirement for anti-vibration mounts (conditions 31 and 32).
- 10.47 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 building, in accordance with the development plan.

Conclusion

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

11. IMPACT ON NEIGHBOURING AMENITY

- 11.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

- 11.2 LP policy D9 about tall buildings says that daylight and sunlight conditions in the neighbourhood must be carefully considered.

Daylight and sunlight

- 11.3 A Daylight, Sunlight and Overshadowing Report has been submitted as part of the application which details any impacts upon neighbouring properties. It has examined the following properties and included a map visualisation in figure 7 of where they are located in relation to the site:

- 30 Inverness Street (map ref: 1);
- 24 Inverness Street (map ref: 2);
- 26 Inverness Street (map ref: 3);
- 20-22 Inverness Street (map ref: 4);
- 18 Inverness Street (map ref: 5);
- 16 Inverness Street (map ref: 6);
- 14 Inverness Street (map ref: 7);
- 12 Inverness Street (map ref: 8);
- 10 Inverness Street (map ref: 9);
- 8 Inverness Street (map ref: 10);
- 5 Inverness Street (map ref: 11);
- 177 Arlington Road (map ref: 12);
- 175 Arlington Road (map ref: 13);
- 16 Parkway (map ref: 14);
- The Cavendish School (map ref: 15);
- Camden House - 199 Arlington Road (map ref: 16);
- 179 Arlington Road (map ref: 17);
- 172a Arlington Road (map ref: 18); and
- 32 Inverness Street (map ref: 19);

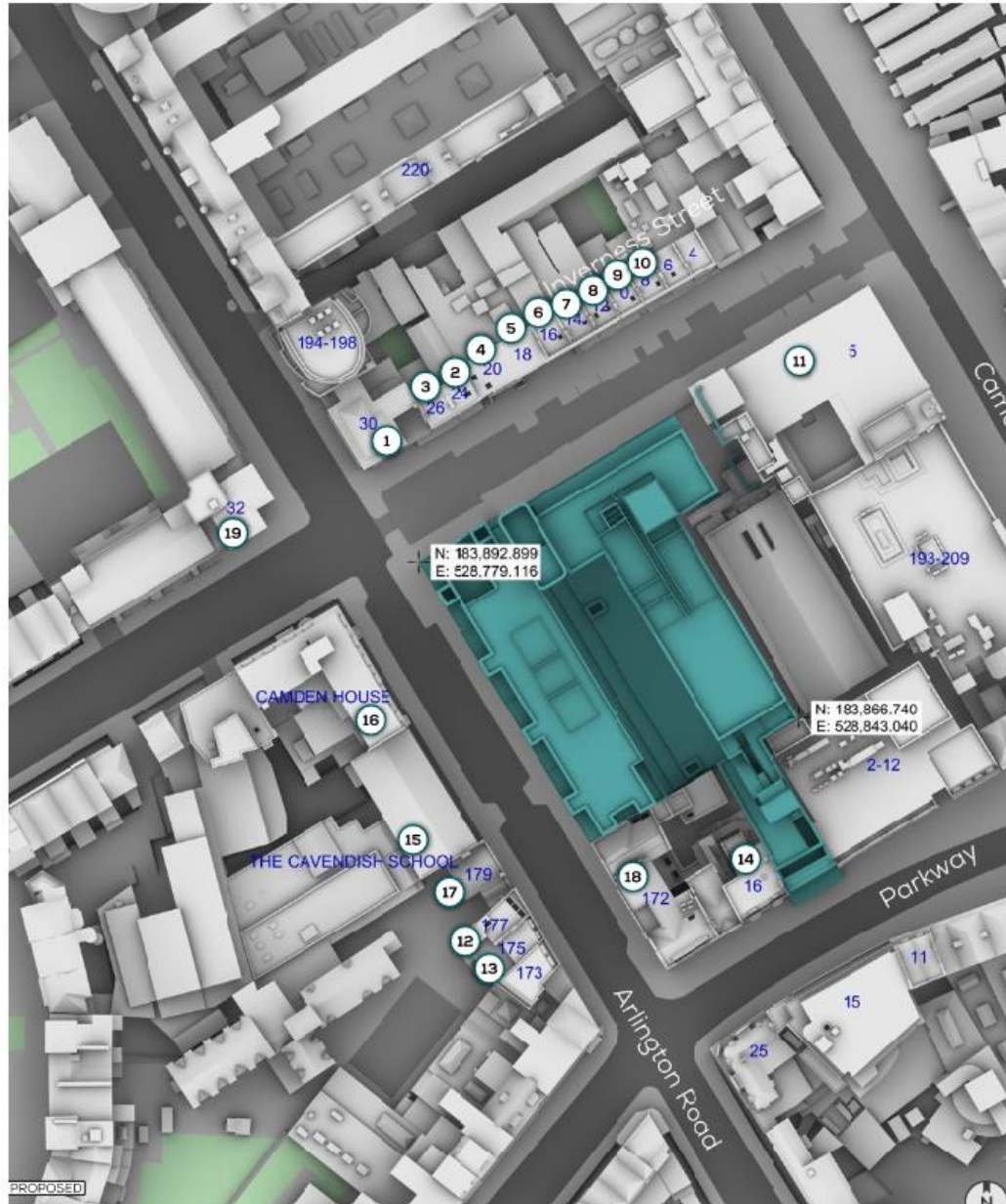


Figure 7: Map from the sunlight/daylight report showing the location of the tested properties

- 11.4 The BRE guidance is also used to assess impact on neighbouring sites, as well as for the proposed accommodation. Again, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.

Methodology

- 11.5 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.

Categorising impacts and alternative targets

- 11.6 The assessment has set significance criteria which is the approach recommended by BRE guidance in the case of EIAs. Officers endorse the approach, and the criteria used 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 7 - Impact criteria

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

new obstruction (the proposed development), is the main factor in the relative loss of light.

Assessment

- 11.8 Many of the properties tested comply with BRE guidelines or receive only a minor negative impact. The properties which do not meet the numerical recommendations set out within the BRE Guidelines, or experience greater than a minor loss in VSC, NSL or APSH are considered in further detail. These properties are:

- 8-32 Inverness Street (even)
- 5 Inverness Street;
- 175, 177 and 179 Arlington Road;
- 16 Parkway;
- The Cavendish School;
- Camden House - 199 Arlington Road; and
- 172a Arlington Road.

- 11.9 *8-32 Inverness Street (even)*
There are residential properties on the upper floors with commercial at ground floor level. They are located to the north of the Site and are directly adjacent.



Figure 8: Showing the location of 8-32 Inverness Street (even) in red in relation to the site (green)

- 11.10 Daylight (Vertical Sky Component – VSC)
- 123 windows tested across 72 rooms. 81 windows (66%) meet BRE guidance and remain unaffected.

- Within No.'s 8, 10 and 12 the windows tested that do not comply will only show small changes (20–30% reduction), generally considered as minor reduction.
- No window/room will experience over a 40% reduction and therefore the impact to these would not be classified as 'major negative' reduction.

11.11 Daylight Distribution (NSL)

- 22 rooms were tested and 12 rooms (55%) meet BRE guidance.
- Of the 10 affected rooms:
 - 4 are bedrooms, which BRE considers less critical for daylight.
 - 3 rooms will still have good daylight distribution (50–73%).
 - 1 kitchen is very small and discounted under guidance.
 - 2 rooms closest to the new building within No's 16 (studio) and 18 (living room) will see the biggest change, with a 44.3% and 52.1% reduction respectively.

11.12 Sunlight (APSH)

- Of the 50 windows tested, 46 windows (92%) meet BRE guidance. 4 windows do not meet the guidance. Of the 4 affected 2 are bedrooms, which BRE guidance accepts are less sensitive. The other 2 rooms only fall short in winter; annual sunlight levels remain excellent.

11.13 Conclusion - Most windows and rooms will continue to receive good levels of daylight and sunlight. Where changes occur, they are generally minor, affect less sensitive rooms, or remain acceptable for a dense urban setting. It is acknowledged that units at 16 and 18 Inverness Street will experience higher reductions within the NSL and shortfall of the APSH in the winter, however the other tests outline that sufficient level of daylight/sunlight can be achieved at these properties. On balance this is considered to be acceptable.

5 Inverness Street

11.14 The residential property at 5 Inverness Street is located to the north east of the Site. It contains 14 flats.

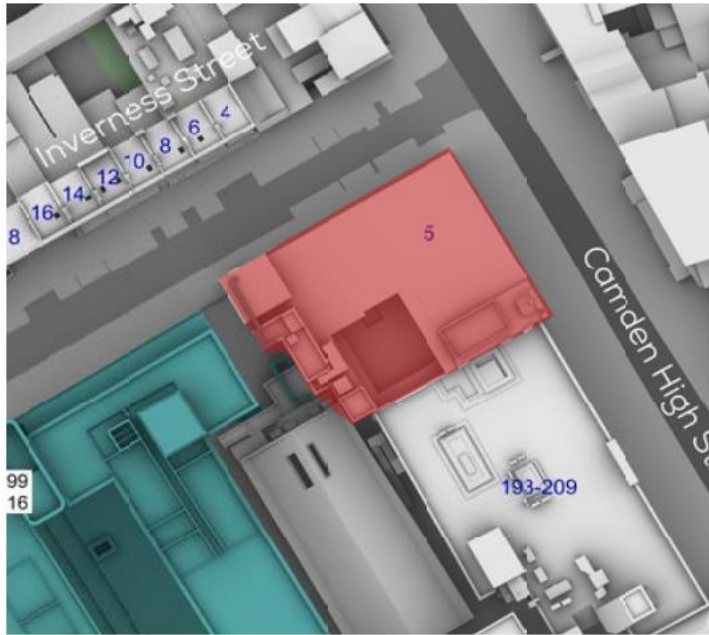


Figure 9: Showing the location of 5 Inverness Street in red in relation to the site (green)

11.15 Daylight (Vertical Sky Component – VSC)

- 8 windows do not meet the BRE guidance but the remaining windows comply.
- 2 of those windows serve living rooms with other windows serving those homes that keep overall daylight levels within guidance.
- 4 windows (3 bedrooms + 1 unknown space) are under roof overhangs, which already limit daylight which impact on the results.
- 2 windows serve single-aspect bedrooms next to the part of the site where new building mass will be closest, so some change is unavoidable.

11.16 Daylight Distribution (NSL)

- 5 Rooms do not meet BRE guidance. All 5 affected rooms are bedrooms, which BRE considers less critical for daylight. These are the same which fail the VSC

11.17 Sunlight (APSH)

- 7 windows fall short of the of the BRE guidance.
- 4 serve bedrooms, which BRE guidance accepts are less sensitive to sunlight loss.
- 1 window is under a roof overhang, causing exaggerated effects.
- 2 rooms still retain good sunlight levels (20% and 23% APSH vs BRE target of 25%), which is considered very good for a dense urban setting.

- 11.18 Conclusion: Within this block of flats it is acknowledged that 1 room at 2nd floor and 4 rooms at 3rd floor will experience a major negative reduction but as outlined above they all serve bedrooms, which are accepted to be less sensitive to loss. It is acknowledged that any development on this site would impact on these windows because they face to the boundary at close proximity which would prevent any future levels of significant development nearby.

16 Parkway

- 11.19 The residential property at 16 Parkway is located to the south of the Site. This site is divided into 4 flats.



Figure 10: Showing the location of 16 Parkway in red in relation to the site (green)

- 11.20 Daylight (Vertical Sky Component – VSC)
- Of the 16 windows tested, 11 windows (69%) meet BRE guidance.
 - Of the remaining 5 windows:
 - 1 window is under a balcony and next to the existing site, already receiving very little daylight (0.2% VSC). The proposed change is negligible (0.1% reduction).
 - 2 windows show only minor changes (22% reduction), generally considered insignificant.
 - 1 window will retain 15.4% VSC, which is good for a dense urban setting.
 - 1 window faces directly onto the site and already has low daylight (8.8% VSC). It would experience a major negative reduction, but it is noted that this served a kitchen of less than 13sqm and it would retain a VSC of 9.1% meaning an actual reduction of 47.4 percentage points. While it falls short of BRE guidance, it is noted the room still meets BRE standards for overall daylight distribution (NSL).

- 11.21 Daylight Distribution (NSL) - 9 of the 10 rooms tested meet BRE guidance. The one affected room sees only a small change (20% reduction) and will still retain 64.6% NSL, considered good for an urban environment.
- 11.22 Sunlight (APSH) - All rooms meet BRE guidance.
- 11.23 Conclusion: Overall, when assessed across the three tests, on balance the units will generally still retain sufficient daylight/sunlight.

172a Arlington Road

- 11.24 This residential property is located to the south of the Site, which contains 6 flats.

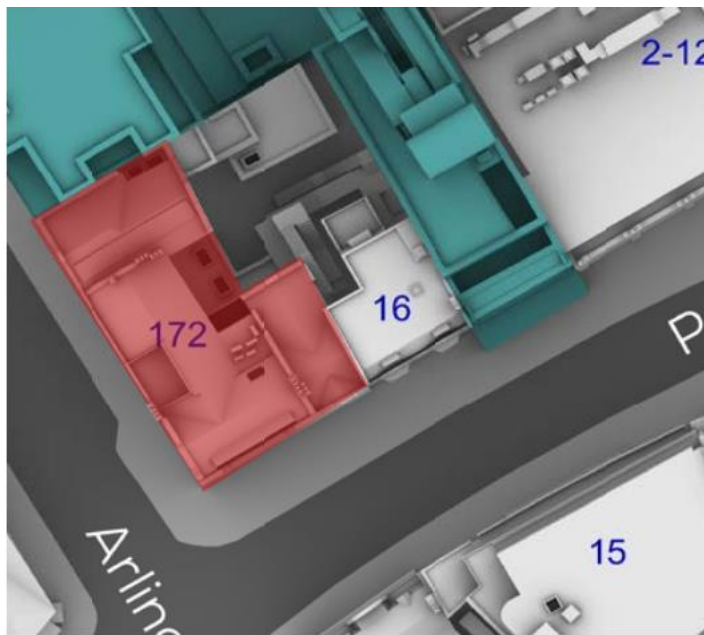


Figure 11: Showing the location of 172a Arlington Road in red in relation to the site (green)

- 11.25 Daylight (Vertical Sky Component – VSC)
- 38 windows do not meet the BRE guidance.
 - 3 windows serve rooms with other windows that keep overall daylight levels within guidance.
 - 12 windows show only minor changes (22–30% reduction), generally considered insignificant.
 - 7 windows will still retain good daylight levels (15.6–20.6% VSC), which is acceptable for a dense urban setting.
 - 6 windows are very close to the existing site, where daylight is already limited (range of 1.8 between 5). These windows will experience major negative reductions of over 40%. Any redevelopment would have similar effects, so these rooms will continue to rely on artificial lighting.

- 13 windows are in an enclosed area where the building's own recessed design restricts daylight more than the proposed development (Shown in the image below).

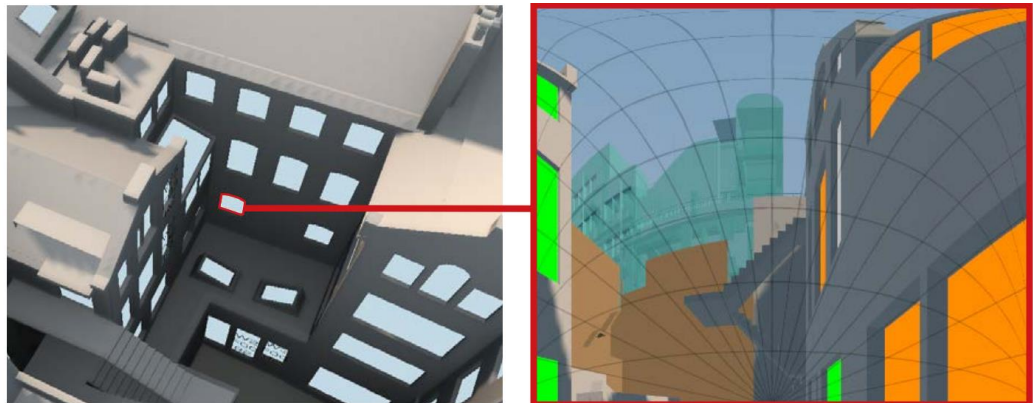


Image xx: Waldram diagram taken from the daylight/sunlight report of W5/F01 of 172a Arlington Road demonstrating how the recess of 172a Arlington Road restricts majority of daylight as opposed to the Proposed Development

11.26 Daylight Distribution (NSL)

- 9 of the 12 rooms tested meet BRE guidance. Of the 3 affected rooms:
 - 1 is a bedroom, which BRE guidance accepts is less critical for daylight. There would be a reduction from 76.5 to 36.5.
 - 1 room (LKD) will retain 52.8% NSL, considered good for an urban environment.
 - 1 room (living room) is in an enclosed area where the building's own design limits daylight. There would be a reduction from 51.9 to 37.8.

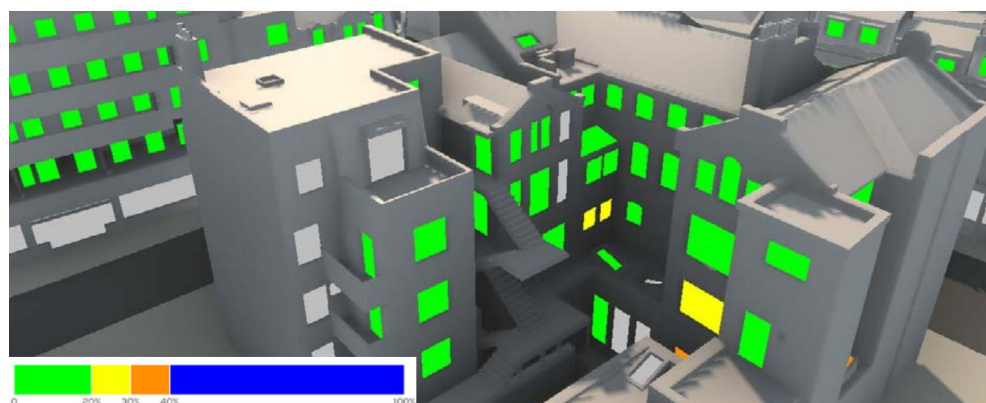


Figure 12: Window map of 16 Parkway and 72a Arlington Road depicting the relative NSL % loss taken from daylight/sunlight report

11.27 Sunlight (APSH) – All rooms meet BRE guidance

- 11.28 Conclusion – Although there are a number of windows with big changes in VSC, only 3 rooms do not comply in NSL of which one would still have a good standard of daylight for an urban area. The remaining rooms, highlighted as a bedroom and an enclosed one would have lower levels of sunlight. On balance with the information set out above and all the rooms meeting BRE guidance for APSH, it would not be considered a harmful loss of light.

175 and 177 Arlington Road

- 11.29 The mixed use properties at 175-177 (odd) Arlington Road are located south-west of the Site, with residential properties located on the upper levels.



Figure 13: Showing the location of 175 and 177 Arlington Road in red in relation to the site (green)

- 11.30 Daylight (Vertical Sky Component – VSC)
- 7 windows (53%) do not meet the BRE guidance. 1 window serves a room with other windows that keep overall daylight levels within guidance. 6 windows show only 'minor negative changes' (21–28% reduction), generally considered insignificant. All windows will still retain good daylight levels (mid-teens up to 21.3% VSC), which is acceptable for a dense urban setting.
- 11.31 Daylight Distribution (NSL) - 2 of the 7 rooms tested do not meet the BRE guidance. The 2 affected rooms are both at 177 Arlington Road and would see only minor changes (21–25% reduction), generally considered insignificant.
- 11.32 APSH – No windows oriented within 90-degrees of due south and therefore do not require an APSH assessment.

11.33 Conclusion – overall the impact to these properties would be minor.

179 Arlington Road and The Cavendish School

11.34 The educational use properties at 179 Arlington Road and the Cavendish School are located south-west of the Site. Although not residential, this has been tested to check the impact as schools can still rely on daylight amenity to a degree, although they also tend to be artificially lit too.



Figure 14: Showing the location of 179 Arlington Road and The Cavendish School in red in relation to the site (green)

11.35 Daylight (Vertical Sky Component – VSC)

- 23 windows of 25 do not meet BRE guidance. 18 of which would have a major negative reduction (over 40% reduction).
- Floor plans were not available, but site visits by the consultant and imagery suggest many rooms have rear-facing windows that likely provide additional daylight, meaning actual impacts may be less than reported.
- At Cavendish School, rear windows appear to offer unobstructed outlooks, which could help rooms meet BRE guidance.
- Some windows (e.g., at 179 Arlington Road) have frosted glass, indicating they may serve ancillary spaces rather than classrooms.
- Classrooms typically have deep layouts and already rely on artificial lighting during the day, so any changes would have limited practical effect.

11.36 NSL and APSH tests show compliance with BRE guidance.

11.37 Conclusion – while a school could be considered a sensitive use, it is not a residential use so does not have the same expectation of amenity – nor do

new schools have amenity standards applied to them. The impact is likely to be noticeable to the school, but many schools tend to be artificially lit throughout the day in any event, particularly in winter months. On balance, the impact is noticeable but acceptable.

Camden House - 199 Arlington Road

- 11.38 The residential property at Camden House is located to the west of the Site. It is in use as a probation hostel which is temporary and transient accommodation. Again, whilst not permanent accommodation, this was still tested to consider the impact on the rooms.



Figure 15: Showing the location of Camden House in red in relation to the site (green)

- 11.39 Daylight (Vertical Sky Component – VSC) - 21 windows would not meet BRE guidance. 5 windows show only minor changes (23–29% reduction), generally considered insignificant. 7 windows will have a ‘major negative’ reduction. However, overall the 16 windows with moderate or major impacts will still retain good daylight levels (15–26% VSC), which is acceptable for a dense urban setting.
- 11.40 NSL was not undertaken as the consultant was unable to find internal layouts for the property and APSH tests show compliance with BRE guidance.
- 11.41 Conclusion – The building provides temporary accommodation and occupiers tend to be transient due to its use as a probation hostel. Given it is not permanent accommodation less weight is given to the loss of sunlight/daylight, but as noted above the impacted rooms will still retain good daylight levels (15–26% VSC) which is acceptable within the context.

30 Inverness street (communal amenity space)

- 11.42 This communal amenity space has been considered in relation to overshadowing, and it does not meet BRE guidance. This has been appraised by undertaking a Sun Hours on Ground (SHOG) and a supplementary Sun Exposure (SE). It is noted that this space is located within an enclosed recess, where sunlight access is inherently limited, with only 53% (on 21st March) in the existing situation receiving at least 2hrs, and is therefore already restricted to sunlight access, relying primarily on direct sunlight from above the Site. The proposal will reduce this down to 19%. As such, any development on the Site would inevitably result in a reduction that will go below the target of 50% for 2hrs on the spring equinox.
- 11.43 A further additional SE test was measured from the 21st June. The test shows that circa 100% of the space would receive at least circa 3 hours of sun exposure in a day in the existing situation. This position would not change once the Proposed Development is erected and therefore sunlight access in the summer months is unlikely to be affected at all.

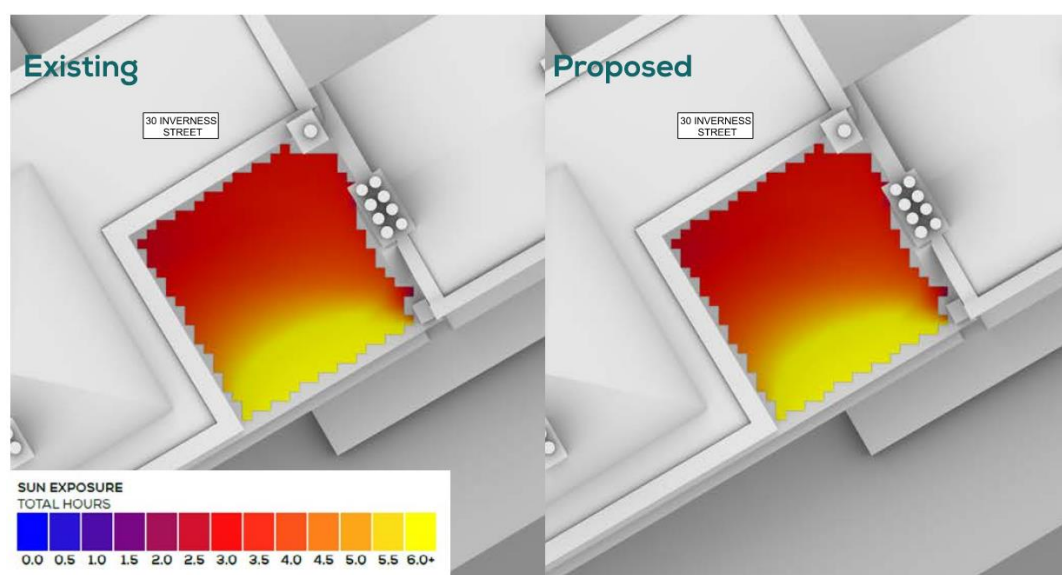


Figure 16: Existing vs Proposed Sun Exposure assessment tested on 21st June for amenity space at 30 Inverness taken from the daylight/sunlight report.

- 11.44 Approximately one-third of the space will also be exposed to 6+ hours of sun in both the existing and proposed situation on June 21st as shown in the figure above. There would be a notable impact on this space from autumn through to spring. However, the space is already enclosed with buildings blocking sunlight, which means that denser development will block even more sunlight. It is considered on balance as the summer hours are unaffected when the amenity space is more likely to be utilised that this is acceptable in this instance.

Conclusion

- 11.45 It is acknowledged that there would be some notable daylight / sunlight impacts on surrounding properties, but these are generally negligible to moderate and are considered acceptable in the urban context. Some of the buildings such as Camden House (Probation hostel) and the Cavendish School are not permanent residential accommodation and so the impact has been given less weight and the impacts are considered acceptable on balance.
- 11.46 There would also be some overshadowing of No. 30 Inverness street's communal amenity space. Nonetheless, the main impact would not be over the summer months and therefore the impacts on amenity are not considered significant and are acceptable and in accordance with policy A1.
- 11.47 It is acknowledged that the site is underdeveloped and has potential to intensify use of the site, in this case the development sought to strike a balance between making best use of land and trying to minimise the impacts on adjacent properties as far as possible. In this context, the impacts are considered acceptable and in line with denser housing sites in London and so overall, impact on light would be acceptable and in accordance with policy A1, especially having regard to the scheme's potential for housing delivery on the site.

Privacy, overlooking and noise

- 11.48 The proposals would not cause undue harm to neighbouring privacy or outlook given the Town Centre location. There is considered to be sufficient distance between the development's windows and neighbouring properties and no windows within the student rooms facing properties such as No.5 Inverness Street (shown with a green dot in the image below) which is closest to the development.

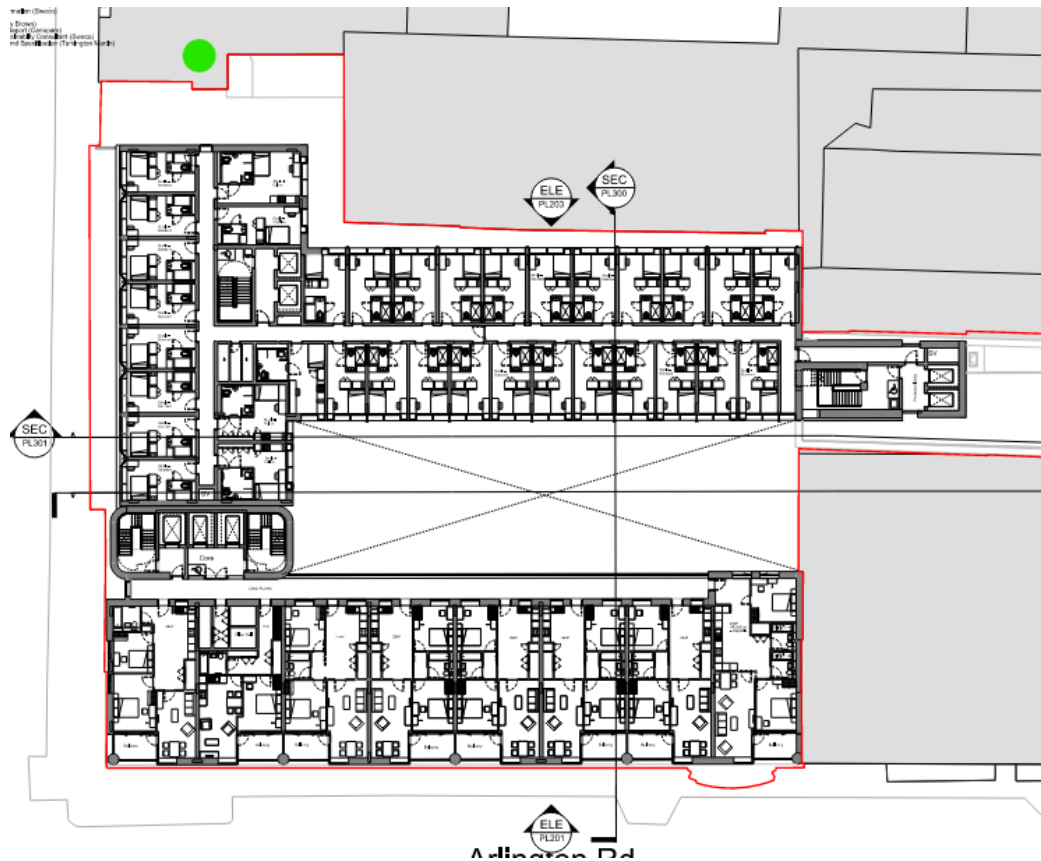


Image xx: Typical proposed floor plan showing the location of the development to neighbouring buildings.

- 11.49 In terms of plant noise and entertainment use, a noise assessment has been submitted and reviewed by the Council's noise officer who found it satisfactory subject to noise compliance (conditions 31 and 33), anti-vibration (condition 32) and soundproofing (condition 16) conditions being attached.
- 11.50 Concerns were raised around the student and entertainment use, but noise and disturbance will be mitigated through S106 obligations to secure a student management plan, non student management plan (for outside term time) and a Leisure/Cultural Management Plan which will also secure the operational hours of the future occupier. A delivery, servicing and waste plan will also be secured by a S106 legal agreement.
- 11.51 Given the above the proposals are not considered to cause undue harm to the neighbouring amenity.

12. CONTAMINATED LAND

- 12.1 Contaminated Land is assessed under Policy A1 and a Phase I Desk Study was submitted for assessment. The Council's Contaminated Land Team have reviewed the details and concluded that a condition securing a Land Contamination Risk Assessment should be attached (Condition 8).

13. HEALTH IMPACT

- 13.1 Camden Local Plan policy C1 seeks to promote strong, vibrant, and healthy communities and requires major development proposals to include a Health Impact Assessment (HIA). Accordingly, a HIA has been submitted with the application and reviewed by an officer from London's Healthy Urban Development Unit (HUDU). The HUDU officer concluded that it demonstrates alignment with Camden's planning and health strategies. Also, that the finished development is expected to have a neutral to moderately positive impact on health and wellbeing.
- 13.2 To mitigate potential negative health impacts from construction phases in terms of noise, dust and pollution, a Construction Management Plan would be secured via section 106 agreement in line with the development plan.

14. URBAN DESIGN

Policy

- 14.1 The Council's design policies aim to achieve the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality to improve the function, appearance, and character of the area; Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Context

- 14.2 The site is located at the edge of Camden Town Centre, forming a significant part of its urban block. It faces Arlington Road, mainly residential with varied architecture, and Inverness Street, which features historic terraced housing and modern infill developments. The site also borders Parkway, a busy commercial street lined with tall Victorian and Georgian buildings.
- 14.3 The area was originally dominated by 19th-century terraced houses, with density increasing over time. The construction of Gaumont cinema in the 1930s transformed the block's character. Split into two uses in the late 1960s, the building's blank ground floors have since defined the streetscape, while the Parkway frontage has been repeatedly altered.
- 14.4 Development at different times has produced a mix of architectural styles and uses, including residential, retail, office, and hotels. The site lies within the Camden Town Conservation Area, near Primrose Hill and Regent's Canal conservation areas. Camden Town CA contains both commercial and formal residential zones, with listed buildings concentrated in the latter. Recent changes have introduced larger, lower-quality commercial buildings. Primrose Hill CA is characterised by smaller cottages, grand terraces, and

villas, many statutorily listed, with white render and yellow stock brick as common materials.

- 14.5 Outside the conservation areas, the context includes modern offices and some residential buildings. Key heritage assets nearby include the Grade II listed Arlington House. The area's material palette is diverse, ranging from traditional brick to innovative high-tech constructions such as the Grade II listed Sainsbury's Superstore. As a result, the site connects a range of urban forms, heights, and architectural styles, each boundary relating differently to its surroundings.

Site appraisal and opportunity

- 14.6 The existing building offers limited value to the streetscape, with no ground floor activation or opening to the street or public realm except on Parkway, creating a hard edge to an otherwise animated Inverness Street, and contributing to a hostile pedestrian experience by exacerbating issues such as drug-related crime and anti-social behaviour. Inverness Street Market taking place across the site, is significantly affected by these issues which are made worse by the lack of activated, inviting frontages on the south side of the street.
- 14.7 Whilst the existing building has some character and interesting detailing derived from an architectural language reflecting its previous theatre use, it has no interaction with the street, both on Inverness Street and Arlington Road, despite forming a prominent corner.
- 14.8 The Parkway frontage still communicates the building's historic use as a cinema since the late 1930s, despite undergoing many alterations and changes over time, some more successful than others. The later additions retained some of the original 1930s elements, such as the semi-circular fin at the top, but introduced materials of a lower quality that appear tired and less characterful than the previous changes. The modern shop-front entrance at ground floor is dark and uninviting, with a small step navigating the sloping street which presents a barrier to those with impaired mobility which will include those with protected characteristics such as age and disability.
- 14.9 There is potential to improve the contribution the site makes to the local streetscape and the Camden Town Centre by:
- Improving the relationship of the building to the street by introducing dynamic and active frontage along Arlington Road and Inverness Street;
 - Increasing the number of entrances and attractive ground floor expression to improve safety, pedestrian experience and permeability into the site;

- Stitching the site back into its context and respond to the varying boundary conditions through high quality architecture;
- Improving the relationship with Inverness Street Market through the activation of the south side of Inverness Street;
- Celebrating and improving the Parkway frontage by reinstating historic features and making it more inviting;
- Introducing high quality public realm;
- Improving biodiversity and greening;
- Introducing amenity provision;
- Continuing the historic leisure/cultural provision of the site that the local community values;
- Optimising an underdeveloped, soon to be fully vacant site that has good connectivity to public transport, and
- Improving its relationship with the wider context and conservation areas.

Assessment

Design Response

- 14.10 The proposal involves an almost total demolition of the existing buildings to deliver a successful proposal that draws from and interprets the positive features of both the immediate and wider context within the historic but eclectic environment of Camden Town Centre.
- 14.11 The proposal is a confident proposal delivering a mixed-use scheme with high quality housing in a tight urban context that has experienced piecemeal development of varying quality in the past, and confidently creates an architecture that is both contemporary and contextual. Seeking to respond to the challenge of designing a building with frontages along two streets on a prominent corner and an entrance on Parkway, the design clearly communicates the different uses through contrasting architectural languages and significantly improves the relationship with the streetscape.
- 14.12 The main components of the proposal include:
- A courtyard block split into an affordable housing building mostly facing Arlington Road and forming the corner with Inverness Street, which comprises of 49 affordable housing units and a landscaped courtyard garden;
 - Student housing arranged in an L-shape, facing Inverness Street continuing in the centre of the urban block and linking to the Parkway frontage to deliver 244 student beds; and
 - A commercial/leisure use accessed from Inverness Street across ground and basement.
- 14.13 During the course of the application, revisions were received to the rooftop plant enclosures and PBSA core. The revisions aim to improve these

features relationship with the building in terms of their form and materiality. The PBSA core which is visible from Parkway, has been simplified to look cleaner and more consistent, while adding details that make the street level more interesting. These changes help the building fit better into the surrounding area and create a better interface for the public realm.

Site Layout and Ground Floor

- 14.14 The proposal's layout makes clever use of the site's large portion of the urban block, introducing buildings fronting both Arlington Road and Inverness Street and creating a raised residential courtyard in the centre. The scheme achieves a successful plan diagram with an independent student block with a main entrance on Parkway and commercial and leisure uses at ground floor on Inverness Street, as well as a courtyard housing building with gallery access for the upper floors and duplexes at ground.
- 14.15 Driven by operational and regulatory requirements, such as the location of student block stair cores led by fire regulations for buildings over 18m, the final site layout shifts the leisure entrance from Parkway to Inverness Street. Whilst losing the cultural entrance on Parkway to a student entrance, the need for the change is understood and leads to a significant and positive increase in leisure frontage along the south side of Inverness Street, transforming a currently blank elevation into an activated ground floor, increasing visibility, passive surveillance of and relationship with the street by introducing three new entrances where there are currently none.
- 14.16 The generosity of the commercial and leisure ground floor frontage in the student block was negotiated and achieved in the pre-application conversations, leading to a taller floor to ceiling height than initially proposed (3.85m) and a frontage free of inactive servicing doors and exits. The introduction of the scalloped, illuminated canopy – a nod to the original 1930s canopy of the Parkway frontage – seeks to highlight the building's cultural function in a similar way to the cinema design. The canopy further increases the visual height of the ground floor, contributing to the generosity, openness and animation of the frontage, simultaneously providing shelter.
- 14.17 The Parkway student entrance retains the civic, shop front quality of the ground floor and reinstates the 1930s lost canopy to provide shelter and an inviting frontage for both students and the new public cafe provided.
- 14.18 For the affordable housing block, the ground floor contains a retail unit successfully activating a previously impermeable, blank corner between Inverness Street and Arlington Road. To further activate the residential block's ground floor, the main entrance and reception has been located on Arlington Road, together with the individual entrances for the duplexes, introducing activity on a currently blank frontage 55m long. This is seen to be a more suitable location for domestic entrances than Inverness Street,

whose relationship is much closer to Camden High Street and the commercial and retail character of the Town Centre than Arlington Road, a much quieter street.

- 14.19 The provision and location of the residential entrances will help to enliven the ground floor of the building, engage with the prominence of the corner and provide a better relationship to the streetscape. The dedicated cycle store adjacent to the main residential entrance and the provision of defensible space for the 4 duplexes which provide privacy, help to introduce activity and greenery, significantly improving the pedestrian experience along Arlington Road. The scheme is therefore seen to successfully integrate good urban design principles and provide high quality residential entrances in a dense, urban context, helping to mitigate existing issues at ground floor.
- 14.20 A key and welcomed design move, which was the result of feedback received from the DRP panel, was to reduce the initial two storey basement to one to simplify construction and logistics, and crucially to decrease the embodied carbon associated with the excavation process and reinforcement of the second basement. This move has also allowed for the residential courtyard to be lifted by one storey, increasing daylight, usability and significantly improving the quality of the space. The reduction in basement has also enabled the moving of the cycle store from basement to ground floor, improving accessibility by providing direct, level access for cyclists, and giving direct access to the courtyard to the residents of the ground floor duplexes, who previously would have had to exit onto street level before reaching the courtyard via the lift and stair core.
- 14.21 The site layout will ensure high quality homes – all units are dual aspect except for the 3 x 1 bedroom flats, with views of the shared courtyard enabled by the external gallery access, with the majority of balconies being south-west facing and located off the living space, all of which is commendable for a tight urban context. The refinements and changes mentioned above have been instrumental in achieving a scheme that maximises the tight urban plot, whilst delivering high quality spaces for all users of the building.

Scale and Massing

- 14.22 The proposed building is 8 storeys across both the student and residential blocks, plus a full storey basement dedicated to the leisure use, which is considered acceptable, and the approach to massing appropriate for the context which includes taller buildings, mostly notably the Grade II listed Arlington House.
- 14.23 The approach to the proposed building's massing responds to its tight urban context and taller buildings found north of Inverness Street towards the Regent's Canal, but keeping below the LVMF view 2B.1 (Parliament Hill – Elizabeth Tower: 63m) with a maximum datum of 58.775m. The verified

views provided in the submission demonstrate that the proposal sits comfortably in its context, without being overbearing or dominant, and steps have been taken to refine the massing to reduce any potential impact.

- 14.24 The residential block is comprised of 8 storeys which is considered an acceptable height for a building in this location. The massing has undergone many iterations throughout the pre-application process, testing different configurations for the roof profile. The final proposal builds on feedback from both Camden officers and the DRP panel, settling on a flat top floor and introducing rhythm to achieve a more dynamic parapet line, echoing that of Arlington House. This is achieved by stepping back the top floor from the front of the building line while continuing the strong vertical piers, creating a zig-zag effect and articulated bays which will add visual interest to the top of the building. The change in massing at the top floor was also influenced by engagement with the local community, who preferred a lower profile on the corner of Inverness Street.
- 14.25 One key design move is making a feature of the lift core located on the Inverness Street, expressing it as a tall vertical element, a nod to Camden's Victorian industrial heritage which included many tall chimney stacks, and referencing the fly tower of the existing building. The location and emphasis of the stair core is a visual marker for the affordable block in long views, and provides a divide between the housing and student blocks, which is welcome.
- 14.26 This language of vertical elements continues elsewhere in the proposal, anchoring the scheme in Camden's history and creating character where there is currently very little. The student block stair core, which references a chimney stack, is acknowledged to be visible behind the set of buildings on Parkway, however its requirement and location is understood, being driven by fire regulations. Steps have been taken to refine this vertical element, reduce visual clutter whilst aiming to retain a playful approach to expression, as found elsewhere on Camden High Street and the proposal itself. Condition 6 secures the final design and details of this stair core.
- 14.27 The student housing block is also comprised of 8 storeys plus a basement, which is considered an acceptable height for a building in this central location close to Camden Town tube station. The massing has been refined throughout the pre-application process, concentrating it towards the centre of the site by the stepping back of the top two floors. This helps mitigate the impact of the building's height and dominance on the streetscape.

Appearance and Detailing

- 14.28 The scheme has been designed with attention to composition and detail across all elevations, with a series of key design principles shaped by use,

street condition and articulation related to immediate and wider Camden context.

- 14.29 The scheme takes different approaches to appearance for the affordable housing and the student blocks, which is successful in helping break up the perceived bulk of the overall proposal and clearly delineates the different uses and functions. These two contrasting approaches speak to the identified architectural styles found in Camden – contextual, referenced in the affordable housing, and experimental, referenced in the student block.
- 14.30 The internal layout of the affordable block dictates much of the appearance and architectural expression of the building. To maximise dual aspect units, the gallery access serving all floors except ground, doubles as circulation space, creating visual connections to the communal courtyard. The introduction of stacked duplexes not only makes for good quality family homes, it also allows for most flats to have recessed balconies on the south-west facing Arlington Road elevation. These are accessed off living spaces, which together with the corner windows, maximise daylight.
- 14.31 This clever organisation of internal space allows the street elevation to be dynamic, full of character whilst being contextual, picking up cues from the immediate context of Gloucester Crescent and traditional Victorian and Georgian terraces found in the immediate context. The elevation is split into a base, middle and top, articulated through a series of vertical brick piers and pre-cast columns, and horizontal bands which create rhythm, layers of texture and decoration through the juxtaposition of shifting planes allowed by the recessed balconies, and a contextual material palette.
- 14.32 The base of the building is emphasised through both materials and appearance – the ground floor duplexes provide an opportunity to create double height space, further articulating the elevation, providing depth and interest, which help improve the relationship with the street. Setting back the living space from the street enables the introduction of planting to provide defensible space and privacy.
- 14.33 Tuning the corner, the architectural expression and detailing changes subtly to bridge between a language belonging to the residential housing and that found on the student block. The recessed balconies emphasise the corner via the vertical pre-cast column. The two circular windows at the top floor introduce a playful element to the corner, signalling the play space behind.
- 14.34 The appearance of the affordable housing block has been refined throughout the pre-application process as a result of feedback from Camden officers and the DRP panel; key moves have been the introduction of pre-cast columns as secondary vertical elements, the significant reduction of glazing on the Arlington Road elevation to mitigate against overheating and provide more usable space internally. This series of carefully considered details here are

an essential part in adding richness, depth and character to the block which sits comfortably in its context, and should be retained in the next stages of design development (Secured by Condition 6).

- 14.35 Whilst the architectural expression and detailing of the student block has changed significantly over the course of the pre-application period, particularly on Inverness Street, the intent has remained the same – to reference Camden’s legacy of high-tech architectural language and more efficient construction methods found in the nearby context, most notably the Sainsbury’s Superstore. This change in approach to architectural expression is welcome in differentiating the block from the affordable housing block.
- 14.36 Similarly to the affordable housing block, the Inverness Street elevation is split into a tall and open base made more generous to clearly communicate the leisure/cultural use and increase engagement at street level; a middle which expresses the modular construction employed in the student rooms in the strong rhythms of the elevation; and a recessed top. The detailing of the elevation is particularly important here, where the regularity of the internal layout provides little relief from what is a relatively flat surface.
- 14.37 Steps have been taken to introduce character, interest and refine the elevation: the profiled horizontal spandrels, the ventilation panels behind the perforated mesh screen and integrated rainwater pipes which reference an honesty of materials and construction found on post-war modernist buildings. Careful detailing and consideration of use is further emphasised in the sill height of the horizontal spandrels being set at desk height to reduce visual clutter externally. The detailing and expression of the top floor are deliberately calmer to help reduce visual impact on the streetscape, while the courtyard facade introduce functional elements which mitigate against overheating, such as deep vertical fins and a recessed glazing line.
- 14.38 The triangular chamfers which introduce an element of playfulness to the facade is further picked up in the ground floor canopy, creating cohesion to the elevation, while the signage present on the eastern end of the elevation speaks to the retail use and eclectic nature of Camden High Street. The canopy is conditioned to ensure the elements which introduce playfulness and character to the building are high quality and durable (condition 6). It is noted that the signage would be covered by a separate advert consent.
- 14.39 On the Parkway elevation, the expression and detailing retain the architectural language of the cinema use, enhancing it by introducing profiled glass to allow daylight into the student amenity spaces, and public art which pays tribute to the original elevation that had a signage frame displaying film listings. The beacon, a feature that has survived the many changes undergone by building on Parkway, is retained and improved to act as a wayfinding element and create cohesion between the various vertical elements found throughout the scheme.

- 14.40 Whilst they are not enclosed within the envelope of the building, the plant enclosures on both buildings have been designed to minimise visual clutter, and detailing has been added to integrate them into the buildings' architectural language more. Additional refinement is expected as the design progresses, and the development of the plant enclosure design would be conditioned to ensure a high quality and integrated approach. Condition 6secures further refinement and the final details of the plant enclosures. A S106 obligation secures the Parkway Art Plan.

Materiality

- 14.41 The material palettes are distinctly and purposely different between the two uses to distinguish their different functions. The palettes are of a high quality, robust and durable, considered to respond appropriately to the character of the area in line with policies D1 and D2 (Camden Local Plan, 2017).
- 14.42 The affordable block palette, which takes cues from the immediate residential context where brick is the predominantly material, has been refined to create a palette that is distinctive without competing with the red brick materiality of Arlington House further up the street, which is welcome in the proposal.
- 14.43 A careful combination of darker London stock brick forming the vertical piers, a nod to the Gloucester Crescent terraces; the white pre-cast elements, such as the ground floor plinth, the columns and horizontal banding; and darker elements which add accents and colour in the balconies, railings, window frames and the ceramic tiles found in the double height ground floor, contribute to a rich, textured and characterful building that sits comfortably in its context.
- 14.44 The student housing block's palette stands in contrast to the affordable block, introducing a materiality referencing the experimental expression found in Camden Town. Profiled aluminium metal panels in a matt finish form the horizontal spandrels and the primary material found on the Inverness Street elevation, while perforated aluminium adds accents of colour in the vent panels and the thin vertical columns connecting the ground floor to the building's shoulder line. Smoother aluminium finish is found on the top two floors and on the courtyard elevations which is a direct response to site conditions and orientation.
- 14.45 The design relies on the quality and subtlety of materials and detailing to deliver a texturally rich, and robust building that will enhance the streetscape and sit comfortably in its context. These should therefore be conditioned to ensure a building of the highest quality with a durable finish that weathers gracefully.

Landscape

- 14.46 The proposal contains a communal landscaped courtyard used by the affordable housing residents. Its design has evolved in conversation with Camden officers and as a result of DRP feedback, most impactfully when the second basement was removed and the courtyard raised. The proposed design helps soften the relatively close proximity of the buildings, offering opportunities for social interaction and play, balancing environmental benefits with visual amenity for all users. The visual connection between the courtyard and the residential units via the gallery access is particularly successful in such a tight urban environment.
- 14.47 The play space's location has been changed as a result of feedback from officers to be directly accessible from the staircore, and sits next to a community room open to residents. Natural light, shade, shelter and sensory planting have been considered and included in the design to deliver a play space that is engaging and offers opportunities for play and interaction.
- 14.48 The success of the scheme relies not only on the architecture, but also on the quality of the materials and richness of the planting palette across the courtyard and terraces, and the way people move through those spaces. These should therefore be conditioned along with a maintenance plan to ensure a holistic scheme that delivers for the users and is successful in the long term (condition 6).

Design Review Panel

- 14.49 The proposals were seen by the DRP in May 2025. The panel were supportive of the design strategy, and the regeneration of the site to provide a mixed-use scheme that retains the leisure use. The panel was comfortable with the height and massing of the proposal. A number of changes were made to the scheme to address some of the comments and issues raised by the panel.
- 14.50 The panel questioned the sustainability strategy of the scheme and expressed concerns regarding the provision of two basements. The suggestion to remove the second basement, which would help provide a leisure use that is located at street level, was taken on board, creating a more successful and considered scheme.
- 14.51 The panel took the view that the architectural expression and massing, particularly that of the affordable block, could be more playful as many building in Camden Town. This has resulted in an affordable block crown referencing Arlington House through its playful roof line, and changes in the student block's architectural language to be more characterful.
- 14.52 The changes made sufficiently addressed the comments made by the panel.

Conclusion

- 14.53 This high-quality design response draws on surrounding influences, responding creatively to the site and is welcomed. The development significantly improves the relationship of the building to the street, introducing dynamic, active frontages along Arlington Road and Inverness Street, increasing the number of entrances and creating a ground floor that is inviting and open. The pedestrian experience will be enhanced and overall, the buildings will help strengthen the character of Camden Town Centre.
- 14.54 Composition and detailing have been well considered, and this proposal demonstrates a high-quality example of how to positively plan for a growth in both a historic environment and central urban location. The considered attention to the composition of the facades and intricate detailing will enhance the architectural character of the existing streets.
- 14.55 A S106 obligation is secured to retain the architect to ensure that there is a consistency and quality retained with the development.
- 14.56 The Council's Designing out crime officer was consulted on this application and requested that the site to achieve a secured by design accreditation to silver award and to maintain this standard through the life of the development. This is secured by condition 23.

15. HERITAGE

Designated and non-designated heritage assets

- 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 where the development is in a conservation area, special regard must be given to preserving or enhancing the character and appearance of that conservation area.
- 15.2 The site is not listed but it is within the Camden Town Conservation area and adjacent to the Primrose Hill Conservation Area (as shown below).

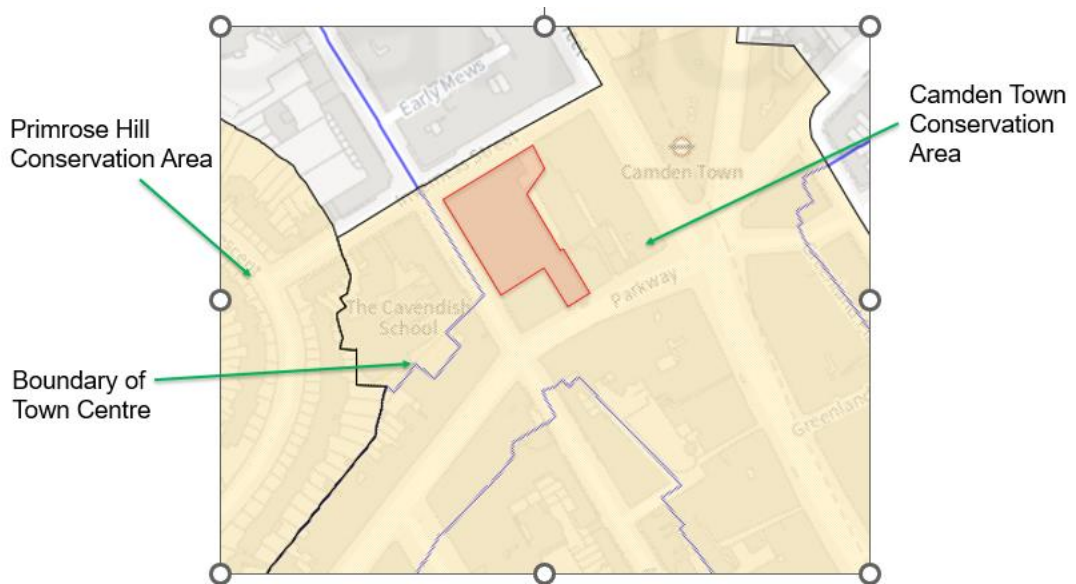


Figure 17: Map showing the location of the Conservation Areas in relation to the site.

- 15.3 While not located directly adjacent any listed buildings, the site is located close to Grade II listed properties at Arlington House north of the site and the terraces found in Gloucester Crescent west of the site (all shown in dark blue). There few lampposts on the local list found on Arlington Road, shown in light blue on the image below.



- Light blue – Locally listed
- Dark blue – Grade II listed
- Yellow – Conservation Area
- Red – Application site

Figure 18: Map showing the heritage assets in relation in relation to the site.

Site and Significance

- 15.4 The Camden Town Conservation Area Appraisal and Management Strategy has regard to the existing building as follows:

The Odeon frontage at No 14 gives a streamlined vertical emphasis. A former Gaumont Cinema designed by W E Sydney Trent and Daniel

McKay, it was erected in 1937 on the site of the Royal Alexandra, Camden Town's first major entertainment venue dating from 1873. The cinema was reopened in 1997 as a multi-screen cinema, the Art Deco frontage restored.

Arlington Road: this eastern stretch of the street is dominated by the flank of the Mecca Bingo Hall, part of the 1930s Odeon development, which makes a distinct contribution to the Conservation Area by way of its dramatic pantiled roof slope recalling early 20th century architecture in the Low Countries

- 15.5 The Conservation Area Appraisal and Management Strategy does not list the cinema in the list of positive contributors, but it clearly notes that the building makes a contribution to the character and appearance of the conservation area which is distinctive and positive. Further to this, the Camden Town Conservation Area map (Camden Town Conservation Area Townscape Appraisal 2006) identifies the existing building as positive and a focal building.
- 15.6 Officers consider the cinema buildings to be positive contributors to the character and appearance of the conservation area and so they are non-designated heritage asset.

Camden Town Conservation Area – Less than substantial harm

- 15.7 The Camden Town Conservation Area can be divided into two sub areas of distinctly different character, a busy commercial and retail area, and a quieter more formal residential area. The subject site is within the commercial sub area.
- 15.8 The commercial sub area consists of a traditional wide shopping street linking the busy junction at Mornington Crescent to the eclectic and lively town centre at the heart of Camden Town. The focus of Camden Town is Britannia Junction which acts as a hub and an important interchange, with busy, noisy, dynamic and diverse characteristics. This retail and commercial area is powerfully urban in character with few openings between the continuous building lines and an absence of public open spaces and soft landscaping. Within this part of the Conservation Area there are two underground stations, an array of banks, restaurants, street markets, shops and stalls, signs and vehicles all existing within an historic architectural streetscape. As described in the design section, the buildings in this area reflect the diverse and changing architectural styles over the last two hundred years. Terraces of flat fronted early to mid 19th century houses now fronted by shops, mid Victorian stucco terraces, Victorian Gothic buildings, late Victorian and Edwardian red brick parades four and five storeys high with decorative gables, imposing banks, places of entertainment and public

houses occupying key focal sites, and 20th century buildings all contribute to the wide ranging variety of architectural styles.

- 15.9 To the east, the backs of the retail premises on Camden High Street are accessed by cobbled mews which today are still largely in commercial use. Beyond the commercial interests are areas of late 18th and early 19th century residential development while to the west of the High Street narrow passage-ways link through to quiet tree lined streets forming the residential sub area. These streets of stock brick and stucco terraces date from the early to mid 19th century and are more consistent in character, and are in marked contrast to the dynamic, busy commercial frontages. The Conservation Area has a high proportion of 19th century buildings both listed and unlisted, which make a positive contribution to the historic character and appearance of the Conservation Area. There is an overall 19th century architectural and historic character and appearance throughout. The conservation area contains a number of listed buildings. The building within most immediate proximity to the subject site is the GII listed Arlington House. The impact of the proposal on the setting of this listed building is assessed later. There are also GII listed terraces on the southern end of Arlington Road: 157 and 159 Arlington Road, 101-145 Arlington Road, 104 Arlington Road (substation) and at 35-37 Parkway and 57-59 Parkway. However, all of these listed buildings are visually disconnected from the site given their distance and siting, so there will be no impact on their setting or significance.
- 15.10 The site is also within the setting of a number of locally listed lampposts on Arlington Road. As with most street lighting, these are located along the pavement for reasons of utility, and their significance relates to their age (although three are good replicas), function, and ornamental qualities. The proposed development is not considered to have any effect on their significance as survivals of late C19th street lighting as they will continue to be appreciated as such and are not within an intact late C19th streetscape.
- 15.11 The site and its significance to the Camden Town Conservation Area is outlined in the relevant paragraph above. The development is considered to cause less than substantial harm to the Conservation area as set out below.
- The loss of the existing building and the proposed replacement
- 15.12 The cinema entrance is part of the commercial terrace on the north side of Parkway. It features a modern frontage which has since been altered and has lost some of its original character. The rest of the building that fronts onto Arlington Road and Inverness Street is brick, with a large pantile roof and a fly tower to the rear. It is proposed to demolish all of the existing building with the exception of the Parkway frontage.
- 15.13 The harm caused by the demolition would be substantial harm to the non-designated heritage asset (the building itself) because the majority of the

building would be demolished. However, this harm is a matter of planning balance and judgement.

- 15.14 The demolition and replacement with the proposed building would also cause harm to the character and appearance of the conservation by reason of the loss of the historical and distinct features of the original building which are not replicated in the replacement. The brick frontages of the site have a distinct character, and while they are blank and somewhat “dead” as a street frontage they nonetheless show interesting massing and handling of the functional facades of the building. They also have evidential value as part of the entertainment history of the Camden Town area (a music hall pre-dated the current building on the site). The Arlington Road frontage is a particularly unusual example of a Dutch Expressionist type of architecture being used on a British cinema. The flytower is a local landmark. Whilst references to these features and site history are made by the replacement building, they would not contribute to the area’s significance to the same degree. As such, the proposal would harm the significance of the conservation area (the designated heritage asset) but at the lower level of less than substantial harm.

Retention and refurbishment: Façade

- 15.15 The Parkway frontage is also identified as a local landmark and it is to be retained and refurbished. The evidential and townscape of that part of the site, and its contribution to the character and appearance of the conservation area, would be preserved and enhanced.

Loss of the Cinema Foyer

- 15.16 Although the existing building is not listed, and therefore the Council cannot directly control the demolition of the interior of the foyer, the foyer is clearly an important element of the 1930s character of the cinema entrance to Parkway. Furthermore, it will be publicly visible from the pavement.



Figure 19: Historic images from 1937 showing the foyer when originally built (left) and in the 1980's (right)

- 15.17 Whilst the foyer retains some of the original plasterwork, and the original Streamline Moderne style remains broadly legible, incremental changes over time have eroded much of the character of the original design. The original panelling, flooring, and some of the other detailing has been lost or altered over time. See image xx below of how the foyer appears today.



Figure 20: Photo of existing cinema foyer taken 2025

- 15.18 Whilst the removal of the foyer is not controlled and does not impact the wider conservation area, concerns were raised by the Cinema Theatres Association and Historic Buildings and Places about the loss of this feature. The heritage note prepared by the applicant sets out that it is not possible to retain this element as the application requires the demolition of the foyer to provide the new core, the location of which is dictated by fire regulations.

- 15.19 To address this concern about the loss, the applicant has agreed to provide a new foyer which closely resembles the former 1930s foyer in its materials, character and detailing and reinstates more the original appearance of the foyer than the present, altered, foyer does. While the original staircase, proportions and fabric of the original foyer would be lost, given the building is not listed the provision of a new interior which resembles the original foyer to some degree is welcomed. This also has the advantage of making the retention of the façade more convincing as the public views into the building will show an entrance which matches the 1930s appearance of the retained façade. A details condition (6) is attached to secure its final appearance.



Figure 21 : Visualisation of how the new student entrance foyer could appear (final details to be confirmed by condition).

New build: Housing block

- 15.20 The housing block primarily fronting onto Arlington Road is of a greater height than the existing cinema building frontage to Arlington Road. However, the proposed height and massing of this block is considered to be acceptable in the context of the conservation area. The buildings on the northern part of Arlington Road are of varying heights and massing and the proposed height and massing would not appear incongruous in this context.
- 15.21 The site is within the setting of the Grade II listed Arlington House (located outside the conservation area). The proposed height, massing and materials are not dissimilar to Arlington House but the building is of a different architectural style which does not compete with the dominance of Arlington House in the streetscape. The setting of Arlington House would be preserved.

- 15.22 The site is also within the setting of the listed buildings at the Inverness Street junction with Gloucester Crescent (all at Grade II). However, the proposed building is not considered to adversely affect the setting of these buildings as their context and streetscape presence is very different in style and character to the more commercial frontages of Arlington Road and the Inverness Street market area.
- 15.23 The proposed lift shaft on the Inverness Street frontage follows the form and materials of the existing flytower. While the lift shaft is not considered to offset the less than substantial harm caused to the conservation area by the demolition of the fly tower, it is nonetheless a response to the original form and character of this part of the site, helping to minimise the harm.

New build: Student block

- 15.24 The new student block occupies a site which is partly occupied by the rear service area of the cinema and partly an area of hardstanding. The form, height and massing is considered to be of an appropriate scale within the streetscape of this part of the conservation area given the substantial scale and massing of the existing cinema and the height and massing of Number 5 Inverness Street.
- 15.25 However, the student block also requires a core which will be visible from a range of views along Parkway and the Camden High Street Junction. In this context it appears as an incongruous element in the primarily Victorian and early C20th streetscape by being of a very different form, scale, character and materiality. It causes a degree of harm to the character and appearance of this part of the conservation area which is primarily composed of a series of C19th and early C20th buildings of 3-4 storeys with very little mass rising behind the depth of their plots. The harm caused would be at the lower end of the less than substantial scale.
- 15.26 However, it is accepted that this core is required in this location for fire safety purposes. Given the necessity of its provision, it is also accepted that it has been given an architectural treatment through rounding its form to at least partly soften the visual impact which it has on the character and appearance of the conservation area. The design approaches minimise the level of harm. As already referenced in the Design section, further refinements to the design of the metal clad lift core are forthcoming under details secured by conditions.

Primrose Hill Conservation Area – No harm

- 15.27 Its character and appearance comes predominantly from the layout of streets lined with Victorian townhouses, set out in terraces. The application site lies adjacent to sub area 4 (Gloucester Crescent) which, although geographically isolated from the main body of the conservation area, it is linked in terms of historical development and architectural form.

- 15.28 This sub-area has abundant trees and vegetation and a lower density of development in comparison with the main body of the Conservation Area. Most buildings are set back from the highway with large front garden spaces containing mature trees. Rear gardens are also visible through gaps between building groups
- 15.29 The proposed development is not considered to adversely affect the setting of the Primrose Hill Conservation Area because it forms part of an area of townscape which is already very different in character to the primarily C19th residential streetscape of the eastern boundaries of Primrose Hill and it would be read in the context of existing C20th development.

Arlington House (Grade II listed) – No harm

- 15.30 The site is within the setting of the Grade II listed Arlington House (located outside the conservation area). Formerly the Camden Town Rowton House, this building dates from 1905. The list description outlines both its special architectural and historic interest. Its architectural interest comes from its imposing landmark design, using red brick, terracotta dressing and a distinctive roofscape.
- 15.31 Its historical interest comes from its being the last and largest of London's well-known Rowton Houses, built to provide accommodation for single men in the late nineteenth and early twentieth centuries. They illustrate a phase of history when philanthropists started to provide purpose-built facilities to accommodate workers due to concern over the squalid housing of the time.
- 15.32 The proposed height, massing and materials are not dissimilar to Arlington House but the building is of a different architectural style which does not compete with the dominance of Arlington House in the streetscape. The setting and so the significance of Arlington House would be preserved.

Gloucester Crescent (Grade II listed)– No harm

- 15.33 The site is also within the setting of the listed buildings at the Inverness Street junction with Gloucester Crescent. The listed 24-41 Gloucester Crescent's special interest comes partly from their architectural design and elevational hierarchy and their group value as a cohesive and planned formal piece of townscape. They are typical of Victorian townhouse development from this time, when the urbanisation and growing wealth of London required the construction of housing to accommodate the expanding middle classes.
- 15.34 24-29 Gloucester Crescent form a wider group with 30-35 and 36-41 as the buildings are largely identical. They share many features including building heights, materials, plot widths and fenestration which create a strongly defined unifying character. There is a strong parapet line terminating the façade, above which other buildings are not visible.

- 15.35 The proposed building is not considered to adversely affect the setting of these buildings as their context and streetscape presence is very different in style and character to the more commercial frontages of Arlington Road and the Inverness Street market area. The development is considered to preserve their setting and so their significance.

Conclusion

- 15.36 The proposal would preserve the significance of most designated heritage assets around the site.
- 15.37 Officers have identified harm to the Camden Town Conservation Area. The harm stems from the loss of historical and distinct features of the original building being demolished which are not replicated in the replacement, as well as from the scale of the student block core visible over the Parkway buildings. The harm is less than substantial and at the lower end of the scale.
- 15.38 Although the harm is at the lower end of less than substantial, considerable weight and importance should be given to that harm, and it should be outweighed in the balance by considerable public benefits.
- 15.39 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.

- 15.40 The demolition of the majority of the current building will clearly cause that building less than substantial harm. The building itself is a non-designated heritage asset and so this harm will be taken into consideration in the planning balance.
- 15.41 With respect to the heritage harm identified it is considered that the development during the pre-app process and revisions received during this application have sought to mitigate this harm as far as possible through a range of design decisions including materials and distribution of massing on the site, while achieving a denser site that delivers on a number of the Council's priorities including significant housing delivery.

16. BASEMENT IMPACT ASSESSMENT

- 16.1 Camden Local Plan policy A5 (Basements) seek to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.
- 16.2 The application was accompanied by a Basement Impact Assessment (BIA) authored by individuals with appropriate qualifications. A Ground Movement

Assessment (GMA) and a Building Damage Assessment were also submitted for assessment. The council's basement consultant (Campbell Reith) carried out an independent review, reviewing the documents for potential impacts on land stability and local ground and surface water conditions arising from basement development.

16.3 The BIA includes a screening and scoping assessment. The BIA confirms that the proposed basement will be found within Made Ground over London Clay Formation, over Lambeth Group, Thanet Sands and Chalk at depth.

16.4 The BIA audit review dated November 2025 concludes the following:

- A maximum damage of Burland Category 1 ('very slight') to neighbouring properties;
- The screening assessment indicates impermeable areas will remain unchanged, and surface-water flows will reduce through inclusion of SuDS features.
- Screening confirms that absence of an aquifer beneath the site and no potential impacts to subterranean flows.
- It is accepted that the proposed development would not adversely affect both the hydrology and the hydrogeology of the local or wider environment.
- Utilities information, including asset plans and a site constraints plan, has been provided as part of the revised submission. The BIA states that engagement with relevant asset owners such as Thames Water and National Grid will be undertaken at Stage 3.
- The BIA recommends a movement monitoring strategy with appropriate trigger levels to ensure that construction-induced ground movements remain within predicted limits.

16.5 Campbell Reith concludes that the BIA is adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements. The appointment of a suitably qualified engineer to oversee the works will be secured by condition (Condition 11), and the build to be in accordance with the audited BIA will also be secured by condition 30.

17. SUSTAINABILITY AND ENERGY

17.1 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.

17.2 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

- 17.3 The development plan promotes circular economy principles and local plan policy CC1 and London Plan 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. In this case, the proposed development will involve substantial demolition with a façade retention.
- 17.4 A condition and feasibility study have been submitted with exploration of development options. These options take into consideration of the hierarchy in CPG chapter 9. A Circular Economy Statement (CES) and GLA CES Template have been provided which include a pre demolition audit. Of the 6 options which include potential for refit, refurbish, substantial refurbishment and extension, 5 were discounted and the development proposes to retain only the façade of the Parkway building with the Odeon and Fly Tower to be demolished and rebuilt as new. This is due to the optimisation of spaces for residential use, as well as ensuring a high-quality living environment such as allowing cross-ventilation and adequate daylight.
- 17.5 Whilst structural retention is technically possible, the works involved would be very impractical and not viable. The main building to the rear is effectively a large shell in terms of structure, and so refitting and adapting would require significant intervention to introduce internal walls and floorplates. Furthermore, the sheer scale of the main structure means floorplates introduced would be very large and not suitable for residential uses which require ventilation and light. The nature of the building means that any effective residential repurposing of the site would result in unacceptable standards of accommodation as well as a lesser number of homes. As such, the principle of substantial demolition, with only façade retention, is accepted in this instance.
- 17.6 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 34).
- 17.7 Due to the scale of the development and proposed substantial demolition a Whole Life Carbon (WLC) assessment is required to show that any replacement building has considered the carbon impact of the construction and use of the building over its lifetime.
- 17.8 The WLC assessment results are discussed further below in section xx. Operational energy performance has been considered separately in this report.

Whole Life Carbon

- 17.9 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.
- 17.10 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).
- 17.11 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).
- 17.12 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).
- 17.13 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again at the end of its life (when it decomposes), so it is included in the total A-C-Modules.
- 17.14 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). It also encourages development to aim for more ambitious aspirational benchmarks. The table below shows how the development performs against the benchmarks, as well as the aspirational targets.

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	951
B-C (excl B6 & B7)	<350	<300	663

Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1,596
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Table 8 - Summary of Whole-Life Carbon results for the residential development

- 17.15 In this case the residential benchmarks are considered the most appropriate. The proposals do not meet the benchmarks or aspirational benchmarks for WLC, and the results are very high for a new build proposal and as such is not considered to meet Local Plan Policy CC1 f) on resource efficiency, guided by CPG chapter 9 to follow WLC guidance (GLA benchmarks). The emissions associated with the building services equipment dominates the A-C results, making up 25.4% of the A-C whole life carbon for the Proposed Development (411 kgCO₂e/m² GIA A-C). The A1–A5 stages exceed the GLA minimum benchmark, while the B–C stages representing the 'use' and 'end-of-life' phases, significantly surpass the benchmark.
- 17.16 The WLC assessment highlighted opportunities for further reductions but will be explored at post-planning stage, particularly through improved material selection and specification-level interventions. This may include switching to low-carbon steel and using steel made with 100% renewable energy, or using greener concrete mixes, like those with more recycled content (such as GGBS).
- 17.17 Notwithstanding the benchmarks for WLC, the assessment has demonstrated a reasonable approach that somewhat reduces embodied carbon through material efficiency and specification of low-carbon materials. For example, the adoption of durable materials such as aluminium rainscreen, which is also designed in a way which allows for it to be disassembled and reused in future projects, extending material life. Furthermore, the structure has been designed to allow for future reinforcing of new uses should higher load capacity be required.
- 17.18 Given officers consider further improvements could be made, a condition is recommended to secure feasible reductions in the WLC of the development to as close to the benchmarks as possible (condition 4).

Energy and carbon reductions

- 17.19 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).

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

Energy and carbon summary

- 17.21 The following summary 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.

Policy requirement (on site) Overall	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	10.6%
Be green stage (renewables): CLP policy CC1	20%	32.8 %
Total carbon reduction: LP policy SI2 and LP CC1	35%	39.9 %

Table 9 - Carbon saving targets (Site Wide) and the scheme results

Policy requirement (on site) Affordable Housing	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	14.4%
Be green stage (renewables): CLP policy CC1	20%	55.8%
Total carbon reduction: LP policy SI2 and LP CC1	35%	62.1 %

Table 10- Carbon saving targets (Affordable Housing – residential) and the scheme results

Policy requirement (on site) PBSA	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	5.5%
Be green stage (renewables): CLP policy CC1	20%	12.6%
Total carbon reduction: LP policy SI2 and LP CC1	35%	17.5%

Table 11 - Carbon saving targets (Student Housing – non-residential) and the scheme results

Policy requirement (on site) Cultural / Leisure / Commercial	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	10.2%
Be green stage (renewables): CLP policy CC1	20%	2.1%
Total carbon reduction: LP policy SI2 and LP CC1	35%	12.0%

Table 12 - Carbon saving targets (Cultural / Leisure / Commercial) and the scheme results

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

Total carbon reductions

- 17.23 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.
- 17.24 This is charged at £95/tonne CO₂/yr (over a 30-year period) which is 55.67 tonnes x £95 x 30 years = £158,660. This amount will be spent on delivery of carbon reduction measures in the borough.
- 17.25 For Building Regulations Student Housing is considered to be a non-residential development. It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets are more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments.
- 17.26 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.
- 17.27 In this case, the overall development improves on the policy target of 35% reductions, achieving an overall on-site reduction of 40% below Part L requirements as shown in Table 9 above. The affordable housing portion of the development exceeds the 50% aspirational target, achieving a 62.1% overall reduction. For the non-residential portions including the PBSA and cultural/leisure/commercial, there is a shortfall against the policy target if considered on their own. Part of this shortfall is likely to do with the changes to building regulations explained above, and the methodology of calculating actual and notional values of energy output from PV under Be Green. It should be noted that site wide the policy target is exceeded and therefore in this case the carbon reductions are considered to meet and improve on the policy requirement. The **carbon offset of £158,660 will be secured by Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 17.28 London Plan policy SI 2 sets a policy target of at least a 10% (residential) and 15% (non-resi) reduction through reduced energy demand at the first stage of the energy hierarchy.
- 17.29 In this case, the affordable housing part of the development meets the policy target of 10% (residential) reducing emissions by 14.5% at this stage through energy efficient design, in compliance with the development plan. Although the PBSA and cultural/leisure/commercial portions of the development do not meet the policy target of 15% (non-resi), they do reduce carbon over the baseline by 5.5% and 10.2% respectively. This is achieved through high performance insulation, low air permeability, efficient glazing, deep window recesses (to reduce overheating) with some external shading, and addresses the requirements of the cooling hierarchy and overheating. The proposals include energy efficient measures like MVHR, low energy light fittings. This means the development as a whole achieves 10.6% reduction at this stage (against a 10% residential and 15% non-residential target).

Be clean stage (decentralised energy supply)

- 17.30 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.
- 17.31 In this case an assessment of the existing London heat map has been made and demonstrated that there are no existing local networks present within connectable range of the scheme. However, given its location, an obligation will be secured requiring future connections to be safeguarded.

Be green stage (renewables)

- 17.32 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 17.33 In this case, site wide the development exceeds the policy target of 20%, reducing emissions by 32.8% at this stage through renewables, in compliance with the development plan. This notable improvement on policy stems from the performance of the affordable housing. The affordable housing portion significantly exceeds the policy target and achieves a 55.8% stage reduction; whereas the PBSA and cultural/leisure/commercial portions has a shortfall against the target and reduces emissions only by 12.6% and 2.1% respectively when considered separately. The proposal includes 95 PV panels with a capacity of 38.95kWp on the roof with full details secured by

condition 12. A condition will be added to secure a meter to monitor the energy output from the approved renewable energy systems (condition 12). The proposal includes low carbon heating with ASHP for the PBSA for heating and cooling (air to water) will provide low temperature hot water (for heating) or chilled water (for cooling), with mechanical ventilation and hot water from Air Source Heat Pumps (ASHP) with possible water source heat pumps to raise the temp to 60 degrees. For the affordable housing ASHP are proposed for heating low temperature hot water with terminal units in residential space. ASHP heating and cooling is proposed for the Cultural, Leisure and Commercial areas.

Be seen (energy monitoring)

- 17.34 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. The proposal includes has proposed a building management system.
- 17.35 The **Energy and Sustainability Strategy secured by Section 106 legal agreement** will secure reporting to the GLA in line with their published guidance.

Climate change adaption and sustainable design

- 17.36 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. BREEAM Excellent is targeted for both the PBSA and cultural/leisure/commercial, with an aspirational target for Outstanding. Both the PBSA and cultural/leisure component meets the requirements of achieving at least 60% of credits for Energy and Water and 40% for materials.
- 17.37 It includes sustainable urban drainage (SuDS) such as green biodiverse with blue roofs and attenuation tank. Thermal Comfort Analysis has been submitted, and overheating has been considered in the proposals and mitigated through the adoption of cooling hierarchy and some measures including using passive measures like deep window reveals, balconies, external shading, high performance glass, glazing ratio and so on to avoid or minimise the demand for active cooling (air con).
- 17.38 Unfortunately, whilst natural ventilation with openable windows is feasible, based on internal noise assessment it is recommended keeping windows shut to maintain acceptable indoor noise levels. It is also noted that even if windows are modelled to opened at PBSA during the evening, most rooms are shown to be at risk of overheating. However, this is likely to be due to the lack of cross ventilation potential and is accepted that active cooling is required for the PBSA units.

- 17.39 For the residential areas the modelling also shows a risk of overheating with openable windows. New residential developments are expected to be designed to not overheat, without active cooling. In instances where security, air quality or noise concerns pose limitations to the opening of windows, applicants are required to demonstrate that all passive design measures have been thoroughly investigated. This should include technical and cost feasibility assessments of the following fixed shading devices; external shutters, external blinds, awnings and ventilated louvres. Should natural ventilation not be proposed due to opening limitations, applicants are required to show that passive measures have been maximised and the façade design has been optimised regardless of the constraints posed by the site's location. In this case as the modelling indicates that, if natural ventilation was not constrained then, more than half of the bedrooms are considered to overheat. Whilst it is accepted that cooling is likely to be required due to noise constraints, this will result in additional cooling demand and as such a condition 17 is recommended to ensure that all options to reduce cooling demand further have been incorporated into the design.
- 17.40 For the affordable housing, mechanical ventilation with heat recovery (MVHR) with trim cooling/peak lopping has been proposed which is considered a more efficient form of cooling for these units. For the PBSA development ASHP is proposed for cooling (as well as heating). As identified from the WLCA, the PBSA uses the R454b refrigerants with global warming potential (GWP) of 466, and for affordable housing are R454c refrigerants with GWP of 150. They are considered relatively low GWP and better alternatives than some refrigerants from an environmental perspective.
- 17.41 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.
- 17.42 In this case, the development incorporates SUDS and green/blue roofs integrated with the solar panels, which would enhance the biodiversity of the site and reduce water runoff. Details of this system will be secured by condition 19. Grey water recycling is also being considered and the Energy Statement advises that a feasibility assessment for greywater harvesting will be provided prior to the commencement of development which is welcomed and will be secured by condition 9. Condition 41 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in the 'Flood risk and drainage' section of this report.

18. WATER, FLOOD RISK AND DRAINAGE

- 18.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of

flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.

- 18.2 In this case, the development incorporates sustainable urban drainage including green and blue roofs (overlying blue roof attenuation cells), attenuation tank in the basement, and backflow prevention devices on sewer connections.
- 18.3 There are 3 flood zones for flooding by rivers and the sea as defined by the Environment Agency; Flood Zones 1, 2 and 3. These are based on the likelihood of an area flooding, with flood zone 1 areas least likely to flood and flood zone 3 areas more likely to flood. The site is located within Flood Zone 1 as of all other Camden sites. The development is at medium risk of surface water flooding and high risk with Climate Change scenario (2040 to 2060) based on Environment Agency's data. It is also located in an area with some reported internal sewer flooding incidents (21-40 reported cases).
- 18.4 Policy CC3 states that vulnerable development should not be located in flood prone areas. The proposed basement includes plant equipment which is considered vulnerable; however the basement construction will incorporate waterproofing/tanking measures to prevent groundwater ingress and it is noted that the basement entrance is at a high point and protected by threshold drains and demarcation walls separating leisure spaces from attenuation tanks. It is considered unlikely that the basement would be prone to flooding. A Flood Risk Emergency Plan (FREP) has been submitted as part of the application, and it has demonstrated that in an unlikely event of flooding in the basement or development, the measures proposed to ensure safe evacuation and recovery. This is considered acceptable. A condition is attached requiring a final FREP with further details and to ensure compliance and implementation of approved measures (Condition 18).
- 18.5 A Flood Risk Assessment and a Drainage Strategy have been submitted as part of this application. The submitted documents include a pro-forma, drainage calculations, exceedance flow routes and maintenance tasks ownership. SuDS are proposed in order to manage the water environment on and around the site.
- 18.6 The proposed attenuation features on the roof include 160mm green roof planting overlying blue roof attenuation cells 125mm deep, which are intended to provide 154.90m³ attenuation volume minimising runoff from the building. Also attenuation tanks. In total, these will provide 127.50m³ attenuation capacity, helping to slow rainfall reaching sewers. Conditions are attached to secure full details of the SuDS and their proposed storage capacities. The information will be required to demonstrate that the system has been designed to accommodate all storms up to and including a 1:100 year storm with 40% provision for climate change as well as demonstrating

a discharge rate of not more than 15.1l/s. A condition (19) requires evidence of installation.

- 18.7 Conditions 9 and 27 will secure SuDS: Construction in accordance with details and details of rainwater/greywater recycling proposals

19. AIR QUALITY

- 19.1 LP policy CC4 says the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

Operational impact of development on the local area

- 19.2 The development uses Air Source Heat Pumps, so it has no combustion for heating and is car-free, and is therefore considered Air Quality Neutral.

- 19.3 The Air Quality Assessment (AQA) confirms a diesel generator is proposed to provide backup, secondary power. The generator will only operate routinely during testing and maintenance. The generator will be approximately 350kVA, and the flue will be taken to the roof of the building. The flue will be more than 3m above roof level and is the tallest point in a surrounding 20m radius, where dispersion conditions are optimal, and higher than all surrounding buildings. The testing regime will comprise a monthly test, it will not exceed 1 hour each month, and annual load testing will not exceed 4 hours; the generator emissions will therefore be significantly less than 50 hours per annum. This is considered acceptable and details will be secured by Condition 15.

Operational impact on occupants

- 19.4 The air quality in the area is considered suitable for the proposed uses of the site. The background monitoring and modelling information used in the AQA is considered acceptable, with worst-case existing concentrations well below the requirements needed for additional mitigation.

Construction impacts risk assessment

- 19.5 The construction dust risk is assessed as High risk without mitigation. Therefore, real-time dust monitoring with 4 monitors is required and is secured by condition 3. Appropriate mitigation measures would also be secured through the **Construction Management Plan secured by section 106 agreement**.

20. TRANSPORT IMPACTS

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

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

- 20.2 The site is bounded by Arlington Road to the West, Parkway to the South, Inverness Street to the North, and Camden High Street to the East. Camden High Street, the southern section of which forms part of Transport for London Road Network (TLRN), is close to the site. TfL is the highway authority for this road and is therefore responsible for its maintenance.
- 20.3 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). The closest underground station is Camden Town which is located approximately 180m metres east, and Camden Road (London Overground) just over 1km metres north-east of the site. There are several bus stops on Camden High Street, Parkway and elsewhere in Camden Town, near the site. The closest Strategic Cycle Network C6 is on Royal College Street, 700m from the site.
- 20.4 The nearest Santander Cycle Hire docking stations are located on Arlington Road, Albert Street and Greenland Road. The nearest dedicated parking bays for dockless rental e-bikes and rental e-scooters are located on Arlington Road at the junction with Inverness Street and on Arlington Road near the junction with Parkway. However, these bays are already showing signs of overcapacity and increasing demand.

Trip generation

- 20.5 The proposal will result in a significant increase in person trips as shown in table 13, especially during peak hours. It outlines that the underground, walking and the bus will have the largest increases in trips. Based on other developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Camden Town (London Underground) station, Camden Road (London Overground) station, the nearby bus stops, and commercial, entertainment, shopping, and restaurant venues in Camden Town. Given this increase, the Council's highways team have requested contributions be secured by S106 legal agreement to deal with the increase, these are set out in the sections below.

Travel Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily (07:00-21:00)		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground	2	14	16	10	5	16	89	97	186
Train	0	3	3	2	1	3	16	18	34
Bus	1	9	10	7	3	10	57	62	118
Taxi	0	0	0	0	0	0	3	3	6
Motorcycle	0	0	0	0	0	0	3	3	6
Driving Car	0	0	0	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0	0	0	0
Bicycle	1	4	4	3	1	4	24	27	51
On Foot	2	13	15	9	5	14	81	88	169
Total	6	43	49	31	16	47	269	295	564

Table 13: Transport statement's trip generation

- 20.6 An Active Travel Zone (ATZ) assessment included in the TA focuses on seven routes to key destinations. The analysis demonstrates that there are opportunities for improvements to the walking and cycling environment, which is pertinent given the CTS commitments.

Travel planning

- 20.7 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.
- 20.8 A Travel Plan and associated monitoring and measures contribution of £11,348 will be secured by legal agreement.

Access and permeability

- 20.9 Pedestrian and cycle access to the student accommodation will be from Parkway to the residential units from Arlington Road, and to the cultural, leisure, and retail uses from Inverness Street. The student cycle store will also be accessed from Inverness Street and will feature a secure controlled gate, lighting, and CCTV coverage to provide a safe and well-lit entrance for cyclists. There is no motor vehicle access to the site.
- 20.10 A car free development is proposed in accordance with Policy T2.

Cycle parking

- 20.11 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5.

- 20.12 95 residential long-stay spaces will be provided on the ground floor, comprising:
- 84 two-tier spaces (88%),
 - 7 larger accessible Sheffield stand spaces (8%),
 - 4 standard Sheffield stands (4%).
- 20.13 184 long-stay spaces will be provided on the ground floor for student accommodation, comprising:
- 50 two-tier spaces (27%),
 - 9 larger accessible Sheffield stand spaces (5%),
 - 2 standard Sheffield stand (1%),
 - 123 x foldable bike lockers (67%).
- 20.14 A proportion of the folding cycle lockers will be provided with pre-loaded bikes for students to use communally. This lessens the need for each student to own their own bicycle and instead encourages cycle use amongst students.
- 20.15 Two long-stay spaces for the cultural / leisure use will be provided within the unit itself.
- 20.16 It is not possible to provide visitor cycle parking on site. The applicant is willing to agree on a financial contribution towards providing the visitor cycle parking on the public highway. A sum of **£2,700 will be secured by legal agreement to provide 9 Sheffield stands** (18 spaces). The Council's highways team will determine the most suitable location close to the site.
- 20.17 The cycle parking provision complies with the standards and requirements set out in the development plan. Full cycle parking details will be secured by condition 22.

Car parking and vehicle access

- 20.18 The site is located in controlled parking zone CA-F(n) Camden Town Area, with controlled hours 08:30-23:00 Monday to Friday, 09:30-23:00 Saturday and 09:30-23:00 Sunday, with Resident Permit Holder Only bays in force at all times on Saturday and Sunday.
- 20.19 The entire development will be **car permit free secured by s106 agreement** if planning consent were granted.
- 20.20 In line with the London Plan standards, two accessible parking spaces should be provided. An off-site contribution of **£8,000 for two disabled parking space to be provided on the public highway is secured by a S106 agreement.**

Demolition and Construction management

- 20.21 Demolition and Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A Construction Management Plan (CMP) was submitted with the application.
- 20.22 The site is located in close proximity to Camden Town. 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. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A final **CMP will also be secured by s106 agreement** in accordance with Local Plan Policy A1 if planning permission is granted.
- 20.23 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.
- 20.24 Implementation **support contributions of £30,513 and construction impact bonds of £32,000 for the Construction Management Plan (CMP) and a Demolition Management Plan (DMP) implementation support contribution of £10,116 and DMP Impact Bond of £16,000 will be secured by s106 agreement** in accordance with Local Plan Policy A1.
- 20.25 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured. The **Construction Working Group will be secured by s106 agreement**.

Deliveries and servicing

- 20.26 A Delivery and Servicing Plan (DSP) was submitted with the application.
- 20.27 The development has a potential to generate a demand for 42 deliveries per day. This is based on a combination of TRICS surveys for residential use, and servicing surveys, including food deliveries, for student accommodations at 203 Westminster Bridge Road, SE1 7FR and Canal Reach, N1C 4BD in King's Cross.
- 20.28 A detailed **DSWP would be secured by s106 agreement** if planning permission is granted. This would help to ensure that any operational impacts associated with delivery and servicing movements will be mitigated.

Highway works

- 20.29 The applicant would be financially responsible for any works relating to changes or repairs to the highway. Given the scale of the development, a **highways contribution of £20,000 will be secured by s106 agreement.**

Pedestrian, cycling and environmental improvements

- 20.30 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes being delivered.

The impact of the development means a contribution to pedestrian, cycling and environmental improvements (PCE) will be required. In line with the increase in walking and cycle trips generated by the proposed development and further promoted by the requested Travel Plan, a financial contribution of £500,000 for PCE will be secured by a s106 agreement. Micro and shared mobility improvements

- 20.31 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.
- 20.32 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 20.33 Therefore, a **cycle/e-scooter hire improvements contribution of £10,000 would be secured by a s106 agreement.** This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate residents, staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

Conclusion

- 20.34 Transport officers also requested a contribution for the review of the local CPZ and EV charging, however officers concluded that this was not justified in this particular case given that parking restrictions run till 11pm every day, the nature of the occupiers and the location next to major transport links.

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

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Car-free development.
- Off-site visitor cycle parking contribution of £2,700
- Off-site accessible car parking contribution of £8,000.
- Demolition Management Plan (DMP) implementation support contribution of £10,116 and DMP Impact Bond of £16,000.
- Construction management plan (CMP) implementation support contribution of £30,513 and CMP Impact Bond of £32,000.
- A Construction Working Group
- Delivery, Servicing and Waste Plan.
- Highway works contribution of £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £500,000.
- Micro and shared mobility improvements contribution of £10,000

21. PUBLIC OPEN SPACE

21.1 CLP policy A2 seeks to secure publicly accessible open space as part of a scheme to address the impact of schemes on the demand for public open space. This takes account of the scale of the proposal, the number of future occupants and the land uses involved.

21.2 The Public Open Space CPG sets out the triggers for providing Public Open Space (POS). The guidance expects a contribution for development with:

- 11 or more self-contained homes
- 11 or more student rooms, units, or occupiers
- 1,000sqm GIA of new commercial (or higher education where appropriate)

21.3 Any commercial elements are a reduction in the existing provision of the site. As such only the homes and the PBSA will trigger the requirements.

21.4 The CPG expects developments with 11 or more dwellings to provide 9sqm of POS for every occupant. With 49 new homes, this development triggers the requirement. The residential requirement for the POS is 9sqm x 49 (the number of additional dwellings) x 2.12 (the average dwelling occupancy for the ward) = **934.92sqm**.

21.5 The CPG expects developments with 11 or more student bedspaces to provide 9sqm of POS for every occupant. This is then reduced by 25%

recognising that student accommodation is often not used for part of the year. With 244 new student occupiers, this development triggers the requirement. The student housing requirement for the POS is 9sqm x 244 (the number of additional bedspaces) x 0.75 (to adjust for student occupancy) = **1647sqm**.

- 21.6 The total POS requirement is therefore **2581.92sqm**.
- 21.7 Although the proposal has a range of private and communal roof terraces for the occupiers, the scheme would provide no publicly accessible space, so it cannot count towards the POS provision. With a site area of around 2920sqm, providing **2581.92sqm** of POS on this site would leave almost 88% of the site undeveloped. In a dense urban environment, on a Town Centre high street, this would not be an efficient use of land and would leave a hole in the townscape. There are also limited options for off-site provision within a reasonable distance.
- 21.8 Where it is not feasible to deliver the full amount of public open space required, the CPG accepts a financial payment in lieu (PIL). The PIL is used for provision, maintenance, and improvement of open space.
- 21.9 The PIL is made up of a capital costs contribution (£516,384), which is calculated at a rate of £200/sqm), and a maintenance costs contribution which covers 10years (£180,734.40, which is calculated at a rate of £70/sqm). Therefore, the total POS contribution is £697,118.40. The **Public Open Space PIL of £697,118.40 would be secured by s106 agreement**, accordance with CLP policy C2.
- 21.10 As such, the scheme would make an adequate contribution to POS in line with the development plan.

22. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 22.1 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.
- 22.2 The site is currently of limited biodiversity value with much of the site comprising habitats which are of no value in biodiversity terms. There are no trees on site, although there are trees immediately off site. No trees are proposed for removal in order to facilitate development. The impact of the scheme on trees immediately off site will be of an acceptable level. Minor

access facilitation pruning may be required. The tree protection plan is considered sufficient to demonstrate the trees to be retained will be adequately protected in accordance with BS5837:2012. Compliance with tree protection details is secured by condition 5.

- 22.3 Green roofs are proposed but full details have not been submitted. Full details are secured by condition 13 to ensure these optimise greening and biodiversity. Courtyard landscaping in the centre of the site is proposed including a range of tree species. Again, full details are secured by condition 14 to ensure the final landscaping optimises the biodiversity value of the site.
- 22.4 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, the 0.4 value is an appropriate target. The proposals achieve an UGF of 0.3. This is primarily achieved through the use of intensive roofs which have a substrate depth of 150 mm or more and new tree planting. Although this exceeds the target for non-residential development (0.3), it does not meet the 0.4 value target. The Nature Conservation officer accepts this but recommends a condition to ensure the green roofs and landscaping are maximised (condition 14). More extensive green roofs could improve the UGF score, as will choices around the final planting scheme.
- 22.5 A condition is also attached regarding details of bird and bat boxes to be incorporated into the building fabric or biodiverse roofs (condition 24).
- 22.6 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

- 22.7 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 22.8 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 a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 22.9 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.
- 22.10 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP

because it is below the *de minimis* threshold. This is because it does not impact an onsite priority habitat and impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat.

23. REFUSE AND RECYCLING

- 23.1 Policy CC5 and CPG Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 23.2 The proposal includes separate bin stores for each use, with storage at ground floor. A delivery, servicing and waste Plan was submitted. This was revised with input from the Council's waste officer. However, a DSWP secured by a S106 legal agreement will secure the final details. A condition is also attached securing the waste stores installation prior to occupation of each use.

24. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 24.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3mill construction costs. To ensure local people benefit from these opportunities in line with CLP policy E1, the Economic Development Team will work with the developer to deliver several benefits from the development.

During construction

- **Apprenticeships** - the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs (or every 1,000sqm GIA newbuild) with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the council's Euston Skills Centre (moved to a new location hence a new name). With an estimated build cost of £58million, this would mean 19 construction apprentices and a £32,300 support fee.
- **Construction Work Experience Placements** - the applicant should provide 4 construction work placement opportunity of not less than 2 weeks, to be undertaken over the course of the development construction. This would be recruited through the council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.
- **Local Recruitment** - the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with

Camden for no less than a week before the roles are advertised more widely.

- **Local Procurement** - the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.

Post construction

24.2 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements.

24.3 There are a number of end-use employment opportunities associated with the scheme given the employment uses proposed, including the student accommodation.

24.4 The developer is encouraged to work with Camden Learning/STEAM on school engagement and with their commercial occupiers to offer work experience placements.

24.5 In addition to construction employment benefits secured above, officers have negotiated an enhanced employment training package for post construction which includes the following:

- At least one end use apprenticeship, either for the future occupier of the leisure space or whoever runs the PBSA. Recruited through the Council's Future Talent Team within Inclusive Economy.
- Reasonable endeavours to engage with the future occupier of the leisure/cultural use to secure such access for local residents or local community groups from time to time depending on the programming of events / the nature of the occupier which could include discounted rates.
- The future occupiers should also confirm their commitment to ensuring the site offers local employment benefits in the long term by:
 - Working with Camden Learning/STEAM on school engagement if applicable (if there's arts base at the space)
 - Joining the Council's Inclusive Business Network and promoting this and good employment practice.
 - Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally

24.6 The above measures would be included in a package of **Employment and Training measures secured by s106 agreement** in accordance with CLP policy E1 and the CPG.

25. FIRE SAFETY

- 25.1 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.
- 25.2 The current fire safety regulatory framework includes three gateways for "relevant buildings". 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.
- 25.3 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.
- 25.4 A fire statement was submitted to address fire safety to meet the requirements of both the London Plan and Planning Gateway One. It was prepared by qualified fire engineers from Arup.
- 25.5 It demonstrates how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
- 25.6 The Fire Statement confirms that fire safety has been considered from the earliest design stages and demonstrates compliance with the requirements of the London Plan 2021, specifically Policies D5(B5) and D12. The design is informed by current guidance, and includes an Evacuation Strategy, fire alarms, sprinkler systems, basement smoke clearance system, automated fire curtain, fire service access facilities, construction materials to minimize spread and future proofing.
- 25.7 The Fire Statement confirms that the fire safety strategy has been reviewed by competent fire professionals, and that the scheme will continue to be developed in compliance with relevant legislation and best practice. Officers consider that the proposed fire safety measures are robust and proportionate to the scale and nature of the development and are in accordance with national and regional fire safety policy.

- 25.8 The submitted drawings confirm a second staircase is included within all buildings over 18 metres.

Conclusion

- 25.9 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. Condition 35 is attached to ensure that the development is carried out in accordance with this fire statement.
- 25.10 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.

26. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 26.1 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. The final CIL liability will be determined by the CIL team.
- 26.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of **£485,806.90**.
- 26.3 The proposal will also be liable for the Camden Community Infrastructure Levy (CIL). The site lies in Zone B where CIL is calculated using rates based on the relevant proposed uses. The estimated Camden CIL liability is **£2,721,839.75**
- 26.4 The total CIL liability is therefore **£3,207,646.65**. The above are estimates based on the information available at the time of determination and may be subject to change based on assessment by the Councils CIL team.

27. CONCLUSION

- 27.1 The proposal is a good mix of uses that successfully reintegrates the site into its diverse context within the town centre. It responds well to the different characters and neighbouring conservation areas in an architecturally sensitive manner. Where there are impacts, it has been designed to minimise or mitigate those impacts as far as possible.
- 27.2 The scheme would redevelop a brownfield site in a well-connected location to provide a significant number of homes meeting a range of needs, including student housing, and affordable self-contained housing with a mix of tenures, the majority of which are for the highest priority and most affordable tenure – social affordable rent. The council's housing deliver engages the "titled balance" outlined at paragraph 11(d) of the NPPF and there is a presumption in favour of granting permission.

- 27.3 Less than substantial harm has been identified to the Camden Town Conservation Area primarily due to the substantial loss of non-designated heritage asset resulting in the loss of the historical and distinct features of the original building which are not replicated in the replacement and scale and massing of the new building core. However, this harm has been minimised through a sensitive design approach and a careful material selection to respond to the local townscape character. Nonetheless it has been given considerable importance and weight in the planning balance.
- 27.4 A range of conditions and obligations ensure that the development does not have a negative impact on neighbouring occupiers in terms of use, noise, transport.

Public benefits

- 27.5 Harm has been identified to Camden Town Conservation Area (a heritage asset) but that harm is less than substantial. Considerable weight and importance must be given to that harm and there are a number of public benefits that outweigh that harm.
- Significant housing delivery.
 - Affordable homes on site with appropriate tenure mix.
 - Significant transport improvements from a car-free active travel development and financial contributions for infrastructure.
 - Improving the relationship of the building to the street by introducing active frontage and entrances along Inverness Street, which could reduce ASB in the area.
 - High quality replacement building and proposed uses that respond well to the character of the Town Centre.
 - Heritage link through the detailed design of the student foyer.
 - Significantly improving biodiversity and greening in the area.
 - An enhanced package of employment and training benefits.
 - Optimising an underdeveloped, vacant, and derelict brownfield site within the Camden Town Town Centre that has good connectivity to public transport.
- 27.6 The presumption in favour of sustainable development, particularly the housing delivery, has been given significant weight. Overall, the proposed development is in accordance with the development plan as a whole.

28. RECOMMENDATION

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

Affordable housing

- Affordable housing (C3) - 49 homes secured as 27 homes for social-affordable rent and 22 homes for intermediate rent

Transport

- Car Free development
- Delivery , Servicing and Waste Management Plan
- £10,000 for shared and micro mobility improvements contribution
- £500,000 towards PCE improvements
- £20,000 highways contribution
- £2,700 for 9 x cycle stands to provide 18 spaces in the public highway
- Demolition Management Plan (DMP)
- DMP £10,116 and impact bond payment of £16,000
- Construction Management Plan (CMP)
- CMP Implementation support contribution of £30,513 and a construction impact bond of £32,000
- Construction Working Group
- £8,000 for disabled parking space on the public highway
- A Travel Plan covering a monitoring and measures contribution of £11,348

Employment

Construction

- 19 construction apprentices with support fee of £32,300
4 construction work placement opportunities of not less than 2 weeks recruited through the Euston Skills Centre
- Local recruitment - work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.
- Local Procurement - sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract,

End uses

- At least one end use apprenticeship, either for the future occupier of the leisure space or whoever runs the PBSA. Recruited through the Council's Future Talent Team within Inclusive Economy
- Working with Camden Learning/STEAM on school engagement
- Joining the Council's Inclusive Business Network and promoting this and good employment practice.
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally

Community and culture

- Leisure/Cultural Space: Use and Management Plan
- Reasonable endeavours to engage with the future occupier of the leisure/cultural use to secure such access for local residents or local community groups from time to time depending on the programming of events / the nature of the occupier which could include discounted rates

Energy and sustainability

- Future proofing of connection to district heating
- Energy and Sustainability Strategy
- Carbon offset contribution £158,660
- Be Seen' energy monitoring
- BREEAM Pre assessment scores (cultural/leisure):
 - Overall score of Excellent (73.81%):
 - Energy 15 out of 21 credits targeted = 71%
 - Water 7 out of 9 credits targeted = 77%
- BREEAM Pre assessment scores (PBSA):
 - Overall score of Excellent (71.86%):
 - Energy 14 out of 22 credits targeted = 63%
 - Water 6 out of 8 credits targeted = 75%

Other

- Open space contribution £697,118.40
- Agent of Change
- Student Management Plan
- Non-student Management Plan (for outside of term time)
- Market Strategy Plan - Agreement to engage with the Council's Markets team around Inverness Market during and post construction
- Parkway Frontage Art Plan
- Retention of scheme architect

29. LEGAL COMMENTS

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

30. CONDITIONS

Standard conditions

1 Time limit

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

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 Approved drawings

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

Existing Drawings:

INSERT24006-AHMM-XX-XX-DR-A-PL000 rev P01; 24006-AHMM-XX-XX-DR-A-PL001 rev P01; 24006-AHMM-XX-B1-DR-A-PL090 rev P01; 24006-AHMM-XX-00-DR-A-PL010 rev P01; 24006-AHMM-XX-01-DR-A-PL011 rev P01; 24006-AHMM-XX-02-DR-A-PL012 rev P01; 24006-AHMM-XX-03-DR-A-PL013 rev P01; 24006-AHMM-XX-04-DR-A-PL014 rev P01; 24006-AHMM-XX-RF-DR-A-PL015 rev P01; 24006-AHMM-XX-XX-DR-A-PL020 rev P01; 24006-AHMM-XX-XX-DR-A-PL021 rev P01; 24006-AHMM-XX-XX-DR-A-PL022 rev P01; 24006-AHMM-XX-XX-DR-A-PL023 rev P01; 24006-AHMM-XX-XX-DR-A-PL030 rev P01; 24006-AHMM-XX-XX-DR-A-PL031 rev P01;

Demolition Drawings:

24006-AHMM-XX-B1-DR-A-PL290 rev P01; 24006-AHMM-XX-00-DR-A-PL210 rev P01; 24006-AHMM-XX-01-DR-A-PL211 rev P01; 24006-AHMM-XX-02-DR-A-PL212 rev P01; 24006-AHMM-XX-03-DR-A-PL213 rev P01; 24006-AHMM-XX-04-DR-A-PL214 rev P01; 24006-AHMM-XX-RF-DR-A-PL215 rev P01; 24006-AHMM-XX-XX-DR-A-PL220 rev P01; 24006-AHMM-XX-XX-DR-A-PL221 rev P01; 24006-AHMM-XX-XX-DR-A-PL222 rev P01; 24006-AHMM-XX-XX-DR-A-PL223 rev P01; 24006-AHMM-XX-XX-DR-A-PL230 rev P01; 24006-AHMM-XX-XX-DR-A-PL231 rev P01;

Proposed Drawings:

24006-AHMM-XX-XX-DR-A-PL080 rev P01; 24006-AHMM-XX-B1-DR-A-PL099 rev P01; 24006-AHMM-XX-00-DR-A-PL100 rev P02; 24006-AHMM-XX-01-DR-A-PL101 rev P02; 24006-AHMM-XX-02-DR-A-PL102 rev P03; 23038-AHMM-ZZ-03-DR-A-PL103 rev P03; 23038-AHMM-ZZ-04-DR-A-PL104 rev P03; 24006-AHMM-XX-05-DR-A-PL105 rev P03; 24006-AHMM-XX-06-DR-A-PL106 rev P03; 24006-AHMM-XX-07-DR-A-PL107 rev P01; 24006-AHMM-XX-08-DR-A-PL108 rev P01; 24006-AHMM-XX-00-DR-A-PL901 rev P02; 24006-AHMM-XX-XX-DR-A-PL200 rev P02; 24006-AHMM-XX-XX-DR-A-PL201 rev P03; 24006-AHMM-XX-XX-DR-A-PL202 rev P02; 24006-AHMM-XX-XX-DR-A-PL203 rev P02; 24006-AHMM-XX-XX-DR-A-PL300 rev P03; 24006-AHMM-XX-XX-DR-A-PL301 rev P02; 24006-AHMM-XX-XX-DR-A-PL302 rev P03.

Documents:

Design and Access Statement dated Sept 2025 by AHMM; Design and Access Statement Addendum dated 21 Oct 2025 by AHMM; Design and Access Statement Addendum dated 19 Nov 2025 by AHMM; Design and Access Statement Addendum dated 21 Nov 2025 by AHMM; Stage 2 Access Statement dated Oct 2025 by David Bonnet Associates; Affordable Housing Statement dated Oct 2025 by Newmark; Air Quality Assessment dated Nov 2025 by RSK; Arboricultural Impact Assessment dated 3 Sept 2025 by SES; Basement Impact Assessment dated 19 Nov 2025 by RBG; Geotechnical Desk Study Report dated 31 Oct 2024 by RBG; Ground Movement and Building Damage Assessment dated 19 Nov 2025 by RBG; Preliminary Roost Assessment & Bat Emergence Report dated Aug 2025 by Assystem; Biodiversity Net Gain Assessment Exemption Letter dated 15 Aug 2025 by SES; Circular Economy Statement, prepared by Sweco; Condition and Feasibility dated September 2025, prepared by Sweco; Outline CEMP dated September 2025, prepared by RSK; Phase 1 desk study dated July 2025 by Leap Environmental; Substitution covering letter dated 23 Oct 2025 by Newmark; Internal Daylight and Sunlight Assessment Report dated 20 Oct 2025 by GIA; Daylight, Sunlight and Overshadowing Report & Appendices dated 15 2025 by GIA; Delivery, Servicing and Waste Management Plan dated Nov 2025 by Caneparo Associates; Dust Management Plan dated Nov 2025 by RSK; Preliminary Ecological Appraisal dated June 2025 by SES; Economic Regeneration and Employment and Skills Strategy dated Sept 2025 by Volterra; Energy, Sustainability and Overheating Assessment dated Sept 2025 by Sweco; Fire Statement dated 17 Oct 2025 by Arup; Flood Risk Assessment and Drainage Strategy Report and associated drawings/appendices dated 31 Oct 2025 by RBG; Flood Risk Emergency Plan dated 31 Oct 2025 by RBG; Rapid Health Impact Assessment dated Sept 2025 by RSK; Landscape Statement by Turkington Martin; Noise and Vibration Impact Assessment dated 5 Sept 2025 by Sandy Brown; Town Planning Statement dated Sept 2025 by Newmark; Statement of Community Involvement dated Sept 2025 by LCA; Draft Student Management Plan dated Aug 2025 by Homes for Students; Heritage, Townscape and Visual Impact Assessment dated Sept 2025 by The Townscape Consultancy; Transport Assessment dated Sept 2025 by Caneparo Associates; Framework BREEAM Travel Plan dated Sept 2025 by Caneparo Associates; and Whole Life Carbon Assessment, prepared by Sweco.

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

Pre-start conditions (any works)

3 Air Quality Monitoring

No development shall take place until real time dust monitors appropriate to the dust risk have been installed:

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

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

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

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

4 Whole Life-Cycle Carbon Assessment

An updated version of the Whole Life Carbon Assessment hereby approved at each of the following stages of development shall be submitted to and approved by the local planning authority in writing:

(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 951kgCO₂e/m² and/or Whole Life Carbon (A1-C4) above 1,596kgCO₂e/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. You must not commence any work on site and/or construction works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, 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.

5 Tree protection

No development, demolition, or site clearance shall commence until the appropriate tree protection measures have been installed and working practices adopted in accordance with the document entitled "Arboricultural Impact Assessment Rev.A" by SES Southern Ecological Solutions dated 3/9/25. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with BS5837:2012 and with the approved protection details. The development shall be monitored by the project arboriculturalist in accordance with the approved report.

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

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

6 Detailed design drawings and samples

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance), detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

a) Detailed drawings including plans, coloured elevations and sections at 1:10 of all typical new facade parts. To include all typical openings, window / external door head and cill, any ventilation grills, screening, balconies, balustrades, parapets, planters and associated elements and lighting fixtures, including at interface with existing buildings and at roof junctions.

b) Detailed drawings including plans, coloured elevation and detail section drawings of the new shopfronts and canopies on Inverness Street and Parkway at a scale of 1:20.

c) Manufacturer's specification details, including high resolution photographs, of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials at a minimum of 0.5 x 0.5m (to be provided on site).

d) Once a) and c) are agreed, sample panel(s) of typical sections of Arlington Road, Inverness Street and Parkway facades at 1:1 scale (minimum 2m x 2m in size) including a glazed opening, showing reveal, cill and header details, joints (including movement joints) and neighbouring facing materials to be installed on site for review, or at alternative pre-arranged location if necessitated by construction methodology. The extents of the panel are to be agreed with the Local Planning Authority ahead of construction.

e) Detail drawings of gates, railings, balustrades proposed which are part of the public realm/landscape a scale of 1:10, including method of fixing.

f) Detailed plan, section and elevation drawings of the student foyer referenced to an interior material specification, to include the materials of permanent surfaces and details of ornament for walls, floors, ceilings and all other relevant parts of the foyer interior, and the provision of physical sample materials, if deemed necessary by the LPA.

g) Detailed drawings of all plant enclosures, including plans, coloured elevations and sections at 1:10. Layout drawings, including plans and coloured elevations, of the plant enclosures at 1:20, to include the plant in the context of the buildings' main facade. To include physical samples of the plant enclosure materials at a minimum of 0.5 x 0.5m (to be provided on site).

h) Detailed drawings of PBSA stair core design, including plans, coloured elevations and sections at 1:10. Layout drawings, including plans, coloured elevations and an axonometric, of the stair core at 1:20. To include physical samples of the PBSA stair core materials at a minimum of 0.5 x 0.5m (to be provided on site).

i) Detailed drawings, including location and size of all external CCTV

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

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the Camden Local Plan 2017.

7 Land Contamination Risk Assessment

Part A:

Prior to commencement of development (other than demolition, site clearance and preparation) a site investigation should be undertaken 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 and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Part B:

Prior to commencement of development (other than demolition, site clearance and preparation) a remediation method statement (RMS) should be submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Part C:

Following the completion of any remediation, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted to, and approved in writing, by the local planning authority. This report shall include (but may not be limited to): details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite

receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

8 Rainwater / greywater harvesting:

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

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

9 Piling method statement

No piling shall take place until a Piling Method Statement (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 by the terms of the approved piling method statement and piling layout plan.

Reason: 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 thus to ensure that the development does not impact the existing Thames Water infrastructure, in accordance with policy T3 of the London Borough of Camden Local Plan 2017.

10 Suitably qualified engineer

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

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

Prior to above ground works

11 Maximising Solar PV

Prior to commencement of above-ground development, a feasibility assessment with the aim of maximising the provision of solar photovoltaics should be submitted to the local planning authority and approved in writing. The proposals should include as a minimum the approved 95 panels and predicted energy generation of photovoltaic cells energy generation capacity (at least 38.95kWp). 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 provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.

12 Blue / Green Roof Details

Prior to commencement of above-ground development, full details in respect of the blue/ green roof in the area indicated on the approved roof plan shall be submitted to and approved by the local planning authority.

A) 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 roof, as well as details of the maintenance programme for green/blue roof.

B) Details of the green roof including

i) a detailed scheme of maintenance

ii) sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used

ii) full details of planting species and density.

The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the London Borough of Camden Local Plan policies

13 Landscaping

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of hard and soft landscaping and means of enclosure of all un-built, open areas and a timetable for implementation, shall be submitted to and approved in writing by the local planning authority. The details shall include:

- tree planting schedule including species and tree pit sizes, any proposed earthworks including grading, mounding and other changes in ground levels.
- Detailed drawings, including plans, elevations and sections at 1:50 of the landscaped courtyard and play and student terraces. To include a maintenance plan.

The proposals should target a UGF of 0.4 and this should be demonstrated in the details submitted.

The development shall be carried out in accordance with the approved details and timetable.

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

14 Diesel or oil back up generators

Prior to commencement of above ground works (other than demolition site clearance & preparation) details of the proposed Emergency Diesel/Oil Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. 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 the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.

15 Sound insulation and noise protection

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

a.) that the design and structure of the development shall be of such a standard that all rooms within the flats and student rooms are not exposed to levels indoors of more than 35 dB LAeq 16 hrs daytime (07:00 to 23:00 hours) and more than 30 dB LAeq 8 hrs at night (23:00 to 07:00 hours the next day).

b.) that the sound insulation ensures that noise levels from leisure/cultural noise in the 63Hz and 125Hz octave centre frequency bands (Leq) should be controlled so as not to exceed 47dB and 41dB (Leq) respectively in bedrooms, and 51dB and 46dB (Leq) respectively within other habitable rooms.

The building and abatement measures as implemented shall ensure music noise levels in the 63Hz and 125Hz octave centre frequency bands (Leq) from any

entertainment premises do not to exceed 47dB and 41dB (Leq) respectively in bedrooms, and 51dB and 46dB (Leq) respectively within other habitable rooms.

The approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

Prior to occupation or use

16 Active Cooling (such as air conditioning):

Prior to occupation, evidence shall be submitted and approved in writing by the Local Planning Authority, demonstrating that measures to adapt to climate change have been implemented and that overheating risk has been managed. It needs to demonstrate that the development has reduced cooling demand as far as possible and that the cooling hierarchy has been followed and any feasible measures implemented. The measures to be implemented should at the minimum include good glazing performance with 0.28 g-value for PBSA and 0.40 for affordable housing, deep window recesses of 430mm with a combination of vertical fins providing shading to all windows in the PBSA and a 255mm recess with deep overhang external corridors in the residential block, LED lighting with occupancy sensing and daylight dimming control in occupied spaces, and mechanical ventilation with heat recovery.

Reason: To ensure that all development reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with policy CC2 of the London Borough of Camden Local Plan

17 Flood Risk Emergency Plan:

Prior to occupation a final Flood Risk Emergency Plan should be prepared in accordance with the aims and objectives of the ADEPT/Environment Agency Flood Risk Emergency Plans for New Development guidance. The Flood Emergency Plan should also:

- clearly reflect suitable routes for emergency vehicle access with suitable mapping and figures
- provide details of signage required along the main emergency egress route, which is not predicted to be dry in extreme rainfall events.

The final Flood Risk Emergency Plan should be submitted to the Local Planning Authority and approved in writing and approved measures shall be provided in their entirety prior to the first occupation and permanently retained thereafter.

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

18 SuDS: Evidence of installation

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

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

19 Water network upgrades

Prior to occupation, the applicant must submit to the Local Planning Authority and be approved in writing to confirm with Thames Water that either:

a) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or

b) 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 - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development thus ensuring that the development does not impact on existing Thames Water infrastructure, in accordance with policy T3 of the London Borough of Camden Local Plan 2017.

20 Waste and refuse storage

The refuse and recycling facility as approved for each use shall be provided prior to the first occupation of each use in its entirety and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

21 Cycle Parking

Prior to first occupation of each use, full details of the following shall be submitted to and approved by the local planning authority:

- a) 95 residential long-stay spaces for the affordable housing
- b) 184 long-stay spaces for student accommodation
- c) 2 long-stay spaces for the cultural / leisure use

The approved cycle parking shall thereafter be provided in its entirety prior to the first occupation of any part of development, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policies T1 and T2 of the Camden Local Plan 2017.

22 Secure by design

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

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

23 Bird and Bat boxes

Prior to first occupation of the development a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

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 (2021) and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.

24 Post-construction monitoring report

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

Reason: In order to maximise the re-use of materials and in the interests of sustainable waste management in accordance with Policies CC1 and CC2 of Camden Local Plan 2017 and policy SI7 of the London Plan 2021.

25 Whole Life Carbon – post construction assessment

Prior to the occupation of the development:

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

b) confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policies CC1, CC2, CC3, and CC4 of Camden Local Plan 2017 and policies, SI1, SI2, SI3, SI4, SI5 and SI7 of the London Plan 2021.

Compliance conditions

26 SuDS: Construction in accordance with details

The sustainable drainage system as approved (Flood Risk Assessment and Drainage Strategy Report: 5503-RBG-ZZ-XX-RP-CV-00001 P04) 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 greenfield runoff rates or a maximum discharge rate of 15.1l/s. Thames Water should be contacted to confirm capacity is available for the proposed discharge rates, which have been approved as per this review. The system shall include 1636m² of green roofs (11.1m³ of storage), 1151m² of blue roofs (143.8m³ of storage), and attenuation tanks (127.5m³ of storage), as stated in the approved drawings and shall thereafter retained and maintained in accordance with the approved maintenance plan. A maintenance owner shall be named.

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 2017.

27 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 safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Policies A1 and CC4 of Camden Local Plan 2017.

28 Landscaping Planting

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

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

29 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 (Basement Impact Assessment Rev.P04 by Robert Bird Group dated 24.11.25) hereby approved, and the confirmation at the detailed design stage that 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, D2 and A5 of the London Borough of Camden Local Plan 2017.

30 Noise limits for plant

The external noise level emitted from plant, machinery or equipment at the development, with any specified noise mitigation hereby approved, shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.

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

31 Anti-vibration isolators for plant

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

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

32 Emergency plant and generators

Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10dB one metre outside any premises.

The emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an emergency loss of power.

Testing of emergency plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.

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

33 Circular Economy Statement: Delivered in accordance with details.

The Circular Economy Statement as approved shall be delivered to achieve at least 95% reuse/recycling/recovery of construction and demolition waste and 95% beneficial use of excavation waste. A minimum of 20% of the total value of materials should derive from recycled and reused content.

Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.

34 Fire statement

The relevant development shall be carried out in accordance with the details outlined in the Fire Statement by Arup dated 17/10/2025.

Reason: In order to provide a safe and secure development in accordance with policy CP3 of the Core Strategy and policy D11 of the Draft London Plan.

35 Controlling use – residential only for permanent accommodation

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 2020, or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the residential flats hereby permitted shall only be used for permanent residential accommodation, and not for temporary sleeping accommodation (tenancies of fewer than 90 days) or for any other purposes whatsoever.

Reason: To protect the permanent residential accommodation in the borough in accordance with Policies H1 and H3 of the London Borough of Camden Local Plan 2017.

36 No additional external fixtures

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the building, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.

37 Wheelchair accessible student accommodation

The 28 wheelchair accessible student units shown labelled on the approved floorplans shall be constructed as Wheelchair-Accessible rooms/units to comply with the relevant parts of Part M of the Building Regulations.

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

38 Roof terraces

No flat roofs within the development shall be used as terraces/amenity spaces unless marked as such on the approved plans, without the prior approval in writing of the Local Planning Authority.

Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy A1 of the Camden Local Plan.

Building regulations (imposed optional requirements)

39 Wheelchair and accessible homes (building control optional requirements)

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

4B8P, 3B6P and 3x 2B4P units shown on drawing no.'s PL102 Rev. P.03; PL103 Rev. P.03; PL104 Rev. P.03; PL105 Rev. P.03 and PL106 Rev. P.03. ;

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

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

40 Water use

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

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

31. INFORMATIVES

1	CIL This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice
2	Building control Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
3	Party Wall Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.

4	<p>Pollution Act</p> <p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319 or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
5	<p>Public highway</p> <p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
6	<p>Legal agreement</p> <p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
7	<p>Short terms lets</p> <p>Under Section 25 of the GLC (General Powers) Act 1983, the residential accommodation approved is not permitted for use as holiday lettings or any other form of temporary sleeping accommodation defined as being occupied by the same person(s) for a consecutive period of 90 nights or less. If any such use is intended, then a new planning application will be required which may not be approved</p>
8	<p>Street numbering</p> <p>The correct street number or number and name must be displayed permanently on the premises in accordance with regulations made under Section 12 of the London Building (Amendments) Act 1939.</p>
9	<p>Biodiversity Net Gain (BNG) Informative (1/3):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:</p> <p>(a) a Biodiversity Gain Plan has been submitted to the planning authority, and</p>

	<p>(b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because de minimis threshold.</p>
1 0	<p>Biodiversity Net Gain (BNG) Informative (2/3):</p> <p>+ Summary of transitional arrangements and exemptions for biodiversity gain condition</p> <p>The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because of one or more of the reasons below: <ul style="list-style-type: none"> - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
1 1	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat:</p> <p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town & Country Planning Act 1990</p> <p>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition</p>

	<p>on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development</p> <p>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>
1 2	<p>Water Comments (Thames Water)</p> <p>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>
1 3	<p>Thames Water</p> <p>A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p>
1 4	<p>Post-construction monitoring report informative</p> <p>Once the Post-Construction Monitoring report is approved by the LPA, the Applicant should provide the approved post-construction monitoring report and any supporting information to the GLA at circulareconomystatements@london.gov.uk</p>
1 5	<p>Cadent Gas</p> <p>Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.</p> <p>If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting cadentgas.com/our-services/gas-diversions</p> <p>Prior to carrying out works, including the construction of access points, please register on www.linesearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.</p>







View from Arlington Rd looking at the Flytower of the Existing Building



Mecca Bingo Facade & Roof on Arlington Rd.



View Standing from James Town Road, Looking down Arlington Rd.



View from Parkway Junction showing Mecca Bingo & Odeon Building

1



HSBC, Camden station and Odeon on the left

2



Odeon facade

3



Arlington Parkway corner showing both existing building. Opportunity to provide more active frontage.

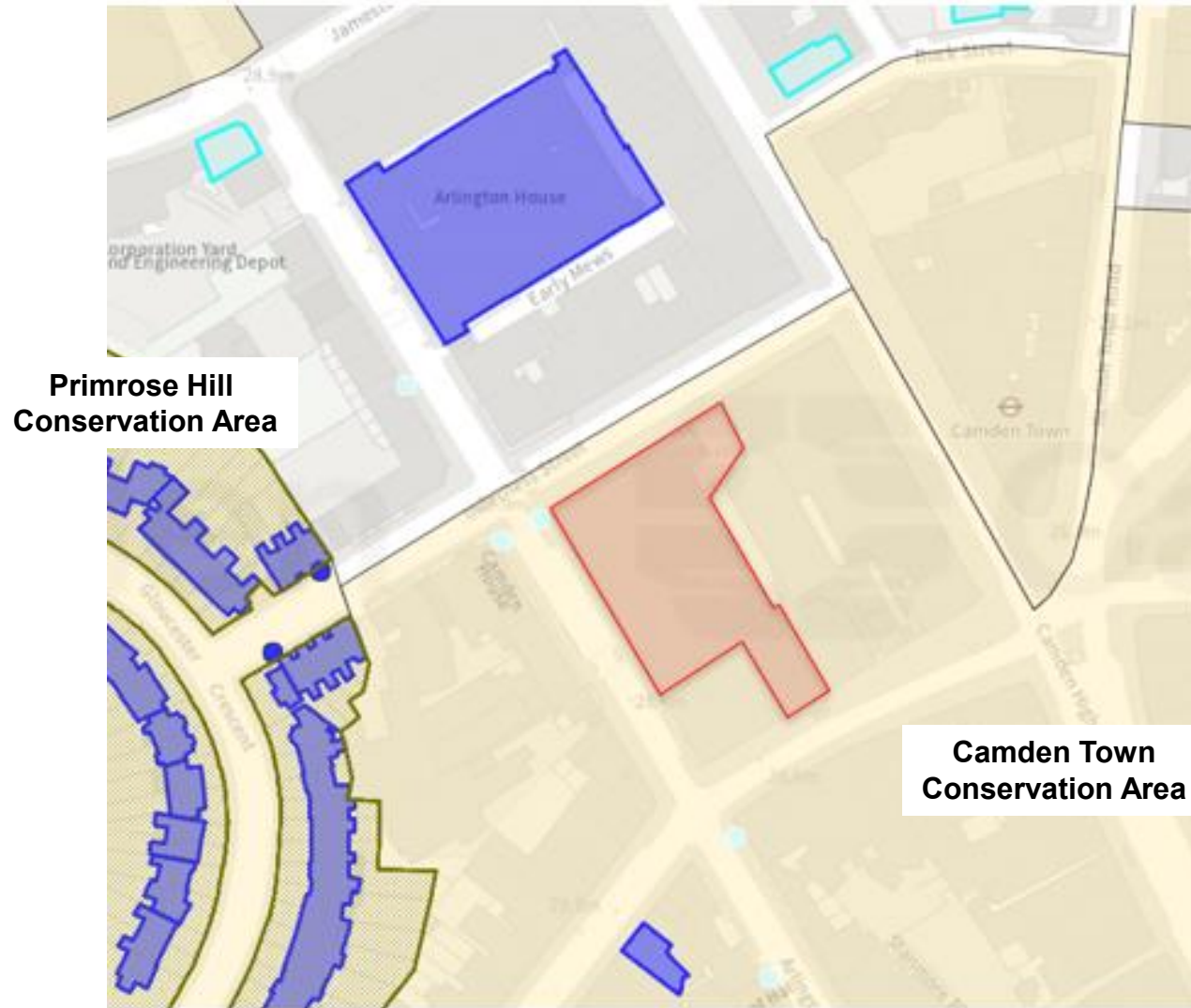


21. 219 Camden High St, mixed use building adjacent to the Market

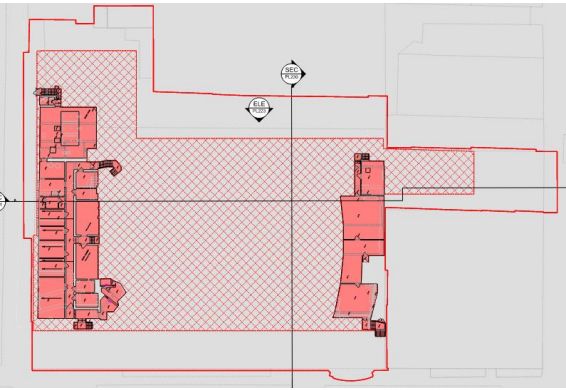




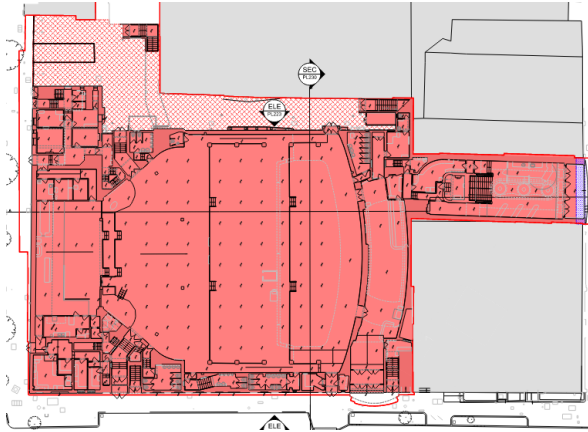
Heritage Designations



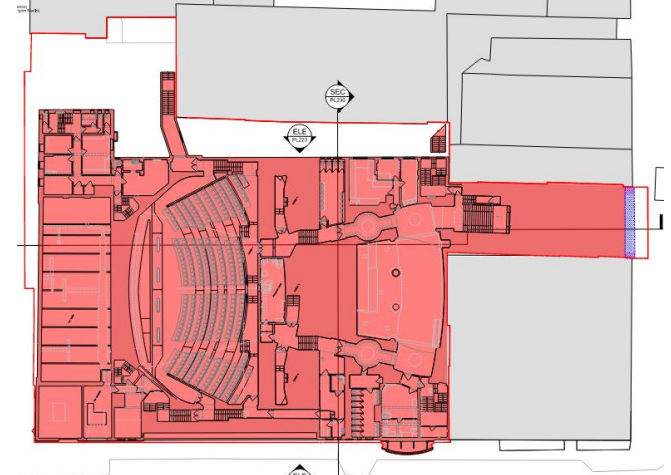
- Light blue – Locally listed
- Dark blue – Grade II listed
- Yellow – Conservation Area
- Red – Application site



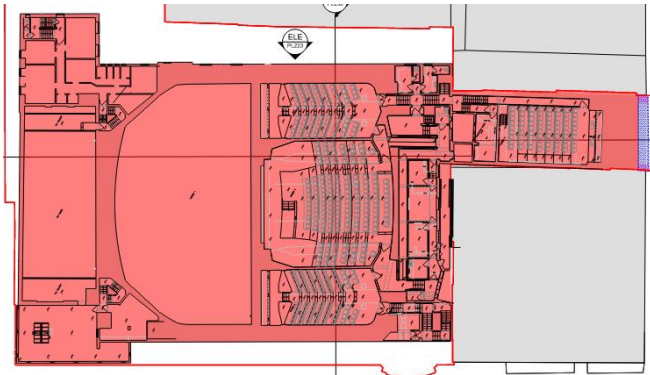
Basement



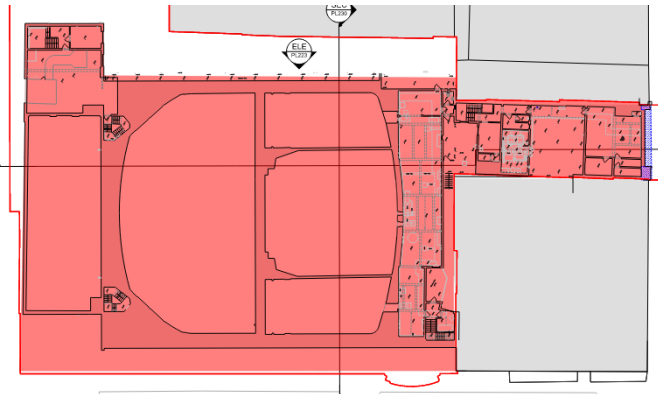
Ground floor



Arlington Rd 1st floor



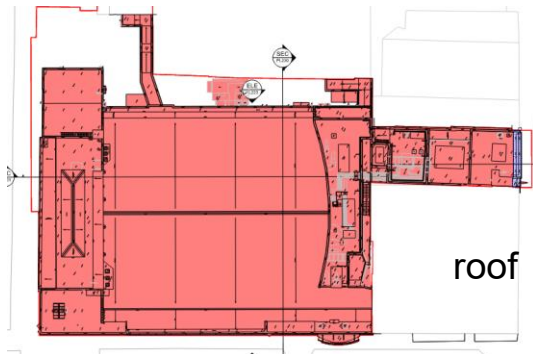
2nd floor



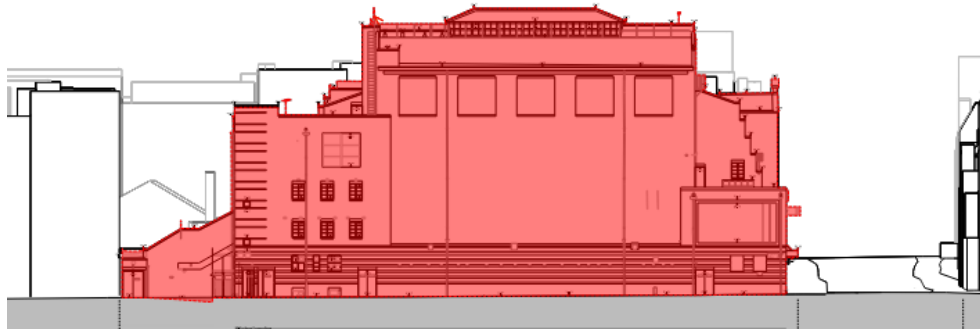
3rd floor



4th floor



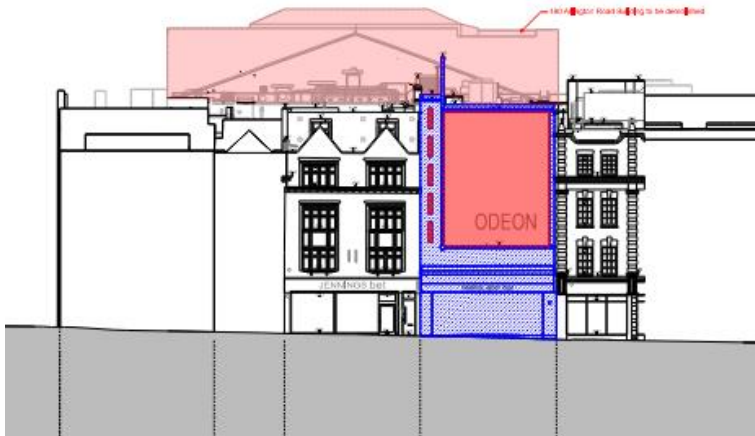
roof



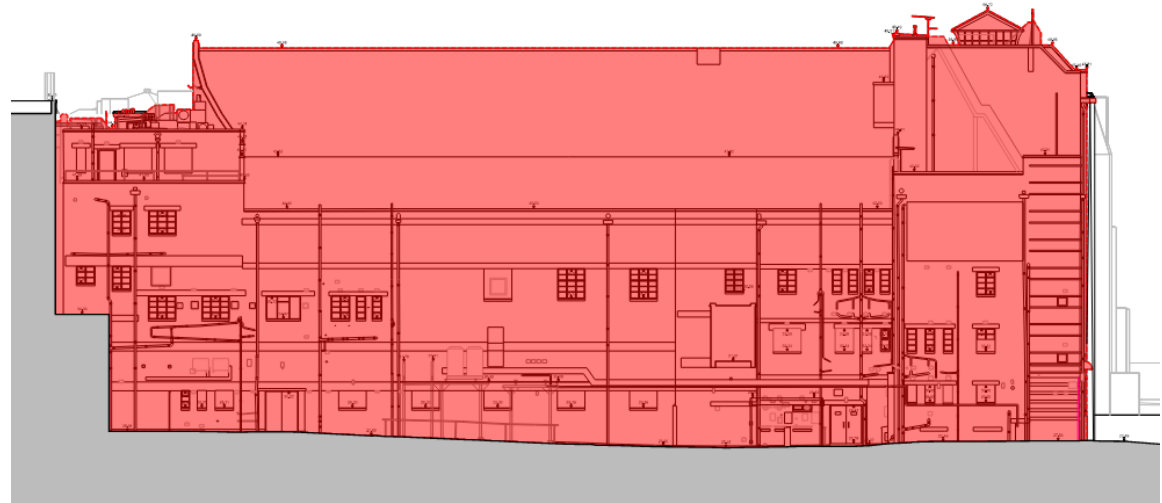
Inverness elevation



Arlington Road elevation



Parkway elevation



East elevation

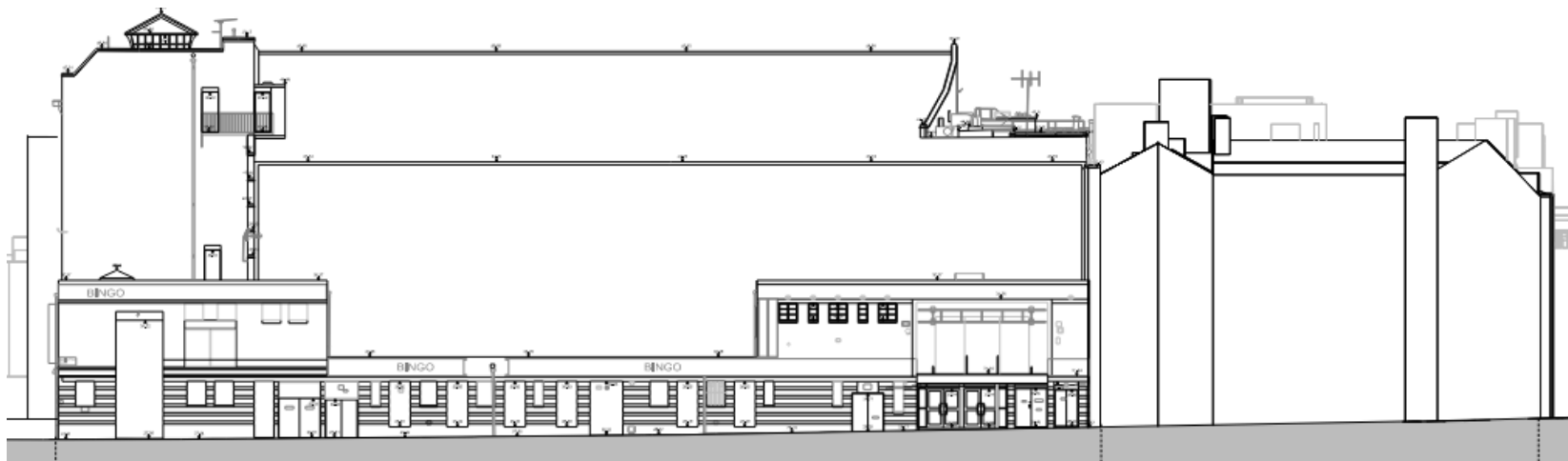


Existing elevation



Proposed elevation

Inverness elevation – Existing and proposed



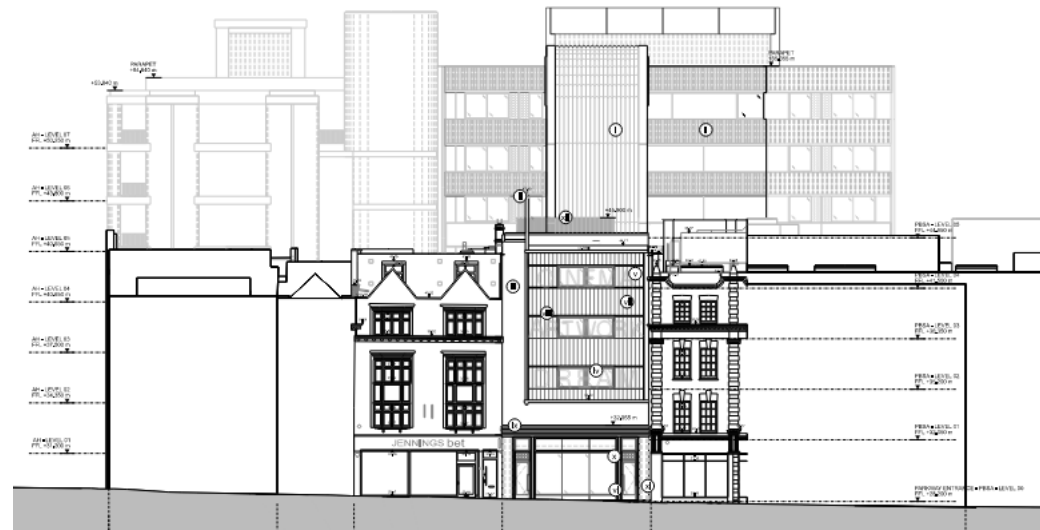
Existing elevation



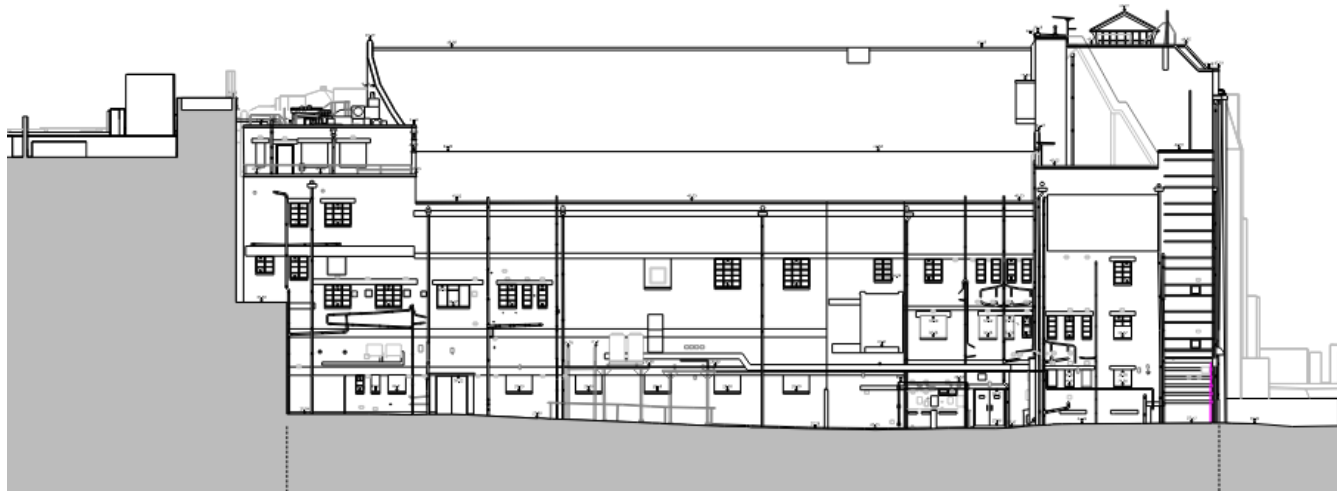
Proposed elevation



Existing elevation



Proposed elevation



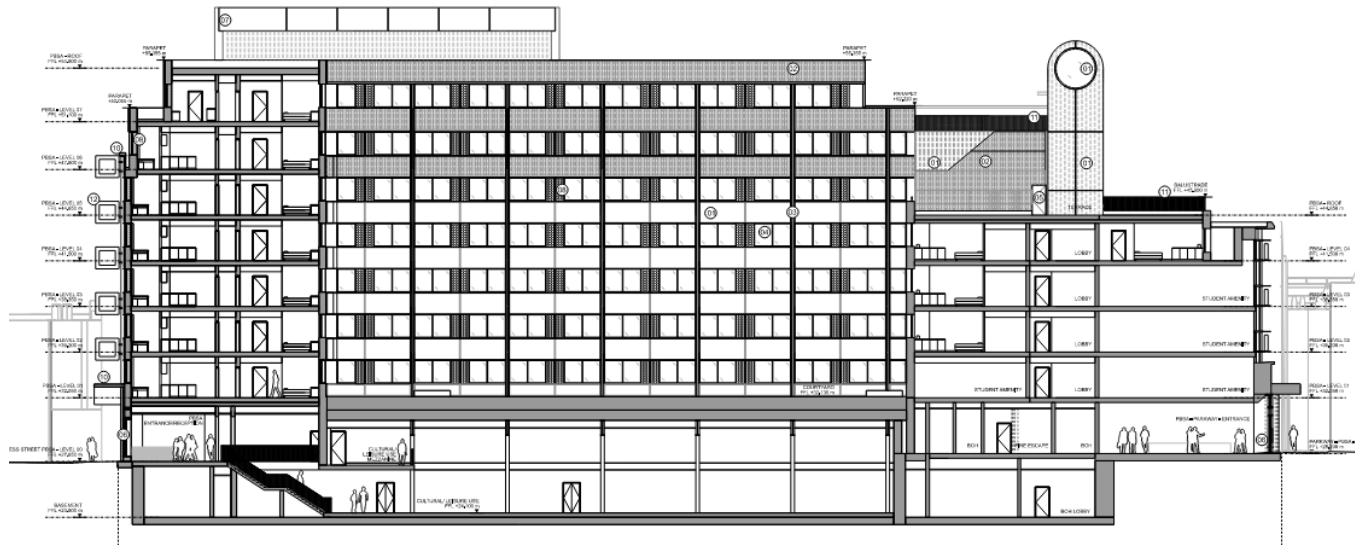
Existing elevation



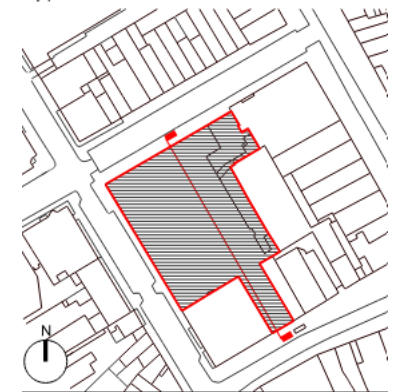
Proposed elevation



Existing section



Proposed section



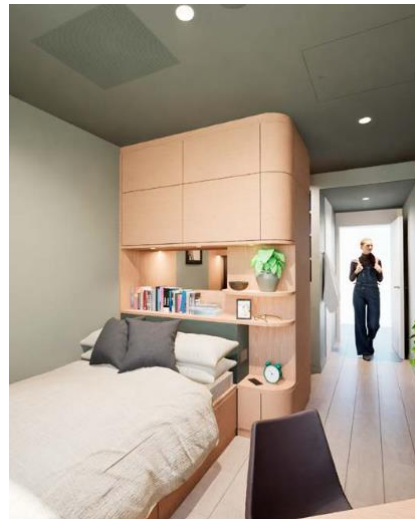
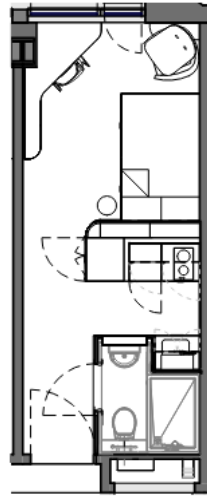




Typical Studio

14-22m²
216 Total
68.5%

- 1 Personal and integrated en-suite pod (off-site lightweight construction)
- 2 Small double beds tailored to operator requirements
- 3 Self-contained kitchenette
- 4 Built-in wardrobe integrated with shelf and storage.
- 5 Study area with 600mm deep desk

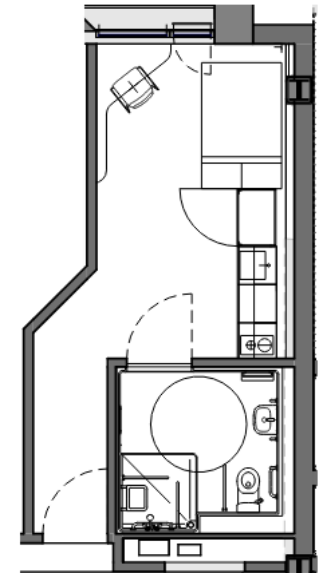


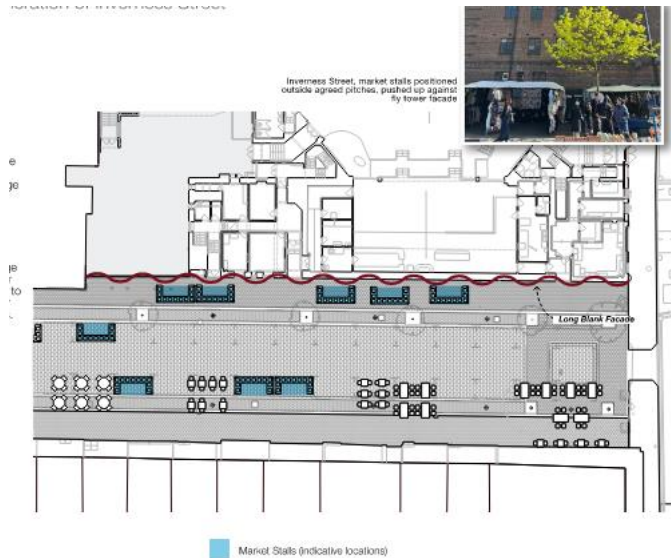
Large Studio

24.5 - 27.5m²
28 Total
11.5%

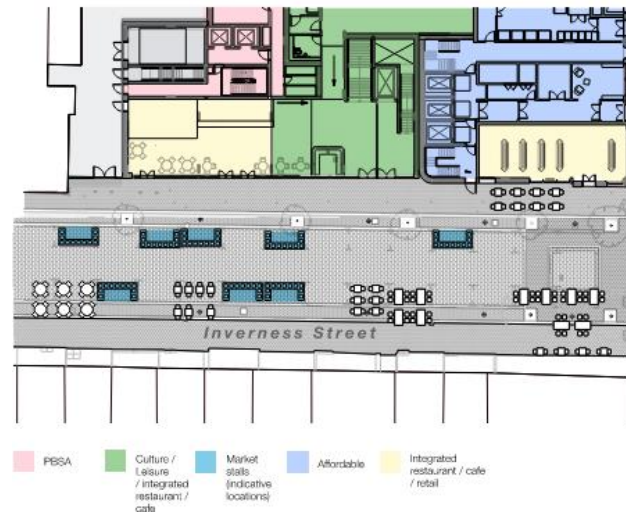
'Meets Part M4(3) accessibility standards'

- 1 Personal and integrated en-suite pod (off-site lightweight construction)
- 2 Small double beds tailored to operator requirements
- 3 Self-contained kitchenette
- 4 Built-in wardrobe integrated with shelf and storage.
- 5 Study area with 600mm deep desk

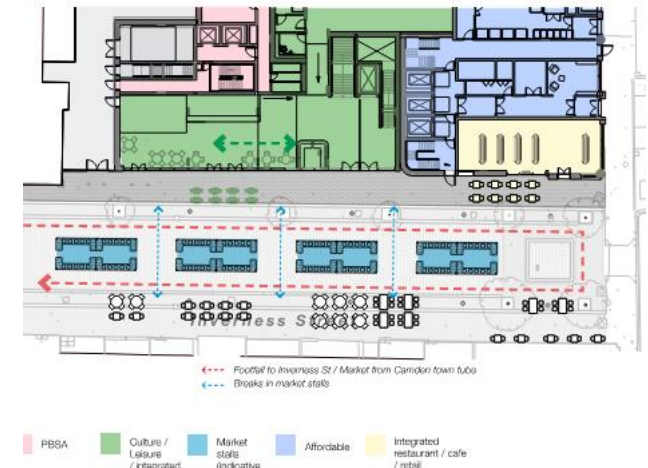




Current Arrangement



**Proposed Arrangement
(Pre-existing designated
Pitch arrangement)**



**Aspirational
Arrangement
(illustrative only)**



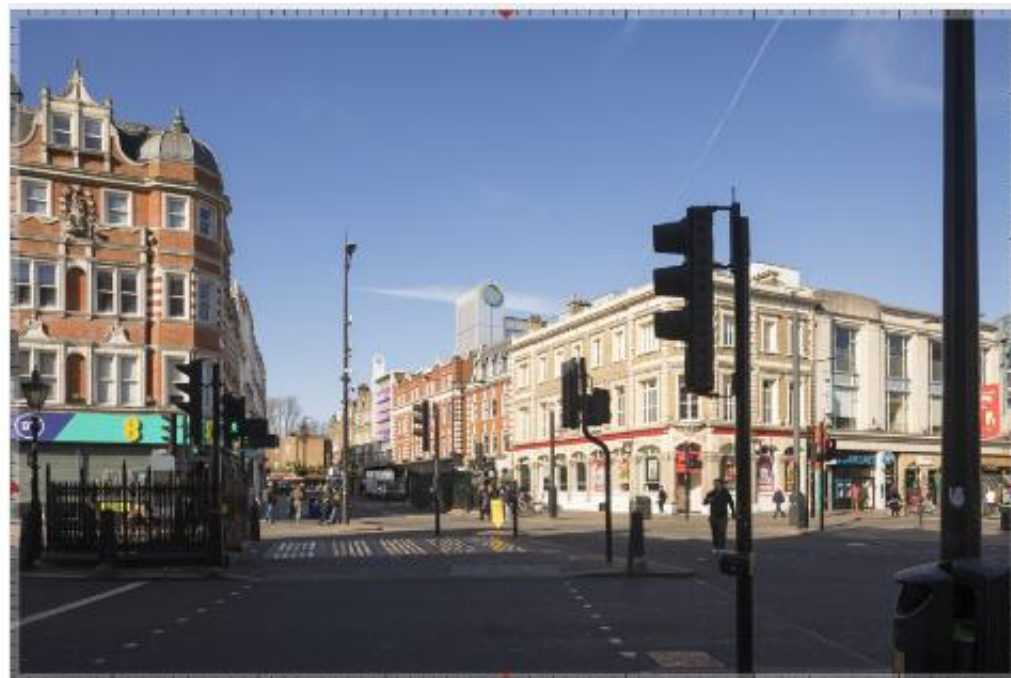
Gloucester Crescent, looking north-east - Existing



Gloucester Crescent, looking north-east - Proposed



Camden High Street / Greenland Road junction, looking south-west - Existing



Camden High Street / Greenland Road junction, looking south-west - Proposed



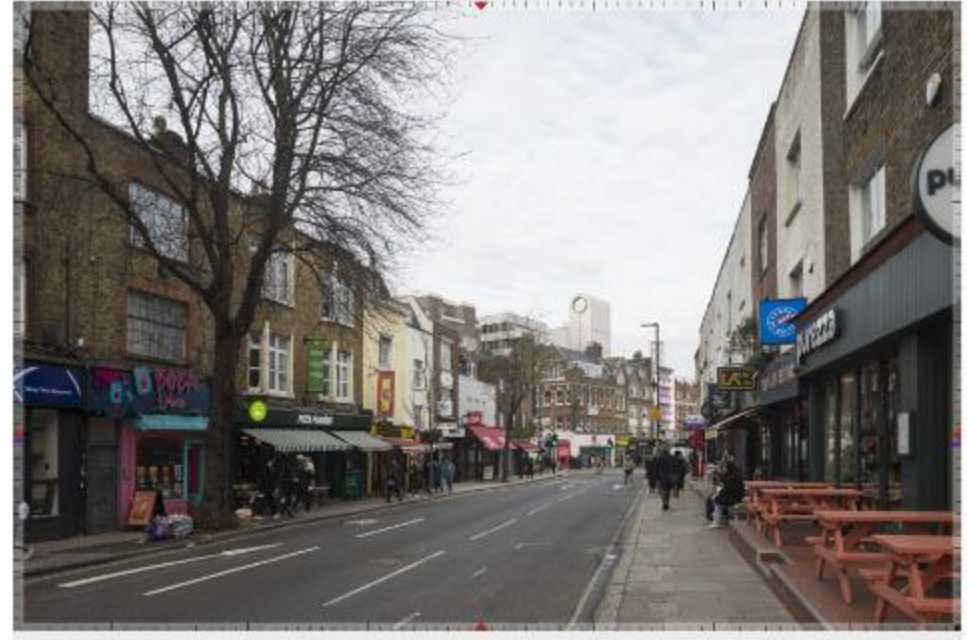
Arlington Road, close to Parkway junction - Existing



Arlington Road, close to Parkway junction - Proposed



Parkway, between Albert Street and Arlington Road, looking north-east - Existing



Parkway, between Albert Street and Arlington Road, looking north-east - Proposed



Arlington Road / Parkway junction, looking north-east - Existing



Arlington Road / Parkway junction, looking north-east - Proposed



Landscaping Site plan

Student terrace (5th floor)

