Address:	Land at Regis Road, Kentish Town, NW5 3EW		**1**
Application Number(s):	2025/4861/P	**Officer:** David Fowler	
Ward:	Kentish Town South		
Date Received:	28/10/2025		
Proposal:	Demolition of existing structures (including part of the listed police station building) and phased redevelopment [of up to 24 storeys (residential equivalent) with basement levels] to include residential development (Class C3), commercial, business and service uses (Class E), film production uses (Sui Generis), education uses (Class F1), visitor accommodation (Class C1), reprovided recycling facility (Sui Generis), local community uses (Class F2), cinema (Sui Generis), drinking establishment (Sui Generis), and studio experience / museum (Sui Generis) together with supporting infrastructure including new and upgraded routes; landscaping, public realm and highway works; energy centre and plant installation; cycle parking and disabled car parking.		

Background Papers, Supporting Documents and Drawing Numbers:

See Conditions List

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:	**Agent:**
YC CFQ Ltd	Montagu Evans LLP

Address:	Kentish Town Police Station, Holmes Road London NW5 3AE		**2**
Application Number(s):	2025/5084/L	**Officer:** David Fowler	
Ward:	Kentish Town South		
Date Received:	28/10/2025		
Proposal:	Partial demolition of the grade II listed Station House fronting Holmes Road and associated works, and development of adjoining building comprising new recycling waste disposal facility (Sui Generis) and residential units (Class C3).		
Background Papers, Supporting Documents and Drawing Numbers: ***See Conditions List***			
RECOMMENDATION SUMMARY: **Grant conditional Listed Building Consent**			

Applicant:	**Agent:**
YC CFQ Ltd	Montagu Evans LLP

ANALYSIS INFORMATION

Land use floorspaces - Existing		
Use Class	**Description**	**Floorspace GIA (sqm)**
C3	Dwellings (flats)	4,797
Sui Generis	Camden Depot (Holmes Road Depot)	10,627
Class E	Kentish Town Industrial Estate	1,714
Class B8	Kentish Town Industrial Estate	1,206
Sui Generis	Station House (Police Station)	2,045
B8	Asphaltic Site	947
Sui Generis	Regis Road Reuse & Recycling Centre	890
Total	**All uses**	**13,547**

Land use floorspaces – Proposed		
Use Class	**Description**	**Proposed GIA (sqm)**
Sui Generis	Film Production (stages, workshops, music production, etc)	68,710
C3	Dwellings (flats)	52,225
E (g)(i)	Workspace (Office including 'Beehive')	10,187
Sui Generis	Visitor and Cultural Attraction	9,032
C1	Hotel / Visitor Accommodation	7,368
F1	Education (London Screen Academy)	6,251
E (a)(b) + Sui Generis	Flexible café, restaurant, and drinking establishment	1,959
Sui Generis	Recycling Waste Disposal Facility	1,268
Sui Generis	Energy Centre	966
Sui Generis	Cinema	805
F1	Non-residential institution (public library, provision of education, public hall)	671
E (a) + F1	Flexible shop, café, and community meeting place	219
E (a)(b)	Flexible café and restaurant	87
Total	**All uses**	**159,748**

Proposed housing mix and tenure – Total					
Tenure	Studio	1 bed	2 bed	3 bed	**Total**
Market	0	83	120	39	**242**
Social-affordable rent	30	57	94	72	**253**
Intermediate rent	0	9	9	0	**18**
Total homes	**30**	**149**	**223**	**111**	**513**

Proposed housing mix and tenure – Inkerman Gardens					
Tenure	Studio	1 bed	2 bed	3 bed	**Total**
Market	0	31	62	29	**122**
Social-affordable rent	0	31	43	31	**105**
Intermediate rent	0	9	9	0	**18**
Total homes	**0**	**71**	**114**	**60**	**245**

Proposed housing mix and tenure – Heathgate					
Tenure	Studio	1 bed	2 bed	3 bed	**Total**
Market	0	52	58	10	**120**
Social-affordable rent	30	15	38	37	**120**
Total homes	**30**	**67**	**96**	**47**	**240**

Proposed housing mix and tenure – Station House					
Tenure	Studio	1 bed	2 bed	3 bed	**Total**
Social-affordable rent (includes housing re-provided from 76 & 78 Holmes Road)	0	11	13	4	**28**
Total homes	**0**	**11**	**13**	**4**	**28**

Existing and proposed homes			
Tenure	Existing homes	Proposed homes	Difference in homes
Market homes	0	242	+ 242
Affordable homes	25	271	+ 246
Tenure	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Market homes	0	25,071	+ 25,071

Affordable homes	0	23,570	+ 23,570

Car Type	**Existing spaces**	**Proposed spaces**
Car - General	0	118
Car - Disabled accessible	0	14
Cycle Type	**Existing spaces**	**Proposed spaces**
Cycle – residential long stay	0	907
Cycle – commercial long stay	0	516
Cycle – short stay (all uses)	0	156

EXECUTIVE SUMMARY

i) Planning permission is sought for redevelopment of a number of plots of land which sit within the Regis Road Growth Area and the neighbouring Police Station site in Kentish Town. The land is currently used for a range of industrial uses including a council depot, reuse and recycling centre, car pound as well as 25 homes (20 of which are affordable) and a police station.

ii) The growth area has been earmarked for redevelopment through adopted and emerging planning policy. The Council's aspiration has been to deliver comprehensive redevelopment of the site, but the fragmented nature of the landownership means that has not happened and recently a proposal for piecemeal development of part of the site has been granted on appeal. To support delivery of the growth area planning guidance has been prepared setting out requirements in terms of routes, spaces, land use and supporting infrastructure. This seeks to ensure that if further piecemeal development comes forward it ultimately delivers the same outcome that was intended through comprehensive redevelopment. It is important that any proposal does not jeopardize the development potential of neighbouring plots or undermine the Council's vision for this new neighbourhood.

iii) The proposed development seeks to respond to that guidance, it is for a mixed use scheme which includes a significant amount of employment floorspace to provide a Film Quarter, this sits alongside educational space for the London Screen Academy and ancillary uses such as hotel and visitor attraction, building an ecosystem that supports the UK film industry. There is no net loss of industrial space and intensification of employment providing many more jobs to the area. Alongside this are 513 homes, of which 485 are additional homes and 25 reprovided (all as affordable). The proposal would deliver 50% of the additional homes as affordable housing providing the policy compliant mix of social affordable rent and intermediate rent. The scheme complies with the affordable housing policies and the delivery of new homes in the borough should be given significant weight because the Council is not meeting the Housing Delivery Test meaning para 11 of the NPPF is engaged and there is a presumption in favour of

the development unless the adverse impacts of the scheme would significantly and demonstrably outweigh those benefits.

iv) The proposed development has been supported by the GLA and any other organisations who have been consulted, but is controversial, with many objections from local groups and residents. The concerns are wide-ranging but most feel that the proposed development is simply too big for the site and that a less impactful scheme could still allow for intensification and better use of the land.

v) The scheme is significant in terms of its scale, mass and density and contrasts with the urban grain which surrounds the site much of which is designated as conservation areas. Whilst the site itself feels quite self-contained and isolated being bound on two sides by railway lines, it is a site which is highly visible in long views and in particular the LVMF strategic views from Parliament Hill and Kenwood. The impact on heritage assets is harmful, there will be an impact on the setting of conservation areas and listed buildings, there is also the loss of historic fabric at the listed Kentish Town Police Station as part of that building needs to be demolished for the scheme to progress, but the most significant impact is on the asset which is within the LVMF view. St Paul's Cathedral is a grade I listed building, it is an iconic landmark and its significance in terms of London and nationally should be given substantial weight. Officers have carefully considered the impact and whether this could be mitigated. The proposed building will harm the setting of the Cathedral and the wider LVMF view because of the prominence of the new building. The proposed buildings causing the impact are those which are delivering much needed homes (Heathgate and Inkerman, the latter causing the most harm) and the film studio, were these to be scaled back in height and mass it would reduce the number of homes, the provision of affordable housing and potentially undermine the film studio ecosystem. Taking account of this officers have sought to negotiate design improvements to the scheme to lessen the impact, but feel the public benefits of the scheme as whole, particularly the housing provision, economic benefits to the film industry and job creation, do outweigh the heritage harm.

vi) The impacts of the scheme are not confined to heritage, some residents near the site will experience a loss of light as a result of the increase in scale, whilst this is unfortunate it is considered to be of a level which is accepted taking account of the needed to support growth in this area and make efficient use of land.

vii) The proposed development will provide the first phase of redevelopment of the Regis Road growth area, it will importantly deliver improvements to Regis Road and Kentish Town Gateway, and new links via Browns Lane and from Holmes Road to Regis Road. The site is currently a cul-de-sac, cut off from surrounding communities, the proposal will change that, starting the challenging process of knitting the site into the wider area. The scheme will aid the prioritisation of pedestrians and cyclists in the neighbourhood which is a key aspiration of policy and guidance. The scheme will also enable work to be progressed on a new bridge, linking the site to Murphy's to the north and the Heath beyond.

viii) Existing Council facilities on the site will be re-provided, the sequencing of the development is absolutely critical to ensure that there is no loss of facilities and this will be tightly controlled via legal agreement.

ix) As well as delivering on placemaking and land use priorities the scheme has been designed to be sustainable, thinking of the needs of future generations and to support local communities. Financial contributions will ensure improvements to public transport, the wider public realm, healthcare and police facilities. In line with policy and guidance the proposed development includes the provision of a range of employment and training opportunities across all non-residential uses and affordable workspace

x) The scheme complies with the development plan as a whole and is recommended for approval.

OFFICER REPORT

Reason for Referral to Committee:

Major development involving the provision of more than 10 new dwellings or more than 1,000 sqm of non-residential floorspace [Clause 3(i)); and subject to the completion of a S106 legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)].

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

Environmental Impact Assessment (EIA):
The proposed development constitutes 'EIA Development' under EIA regulations, and as such, an EIA has been undertaken and is reported upon in an Environmental Statement (ES) submitted with the application. An EIA scoping opinion for the proposal was not sought from the Council prior to submission of the planning application; instead, a scoping exercise was undertaken to define the appropriate scope of the EIA, which is outlined in detail as part of the ES. Officers are satisfied with the scope of the submitted EIA.

1. SITE AND BACKGROUND

Designations

1.1 The following are the relevant designations or constraints:

Designation	Details
Local Plan Growth Area	Kentish Town Regis Road
Neighbourhood Plan Area	Kentish Town
Site Allocation	Site 40: Kentish Town Police Station, 10A, 12A, 14 Holmes Road
Draft Site Allocations	Site Allocation C2 - Regis Road and Holmes Road Depot Site Allocation C4 – Kentish Town Police Station
Town Centre	Kentish Town
PTAL (Public transport accessibility)	Varies from 2 to 5 primarily (highest PTAL to south and east)
Archaeological Priority Area	Kentish Town
Designated Open Space	Railway Embankment, Kentish Town Junction

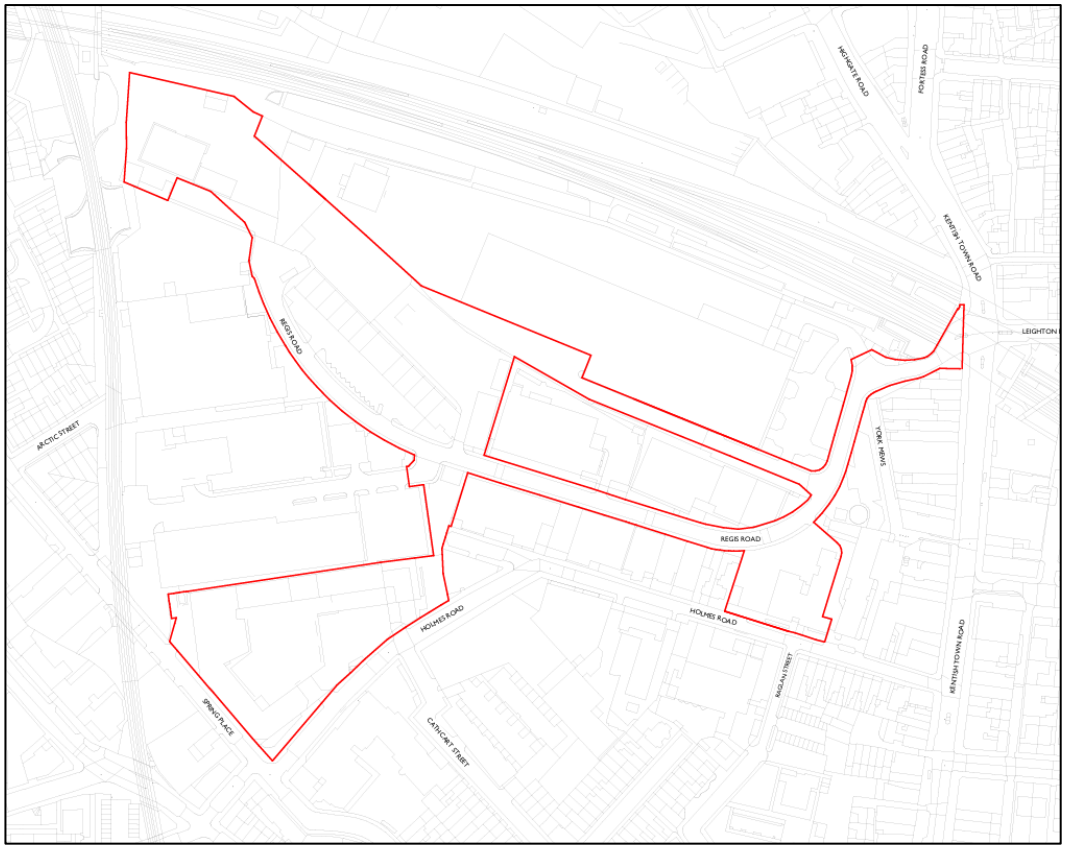
	Gospel Oak Woodyard SNCI
Site of Importance for Nature Conservation (SINCs)	Kentish Town City Farm, Gospel Oak Railsides, and Mark Fitzpatrick Nature Reserve (Grade 1)
Strategic Views	Kenwood to St Paul's Cathedral Parliament Hill to St Paul's Cathedral
Contaminated Land Potential	Industrial Land
Flood Zone 1	Low probability of flooding
Underground development constraints and considerations	Subterranean (groundwater) flow Surface water flow and flooding Slope stability
Local Plan Waste Safeguarding	Waste Site Safeguarding on Regis Road

Site designations and constraints

Description

1.2 Regis Road is located in Kentish Town in the north-east of the borough. It is bounded by railway lines to the north (Thameslink) and west (London Overground), with Kentish Town Road running to the east and predominantly residential uses to the south, beyond Holmes Road. Regis Road is predominantly in use as industrial land, with a number of low-density uses such as storage, distribution, and healthcare located throughout the site.

1.3 At the north-east corner of the site is the main vehicular entrance to the site, the road known as Regis Road connects to Kentish Town Road, the junction is in close proximity to Kentish Town Station. Regis Road runs south and then west through the centre of the site before curving up to the north-west, forming a roughly U-shape. The application site includes the entirety of Regis Road, as well as the entrance to Browns Lane, an access road from Regis Road to the rear of the existing Recycling Centre. It includes land to the north of Regis Road with the exception of UPS, Big Yellow (building works are already under construction on this site – see relevant planning history), as well as land owned or in use by the NHS and Create London, and includes two parcels of land to the south of Regis Road. The site boundary is shown outlined in red in the figure below.



The existing site

1.4 The existing uses within the application site include the Camden Depot (which includes a Council depot, offices and 25 homes including 20 affordable homes) and a Police Station which are both on plots to the south of Regis Road, various businesses within Class B, sui generis and Class E (e.g. builder suppliers, a dark kitchen, beverage suppliers, an architect's offices) and the Regis Road Reuse & Recycling Centre and car pound are located to the north; the table below shows the use classes and total area of the main buildings on the existing site.

Building	Use Class	Area (GIA – sqm)
Station House	Sui Generis	2,045
Regis Road Reuse & Recycling Centre	Sui Generis	890
Kentish Town Industrial Estate	B8 / Class E	2,920
Asphaltic Site	B8	947
Camden Depot	Sui Generis	10,627
Residential flats	C3	4,797

Existing land uses and floor spaces at the site

1.5 Immediately to the north-west of the application site is a designated Site of Importance for Nature Conservation (SINC) – the 'Kentish Town City Farm,

Gospel Oak Railsides, and Mark Fitzpatrick Nature Reserve', also designated private open space and a green habitat corridor.

1.6 The surrounding context of the site is mixed, with a variety of uses including commercial and retail concentrated within the 'Kentish Town' Town Centre (which largely consists of Kentish Town Road), along with residential to the south and east of the site across surrounding streets. To the west of the site is also predominantly residential, with the West Kentish Town Estate located across the London Overground line that runs along the western boundary of the site. The site is also bounded by railway lines to the north, beyond which is the 'Murphy's Yard', an allocated site in the Proposed Submission Draft Local Plan (DCLP) which currently provides industrial land.

1.7 The application site forms part of the Regis Road Growth Area (RRGA), which was designated as such in the Camden Local Plan 2017, as well as being part of the wider Kentish Town Planning Framework Area, which was adopted as a Supplementary Planning Document (SPD) by the Council in July 2020. The Framework includes both the RRGA and Murphy's Yard sites and sets out a clear vision and strategy for both areas. An addendum to this Framework was adopted by the Council in March 2025, which specifically relates to the Regis Road part of the area and provides key development principles. These aim to promote the successful development of the area to provide new homes, jobs, public open space, and community facilities.

1.8 Part of the site (Station House) is included in the adopted Site Allocations (Site 40), which identifies the listed police station site for either police facilities or mixed-use development including police facilities, permanent residential, and/or community uses. The whole site is also identified within the Emerging Local Plan 2025 under Site Allocations C2 and C4, which allocate the wider Regis Road site as a key development area, with the potential to become a new mixed use neighbourhood which includes industry/employment (including offices), residential, community uses, open space, waste and recycling and depot facilities. As with the adopted site allocation, the draft policy for the police station allocates the site for police facilities or mixed-use redevelopment for police facilities and permanent homes.

1.9 No part of the site is located within a conservation area, though the southernmost portion of the site is directly opposite the Inkerman Conservation Area; the boundary of this conservation area runs along the south-east of Holmes Road. The site boundary contains the aforementioned Grade II listed Police Station, and just beyond the site boundary is the Grade II listed Kentish Town Centre, Kingsway College, and attached walls (87 Holmes Road). There are a number of locally listed buildings just to the south of the application site, but none are located within the site itself.

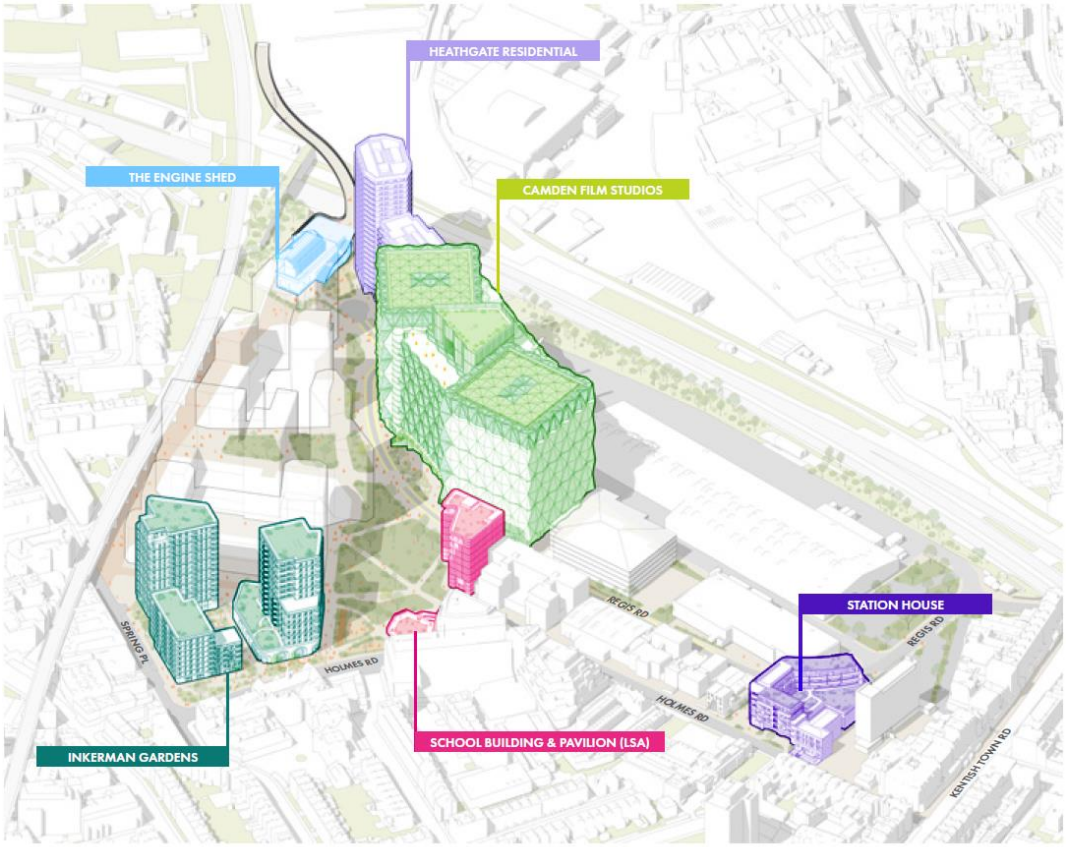
1.10 Due to its size, different parts of the site have different Public Transport Accessibility Level (PTAL) ratings; there is a relatively low connectivity rating of 2 in the north-western corner of the site, a moderate rating of 4 in the central part of the site, and a higher rating indicating good connectivity of 5 to the south and east areas of the site. The site is close to Kentish Town Underground and National Rail Stations, as well as several bus services from nearby bus stops on Highgate Road and Kentish Town Road (leading to Highgate and Archway to the north and Camden Town and Central London to the south). The Kentish Town West Overground Station is located within walking distance to the south of the site. The Gospel Oak Overground Station is also a reasonably short distance from the site, though due to the bordering railway lines to the north and lack of crossing points, is not easily accessible.

2. THE PROPOSAL

2.1 The application is for redevelopment of the site, including the full demolition of all existing structures (except the listed police station – although there is partial demolition of this building) to deliver an employment-led mixed use scheme centring around the Camden Film Quarter. This would include a film production building (including overnight accommodation), education/training facilities (including cinema), and a cultural and visitor attraction, alongside new residential buildings, open spaces, and associated commercial and community uses. The proposal also includes the re-provision of the recycling centre.

2.2 Given the scale of the site and the complexity of the proposals, the site has been divided into six development plots:

- Station House
- The Engine Shed
- Heathgate Residential
- Camden Film Studios
- Inkerman Gardens
- School Building & Pavilion



Visualtisation of six development plots that make up the development

2.3 The proposals relating to each development plot are outlined below.

Station House

2.4 The grade II listed police station is located at the south-east of the site, it is a three-storey, brick building which fronts Holmes Road which was constructed in 1896. There is an arched entrance on Holmes Road and a vehicular entrance which is blocked. It has non-original extensions to the west and north of the original building. It is proposed to demolish the non-original additions to the building and construct in their place, within the curtilage of the listed building, a purpose-built structure that incorporates an enclosed recycling centre and residential units above.

Existing Station House building, viewed from Holmes Road

2.5 The new building would comprise of five storeys and would accommodate the relocated Regis Road Reuse and Recycling Centre, as well as the residential units that are currently situated at 76-78 Holmes Road (Camden Depot). The building would be constructed primarily of brick with green window frames and features and would provide 28 homes (slightly over the 25 homes that are required to be re-provided), all of which would be social rent homes.

2.6 There are no further external alterations proposed for the retained remaining Grade II listed police station as part of this submission. The applicant envisages that it will refurbish the police station to allow for the provision of a new education or community facility. Whilst there is no requirement on officers to assess proposals for further potential physical works to the building under this application, it is important that officers are satisfied that the proposed uses in this application do not place that listed building at risk by requiring significant future intervention in the historic fabric to facilitate that use. Were necessary works to be unacceptable it would leave the building without a viable use.

The Energy Centre

2.7 To the very north-west of the site, it is proposed to construct a new building that would be integrated into the landscaping of the site, incorporating play and planting. This structure would contain the Green Energy Centre (sometimes referred to in submission documents as the 'Engine Shed'), which serves as a key infrastructure element of the development, providing essential services such as heating, cooling, and hot water. This would be

achieved through the inclusion of renewable energy sources, ground and air source, heat recovery, and energy storage technologies.

2.8 The building as originally designed would have incorporated a glass pavilion structure above the energy centre surrounded by public open space. This was to provide a Class E retail use (intended to be a food and beverage offering) that could also be used as a community space. This aspect of the development was revised during the course of the application and this has led to the omission of the pavilion.

2.9 The roof of the Engine Shed has to provide the landing point for a pedestrian bridge which is to be provided across the railway tracks linking the site to Murphy's to the north. This is a key piece of infrastructure to support comprehensive redevelopment of the growth area, as it will improve connectivity between the two neighbourhoods and ensure that there are direct routes from the site to Hampstead Heath beyond. The design of the bridge remains at an early stage of development and, as a result, the final design of the Engine Shed may need to change. The application proposes an interim solution for the roof of the shed allowing for the space to provide a park for residents moving into the adjacent residential (Heathgate). When the bridge comes forward the shed will be transformed to provide an open space alongside a key pedestrian and cycle path. The proposal also includes play space in this location adjacent to the building.

Heathgate Residential

2.10 The Heathgate buildings sit adjacent to the Engine Shed and are also located at the north-western point of the site. Heathgate consists of two Class C3 residential blocks ranging between 16-23 storeys and would provide a total of 240 homes, of which 120 homes would be affordable and would include accessible homes. The buildings are both primarily brick; one being white brick with green elements, and the other being red brick with grey elements

2.11 One of the two residential blocks would also include a community space at ground level, which would open onto Regis Road and new proposed public space. Given Heathgate's proximity to the Engine Shed and surrounding public space, residents would have easy access to public amenity space, alongside private amenity space that is proposed in the form of balconies.

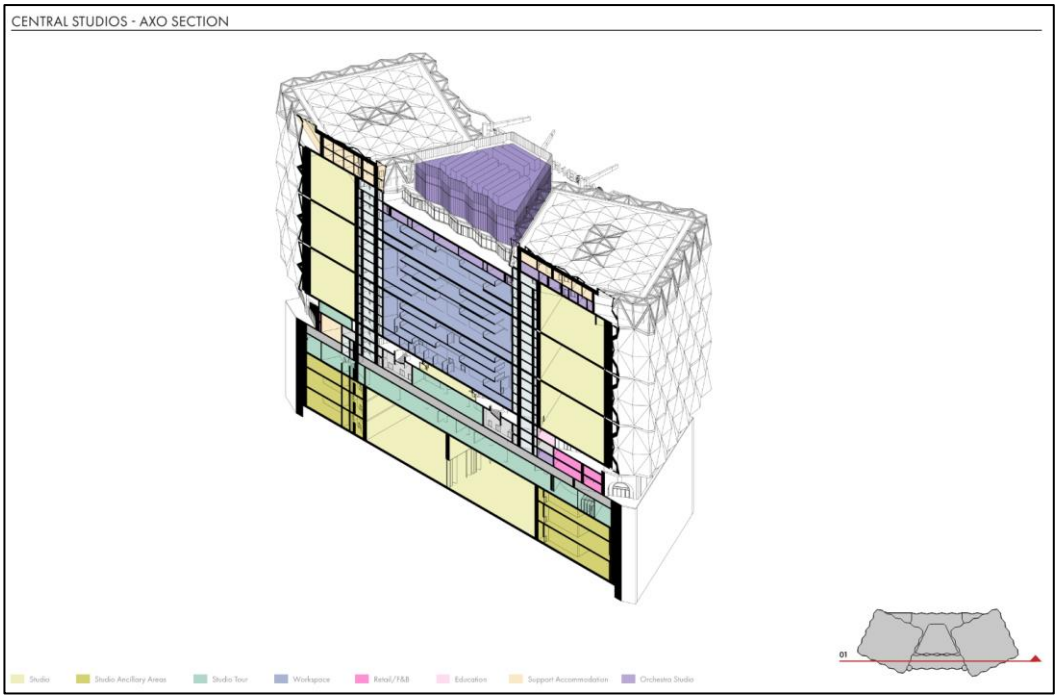
Camden Film Studios

2.12 At the heart of the site, the Camden Film Studio building comprises the largest structure and the centrepiece of the wider development, accommodating a large mixture of uses. Broadly speaking, the building consists of two matching linked buildings with a height of between 73m and 77m, which is equivalent to 22 to 23+ standard residential storeys (containing the stacked film studios), with a glazed spine linking the two.

The building's composition is also split horizontally, with the lower levels providing activation at street level, the middle levels expressing the massing of the film studios, and the top levels appearing lighter in weight and in parts recessed.

2.13 The majority of the two studio parts of the building will be finished with kite-shaped brick panels with no window openings, which would be a necessity given the requirements of the studio use inside. The central spine between these parts of the building would predominantly be glazed, utlising a similar kite shape to the brick panels. At the upper levels, the setback part of the building above the spine and studios parts of the structure would be finished with corten, and the top levels of the studio structure would be glazed.

2.14 In terms of use, the most significant use within the building is a series of eight film production studios stacked throughout, along with workshops, offices, and workspace associated with the studios (Sui Generis). At lower levels, the building provides retail space for a food and beverage offering and a cultural and visitor attraction, activating the structure at ground level and opening it up to visitors and the local community. The roof of the building would also be partly publicly accessible, with a terrace for visitors. The upper levels would provide visitor accommodation for those involved in film production, as well as general visitors and members of the public (when not being used during filming). Within the central part of the upper levels would be an orchestra studio, with production suites and smaller recording studios located adjacent to this; the orchestra and music space would be utilised either independently from the film studios or in association with the production through the rest of the building. The final use located within the building would be education spaces associated with the National Film and Television School (NFTS), constituting a mix of classrooms, editing suites, and event spaces. This would be accessed from the entrances at street level and located in the lower parts of the building.



Diagramatic section of studios building to show mixture of uses

2.15 Vehicular servicing for the Film Studios would be from an existing servicing road, currently used by UPS, which connects to the rear/north side of the building and is included in the red line for the application. The new service road would require modification to existing servicing arrangements on UPS land, including the relocation of an existing substation, all of which would be controlled by the S106 Infrastructure Delivery Plan detailed in the relevant sections of the assessment below. The main pedestrian entrance would be on the southern side of the building on Regis Road. The Transport section covers the above in more detail.

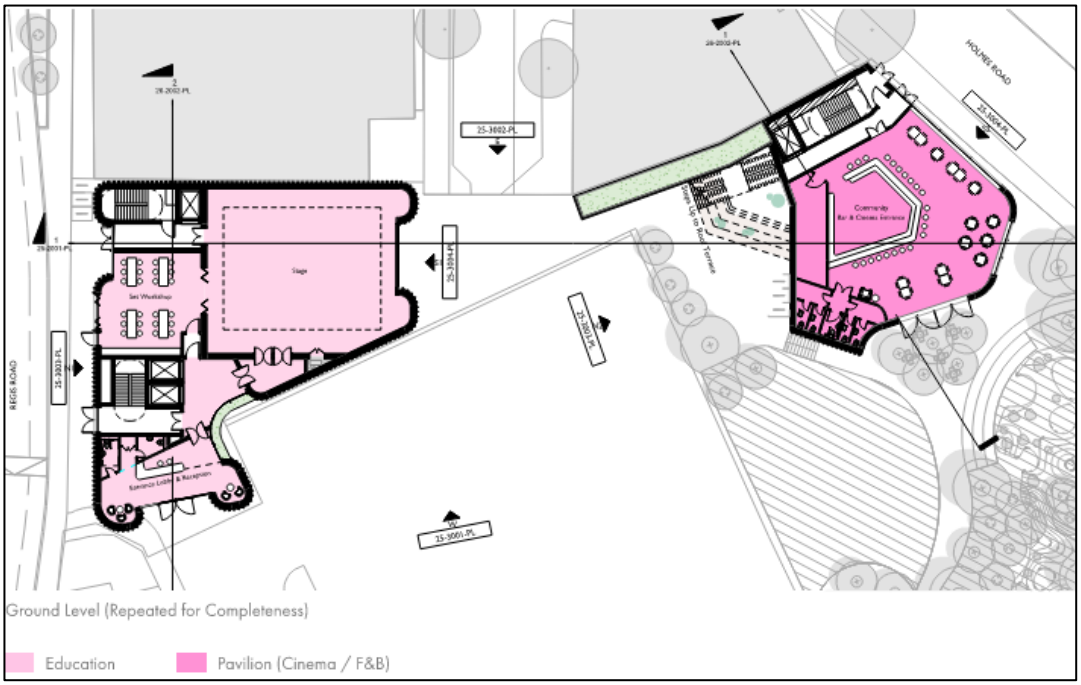
Inkerman Gardens

2.16 In the area of the site currently occupied by the Camden Depot, it is proposed to erect three residential blocks of between 5-16 storeys. The accommodation would provide 245 Class C3 homes, of which 123 are proposed to be affordable, providing a mix of 1-3 bedroom homes, including accessible homes. The buildings are primarily constructed of brick, with red tones and white coloured brick features

2.17 The three buildings are centred around a garden for residents and includes commercial space at ground level, as well as film studio space in a proposed basement beneath Block C and community facilities at ground floor level, providing activation to the street. Cycle storage would be provided in the basement of the building and flats would benefit from private amenity space in the form of balconies.

School Building & Pavilion

2.18 Directly to the south of the Camden Film Studios building, a new facility for the London Screen Academy (LSA) would be provided, which constitutes a sixth form academy for 16-18 year olds that are looking towards a career in film and the creative industries. This would consist of an eight-storey main building providing educational space, largely made up of classrooms, studios, editing suites, studios, and collaboration space (Class F1).



Diagramatic plan of School Building and Pavilion to show mixture of uses

2.19 The LSA facilities would also include a pavilion building that would be separate to the main structure, hosting a cinema (sui generis) and outdoor amphitheatre, alongside an associated food and beverage space.

Revisions during the course of the application

2.20 A number of revisions were made to the application during the course of the application.

2.21 The Engine Shed in the north-west corner of the site was reduced in height with the proposed Class E use removed, resulting in the Energy Centre reading as part of the site landscaping, rather than a separate building. This was in part to accommodate where the bridge over to the Murphy's site would land.

2.22 Changes were made to the ground floor of the Heathgate Building and also the surrounding public realm, to improve the situation in terms of activation and secure by design. The changes also mean vehicular access to this part of the site does not rely on land within the application site red line, but currently used by Royal Mail.

2.23 The Film Studios building was pulled back at ground floor level. The façade depth was pushed back at the corners to mitigate the impact of the road overhang. This was to provide more public realm and facilitate access along Regis Road for all users.

3. ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

3.1 An EIA scoping opinion for the proposal was not sought from the Council ahead of submission of the planning application, but a scoping exercise was undertaken to define the appropriate scope of the EIA. The scope of the EIA is outlined in detail as part of the Environmental Statement (ES) that has been prepared under the EIA Regulations 2017. The ES includes the following sections:

- Alternatives and Design Evolution
- The Proposed Development
- Demolition and Construction
- Socioeconomics
- Health
- Transport and Movement
- Air Quality
- Noise and Vibration
- Wind Microclimate
- Daylight, Sunlight, Overshadowing, Light Pollution, and Solar Glare
- Effect Interactions
- Likely Significant Effects and Conclusions
- Environmental Management, Mitigation, and Monitoring Schedule
- Built Heritage, Townscape, and Visual Impact Assessment
- Non-Technical Summary

3.2 The ES considers the impact of the development along with the cumulative impact of other recent or future anticipated development in the area. The cumulative schemes considered in the ES are:

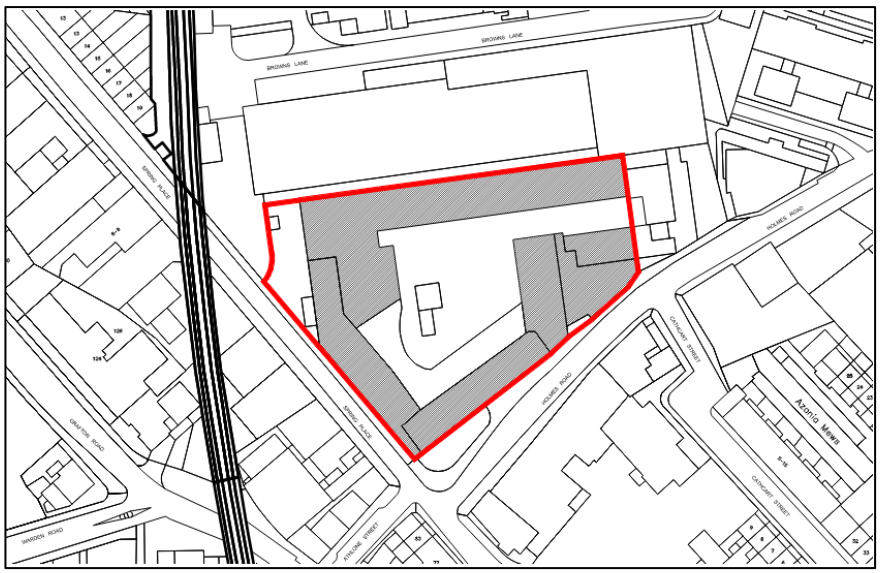
- Regis Road and Holmes Road Depot (Site Allocation Policy C2)
- Joseph Holmes Land (also included in Site Allocation Policy C2)
- Murphy Site (Site Allocation Policy C3)
- Kentish Town Police Station (Site Allocation Policy C4)
- Juniper Crescent (Site Allocation Policy C10)
- Wending Estate and St Stephens Close (Site Allocation Policy C15)
- UCL Camden Campus (Site Allocation Policy C18)
- Camden Goods Yard
- The O2 Masterplan Site Finchley Road
- 100 and 100a Chalk Farm Road
- West Kentish Town Estate

3.3 The Council referred the Environmental Statement to 'Land Use Consultants', an independent consultant who reviewed and advised that the submitted ES covers all the necessary issues, is robust and acceptable.

4. RELEVANT HISTORY

The site

78-79 Holmes Road (Holmes Road Depot)



Map to show the location of 78-79 Holmes Road

4.1 **2017/3789/P** – Reconfiguration of workshop, storage and office uses and alterations including replacement windows, glazed curtain walling and aluminium cladding to internal elevations, glazed pedestrian entrance with canopy to the south elevation, new roof plant including acoustic screening, boiler flue to west roof, substation, photovoltaic panels to north roof, reconfiguration of waste skip in central yard and cycle parking. **Granted 15/05/2018.**

4.2 **2014/6465/P** – Enclose depot bay for provision of additional office accommodation. **Granted 17/12/2014.**

4.3 **2014/5349/P** – Retrospective erection of a double storey portacabin and formation of a new fire escape for a temporary period of 12 months. **Granted 16/10/2014.**

4.4 **2012/1780/P** – Retention of 10 x air conditioning units and associated enclosures at roof level and 13 x extract louvres on elevations at second floor level to existing office/depot/flats. **Granted 12/06/2014.**

4.5 **2004/0308/P** – Alterations to office. **Granted 18/02/2004**.

4.6 **PEX0000095** – Installation of new shop front on Spring Place in association with the use of the building as a parking shop at Holmes Road depot. **Granted 08/05/2000.**

4.7 **PEX0000994** – Retention of a 900mm high safety guard rail to a small area at second floor level on front elevation. **Granted 30/04/2001.**

4.8 **PE9900912** – Change of use of part of the ground floor to parking shop, and associated external alterations. **Granted 13/01/2000.**

4.9 **9401243** – Change of use of part ground and part first floor from depot facilities to education and training facilities as shown on ground floor and two first floor plans. **Granted 10/11/1994.** ***(Granted as a personal permission to Camden Jobtrain during their occupation, with the use to revert to the lawful use for depot purposes following vacation of the premises)***

Units 7A, 8, 9, 10, 11 Regis Road

Map to show location of Units 1-12 Regis Road

4.10 **2017/2747/P** – Increase in height and alteration to facades of Units 8, 9, 10 and 11 to provide additional floorspace (mixed Class B1/B2/B8 uses) and to create two new levels (second and third floors); alterations to roof of Unit 7a in association with provision of additional floor space (Class B1c); creation of front roof at Units 7a, 8, 9, 10, 11; associated works. **Granted subject to a S106 legal agreement 07/08/2017.**

Unit 12 Regis Road

4.11 **2011/0482/P** – Retention of the change of use from a light industrial unit (Class B1) to a Camden Jobtrain training centre (Class D1) and the retention of perimeter railings and gates. **Granted 28/03/2011.**

4.12 **2006/1891/P** – Erection of a second floor extension, a three storey side extension, terrace at front second floor level, external staircase at rear and associated alterations to rear boundary wall/gates to light industrial unit (Class B1). **Granted 06/07/2006.**

4.13 **2005/2932/P** – Erection of a two-storey extension to provide additional floorspace to the existing light industrial unit (Class B1c). **Granted 08/03/2006.**

4.14 **2005/1199/P** – Erection of a new 2-storey side extension to industrial unit. **Refused 31/05/2005 and dismissed at appeal 01/02/2006**.

Unit 7A Regis Road

4.15 **2004/2496/P** – The erection of a new 3 storey building for Class B1(c) use. **Granted 03/08/2004.**

4.16 **2004/1228/P** – The erection of a new 2 storey building for Class B1 use. **Granted 06/05/2004.**

Unit 4, Regis Road

4.17 **2011/3868/P** – Erection of an additional floor at second floor level to storage and distribution premises (Class B8). **Granted 30/09/2011.**

Unit 3, Regis Road

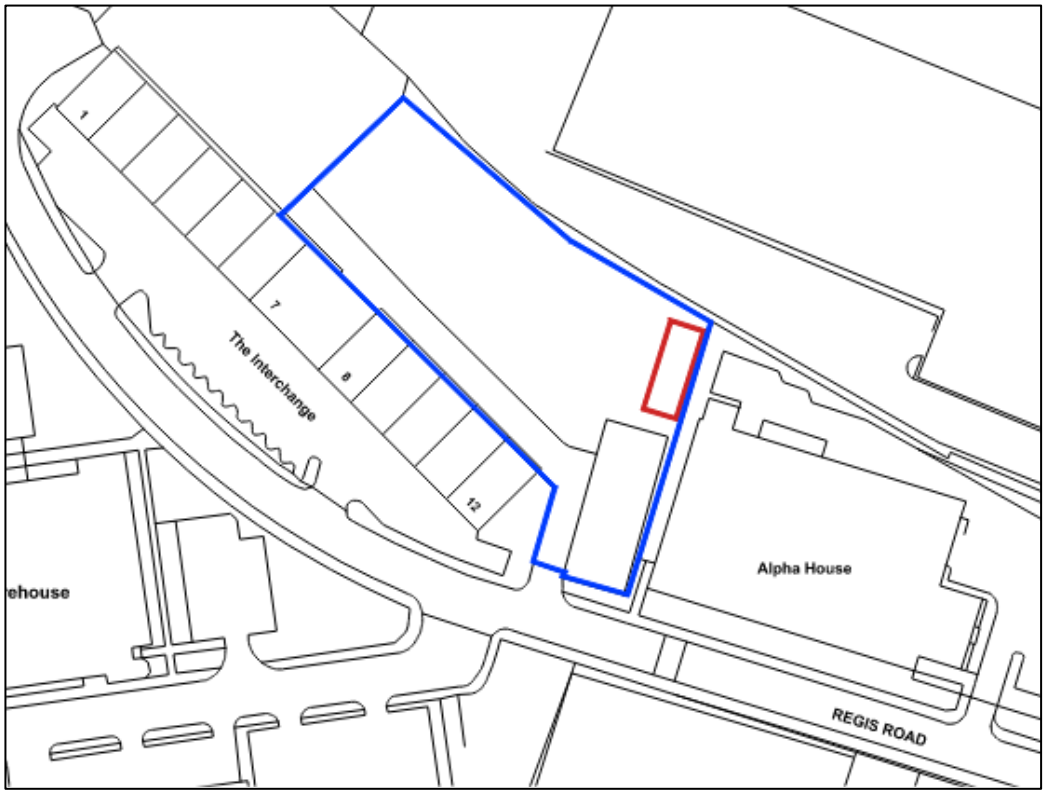
4.18 **2016/0521/P** – Erection of a 2nd floor roof extension providing B8 and ancillary B1 floorspace. **Granted 04/05/2016.**

Land adjacent to Unit 1, Regis Road

4.19 **2013/4832/P** – Erection of new three storey building for a mixed use development to provide a light industrial unit with ancillary offices (Class B1c) at ground floor and part first floor levels, and an office unit (Class B1a) at second floor level, plus the provision of 2 car parking spaces. **Granted 15/10/2013.**

4.20 **2015/4234/P** – Erection of additional storey to provide office and storage accommodation (Class B1 and B8) to Units 1, 2 & 3. **Granted 07/10/2015.**

Regis Road Recycling Centre

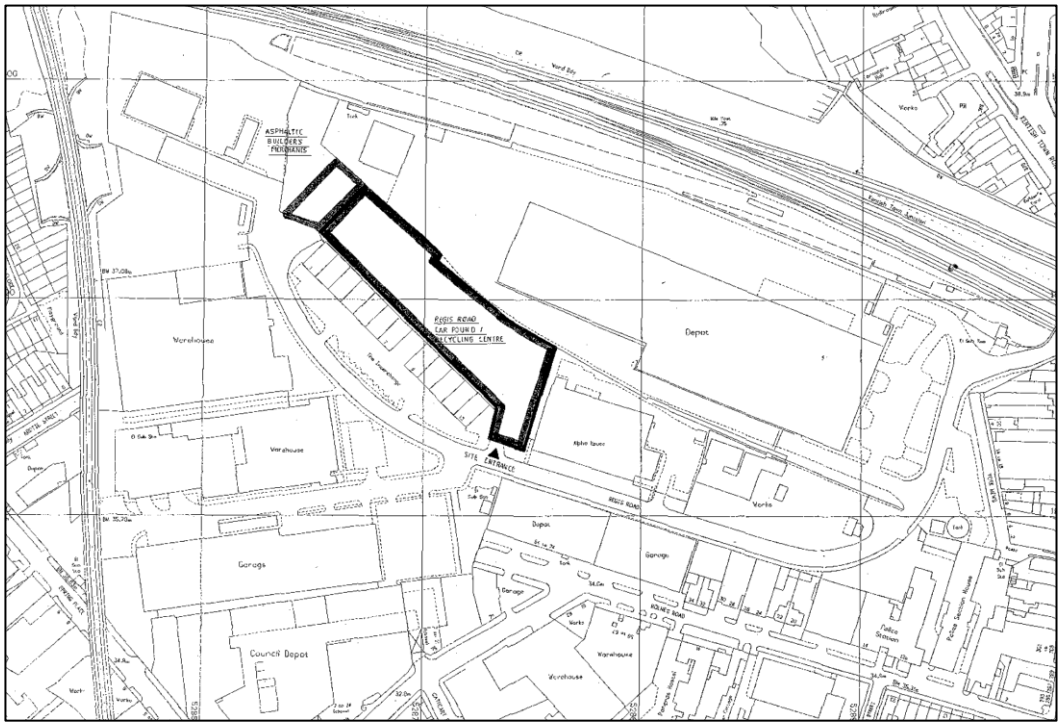


Map to show location of Regis Road Recycling Centre

4.21 **2012/6047/P** – Alterations to portal frame storage building; comprising the replacement of external shutter opening installation of new wall including new windows and door with external access ramp to front (west) elevation, and the installation of replacement entrance door to side (south) elevation. **Granted 22/01/2013.**

4.22 **2004/3009/P** – Erection of a three-storey office building in association with the existing recycling centre and car pound and various works to the recycling centre (involving the demolition of the majority of the existing portacabins). **Granted 22/11/2004.**

Asphaltic Site (Regis Road)



Map to show location of Asphaltic Site at Regis Road

4.23 **2005/3175/P** – Change of use of part of the existing builders' merchant yard (Class B8) to additional vehicle parking space for the existing adjacent car compound (Sui Generis) with associated installation of security railings. **Granted 07/10/2005.**

4.24 **2004/2124/P** – Construction of a light industrial unit within Use Class B1c and associated offices. **Granted 06/07/2004.**

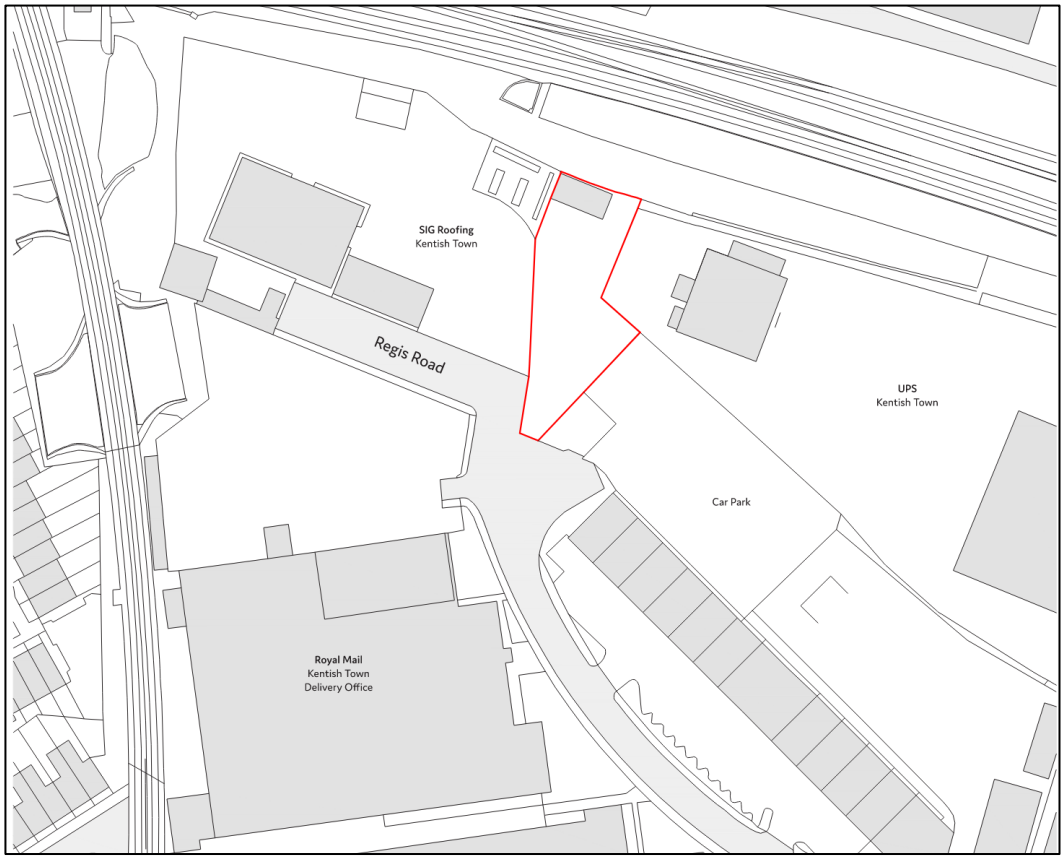
4.25 **2003/1667/P** – Construction of a light industrial unit within Use Class B1c and associated offices. **Granted 05/12/2003.**

4.26 **PE9700444R2** – Development of the site by the erection of a single-storey building comprising 3 industrial units to be used for storage/distribution (B8) purposes with ancillary office and showroom space, together with the provision of associated parking spaces for 5 cars and 12 bicycles. **Granted 10/10/1997.**

4.27 **9401146** – Construction of factory unit with parking places and manoeuvring space for vehicles. **Granted 13/10/1994.**

4.28 **9300852** – Erection of a new warehouse building. **Granted 21/10/1993.**

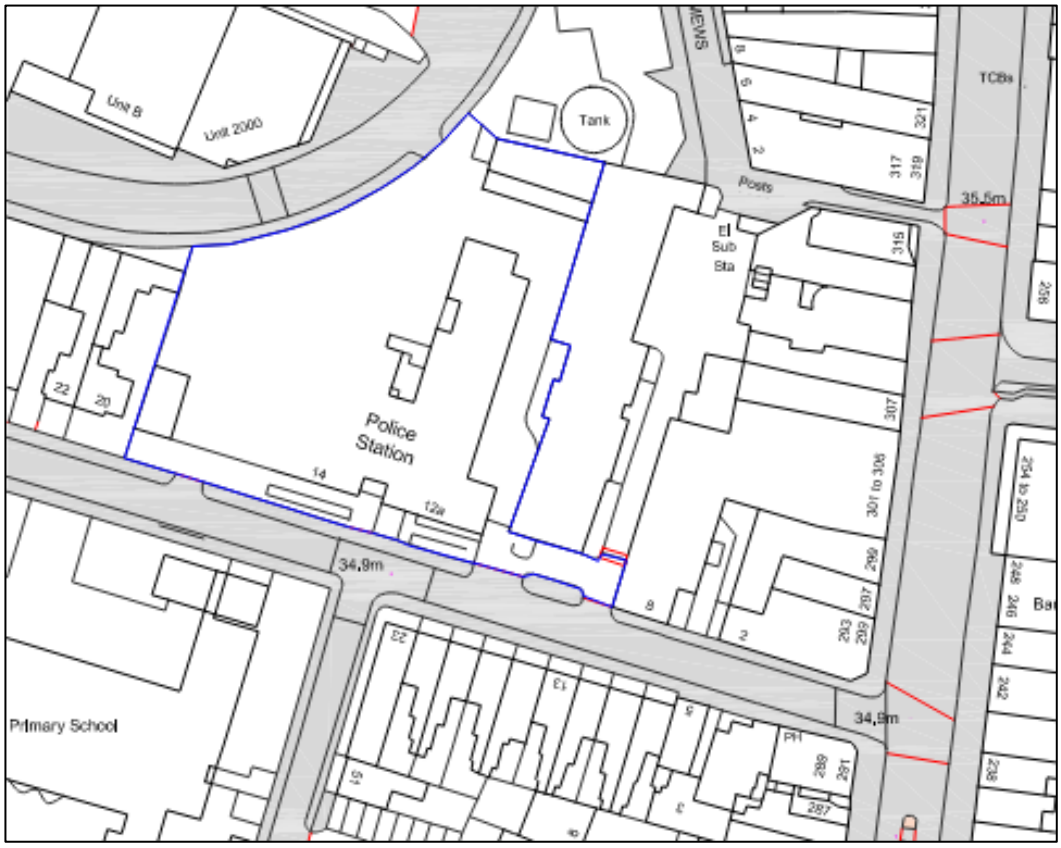
Land and Buildings to the North of Regis Road



Map to show location of 'land and buildings to north of Regis Road'

4.29 **2022/0652/P** – Part-retrospective application for siting of containers within open storage and parking area to commercial kitchen units, vertical farming units, online grocery distribution facility, electric bicycle testing and charging facility with staff office and communal staff rest area and electric vehicle charging bays (Sui Generis) for an interim period of three years. **Granted subject to a S106 legal agreement 19/02/2025.**

Kentish Town Police Station



Map to show location of Kentish Town Police Station

4.30 **2021/0053/P & 2021/1015/L** – Replacement of side hung gate with a new bi-folding gate, railings, and associated works. **Planning and listed building consent granted 19/04/2021.**

4.31 **2006/2945/P** & **2006/2946/L** – Retention of pedestrian gate access within boundary wall fronting Regis Road. **Planning and listed building consent granted 02/04/2007**.

4.32 **2005/2937/P & 2005/2938/L** – Installation of access ramp to front entrance and erection of a temporary office on the southwest forecourt of police station. **Planning and listed building consent granted 14/10/2005.**

4.33 **2005/0364/P** & **2005/0366/L** – Replacement of gates to vehicular access fronting Regis Road. **Planning and listed building consent granted 11/04/2005**.

The area

10a Holmes Road – Metropolitan Police Station, Section House

4.34 **2025/5479/P** – Partial demolition, rebuilding, and extension of the former Section House building in connection with its continued use for policing services, including the erection of lift shaft and single-storey ground floor extension; external cladding and windows; erection of a vehicular access

ramp and first-floor podium; structural works; installation of rooftop plant; waste store; boundary treatments; cycle parking; operational car parking; hostile vehicle mitigation bollards; landscaping works; external lighting; CCTV; and other associated works. **Application submitted 03/12/2025 pending determination.**

61-63 Holmes Road

4.35 **2014/3795/P** – Erection of mansard roof extension with roof balcony and front terrace, to create a 5th floor level and allow change of use of 2 x 1 bed flats to 2 x 2 bed flats, and associated installation of green roof, photovoltaic panels, glazed balustrades and screening. **Granted subject to S106 legal agreement 16/01/2015.**

4.36 **2011/0201/P** – Outline application for the erection of a 5 storey plus basement building comprising light industrial (Use Class B1) at basement and ground floor levels and residential (Use Class C3) at 1st, 2nd, 3rd and 4th floors (5 x 1bed and 3 x 2bed units) following demolition of existing building (application seeks permission for scale, layout and access only and not appearance of the building or landscaping). **Refused 27/09/2011, on grounds that proposed mix of units would not be appropriate and the lack of legal agreement securing car-free housing, educational contributions, public open space contributions, Construction Management Plan, highways works, and environmental sustainability measures. Allowed at appeal 12/03/2012 (APP/X5210/A/11/2163152).**

West Kentish Town Estate

4.37 **2025/2667/P** – Hybrid Planning Application for Part Full and Part Outline Planning Permission comprising: Detailed planning permission for Development Plots A1 and D1 including demolition of any above ground structures, and erection of new buildings for use as residential dwellings (Class C3) and flexible commercial, business and service space (Class E), together with landscaping, public realm, cycle parking, highways works, infrastructure and other works associated with those Development Plots; Detailed planning permission for a scheme of temporary hard and soft landscaping adjacent to Development Plots A1 and D1 and associated works; and, Outline planning permission for a phased development with all matters reserved for Development Plots A2, A3, B1, C1, D2, D3, E1, E2, F1, F2 and G1 including demolition of all existing above ground structures within those plots and erection of new buildings to provide residential dwellings (Class C3) and flexible commercial, business and service space (Class E) together with new pathways, play space, cycle and disabled parking, hard and soft landscaping, highways works, infrastructure, and other works associated with those Development Plots in accordance with the Development Specification. **Granted subject to section 106 agreement 31/03/2026.**

Alpha House, Regis Road (Big Yellow)

4.38 **2023/0093/P** – Demolition of the existing building and the construction of a self-storage facility (Use Class B8) and office space (Use Class E(g)(i)), together with vehicle and cycle parking and landscaping. **Refused 25/08/2023, on grounds that proposal prejudices the comprehensive redevelopment of the area, would fail to make the best use of the site or respect the design aspirations for the Regis Road Growth Area, fails to demonstrate that proposed substantial demolition is justified, and the lack of a legal agreement securing car-free development, Construction Management Plan, carbon off-set contribution, a Local Level Travel Plan, a local employment and training package, and affordable workspace for SMEs. Allowed following public inquiry 05/07/2024.**

Other relevant cases

Marlow Film Studios – Buckinghamshire Council

4.39 **22/06443/FULEA** - Planning permission was sought for production space and supporting buildings for screen-based media and associated services/industries. The development comprises: Sound stages; Workshops; Office accommodation; Studio Hub; Associated outdoor space such as backlots and unit bases; Entrance structures and reception; Security infrastructure; Mobility hub; Cafes; Parking; Bridge; Incidental supporting buildings; Associated infrastructure; Public art; Upgraded vehicular access onto Marlow Road; New cycle and pedestrian accesses; A new cultural/educational/recreational building; A new community building; and Associated landscaping, publicly accessible recreational land and ecological and environmental enhancements/habitat creation. **Recovered appeal approved by Secretary of State on 26/11/25.**

4.40 In this appeal the central issue was the use of land designated as Green Belt for the provision of film studios. Whilst the Secretary of State (who recovered the appeal following a public inquiry) accepted that the proposal would cause harm to the Green Belt resulting in a loss of openness, causing significant landscape and visual harm and less than substantial heritage harm they considered that there were very special circumstances which outweighed this. The parties did not agree on the need position and the Secretary of State agreed that it was inherently difficult to predict future demand for studio space. Key to the Secretary of State's decision to support the application were the scale, quality and overall offer of the proposal which included a Culture and Skills Academy and its location in the West London Cluster. The Secretary of State in the planning balance gave very substantial weight to the economic benefits, the decision noted the global significance of the UK film/tv production industry, the direct and indirect job opportunities it would provide and its contribution to economic productivity.

5. CONSULTATION

Pre-application Consultation

5.1 Prior to submission of the applications the applicant sought pre-application advice from the local planning authority having entered into a Planning Performance Agreement (PPA). Pre-application engagement with local planning authorities is encouraged by para 40-48 of the NPPF. As part of this process the Council held a Development Management Forum on 13th October 2025, where the developer presented their proposals to the community and responded to questions. The Council facilitated and chaired the Forum. The local community asked questions and made comments about a range of factors, with clear concerns being expressed in respect of: Height and massing, heritage impacts, alignment with future proposals for the wider area, need for a film studio, relocation of the reuse and recycling centre, increased traffic and permeability and separate non-planning concerns about the Council land transaction.

Formal Application Consultation

5.2 For both the planning and listed building consent applications site notices were displayed from 20th November 2025, expiring on 14th December 2025. Press advertisements were published on 20th November 2025 in the Camden New Journal.

5.3 Two further re-consultations on the planning application took place in January 2026 and February 2026. The former was the result of an amended Environmental Statement because of a Regulation 25 request for additional information. This meant that the application was required to undergo a second 30-day consultation period, with site notices and press advertisements published on 02/02/2026 and 29/01/2026, respectively.

5.4 Para 26 of the NPPG states where an application has been amended it is up to the local planning authority to decide whether further publicity and consultation is necessary in the interests of fairness.

5.5 The second re-consultation period was required taking account of that guidance due to the submission of revised drawings and documents detailing design changes throughout. These primarily concerned redesigns at the northwest corner of the site, including the energy centre and the Heathgate buildings. The site notices were displayed 16/02/2026 and the press advertisement was placed on 26/02/2026.

Statutory consultees

<u>Greater London Authority (GLA) – Stage 1</u>

5.6 The GLA have provided a Stage 1 report on the proposed development. Their report on the strategic matters can be summarised as follows:

Land use principles

5.7 The principle of the mixed-use development that would deliver housing, film studios, and associated commercial uses would follow a masterplan-led approach and is supported and in line with Objectives GG1 and GG2 and Policies S1, S3, E4, E7, E8, and H1 of the London Plan.

Affordable housing

5.8 The proposal delivers 271 affordable housing units (50.2% by habitable rooms), with a tenure split of 60% low-cost rent / 40% intermediate products. Subject to acceptable affordable tenures, the proposals may be eligible to follow the Fast Track Route.

Urban design and heritage

5.9 No strategic concerns with the tall buildings on site. Refinements to the height, massing, layout, and architecture should be considered. There is a very low to medium level of less than substantial harm identified to heritage assets which must be outweighed by the benefits of the scheme.

Transport

5.10 The scheme is generally acceptable subject to improving step-free connectivity to public transport and ensuring inclusive and safe access for pedestrians and cyclists. Contributions towards Kentish Town Thameslink services would be supported along with contributions for a cycle docking station and legible London wayfinding signage.

Sustainable development

5.11 The energy statement does not yet comply with the London Plan policies, as further exploration and demonstration of suitable measures is required for all stages of the energy hierarchy. Further information is also required with respect to energy infrastructure, specifically the district heating network, and on how the cooling hierarchy has been followed.

5.12 An updated Whole Life Carbon Assessment is also required with further technical information on cost allocations, estimated WLC emissions, and GWP potential for all life-cycle modules. The Circular Economy statement should also be amended with further information on the design approach, design principles, pre-redevelopment audit, pre-demolition audit, bill of materials, operational waste, circular economy targets, post-construction report, and end-of-life strategy.

5.13 The Urban Greening Factor is acknowledged to be lower than the target score, and opportunities to increase this should be pursued.

Environment

5.14 The development should avoid direct impacts to the SINC and make clear how direct or indirect impacts will be avoided – where the avoidance of

impacts is not possible, information demonstrating how the mitigation hierarchy has been followed should be provided.

5.15 The Flood Risk Assessment generally complies with the London Plan, subject to mitigation measures and conditions. The sustainable urban drainage strategy is also generally compliant, subject to the Council's further review. The Air Quality Assessment identifies that mitigation measures would be required during the construction phase of development, which the Council should identify to ensure that these are appropriately secured.

Officer response: Further commentary on these points will be provided in the relevant sections of the report below, with conditions and planning obligations securing further information as appropriate.

Historic England (Heritage Assets)

5.16 Historic England (HE) responded to the application during the first consultation period to note that, although they did not object to the proposal in principle, they held concerns regarding the following:

- The significant impact of the proposed development on the Parliament Hill London Panorama, as designated in the LVMF, including views towards St Paul's Cathedral and the Victoria Tower of the Palace of Westminster (Protected Vistas 2A.1 and 2A.2, respectively);
- The impact of the development on the strategic view of St Paul's Cathedral from Parliament Hill and subsequently on the setting of the Grade I listed cathedral itself. Whilst the proposals would not directly obstruct the cathedral, the Inkerman Gardens buildings would make it harder to perceive and erode its presence in the panorama;
- The lack of nighttime views mean it is more difficult to make a full assessment of the proposal's impact on the setting of the cathedral; and
- The impact on the legibility of the panorama would run counter to policies in both the London Plan and the Camden Local Plan and amendments, safeguards, or further information should be sought.

Officer response: Please see section 12 (Heritage) of this report.

Building Safety Regulator (BSR) – Fire Safety (Gateway 1)

5.17 No objection in principle and content with the fire safety design of the proposals, to the extent that it affects land use planning considerations. Identified some matters to be addressed ahead of later regulatory stages, specifically:

- Lobby layouts for firefighting shaft access;
- Smoke ventilation modelling;
- Risk arising from green roofs; and

- Cabling of PV panels.

5.18 Following an update on the fire strategy being issued that responded to the above points and the BSR being reconsulted, an additional response was issued. The BSR confirmed that their review of the additional information meant they were content with the fire safety design, to the extent that it is relevant to land use planning matters.

Officer response: The guidance offered by the BSR response is covered in Section 21 of this report, which includes where matters are covered by planning conditions or other regulatory regimes.

Transport for London (TfL) – Spatial Development

5.19 No response received.

Transport for London (TfL) – Infrastructure Protection

5.20 No objection in principle, subject to conditions to cover the following matters:

- Details of maintenance, resurfacing, or improvement works proposed from the junction of Kentish Town Road leading into Regis Road.
- Detailed design on the use of any tall plant/crane/lifting equipment.

5.21 The consultation response also noted that the impact of the proposed development on Network Rail and London Overground assets should be taken into account.

Officer response: It is considered that details and delivery of the improvements to the junction of Kentish Town Road and Regis Road should be secured by a Section 106 obligation relating to this piece of infrastructure, as detailed in Section 10 (Infrastructure and phasing) of this report. A condition has been added in relation to the second point.

Network Rail (NR)

5.22 No objection, but strongly recommended that the developer complies with requirements to maintain the safe operation of the railway and protect NR infrastructure. These include ensuring that during and after completion the works do not encroach onto or adversely affect any railway land or structures, affect the safe operation of the railway, over-sail the air space of NR land, and avoid locating balconies directly facing the railway. To this end, NR strongly advised that the developer contacts Network Rail's Asset Protection Team (ASPRO) to ensure compliance and safeguard railway operations.

5.23 A further response was received from NR to confirm that ASPRO engineers have advised that the risks presented from the proposed development

would necessitate an agreement with ASPRO via a Basic Asset Protection Agreement (BAPA), which would need to address the following:

- Environmental impacts on operational railway (including pollution, tree conservation, etc).
- Collapse of lifting equipment adjacent to the NR boundary line or collapse of temporary work and structural stability and movement of NR Assets which will affect the Track Support Zone.
- Potential impact on railway infrastructure from construction activities, including piling adjacent to railway infrastructure.
- Effects of artificial lighting and human factor effects from glare on train drivers.
- The carrying out of construction activities at height.
- Unauthorised access through insecure or damaged boundaries or errant vehicles on railway land.
- Impact of SuDS measures on railway land.

Officer response: The applicant will be reminded of the need to enter into a Basic Asset Protection Agreement with Network Rail by informative. It is not necessary to impose a condition dealing with this matter. A BAPA is a contractual requirement from Network Rail that effectively must be in place before any development affecting the railway can proceed.

Thames Water

5.24 No objections subject to conditions and informatives, as detailed in section 26 of this report.

Metropolitan Police Service (MPS)

5.25 MPS requested a financial contribution of £249,019.43 for mitigating the additional impacts of the development on MPS infrastructure. Their consultation response outlines the rationalisation of this request.

Officer response: Please see section 20 (Safety and security) of this report.

Metropolitan Police (Secure by Design)

5.26 No objection was raised, but the Designing Out Crime Officer noted areas of the development where the design and layout should be reconsidered, as well as recommending the following conditions:

- Prior to construction, proof that the plans can achieve secured by design accreditation, to be submitted to the designing out crime officer and local planning authority for approval.
- For the site to achieve a secured by design accreditation to silver award and to maintain this standard through the life of the development.

Officer response: Noted and covered in Section 20 of this report.

Natural England

5.27 No objection was raised, and NE confirmed that the proposal would be considered not to have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

5.28 Following re-consultation, an additional response was issued which confirmed that the amendments were unlikely to have significantly different impacts on the natural environment than the original proposal.

Environment Agency (EA)

5.29 No comments issued on the proposal as the application is not subject to any constraints within the EA's remit. General advice on environmental permitting was given in the response.

Cadent Gas

5.30 No objection, informative recommended.

NHS – London Healthy Urban Development Unit (HUDU)

5.31 No objection in principle to the proposed development, subject to the securing of a financial contribution of £294,800. This contribution would help to safeguard the quality and accessibility of healthcare for existing and future patients and make the development acceptable, as the proposal would otherwise cause an increase in patient population that would not be able to be met within existing NHS clinical infrastructure.

Officer response: Please see Section 27 (Health impact) of this report.

National Amenity Societies

Historic Buildings and Places, the Georgian Group, The Society for the Protection of Ancient Buildings, The Victorian Society and The Twentieth Century Society where all consulted on the Listed Building application.

Historic Buildings and Places (formerly Ancient Monuments Society)

5.32 Objection on the basis that the massing, height, and scale of development would have a negative impact on the protected views across London – in particular, the view from Parliament Hill.

Officer response: Please see section 12 (Heritage) of this report, which specifically includes an assessment with respect to the London View Management Framework.

Neighbouring Boroughs

City of London Corporation

5.33 The City of London Corporation was notified of the planning application as a neighbouring planning authority, as well as the statutory body responsible for the management and protection of Hampstead Heath. In its role as the latter, an initial objection was issued, followed by a more detailed objection (including a Building Height Study), raising the following concerns:

- The proposed development would represent a substantial and intrusive development within the setting of Hampstead Heath.
- The proposed development would introduce adverse impacts on neighbouring amenity, specifically with regards to overbearing impact, loss of visual amenity, and noise, activity, and light spill.
- The proposed height would be excessive and fail to respect local context, townscape, heritage, and important views.
- The proposed development would detract from the legibility and appreciation of the City cluster of tall buildings, eroding the established wider London skyline.

5.34 As a neighbouring planning authority, the City of London also responded to the request for observations to raise concerns regarding the following:

- The proposed development would be conspicuous in the foreground of the Protected Vista 2A.1, which would result in significant change to the panoramic experience of St Paul's Cathedral and the City cluster of tall buildings.
- The Inkerman Gardens element has the potential to distract from and erode the ability to appreciate and recognise the Cathedral as the Strategic Landmark.
- The Heathgate buildings and Film Studios building would almost entirely obstruct the City cluster of tall buildings.

5.35 Following reconsultation, an additional response was issued which confirmed that the amendments did not change the authority's original comments, which still stood.

Officer response: Please see section 12 (Heritage) of this report, which specifically includes an assessment with respect to the London View Management Framework.

LB Islington Council

5.36 No objection or comments issued.

LB Brent Council

5.37 No objection.

LB Westminster Council

5.38 No response received.

Non-statutory consultees

The Council's Landowning and Regeneration Function (distinct from Local Planning Authority)

5.39 The Councils Regeneration Function has responsibility for facilitating regeneration of the Regis Road Growth Area with a view to securing local and national policy objectives for the benefit of Camden people. The Local Planning Authority (LPA) is a separate and independent part of the Council required to operate in accordance with legal duties which apply to all planning authorities. We recognise that this representation will be assessed and considered by the LPA on its planning merits and the same footing as any other representation received by the LPA in relation to the planning application.

Benefits

5.40 We welcome the CFQ as a significant contribution to the regeneration of the Growth Area. We encourage Yoo Capital to work closely with existing businesses within the Film Quarter site to deliver continuity of existing businesses and minimise disruption arising from the development. We strongly welcome the development's contribution to meeting Camden's housing need, and in particular the need for affordable housing. The development would also bring forward significant other economic, education, social and environmental benefits.

Station House

5.41 The Station House site is well suited to re-providing the housing for the existing resident community and the principle of locating the housing on this site is strongly supported. The number of re-provided social rented homes and their size and mix meet our requirements. We are prioritising affordable housing options for existing residents within the new development at Station House. We support the principle of retaining the Reuse and Recycling Centre (RRC) in the growth area and increasing the efficiency of land through a mixed-use typology, which is consistent with the aims of the CPG. We acknowledge that the co-location of housing and RRC involves complex technical and operational considerations to protect amenity of residents & the local environment and to ensure that the RRC can operate successfully within the new mixed use environment. We will continue to work with Yoo Capital's design team and with the North London Waste Authority (NLWA) and London Energy Ltd to ensure that the uses can co-exist comfortably on the site and to mitigate the impacts of the RRC beyond the site.

Car Pound & Depot

5.42 The Car Pound is challenging to incorporate into the Film Quarter development and does not present an efficient use of land for the purposes of regeneration. Our preference is to move the facility to a Council- owned site outside of borough and we are working with Yoo Capital on the terms for its re-location.

5.43 Work is also ongoing with YC on options for the Holmes Road Depot, with a focus on maintaining Camden's service provision and ensuring the Depot is sustainably designed to meet Camden's current and future service needs. Any move of services will be contingent on new facilities bring completed and ready for occupation beforehand, and the existing facilities will continue to be used by staff and services until alternatives are completed.

Infrastructure

5.44 Regeneration in the Growth Area needs to be supported by essential infrastructure, in accordance with Regis Road Planning Guidance (2025). We will support Yoo Capital to secure the necessary land / rights to deliver the essential components and will liaise with the LPA to ensure that our future Site Assembly Strategy is consistent with planning policy in its approach to ensuring the necessary infrastructure is delivered when required. We will continue to work with developers and landowners in the Growth Area to ensure that key infrastructure including Regis Road (with an enhanced gateway), a western link towards Arctic Street and a new service road will be delivered before the occupation of the Camden Film Quarter, in order to meet the key policy and guidance principles which are core to Camden's vision for a transformed Growth Area.

Obligations/conditions

5.45 We request that a range of matters are addressed through the use of appropriately worded conditions or obligations.

Officer Comment: These comments are dealt with in the Land Use and Infrastructure Phasing parts of the assessment below.

North London Waste Authority (NLWA)

5.46 The Waste Authority has expressed concern about the potential impact of odour and noise on residents and the operational challenges posed by the internal location below residential use. It has also raised concerns about traffic management and identifies risks associated with the protection of residential amenity, service reliability and local traffic conditions. It nonetheless remains committed to ongoing constructive engagement to ensure the new Reuse and Recycling Centre (RRC) meets operational requirements while safeguarding community interests.

Officer Comment *The reprovision of the RRC is dealt with in Section 8 below (Land Use), Section 14 (amenity), and Section 16 (Transport).*

Historic England (GLAAS)

5.47 No comments issued as the application is not within an Archaeological Priority Area and GLAAS agrees with the application submission that there is a low potential for archaeological remains on the site.

5.48 Following re-consultation, GLAAS confirmed that the revised design changes do not alter their original response

Joseph Homes

5.49 As a neighbouring landowner, Joseph Homes submitted a representation to the planning application, noting that they were not in a position to support the scheme due to it potentially prejudicing future proposals for their and the delivery of the wider masterplan, as set out in the Regis Road Area Guidance. The concerns noted included the following:

- Inconsistencies in the EIA methodology, specifically with regard to whether the Joseph Homes proposals are included as part of an assessment of the cumulative impact.
- The methodology of the daylight and sunlight assessment and failure to fully consider the impact on the emerging development at the Joseph Homes site.
- The reference to the Agent of Change principle with respect to the homes delivered through the Joseph Homes scheme and the Camden Film Studios does not apply, as this would only be able to used where the noise generating use (in this instance, the film studios) currently existed.
- The EIA chapter relating to traffic and movement fails to address the impact of the Joseph Homes site coming forward.
- Parts of the red line includes land that is not within Yoo Capital ownership, so cannot be included. Similarly, parts of the development cross existing Rights of Way, which would also prevent implementation of the scheme.

Officer response: The ES has been independently reviewed for the Council by The Land Use Consultants, and their final report has been made public on the application file. The ES outlines the assessment of the development both in its own right and considering the cumulative impact of nearby development. In an ES it is necessary to consider cumulative development to understand the potential combined environmental effects of the proposed development with other committed projects affecting the same receptor. It is considered that the ES satisfactorily assesses the impact of the proposed development and cumulative development and this has been reflected in the assessment presented in this report. It should also be noted that matters

relating to land ownership and private access rights are not material planning considerations. There is a separate but related matter which is the potential impact of the proposed development on neighbouring development plots which form part of the growth area/emerging site allocation. Officers have considered this and do not consider that the proposed development of this land would prejudice the future development potential of neighbouring sites and delivery of the whole masterplan. In response to concerns about the impact of the proposed development on the Joseph Homes site in terms of daylight and sunlight, the applicant has provided an updated façade study, which is detailed in Section 16 (Impact on neighbouring amenity) of this report.

Royal Mail

5.50 As a neighbouring landowner, Royal Mail submitted a representation to the planning application, raising the following concerns:

- The introduction of residential development close to the Royal Mail Delivery Office potentially gives rise to future amenity issues resulting from Royal Mail's operations. In particular, noise complaints arising from vehicular movement at early hours of the morning.
- Regis Road provides the only access to the Royal Mail Delivery Office and unrestricted access to this road is therefore required.

Officer response: Please see Sections 16 (impact on neighbouring amenity) and 18 (transport) of this report. Concerns regarding noise disturbance to future residents and the impact of construction traffic on Royal Mail operations will be alleviated and mitigated against through planning conditions and the Construction Management Plan and Construction Working Group, which is secured by Section 106 legal agreement.

UPS

5.51 As a neighbouring landowner, UPS submitted a representation to the planning application, raising the following concerns:

- The proposed development must ensure that UPS operation will continue without disruption, specifically regarding access to Regis Road.
- The use of the service road and UPS land by vehicles accessing the film studios raises concerns regarding health and safety, security, and congestion. The service road cannot be used between the critical hours of 07:00-09:00 every morning, as this would impact UPS operations.
- The junction of Regis Road and Kentish Town Road needs to be considered to avoid any congestion from additional HGVs relation to construction or operation of the film studios.

Officer response: Please see sections 10 (Infrastructure and phasing) and 18 (Transport) of this report. The concerns raised by UPS are noted and have been addressed. In order for the proposed development to be implemented it will be necessary for improvements to be made to Kentish Town Gateway. The proposed film studio traffic will required to use the service road, but the applicant has agreed to conditions which restricted the hours that they can use it in order to avoid any conflict with UPS operations.

National Film and Television School

5.52 Support for the application, citing the importance of high-quality studio infrastructure, education and skills provision being located together, in order to benefit both Camden and UK's screen industries.

London Screen Academy

5.53 Support for the application, citing the opportunity presented to improve young people's access to the film industry and the creative sector, more broadly. The co-location of the educational uses and the film studios are noted as particularly important and beneficial aspects of the scheme, as well as the potential to create many more jobs and allow the LSA to expand their reach and deepen industry partnerships.

Dean and Chapter of St Paul's Cathedral

5.54 Concern regarding the impact of the proposed development on the LVMF view from Parliament Hill towards St Paul's Cathedral and the setting of the Grade I listed Cathedral. The impact on the building's setting would result in erosion of the ability to appreciate the relationship between St Paul's and the topography and urban form of London. The representation states that the development would compound existing and different harms to the Cathedral caused by other, unrelated development.

Officer response: Please see section 12 (Heritage) of this report.

Bideford Ventures

5.55 As a neighbouring landowner, Bideford Ventures, who are the freehold owners of the Royal Mail Delivery Office which is adjacent to the application site, submitted a representation to the planning application. Their response notes support for the comprehensive regeneration and redevelopment across the Regis Road Growth Area, but states it must properly align with the adopted planning guidance and not prejudice future delivery of the adjacent sites. As such, the following matters are raised as potential issues that should be resolved to avoid prejudicing the emerging Joseph Homes proposals:

- Red line boundaries should be clear to avoid conflict with rights of way/access and elements such as turning heads, parking bays, and

landscaping should not be included within land not owned by the applicant.

- The proposed development has the potential to impact the light availability for the adjacent Joseph Homes development site, and no BRE compliant testing has been done for the sites on the western side of Regis Road.
- The application lacks detail with respect to its integration with future emerging proposals that fall within the Regis Road Area.
- The EIA applies cumulative assessment inconsistently, which may result in undue burden being placed on adjacent sites.

Officer response:

- *It is noted that the proposal has undergone minor revisions to remove any works within the application red line but on land owned by Bideford and used by Royal Mail. The applicant already has a right of access over the land.*
- *Additional information on the light impact to adjacent development sites has been provided and is covered in section 16 (Impact on neighbouring amenity) of this report. Officers are satisfied that the proposed development would not stifle the development potential of that land, whilst the Heathgate and the Film Studio would impact on light availability to windows on the façade of any buildings facing Regis Road, it is considered that the design and form of those buildings and the layout of homes can still ensure that the residential accommodation provides a good standard of amenity including light and outlook.*
- *Please see Section 10 (Infrastructure and phasing) of this report for assessment of the proposal's integration with future development.*
- *It is noted that additional information was submitted for the ES and the application reconsulted on, as detailed earlier in this section. The ES has been reviewed by The Land Use Consultants, whose final review report has been made public on the application file and outlines the assessment of the development both in its own right and considering the cumulative impact of nearby development. It is considered that the ES satisfactorily assesses the impact of both scenarios and this has been reflected in the assessment presented in this report.*

Department for Business and Trade

5.56 Support for the application, noting its potential to contribute to the continued growth and international competitiveness of the UK and its creative industries. Benefits such as the support for skills, education, and suitable workplace are all referenced.

Local groups

Kentish Town Neighbourhood Forum

5.57 Multiple letters of objections were received from the Forum during the course of assessing the application, the issues raised can be summarised as follows:

Land use

- Lack of research to support viability of commercial units within development.
- Recycling centre will impact on local highways and pedestrian access.
- Kentish Town Neighbourhood Plan states redevelopment of the Regis Road site should be employment-led, but the application dilutes this.
- Existing businesses will experience unacceptable impact.
- No provision for healthcare in the proposed application.
- Unclear reprovision of services such as Depot and recycling centre.
- Recycling Centre appears to have no clear operational management plan.
- Proposed basements are too deep and large in scale.
- The film studios may not be economically viable and may not generate the jobs that are promised by the application.
- Kentish Town is not a tourist area and does not have the infrastructure to support becoming a tourist destination.

Officer response: Please see sections 9 (Land use and principle of development), 10 (Infrastructure and phasing), 15 (Employment and social value), 18 (Transport), 24 (Basement considerations), and 27 (Health impact) of this report.

Design and heritage

- Scale and massing of development is excessive.
- Poor architectural quality that lacks character.
- Impact to protected views from Parliament Hill.
- Excessive height would affect views and surrounding area.
- Public realm poorly designed, including landscaping and streetscene, which are lacking in detail – as well as perimeter treatment.
- Proposed building at Station House site would substantially harm the Grade II listed police station.

Officer response: Please see sections 11 (Placemaking and design) and 12 (Heritage) of this report.

Housing

- The tenure mix for affordable housing is not what is required due to lack of larger units.
- The proposal does not include any specialist housing for elderly people.

Officer response: Please see sections 13 (Affordable housing) and 14 (Housing mix and quality) of this report.

Amenity

- Development likely to result in overshadowing and low light levels.
- Noise impact assessment understates noise impact and is lacking detail.
- Creation of poor quality homes due to single aspect and limited separation distances between buildings.
- The homes above the Recycling Centre would likely have reduced amenity and are at risk of fire.

Officer response: Please see sections 16 (Impact on neighbouring amenity), 21 (Fire safety), and 22 (Air quality) of this report.

Transport concerns

- HGV access will put traffic pressure on Regis Road / Kentish Town Road junction and those related to Recycling Centre will experience issues with access and turntables.
- Baseline conditions are inaccurate and unreliable.
- Trip generation, mode share forecasts, and car parking demand are underestimated.
- The proposed car parking undermines the car-free aims of the Council.
- Pedestrian and cycle movement is not sufficiently prioritised.
- The proposal relies on agreement with UPS due to their servicing road being utilised by the proposed development.

Officer response: Please see sections 10 (Infrastructure and phasing) and 18 (Transport) of this report.

Sustainability

- Basements require significant reinforced concrete for piling and support walls, which are very carbon intensive.
- Existing buildings are in good condition and should not be demolished.
- The proposed development will introduce a significant amount of carbon through construction and operation.
- The proposal does not sufficiently protect nearby ecology and the SINC.

Officer response: Please see sections 17 (Sustainability and energy) and 19 (Trees, greening, and biodiversity) of this report.

Application (and pre-application) processes

- Publication of documentation and errors or missing information with plans.
- Difficult to understand plans and documents.
- Misrepresentation of land ownership.
- Impact cannot be fully assessed without Joseph Homes application being included too.
- Incorrect data used throughout application.
- Consultation timing is not appropriate.
- Application contradicts Draft Camden Local Plan.

Officer response: The consultation process is detailed at the start of this section of the report. It is also noted that planning applications must be assessed on their own merit, with regard to the policies of the development plan and taking account of other material considerations. The local authority can only assess the proposal that is presented to it and the absence of proposals at adjacent sites does not, in itself, constitute a reason for refusal. A potential scheme which does not have planning permission can be given limited weight, but the aspiration in policy to develop that land to bring forward high density and high quality homes can be given more weight.

Queens Crescent Neighbourhood Forum

5.58 Multiple letters of objections were received from the Forum during the course of assessing the application, the issues raised can be summarised as follows:

Design, heritage, and amenity impact

- Excessive scale and height.
- Lack of views from Kentish Town City Farm, Cressfield, or Woodyard.
- The film studios building is not flexible or adaptable enough.
- Basement design is not feasible and would require deep excavations that have not been fully addressed.
- The proposals would harm the listed buildings in Holmes Road and the surrounding conservation areas.
- Quality of open space is poor and play space is underdelivered.
- Scale of development would have an overbearing visual impact and result in loss of privacy.

Officer response: Please see sections 11 (Placemaking and design), 12 (Heritage), 16 (Impact on neighbouring amenity), and 24 (Basement considerations) of this report.

Land use and development context

- Proposed hotel use within building is inappropriate.
- Joseph Homes proposals should be included in application.
- Concerns with deliverability given the varied land ownership (i.e. UPS).
- Limited detail on reprovision of existing services and potential for these to be interrupted during implementation.
- Harm to Camden's industrial and logistics capacity of industrial estate.
- Impact on Metropolitan Police operations given adjacent Section House.
- There is no assessment of cumulative impact of increase in population on health services.
- Impact of tourists from proposed museum / visitor attraction offering.

Officer response: Please see sections 9 (Land use and principle of development), 10 (Infrastructure and phasing), and 27 (Health impact) of this report. It is also noted that planning applications must be assessed on their own merit, with regard to the policies of the development plan and other material considerations. The local authority can only assess the proposal that is presented to it and the absence of proposals at adjacent sites does not, in itself, constitute a reason for refusal. A potential scheme which does not have planning permission can be given limited weight, but the aspiration in policy to develop that land to bring forward high density and high quality homes can be given more weight.

Housing

- Amount of affordable housing is unlikely to be delivered and should therefore not be supported.

Officer response: Please see section 13 (Affordable housing) of this report.

Sustainability and ecology

- Construction works would cause significant carbon emissions.
- Extensive basement is incompatible with sustainability targets.
- Scheme does not provide enough green or open space, and does not satisfactorily address local biodiversity.

Officer response: Please see sections 11 (Placemaking and design), 17 (Sustainability and energy), and 19 (Trees, greening, and biodiversity) of this report.

Transport

- Traffic analysis is based on unrealistic and incorrect data.
- Stacking of uses within studio building will not reduce expected vehicular movement at site.

- Complexity and number of uses will bring complex servicing requirements.

Officer response: Please see section 18 (Transport) of this report.

Dartmouth Park Neighbourhood Forum

5.59 Objection on the basis that, whilst an ambitious development at the site is supported, the following issues have been identified:

- The Joseph Homes application has not been submitted and therefore cannot be assessed concurrently. Given the interrelationship between the two schemes, neither should be determined without the other.
- The heights of the film studio building, Heathgate towers, and two of the three Inkerman Gardens buildings is too great and should be reduced to reduce the impact on the surrounding area and protected views.
- The design of Regis Road does not appear suitable to accommodate vehicular, pedestrian, and cycle traffic.
- The servicing of the buildings may result in traffic related issues, particularly at the junction of Regis Road with Kentish Town Road.
- The architectural treatment of the proposed buildings is lacking in quality.
- The bridge over the railway to the north of the site should be secured by legal agreement.
- There should be adequate green and open spaces within the application (and it should not depend on future submissions at adjacent sites).

Officer response:

- *It is noted that planning applications must be assessed on their own merit, with regard to the policies of the development plan and other material considerations. The local authority can only assess the proposal that is presented to it and the absence of proposals at adjacent sites does not, in itself, constitute a reason for refusal. A potential scheme which does not have planning permission can be given limited weight, but the aspiration in policy to develop that land to bring forward high density and high-quality homes can be given more weight. Additionally, Section 10 (Infrastructure and phasing) covers concerns relating to the implementation of key infrastructure for the Regis Road Area.*
- *Please see Sections 11 (Placemaking and design) and 12 (Heritage), which detail the assessment of heights, impact to views, quality of architectural treatment, and provision of open/green space.*

- *Please see Section 18 (Transport), which details the assessment of traffic and servicing matters.*

Bartholomew Estate and Kentish Town Conservation Area Advisory Committee (CAAC)

5.60 Objection on the basis that the proposed works to the Grade II listed Station House would be unacceptable and would harm the character and the appearance of the building. In particular, the loss of the brick arch and the doorway lamp are noted.

5.61 The CAAC subsequently issued an additional objection at a later point that raised concerns regarding the impact on views from Hampstead Heath and the scale of the proposed buildings, which would fail to align with the character of the conservation area. This objection also suggested that the proposal could not be assessed without the Joseph Homes proposal also being submitted and raised a number of non-conservation related matters, such as:

- The lack of facilities for new residents such as medical, sports, play, and commercial units.
- The distance from public transport.
- The likelihood of the development to exacerbate traffic issues, particularly due to the queues arising from the reprovided Recycling Centre.

Officer response: Please see Sections 9 (Land use and principle of development), 11 (Placemaking and design), 12 (Heritage), 18 (Transport), and 27 (Health impact) of this report. It is also noted that planning applications must be assessed on their own merit, with regard to the policies of the development plan and other material considerations. The local authority can only assess the proposal that is presented to it and the absence of proposals at adjacent sites does not, in itself, constitute a reason for refusal. A potential scheme which does not have planning permission can be given limited weight, but the aspiration in policy to develop that land to bring forward high density and high quality homes can be given more weight.

Highgate Conservation Area Advisory Committee (CAAC)

5.62 Objection based on the following issues:

- Tall buildings would impact vistas from key vantage points.
- Unacceptable scale and height and would impact conservation area.
- Likely to have a minimal impact on social housing delivery.
- A new film quarter is not viable and most of those working in film are poorly paid. Most people studying film do not go on to work in the industry and AI likely to replace jobs.

Officer response: Please see Sections 11 (Placemaking and design) and 12 (Heritage) of this report. Sections 9 (Land use and principle of development) and 15 (Employment and social value) of this report are also relevant to the concerns around viability; however, these sections do not assess potential trends in employment and the increasing use of AI, whilst 'need' is relevant it is difficult to predict (as noted in the Secretary of State decision in Marlow Film Studios appeal decision), similarly whilst AI is likely to impact on all professions, it is impossible to predict the extent and scope of impact of AI on the film industry.

Inkerman Area Residents Association

5.63 Objection based on the following issues:

- Unacceptable scale and height.
- Construction phase impacts to neighbourhood amenity.
- Cumulative impact of development with nearby major developments.
- Location of new housing above recycling centre unacceptable.
- Opposition to relocation of recycling centre to Holmes Road.
- Poor timing of submission and complex information.
- Continual updates to scheme throughout consultation period.
- Proposal would result in limited public benefits.

Officer response: Alongside this section, which details the consultation process for the application, please see the following sections for an assessment of the following matters, which are relevant to the content of the objection:

- *Section 9 (Land use and principle of development)*
- *Section 11 (Placemaking and design)*
- *Section 12 (Heritage)*
- *Section 14 (Housing quality and mix)*
- *Section 16 (Impact on neighbouring amenity)*
- *Section 18 (Transport)*

South End Close Residents Association (SECRA)

5.64 Objection based on following issues:

- Unacceptable height out of sync with surrounding area.
- Impact on views from Parliament Hill.
- Light impact from proposed buildings.
- Concerns around consultation timings for comment.

Officer response: Please see sections 11 (Placemaking and design), 12 (Heritage), and 16 (Impact on neighbouring amenity) of this report. Concerns surrounding the consultation process are responded to earlier in this section.

Kelly Street Residents Association

5.65 Objection based on the following issues:

- Height and massing of the buildings are out of character with the area.
- Buildings would overshadow existing homes and impact privacy.
- Proposals would negatively impact views from Hampstead Heath.
- Impact on local infrastructure and services likely to be significant, particularly on local health services, schools, and transport.
- The relocation of the Recycling Centre would not be an appropriate mix of uses, particularly due to amenity impact on relocated homes and fire risk.
- The proposed development would not deliver enough affordable housing.
- The proposal should include the Joseph Homes development site.
- Impact on existing businesses on site and concern about viability of film studios use.

Officer response: Please see the following sections for an assessment of the above matters relevant to the content of the objection:

- *Section 11 (Placemaking and design)*
- *Section 12 (Heritage)*
- *Section 13 (Affordable housing)*
- *Section 14 (Housing mix and quality)*
- *Section 15 (Employment and social value)*
- *Section 16 (Impact on neighbouring amenity)*
- *Section 18 (Transport)*
- *Section 21 (Fire safety)*
- *Section 27 (Health impact)*

It is also noted that planning applications must be assessed on their own merit, with regard to the policies of the development plan and other material considerations. The local authority can only assess the proposal that is presented to it and the absence of proposals at adjacent sites does not, in itself, constitute a reason for refusal. A potential scheme which does not have planning permission can be given limited weight, but the aspiration in policy to develop that land to bring forward high density and high quality homes can be given more weight.

Cressfield and Woodyard Tenants and Residents Association

5.66 Objection based on the following issues:

- Development is excessively high and would cause overshadowing and loss of light.

- Proposals would be out of character with surrounding area.
- Construction would result in noise and disturbance for residents.

Officer response: Please see sections 11 (Placemaking and design), 12 (Heritage), 16 (Impact on neighbouring amenity), and 18 (Transport) of this report.

The Heath and Hampstead Society

5.67 Objection based on the following issues:

- Size of the proposed buildings impact the open views from Hampstead Heath, specifically 2A.1 and 2A.2 of the LVMF.
- Height exceeds the recommended height in the draft site allocation.
- Impact from cumulative development of nearby sites is significant.
- Form of the building (i.e. stacked studios) is not feasible.

Officer response: Please see sections 9 (Land use and principle of development), 11 (Placemaking and design), and 12 (Heritage) of this report.

Collège Français Bilingue de Londres (CFBL)

5.68 Multiple letters of objections were received during the course of assessing the application, the issues raised can be summarised as follows:

- Impact of the proposed buildings on surrounding conservation areas.
- Excessive height and massing of proposed development.
- Light impacts from towers.
- Noise and disturbance from construction work and long-term residents.
- Overlooking of school from proposed dwellings.
- Increased traffic from proposed studios.
- Recycling centre will bring pollution and disturbance.
- Concern about proposed depth of excavations and potential impact to the structure of the school buildings, as well as disruption from construction activity.

Officer response: Please see the following sections for an assessment of the following matters, which are relevant to the content of the objection:

- *Section 11 (Placemaking and design)*
- *Section 12 (Heritage)*
- *Section 16 (Impact on neighbouring amenity)*
- *Section 18 (Transport)*
- *Section 24 (Basement considerations)*

Kentish Town City Farm (KTCF)

5.69 Objection on the following grounds:

- Height is excessive and would adversely affect the Farm, specifically in the north-west corner of the development site (Heathgate buildings), through loss of privacy, peace, and enjoyment.
- Insufficient information on the protection of ecology and biodiversity, including with reference to the SINC.
- Shadowing from the proposed development may impact the SINC and the Farm, and insufficient information has been presented to review this

5.70 The KTCF issued an additional comment following their first consultation response, noting that they had reviewed information from the developers concerning shading studies and were satisfied that there would not be adverse shading effects on the Farm's gardens or paddocks. As such, they confirmed that this aspect of their objection should be removed.

Officer response: Please see sections 11 (Placemaking and design), 16 (Impact on neighbouring amenity), and 19 (Trees, greening, and biodiversity) of this report.

Bacton Towers Action

5.71 Initial response requested an extension to the consultation period. A subsequent detailed response was issued that objected on the following grounds:

- Height and density of the proposed development is disproportionate for the area of Kentish Town.
- The impact of the proposed development on neighbouring amenity will be harmful, particularly from light, construction, and air pollution.
- Affordable housing provision is not sufficient and tenure inappropriate.
- The homes located above the Recycling Centre have an unacceptable risk from fire, in addition to other disturbances.
- The surrounding services and infrastructure cannot accommodate the increase in population resulting from the proposal
- The height of the proposed buildings would impact views, including from Parliament Hill and Kenwood House.
- The ES is incomplete due to missing information.
- Disruption during construction would be significant and impact nearby vulnerable uses such as nurseries and sheltered accommodation.
- Green space is low quality and results in poor public realm.

- Carbon emissions are significant, specifically from basement.
- The ES does not provide a fully cumulative assessment of the proposed development with nearby sites.
- The Joseph Homes site should be included as part of the application.

Officer response: Please see the following sections for an assessment of the matters which are relevant to the content of the objection:

- *Section 9 (Land use and principle of development)*
- *Section 10 (Infrastructure and phasing)*
- *Section 11 (Placemaking and design)*
- *Section 12 (Heritage)*
- *Section 13 (Affordable housing)*
- *Section 16 (Impact on neighbouring amenity)*
- *Section 17 (Sustainability and energy)*
- *Section 18 (Transport)*
- *Section 21 (Fire safety)*
- *Section 22 (Air quality)*
- *Section 27 (Health impact)*

It is also noted that additional information was submitted as part of the ES and the application reconsulted on, as detailed earlier in this section. The ES has been reviewed by The Land Use Consultants, whose final review report has been made public on the application file and outlines the assessment of the development both in its own right and considering the cumulative impact of nearby development. It is considered that the ES satisfactorily assesses the impact of both scenarios and this has been reflected in the assessment presented in this report. It is also noted that planning applications must be assessed on their own merit, with regard to the policies of the development plan and other material considerations. The local authority can only assess the proposal that is presented to it and the absence of proposals at adjacent sites does not, in itself, constitute a reason for refusal. A potential scheme which does not have planning permission can be given limited weight, but the aspiration in policy to develop that land to bring forward high density and high quality homes can be given more weight.

Kentish Town Road Action

5.72 Initial response requested an extension to the consultation period. A subsequent response was issued that objected on the following grounds:

- There is no traffic management scheme or masterplan regarding the construction traffic and impacts.
- The application does not address or action step-free access at any one of Kentish Town Thameslink, Kentish Town Underground, or Kentish Town West Overground Station.

- The affordable housing provision is insufficient in tenure mix.
- The heights of the proposed buildings are inappropriate for the local area.
- New schools are not required in Kentish Town.

Officer response: Please see the following sections for an assessment of the matters which are relevant to the content of the objection:

- *Section 9 (Land use and principle of development)*
- *Section 10 (Infrastructure and phasing)*
- *Section 11 (Placemaking and design)*
- *Section 12 (Heritage)*
- *Section 13 (Affordable housing)*
- *Section 16 (Impact on neighbouring amenity)*
- *Section 18 (Transport)*

Climate Emergency Camden

5.73 Objected on the basis of the following:

- Existing buildings should not be demolished and should be retained as part of any proposal.
- Development would substantially increase carbon emissions including through construction and excavation of large basements.
- Documentation is very likely underreporting emissions or falsified.
- The EIA has not been carried out in line with requirements.
- The construction would increase the likelihood of ecosystem collapse through the sourcing of construction materials.
- The buildings have not been designed to be flexible or adaptable.
- There is limited green space proposed through the development.
- The Recycling Centre reprovision is not sufficient and undersized.
- The use as film studios is not appropriate as there are existing UK studios.

Officer response: Please see Sections 9 (Land use and principle of development), 10 (Infrastructure and phasing), 15 (Employment and social value), 17 (Sustainability and energy), 19 (Trees, greening, and biodiversity), and 23 (Waste and recycling) of this report. It is also noted that planning applications must be assessed on their own merit and on the assumption that the information is accurate, unless there is substantive evidence to the contrary or to assume otherwise.

Camden Cycling Campaign

5.74 Objected on the basis of the following:

- Information is confusingly presented, misleading, or contradictory.

- Access to cycle storage is not sufficiently detailed.
- Lack of dedicated cycle lanes on Regis Road is not acceptable, particularly given predicted traffic volume and vehicle mix.
- Construction may give rise to safety concerns due to use of Holmes Road and construction phasing is unclear.

Officer response: Please see Section 18 (Transport) of this report.

Camden Nature Corridor

5.75 An initial objection was submitted, based on the following issues:

- Impossible to evaluate the application impact on the delivery of the nature corridor without the Joseph Homes application having also come forward.
- Detail regarding the corridor is sparse at this stage and further detail on landscaping, ecology, and the SINC should be provided.
- Changes from 2025 masterplan (Regis Road Area Guidance).

5.76 Following the reconsultation period, a further comment was provided which noted the following:

- The application aims to introduce a green corridor through the Regis Road Area Guidance area, which relies on delivery through the Joseph Homes scheme. The same concern regarding reliance on a separate application is noted (as with previously submitted objection).
- The applicant has provided detail on use of native plant species, which would be approximately 70% at most sites. This appears acceptable in principle, and further detail could be secured at condition stage.
- The revisions to the northwest of the site improve the scheme through the extension of a semi-natural vegetation buffer along the SINC fence, the inclusion of native species, and the inclusion of ecological features at the energy centre.

Officer response: It is noted that planning applications must be assessed on their own merit, with regard to the policies of the development plan and other material considerations. The local authority can only assess the proposal that is presented to it and the absence of applications at adjacent sites does not, in itself, constitute a reason for refusal. Additionally, the Regis Road Area Guidance is a supplementary planning document that establishes the general principles of development but should not be seen as a strict outline for applications to follow. Please also see Sections 11 (Placemaking and design) and 19 (Trees, greening, and biodiversity) of this report for more detail relating to landscaping and ecology.

Highgate Society

5.77 Objection based on the following issues:

- Height and scale of proposed buildings are considerable and would be out of character with surrounding area, townscape, and skyline and harm the views from Hampstead Heath.
- Absence of a coordinated masterplan for wider Regis Road area and lack of Joseph Homes scheme as part of application.
- The proposed development would be mixed-use instead of employment-led, which is contrary to the Kentish Town Neighbourhood Plan.
- The provision of affordable housing would not be sufficient in quantity or tenure.
- The location of housing above a recycling and waste facility would result in poor quality housing and potential risks to occupants.

Officer response:

- *Please see Sections 11 (Placemaking and design) and 12 (Heritage) of this report for consideration of heights and impact on surrounding area.*
- *The Regis Road Area Guidance SPD is adopted planning guidance, as detailed in Section 9 (Land use and principle of development) of this report. The planning application must also be assessed on its own merits, with regard to the policies of the development plan and other material considerations. The local authority can only assess the proposal that is presented to it and the absence of proposals at adjacent sites does not, in itself, constitute a reason for refusal. A potential scheme which does not have planning permission can be given limited weight, but the aspiration in policy to develop that land to bring forward high density and high quality homes can be given more weight.*
- *Please see Sections 13 (Affordable housing), 14 (Housing mix and quality) and 21 (Fire safety) for consideration of matters relating to the standard of proposed homes.*

The Friends of Kenwood

5.78 Objection based on the concern that the two tallest buildings would have a dominating effect on the skyline, with the massing and height likely to have a significant impact on the open and panoramic views of London from Kenwood.

Officer response: Please see Section 12 (Heritage) of this report.

Camden Green Party

5.79 Objection based on the following issues:

- The scheme will result in significant carbon emissions, including from the significant scale of the basements.
- Existing buildings are in good condition and should not be demolished.
- The scheme only provides for one specific industry (film) and so does not deliver a diverse employment character.
- The application does not assess the social and health infrastructure for new residents.
- The quantity and tenure the of social and affordable housing is insufficient.
- The height and massing are inappropriate and excessive.
- The traffic data is inaccurate and does noes not properly assess the current condition of the site and area.
- The application should have been submitted by both Yoo Capital and Joseph Homes for more comprehensive redevelopment.

Officer response: Please see the following sections for an assessment of the matters which are relevant to the content of the objection:

- *Section 9 (Land use and principle of development)*
- *Section 11 (Placemaking and design)*
- *Section 12 (Heritage)*
- *Section 13 (Affordable housing)*
- *Section 15 (Employment and social value)*
- *Section 17 (Sustainability and energy)*
- *Section 18 (Transport)*
- *Section 23 (Waste and recycling)*
- *Section 24 (Basement considerations)*
- *Section 27 (Health impact)*

On the final issue raised, it should be noted that the Council can only assess the application as it is submitted and on its own merit.

Councillors or MPs

5.80 No responses were received from any councillors or MPs.

Resident responses

5.81 As noted at the start of this section, the application was initially advertised by way of site notices and press notices in November-December 2025, before being reconsulted on in January 2026 and February 2026. Throughout this time and up until the time of recommendation, the Council has continued to receive representations to the proposal. These are summarised in their totality (rather than by each separate consultation period) in the following paragraphs.

5.82 It should be noted that representations vary in detail; many raised multiple issues, whereas other simply stated support or objection to the scheme. Officers have also attempted to report the numbers below without counting multiple representations from the same source, but these cannot always be identified. As such, the numbers below are indicative of the levels of objection and support, rather than exact figures.

5.83 At the time of writing, the public responses can be broken down as follows:

- Objection: 441
- Neutral: 215
- Support: 111

5.84 The representations in objection are broadly summarised by concerns over:

- Administrative and governance concerns (including EIA preparation)
- Poor design and excessive scale, height, and massing
- Impact on residential amenity from overshadowing and privacy
- Transport strain and implications
- Construction impact
- Heritage harm
- Affordable homes and housing mix
- Loss of trees, green space, and open space
- Impact on local infrastructure, including health and schools
- Incompatible and inappropriate uses

5.85 The representations in support largely emphasise the following:

- Need for new homes within the area and the borough more generally;
- Need for affordable housing;
- New homes may bring more families and children to the area and avoid closure of primary schools;
- Improvement to industrial area that is currently inactive, has limited usable public space, and can feel unsafe;
- Proposed employment uses will bring an exciting new industry to the borough and generate jobs;
- The proposed educational uses will bring better opportunities for young people looking to work in creative industries;
- The relocation of the Recycling Centre would mean that it is closer to access from Kentish Town Road and for those without cars.

5.86 The representations making comments (but not objecting or supporting the scheme) largely note the following:

- General support for proposed housing delivery but noting that a larger amount of affordable housing would be preferred;
- Concern around height of proposed buildings but noting the operational requirement for height or need to facilitate delivery of housing;
- Recognition of likely disturbance from construction and request for some mitigation and alleviation where possible;
- Noting the importance of continuing community and resident consultation throughout the course of development;

Objections – issues raised

Administrative and governance concerns (including EIA preparation)

5.87 The objections raised regarding this issue focused on:

- Request for extension of the consultation period due to limited time to review documents and expiry in the Christmas season;
- Claims around insufficient and inadequate consultation and unavailability of documents on Camden website;
- Claims that consultation responses were not being uploaded to the application file on the Camden website;
- Concerns around land disposal agreement and potential contractual arrangements having implications on the Council's decision-making capacity in planning terms;
- The Environmental Statement has not been prepared adequately and omits cumulative impacts from nearby schemes.

Officer response:

- *The public have been able to comment on the application since it was submitted and were reconsulted on changes twice during the course of the application (see the 'Formal application consultation' sub-section of this section of the report).*
- *Consultation responses were grouped in a folder on the Planning Register so that the application material was easier to review, and the consultation folder has always been clearly labelled and publicly available.*
- *Comments have been accepted up until the date of committee.*
- *The ES has been reviewed by The Land Use Consultants, whose final review report has been made public on the application file and outlines the assessment of the development both in its own right and considering the cumulative impact of nearby development. It is considered that the ES satisfactorily assesses the impact of both scenarios and this has been reflected in the assessment presented in this report.*

- *The Council is unable to respond to any mistrust in its governance through the planning process.*

Poor design and excessive scale, height, and massing

5.88 The objections raised regarding this issue focused on:

- Proposed buildings fail to integrate with local context and existing townscape and is inappropriate for surroundings and skyline;
- Buildings up to 24-storeys exceed the recommended height taken from the Regis Road Area Guidance of up to 16 storeys;
- Development is too dense and is not suitable for the Kentish Town area, particularly when considering cumulative development;
- Poor design quality with respect to bulky appearance and inappropriate materiality;
- Insufficient design quality of homes.

Officer response: The above concerns are principally dealt with in sections 11 (Placemaking and design), 12 (Heritage), and 14 (Housing mix and quality) of this report. It is also noted that the Regis Road Area Guidance is not adopted policy, but a material consideration when determining applications. The recommended height is therefore not a deviation from policy and is considered alongside other considerations of location and design, as detailed in the relevant sections of the report.

Impact on residential amenity

5.89 The objections raised regarding this issue focused on:

- Loss of daylight, sunlight, and outlook for existing homes;
- Impact to privacy and sense of overbearing from massing and height of proposed buildings;
- Poor residential amenity for proposed units;
- Noise and disruption from occupation phase uses, particularly due to film studios and their operational requirements;
- Potential for wind tunnels effect;
- Pollution and impact on the health of locals.

Officer response: The above concerns are dealt with in sections 14 (Housing mix and quality), 16 (Impact on neighbouring amenity), and 27 (Health impact) of this report.

Transport strain and implications

5.90 The objections raised regarding this issue focused on:

- Likelihood of proposal to exacerbate traffic issues in area and, in particular, along Kentish Town Road;

- Car free approach will lead to displacement pressure on on-street parking within the surrounding CPZ without mitigation measures such as parkin permit restrictions or contributions to CPZ enhancements;
- The trip generation underestimates due to outdate data and inappropriate methodology;
- The development would result in additional pressure on nearby rail stations such as Kentish Town, Gospel Oak, and Kentish Town West, but without providing accessibility or capacity improvements;
- The servicing of the development (including the use of HGVs at the film studios and refuse vehicles at the RRC) has not been fully examined and shown to be compatible.

Officer response: The above concerns are dealt with in section 18 (Transport) of this report. Where relevant, contributions and planning obligations relating to transport matters are detailed in section 28 of the report.

Construction impact

5.91 The objections raised regarding this issue focused on:

- The construction phase will cause significant disruption to surrounding residents, businesses, schools, and other facilities;
- The process of demolition and construction will result in harmful air pollution and dust emissions;
- There is a safety risk due to the movement of construction-related vehicles, specifically to the nearby schools;
- The proposed basements would present a significant structural risk to the nearby buildings and in particular the CFBL primary school, which is in close proximity to Inkerman Gardens.

Officer response: The concerns raised above are responded to in a number of different sections of the report, summarised below:

- *Construction disruption – Section 18 (Transport)*
- *Air and dust risk – Section 22 (Air quality)*
- *Wider health concerns – Section 27 (Health impact)*
- *Basement impact – Section 24 (Basement considerations)*

It is noted that disturbance from construction works is an unavoidable element of development and that the Council aims to minimise disturbances and risks through a comprehensive suite of management measures. These include demolition and construction management plans, monitoring of works, and a construction working group – all of which are secured by appropriate conditions and planning obligations.

Heritage harm

5.92 The objections raised regarding this issue focused on:

- The scale of development would harm the setting of nearby heritage assets such as the Grade II listed Kentish Town Police Station;
- There would be a harmful impact on the protected LVMF views from Hampstead Heath, including from Kenwood and Parliament Hill;
- The effect on views would lead to a harmful impact on the setting of the Grade I listed St Paul's Cathedral.

Officer response: The above concerns are dealt with in section 12 (Heritage) of this report. Although there will inevitably be an impact on heritage assets, the level of harm is clearly identified and assessed in this section.

Affordable homes and housing mix

5.93 The objections raised regarding this issue focused on:

- The Council sale of land at the Regis Road site was conditional on 50% of the additional housing to be affordable, however Joseph Homes (making up the other portion of the wider area) is currently only proposing 35% affordable housing;
- Only 28% of affordable homes are 3-bed flats, and none are 4-bed homes, which is not an acceptable housing mix;
- The scheme is prioritising more profitable private homes over affordable housing;
- Concerns around gentrification and pushing out existing Kentish Town residents;
- Appropriate reprovision of existing council tenants to be rehoused;
- Lack of key-worker housing.

Officer response: The above concerns are dealt with in sections 10 (Infrastructure and phasing), 13 (Affordable housing) and 14 (Housing mix and quality) of this report. It should also be noted that any proposals coming forward at other sites (such as the Joseph Homes site) are not proposed as part of this application; the Council must assess applications on their own merit and a potential scheme which does not have planning permission can be given limited weight, but greater weight is given to the policy aspiration to deliver high quality homes.

Loss of trees, green space, open space, and ecology

5.94 The objections raised regarding this issue focused on:

- Loss of mature trees, including the removal of 50% of on-site trees;
- The landscaping design relies heavily on non-native species;
- Proposed basements would limit soil for canopy trees and undermine potential for sustainable planting at site;

- The proposal underdelivers open and green space and does not provide sufficient playspace;
- The lighting and noise from the proposed development will negatively impact ecology, including in the nearby SINC.

Officer response: The above concerns are dealt with in sections 11 (Design and placemaking) and 19 (Trees, greening, and biodiversity) of this report.

Impact on local infrastructure, including health and schools

5.95 The objections raised regarding this issue focused on:

- Proposed development would fail to deliver infrastructure improvements necessary for increased population;
- There would be an increased demand for local schools and healthcare services that is not being met;
- Existing uses at the site must be reprovided – such as the Depot, Recycling Centre, and Car Pound.

Officer response: The above concerns are dealt with in sections 10 (Infrastructure and phasing), 18 (Transport), and 27 (Health impact) of this report. The expected increase in population that would result from the proposal is considered to have an acceptable impact on local infrastructure, subject to obligations detailed in the sections above. Future local improvements in social infrastructure could also be provided through the CIL funds secured from this application. Utilities impact has been considered through consultation with utility providers (as outlined earlier in this section) and transport impact has been mitigated through the various measures including conditions and planning obligations. The reprovision of existing uses is detailed throughout this report and would be secured at the appropriate times to ensure no loss of services to residents.

Incompatible and inappropriate uses

5.96 The objections raised regarding this issue focused on:

- The proposed recycling centre would not be appropriate in close proximity to residential use or schools, due to impacts such as odour, noise, dust, and air pollution;
- The fire risk presented by the recycling centre should prevent housing from being located directly above;
- The creation of a film studios is not suitable for the surrounding area and is likely to have limited business success or would be more appropriate to be located elsewhere;
- The existing businesses should be allowed to be retained;
- The surrounding area has a declining youth population and demand for schools, so the provision of educational uses is inappropriate.

Officer response: The concerns raised above are responded to in a number of different sections of the report, summarised below:

- *Amenity impacts on residents or sensitive users – Section 16 (Impact on neighbouring amenity)*
- *Fire risk of buildings – Section 21 (Fire safety)*
- *Suitability of employment uses and retention/reprovision of existing businesses – Section 9 (Land use and principle of development)*
- *Training and educational facilities – Section 15 (Employment and social value)*

Some of the concerns raised above would also be covered by separate regulatory regimes, such as the Building Control regime. As such, matters concerning health and safety or fire risk are considered insofar as they are relevant to planning and land use concerns but would be covered in full through other legislation. It should also be noted that the educational use proposed is not a typical school, but specialist training for young people. As such, concerns around declining demand for schools locally are not specifically relevant to this proposed use.

Petitions

5.97 Two petitions were received which objected to the proposed development. These both raised the same concerns as have been noted above, with no additional topics of objection.

5.98 The first petition was received from the 'Residents of Kentish Town', and more specifically the residents of Cressfield Close and Woodyard Close (as noted within the petition). This petition has 205 signatories, the large majority of whom live within close proximity to the site.

5.99 The second petition was received from 'the residents of Kentish Town and surrounding areas'. At the time of submission, it had 959 signatories, noting that 435 of these were from residents in northwest London, with a further 369 from elsewhere in London, and another 155 from the rest of the UK. At the time of writing, the same petition now has 1,390 signatories.

5.100 Both of the petitions raised the same matters of objection that were outlined earlier in this section, and no new or additional areas of concern were noted.

Officer response: Given the objections raised by the petitions are the same as raised by members of the public, the officer responses outlined above are also relevant and the aforementioned sections of the report should be referred to.

6. POLICY

National and regional policy and guidance (adopted)

National Planning Policy Framework 2024 (NPPF) (as amended in 2025)
National Planning Practice Guidance (NPPG)

National and regional policy and guidance (draft)

National Planning Policy Framework: consultation draft 2025

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
SD6 Town centres and high streets
SD7 Town centres: development principles and Development Plan Documents
SD8 Town centre network
SD9 Town centres: Local partnerships and implementation
SD10 Strategic and local regeneration
D1 London's form, character and capacity for growth
D2 Infrastructure requirements for sustainable densities
D3 Optimising site capacity through the design-led approach
D4 Delivering good design
D5 Inclusive design
D6 Housing quality and standards
D7 Accessible housing
D8 Public realm
D9 Tall buildings
D10 Basement development
D11 Safety, security and resilience to emergency
D12 Fire safety
D13 Agents of Change
D14 Noise
H1 Increasing housing supply
H4 Delivering affordable housing
H5 Threshold approach to applications
H6 Affordable housing tenure
H7 Monitoring of affordable housing
H8 Loss of existing housing and estate redevelopment
H10 Housing size mix
S1 Developing London's social infrastructure
S2 Health and Social Care facilities
S3 Education and childcare facilities
S4 Play and informal recreation
E1 Offices
E2 Providing suitable business space

E3 Affordable workspace
E4 Land for industry, logistics and services to support London's economic function
E6 Locally Significant Industrial Sites
E7 Industrial intensification, co-location and substitution
E8 Sector growth opportunities and clusters
E9 Retail, markets, and hot food takeaways
E10 Visitor infrastructure
E11 Skills and opportunities for all
HC1 Heritage conservation and growth
HC3 Strategic and Local Views
HC4 London View Management Framework
HC5 Supporting London's culture and creative industries
HC6 Supporting the night-time economy
G1 Green infrastructure
G4 Open space
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
G8 Food growing
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 4 Managing heat risk
SI 5 Water infrastructure
SI 6 Digital connectivity infrastructure
SI 7 Reducing waste and supporting the circular economy
SI 8 Waste capacity and net waste self-sufficiency
SI 9 Safeguarded waste sites
SI 12 Flood risk management
SI 13 Sustainable drainage
T1 Strategic approach to transport
T2 Healthy Streets
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.1 Residential parking
T6.2 Office Parking
T6.3 Retail parking
T6.4 Hotel and leisure uses parking
T6.5 Non-residential disabled persons parking
T7 Deliveries, servicing and construction
T9 Funding transport infrastructure through planning
DF1 Delivery of the Plan and Planning Obligations
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
Fire Safety LPG (draft)
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
Preparing Borough Tree and Woodland Strategies 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
Support for Housebuilding LPG | London City Hall

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth
Policy H1 Maximising housing supply
Policy H2 Maximising the supply of self-contained housing from mixed-use schemes
Policy H3 Protecting existing homes
Policy H4 Maximising the supply of affordable housing
Policy H5 Protecting and improving affordable housing
Policy H6 Housing choice and mix
Policy H7 Large and small homes
Policy C1 Health and wellbeing
Policy C2 Community facilities
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 E3 Tourism
Policy A1 Managing the impact of development
Policy A2 Open space
Policy A3 Biodiversity
Policy A4 Noise and vibration
Policy A5 Basements
Policy D1 Design
Policy D2 Heritage

Policy D3 Shopfronts
Policy D4 Advertisements
Policy CC1 Climate change mitigation
Policy CC2 Adapting to climate change
Policy CC3 Water and flooding
Policy CC4 Air quality
Policy CC5 Waste
Policy TC1 Quantity and location of retail development
Policy TC2 Camden's centres and other shopping areas
Policy TC3 Shops outside of centres
Policy TC4 Town centre uses
Policy TC5 Small and independent shops
Policy T1 Prioritising walking, cycling and public transport
Policy T2 Parking and car-free development
Policy T3 Transport infrastructure
Policy T4 Sustainable movement of goods and materials
Policy DM1 Delivery and monitoring

Kentish Town Neighbourhood Plan (2016) (KTNP)

Policy SW1: Supporting small business
Policy D1: The view of Parliament Hill
Policy D2: Railway lands
Policy D3: Design principles
Policy D4: Non-designated heritage assets
Policy GO1: Local Green Spaces
Policy GO3: Biodiverse habits
Policy CC1: Pre Application Consultation
Policy CC2: Statements of Community Consultation and Statements of Neighbour Involvement
Policy SP1: Kentish Town Square Phase 1 – CIL Priority
Policy SP2: Kentish Town Potential Development Area (KTPDA)
Policy SP2a: KTPDA – General Development Criteria
Policy SSP2: York Mews, Section House, and land around the Police Station

North London Waste Plan (2024)

Camden Site Allocations

Adopted site allocations (2013):

Site 40: Kentish Town Police Station, 10A, 12A, 14 Holmes Road

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

Access for All CPG - March 2019
Adverts CPG - March 2018
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
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)
Inkerman Conservation Area Statement (2001)
Kentish Town Conservation Area (2011)
Bartholomew Estate Conservation Area (2000)
Rochester Conservation Area (2001)
Kelly Street Conservation Area (2011)
West Kentish Town Conservation Area (2005)
Mansfield Conservation Area (2008)
Dartmouth Park Conservation Area (2009)
Kentish Town Planning Framework (2020)
Regis Road Area Guidance Supplementary Planning Document (2025)

Proposed Submission Draft Camden Local Plan (DCLP)

6.1 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 Local Plan examination commenced on 18th May 2026 and is scheduled to end on 11th June 2026.

6.2 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.

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

preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

DCLP Draft Site Allocation – C2 (Regis Road and Holmes Road Depot)

6.4 The DCLP identifies the site as a draft site allocation. It is allocated for industry and employment (including offices), an indicative capacity of 1,000 permanent self-contained homes, community uses, open space, waste and recycling facilities, and depot facilities. Principle 9 states that the housing associated with the Holmes Road Depot site must be re-provided on site, and principle 23 requires that the Regis Road Recycling Centre must be retained or re-provided as necessary.

DCLP Draft Site Allocation – C4 (Kentish Town Police Station)

6.5 The DCLP identifies the site as a draft site allocation. It is allocated for police facilities, an indicative capacity of 35 self-contained homes, and student accommodation. Principle 1 also confirms that community uses and small-scale employment uses may also be appropriate.

7. ASSESSMENT

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

9	**LAND USE AND PRINCIPLE OF DEVELOPMENT** Site context Policy context and principle of development (including site allocations) Industrial and employment space (Sui Generis/Class B8/Class E) Residential use – self-contained homes (Class C3) Hotel use (Class C1) Education uses and non-residential institution (Class F1) Reprovision of recycling centre (Sui Generis) Other Sui Generis uses Land use conclusion
10	**INFRASTRUCTURE AND PHASING** Scheme delivery Site infrastructure Phase 1a: Station House, Heathgate, and Energy Centre Phase 1b: Camden Film Studios Phase 2a: Inkerman Gardens Phase 2b: School building and pavilion Connectivity infrastructure (routes and connections)
11	**PLACEMAKING AND DESIGN** Policy context Masterplan considerations and routes Camden Film Studios Heathgate Buildings Inkerman Gardens Station House (RRC and housing reprovision) School building and pavilion

	Public Realm, Open Space, Play Space, and Landscaping
12	**HERITAGE IMPACT** Legislation and policy Designated and non-designated heritage assets Impact on heritage assets London View Management Framework (LVMF) Archaeology Conclusion
13	**AFFORDABLE HOUSING** Policy context Affordable provision and tenure Housing Mix – tenure and unit Housing quality
14	**HOUSING MIX AND QUALITY** Policy context Housing mix Housing quality
15	**EMPLOYMENT AND SOCIAL VALUE** Policy context During construction End use / occupation phase Conclusion
16	**IMPACT ON STANDARDS OF AMENITY** Policy context Daylight, sunlight, and overshadowing Solar glare – impact on railways Noise and vibration Outlook and privacy Artificial light Microclimate Conclusion
17	**SUSTAINABILITY AND ENERGY** Redevelopment strategy Whole Life Carbon Energy and carbon reductions Climate change adaptation and sustainable design Conclusion
18	**TRANSPORT** Policy context Site context Trip generation Car and cycle parking Travel planning Access, servicing, and deliveries Construction management Pedestrian, cycling, and environmental improvements Highways works Micro and shared mobility improvements

19	**TREES, GREENING, AND BIODIVERSITY** Impact on trees, greening, and biodiversity Statutory Biodiversity Net Gain Impact on SINC and Nature Corridor
20	**SAFETY AND SECURITY** Policy context Crime, security, and building resilience
21	**FIRE SAFETY**
22	**AIR QUALITY** Policy context Site context Impacts on local air quality (operational) Impacts on occupants Demolition and construction impact
23	**WASTE AND RECYCLING** Construction waste Domestic and commercial waste and recycling
24	**BASEMENT CONSIDERATIONS** Policy context Basement Impact Assessment Audit
25	**CONTAMINATED LAND**
26	**FLOOD RISK AND DRAINAGE** Policy and site context Proposed development
27	**HEALTH IMPACT**
28	**PLANNING OBLIGATIONS**
29	**COMMUNITY INFRASTRUCTURE LEVY (CIL)**
30	**CONCLUSION**

8. LAND USE AND PRINCIPLE OF DEVELOPMENT

Site context

8.1 As outlined in the 'site and background' section of this report, the application site is used for a range of industrial uses, but it includes Council facilities such as a depot, car pound and recycling centre, there is also a police station and residential accommodation. The current uses on the site are reproduced in detail here:

Existing Commercial Floorspace		
Description	Use Class	Floorspace GIA (sqm)
Camden Depot	Sui Generis (Depot)	10,627
Kentish Town Industrial Estate	Class B8*	1,206
Kentish Town Industrial Estate	Class E (g) (I)/ E (g) (iii)*	1,714
Station House	Sui Generis (Police Station)	2,045
Asphaltic Site	Class B8	947
Recycling Centre	Sui Generis (Recycling Centre)	890
Total		**13,547**

Kentish Town Industrial Estate	**Class B8***	
EKO & Rexel (unit 2 currently vacant)	Class B8	403.16
Wolseley Plumb and Parts	Class B8	187.03
Next gen Boba	Class B8	398.07
Angelana Investments Ltd	Class B8	218.15
	Total	1206.41
Kentish Town Industrial Estate	**Class E (g) (I)/ E (g) (iii)***	
Karl & Geihle Sander & Union Pension Trustees	Class E	213.62
Woo&Co.	Class E	203.38
Rocket Products	Class E	295.53
KTOWN Studios	Class E	199.19
Deliveroo	Class E	325.9
Correct Group Ltd	Class E	313.87
Specialised HGV Training	Class E	162.15
	Total	1713.64

8.2 The proposed development involves full demolition of all structures and buildings across the site and redevelopment to provide a mixed-use scheme that consists of residential (including replacement homes for those lost through redevelopment), creative, cultural and commercial uses linked to the Film Quarter which includes studio space, offices, visitor and cultural attractions and cafes/restaurant. Alongside this is a hotel primarily (but not exclusively) to provide overnight accommodation to people working in the film studios, education space intended for organisations with synergies to the film quarter, a cinema, replacement recycling facility and community uses. These are outlined in more detail including their relevant use classes in the table below:

Proposed Floorspace	Use Class	GIA (sqm)
Film Production	Sui Generis	68,710
Flexible café, restaurant, and drinking establishment	Class E (a) & (b) & Sui Generis	1,959
Studio Tour (Cultural & Visitor Attraction)	Sui Generis	9,032
Education	Class F1	6,251
Beehive (Workspace)	Class E (g) (i)	10,187
Hotel / Talent Accommodation	Class C1	7,368
Community Cinema	Sui Generis	805
Energy Centre	Sui Generis	966
Recycling Centre	Sui Generis	1,268
Non-Residential Institution (Public Library, Provision of Education, Public Hall)	Class F1	671
Flexible Shop, Café and Community Meeting Place	Class E(a), E(b) and Class F1	219
Flexible Shop, Café and Restaurant	Class E (a) & (b)	87
Plant	-	14,310
Core	-	10,654

8.3 This section of the report will deal with the principle of redevelopment of this land with reference to adopted and emerging planning policies and guidance. It will then consider the specific land uses which would be lost or provided against relevant policies and guidance.

Policy context and principle of development

Adopted policy

The London Plan 2021

8.4 The London Plan was adopted in 2021 and establishes the strategic principle of optimising land, which is identified within Policy GG2. This sets out the expectation that development on brownfield land will be encouraged, particularly where this would support the creation of additional homes, promote higher density employment, and is located in well-connected and accessible locations.

8.5 However, the London Plan also makes clear that industrial uses are essential to the city's economy. Policy E4 states that a sufficient supply of land for industrial functions should be provided and maintained, which should allow for a range of varied operational requirements. Although new development on brownfield sites is encouraged, this shouldn't therefore come at the expense of the unmanaged loss of industrial land – particularly in identified Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS), and non-designated industrial sites. The application site is neither a SIL or an LSIS, though would be considered a non-designated industrial site. The Murphy's site directly to the north is an LSIS.

8.6 The London Plan does accept that, in some circumstances, industrial land may be acceptable to release for development. In particular, Policy E7 outlines that mixed-use or residential development on non-designated industrial sites can be acceptable where this land has been allocated in an adopted local development plan document and employment uses can be provided as part of a mixed-use intensification.

8.7 With respect to commercial land (rather than the more specific definition of industrial land), the London Plan also promotes the protection of employment land, whilst acknowledging that its development for mixed-use or residential purposes can be supported where this would constitute a more efficient use of land. Policy E2 relates to the provision of business space and makes clear that the loss of employment land can be acceptable if an equivalent (or greater) provision can be reprovided. This is particularly relevant where existing commercial land may not meet modern requirements and make poor or inefficient use of space. The London Plan therefore allows for flexibility when considering the loss of employment space, acknowledging that its development can contribute to housing delivery whilst supporting continued employment generation.

Local Plan 2017

8.8 The Local Plan was adopted in 2017. It identifies under Policy G1 a number of areas in the borough where the most significant growth is expected to be delivered, this includes Kentish Town Regis Road. The site is noted as being home to low density industrial and warehousing offering a significant opportunity to deliver high density industrial provision as part of a redevelopment scheme whilst also delivering an increase in homes, jobs and improved movement through the area reconnecting communities. The land which forms part of the application site is within the growth area and therefore the proposal to redevelop the land to intensify use of the site to deliver increased employment space and housing is supported in principle.

8.9 The supporting text to the policy states that development of this growth area is expected to be comprehensive, and employment led and indicates that further guidance on how the area will be developed will be provided in the form of a framework. A framework was prepared in 2020 and updated in 2025, consideration to this document (which is a material consideration) is dealt with below. There is a conflict with this expectation as the proposed development is for only part of the growth area.

8.10 The Council has previously sought to resist piecemeal redevelopment of the growth area. In 2024 the Council sought to defend its decision to refuse planning permission for redevelopment of Alpha House, a relatively small plot of land within the Regis Road growth area occupied by Big Yellow Storage Company limited (see planning history Ref: 2023/0093/P in Para 4.38 above). The Inspector at the public inquiry noted the conflict with Policy

G1, as well as Policies SP2 and SP2A of the Kentish Town Neighbourhood Plan and the Kentish Town Planning Framework (2020) all of which support the comprehensive approach. However, they went on to consider whether the proposal would undermine the intentions for the area as part of a future development strategy, the Inspector gave consideration to the aspiration for improved links, the potential impact of the new building within any future context and whether the uses might undermine the intention to deliver housing within the growth area. He concluded:

> *"The future character and appearance of the area is unknown given the lack of a masterplan, but there is nothing on the basis of the evidence before me to indicate that the proposal would have any* unacceptable *impact in this regard"*

8.11 The appeal was subsequently allowed. The appeal decision is a material consideration which needs to be taken into account in decision making. In view of this, it is considered that whilst there is a degree of conflict with policy G1 of the Local Plan and policies SP2 and SP2A of the Kentish Town Neighbourhood Plan in that this application is not for comprehensive redevelopment of the growth area, it does not follow that the proposal is unacceptable in principle, what is important is that the scheme should not undermine the comprehensive redevelopment of the growth area at some future date. This matter must be fully considered as part of the assessment of the application and is addressed in Section 8 (Land Use) below.

Site allocation - Allocation 40

8.12 The adopted site allocation dates from 2013. Only part of the application site is designated as a site allocation in the adopted Camden Site Allocations (2013), under 'Kentish Town Police Station, 10A, 12A, 14 Holmes Road' (Site 40). This includes the listed police station fronting Holmes Road to the south of the site but also includes 'Section House' to the east of the listed building, which is not included within the application boundary. The rest of the application site does not have an adopted site allocation.

8.13 The designation states that the site is suitable for: "police facilities or new mixed use development including police facilities, permanent (Class C3) residential (including affordable housing), and/or other community uses". The guidance included in the adopted designation also states that development will be expected to preserve the listed police station and not harm its setting, as well as maximise the potential of the site to provide new housing.

8.14 The proposed development does not include the full area of the site allocation within its boundaries, but works which are both part of the application and site allocation include demolition of the non-original wing of the police station and the erection of a five-storey building consisting of the Recycling and Reuse Centre (RRC) and 28 residential units. The allocation

does not give a figure for the expected capacity of the site in terms of numbers of dwellings. The proposal also includes the provision of a community facility within the retained parts of the listed police station building, which could be used as an education space, a library, or a public hall. The Metropolitan Police intend to consolidate their existing facilities in Section House which is outside the application site (planning permission for works which allow for this to happen have already been submitted under ref. 2025/5479/P, and is currently awaiting determination– see 'relevant history' section of this report for full details – Para 4.34, above). Whilst the Police would vacate their historic home, there would continue to be a police presence in the area.

8.15 It is considered that proposed development would not conflict with the adopted site allocation which clearly intended that it comes forward for redevelopment (retaining the listed building) to optimise use of this land. The proposed uses within the application site and on the land outside it but within the allocation (Section House) broadly align with the land uses which were envisaged. The works on this land would deliver new and replacement homes, retain police facilities (the police facilities would need to be reprovided at Section House prior to any development commencing on this part of the site, which would be secured via S106 legal agreement and is detailed further in Section 10 of this report) and also for the reprovision of the RRC which serves a community purpose. The site allocation reminds of the need to preserve the heritage asset, there would be some heritage harm to the significance of the listed building, which is covered separately in the 'Heritage' section of this report in Section 11 and taken account of in the planning balance.

8.16 In summary, the proposed development responds to the principles set out in the adopted site allocation.

Kentish Town Planning Framework 2020

8.17 The Kentish Town Planning Framework (KTPF) was adopted in July 2020 and sets out the council's vision and key aims for the framework area; this consists of industrial land to the west of Kentish Town Road and Highgate Road, including the Regis Road area and Murphy's Yard site. The KTPF aims to promote this area as a sustainable mixed-use neighbourhood, delivering approximately 2,000 homes in the area, alongside industrial, commercial, and creative activity.

8.18 Although the KTPF is deliberately intended to be used as a framework rather than a detailed plan, it does also provide indicative land use character areas and sets out the expectation of development in the various parts of the wider area. For Regis Road, this entails reproviding light industrial provision, providing new homes, and establishing a business retention and relocation strategy alongside small scale office development.

Regis Road Area Guidance SPD 2025

8.19 The Council has also prepared the Regis Road Area Guidance (RRAG) document as an addendum to the KTPF, which builds further on the latter document's vision. This was adopted as a supplementary planning document in March 2025, meaning it is now a material consideration in the Council's planning decision-making.

8.20 The RRAG places even greater emphasis on the delivery of new homes, largely due to the worsening housing and cost of living crises. In addition to this, the focus of the employment provision within the area has been redirected towards a more flexible approach, with focus placed on diverse sectors such as creative industries, local services, retail, and logistics – rather than just prioritising industrial use. This is in recognition of the changing economic landscape and need for different types of commercial spaces, as well as the desire to promote development that blends more seamlessly into the character of Kentish Town more widely.

Emerging policy

Draft Camden Local Plan

8.21 The draft Local Plan is currently being examined by the Planning Inspectorate. In terms of the principle of redevelopment of the land at Regis Road which falls within Central Camden, it is relevant to consider Policy C1. A number of constituent parts of the site also fall under the site allocations in the DCLP, which are also outlined below. Whilst the DCLP has limited weight at this stage, that weight will increase as the plan progresses towards adoption.

8.22 As part of the emerging Local Plan examination process, the Council has published a schedule of proposed main modifications and minor modifications to the draft Local Plan and its policies, with the most recent update having been published on 11th May 2026. Modifications have been proposed to all of the below site allocations, though these are minor changes that are mostly for the purposes of clarification or typographical corrections.

Emerging Allocation C1 – Central Camden

8.23 The whole site falls within the area covered by Policy C1 in Central Camden. This is shown in Figure 12 below and includes Gospel Oak, Haverstock, Kentish Town, Belsize Park, Primrose Hill, and Camden Town. Given the scale of the area covered, the uses within it are broad though it is noted that the area is predominantly residential, contains two town centres, one of which is Kentish Town, as well as several neighbourhood centres. In para 4.11 the draft plan notes that there are a number of opportunities in the area to deliver new homes, jobs, and infrastructure to support Camden's communities, the most significant being on the sites at Regis Road and

Murphy's in Kentish Town. It goes on to state that there is an opportunity for intensification and diversification and to create a new vibrant neighbourhood whilst ensuring the continued provision of industry, logistics and employment uses at a higher density. In Figure 12 of the document Regis Road is identified as a key area of development.

Map of 'Central Camden' emerging allocation C1 (emerging allocations within this area are also shown).

8.24 The DCLP states in Policy C1 (A) that development in this area:

> *"should have a positive identity, drawing on the area's rich heritage and Camden's distinctive cultural energy, community and creative spirit; and deliver substantial benefit to Camden's communities, the local area and the borough as a whole, in accordance with the Local Plan and, where relevant, the Kentish Town Neighbourhood Plan".*

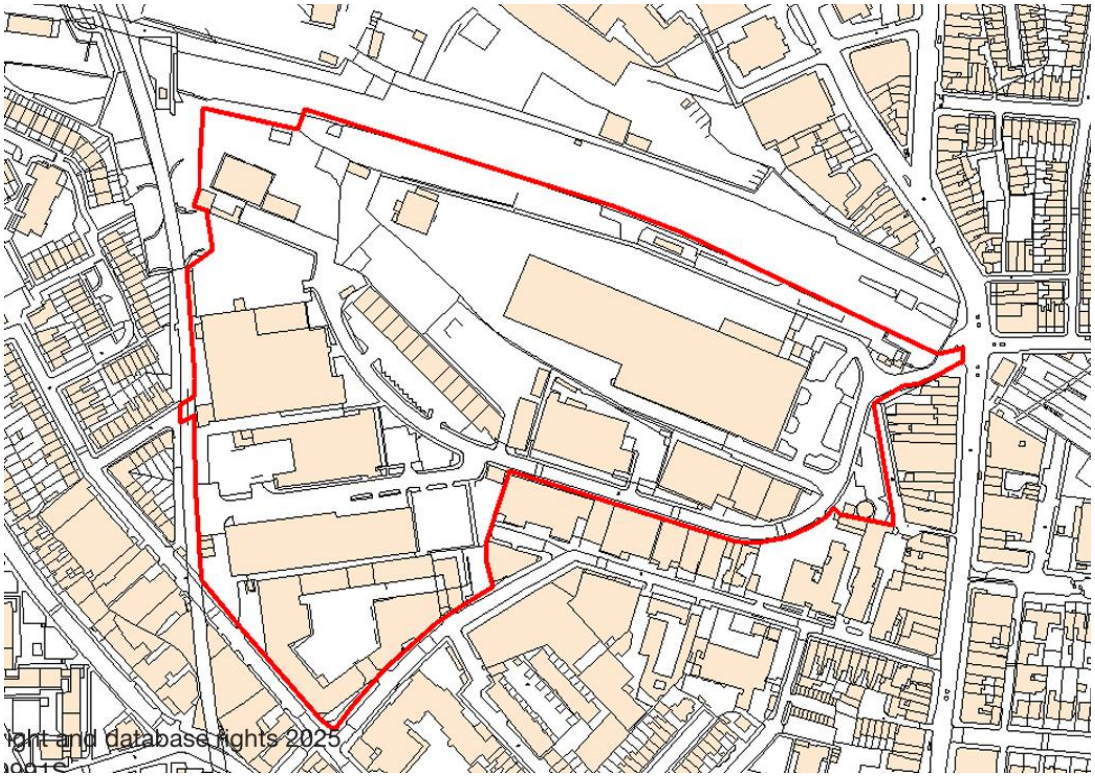
8.25 The draft policy goes onto state that development in the area should support the delivery of new homes (1750 homes across Regis Road and Murphy's), higher density employment/economy uses, including creative industries, and support retail and town centres and the delivery of improved infrastructure.

8.26 The proposed development set out in the application is for redevelopment of land identified for intensification and diversification in Policy C1. It includes the provision of a significant number of new homes (513 homes), in addition to various new employment uses that are intended to support the Kentish Town area, whilst not undermining the existing town centre, as well

as the borough more widely. The employment uses primarily consist of the film studios, this use falls within the creative sector but film production and sound recording are considered to be a form of industrial process, as defined by the Use Class Order. Although the film studios are designated as a Sui Generis use, the proposed use would continue to offer industrial provision, albeit a different character to the existing industry use. The proposal also includes the reprovision of the existing recycling centre and improves transport linkages through, into, and out of the application site. It is therefore considered that the proposed development broadly aligns with this emerging policy for Central Camden.

Emerging Allocation C2 – Regis Road and Holmes Road Depot

8.27 The majority of the site falls within the 9 hectares area that is designated as a draft site allocation in the DCLP under site allocation reference C2. Figure 13 below shows this area, which does also include parts of the site that are not included in the application boundary, including the UPS building, the Kentish Town Delivery Office, the 'Big Yellow' storage warehouse, and other smaller industrial units. The allocated uses in the DCLP are for industry/employment space, permanent self-contained homes (with an indicative site capacity of 1,000 additional homes), community uses, open space, waste and recycling facilities, and depot facilities.



Map of 'Regis Road and Holmes Road Depot' emerging allocation C2.

8.28 The draft site allocation sets out a number of development and design principles for proposals to follow. There are over twenty principles in total, and these include that development must:

- Be designed to create a vibrant and sustainable new mixed-use neighbourhood that is integrated into the surrounding area through excellent design and architecture, providing significant intensification of industrial and other employment uses alongside a substantial number of homes, open space, and community uses;
- Intensify industrial and other employment uses through efficient design that enables co-location with housing and other proposed uses;
- Provide a range of employment uses (including affordable workspace) to increase the range of business premises and sectors on site and provide significant additional jobs;
- Reprovide on site the existing housing floorspace (including the affordable housing) from the Holmes Road Depot site, in addition to the required new housing provision across the wider scheme area;
- Significantly improve connections both through the site and between the site and the surrounding area, to promote active travel and ensure that the site is successfully integrated into the wider Kentish Town Area;
- Contribute towards the provision of new community facilities and/or the improvement of existing facilities to meet increased resident needs;
- Create new and enhance existing areas of biodiversity across the site; and
- Be designed to be compatible with, and facilitate, the development of neighbouring sites, in particular the Murphy's site.

8.29 The application's response to the design and development principles (as well as the infrastructure requirements) as outlined above is assessed throughout this report. The purpose of this section is just to consider the principle of redeveloping this land and the land uses proposed.

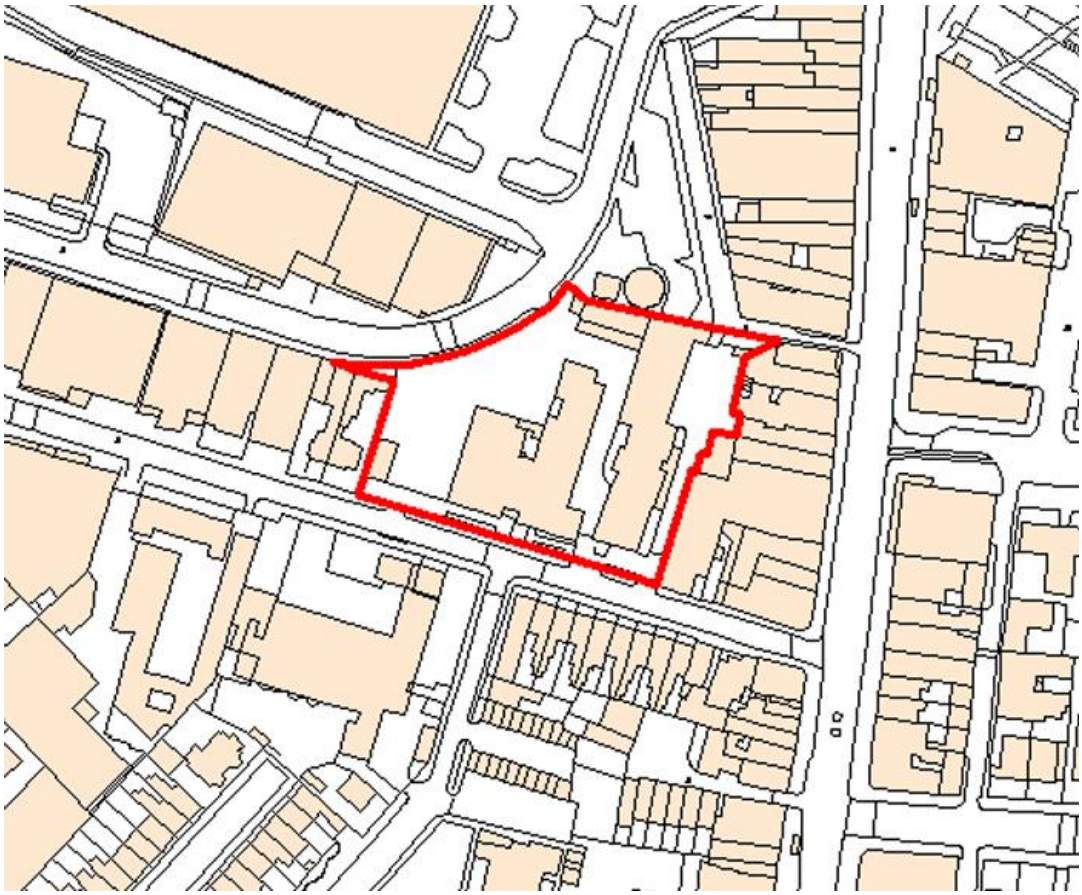
8.30 It is clear that emerging policy envisages redevelopment of the Regis Road industry area in the same way adopted policies do, that the focus is on intensification of the land and delivery of a mixed-use neighbourhood. The proposed development integrates a substantial contribution of new housing with vibrant new employment spaces and an educational offer. Employment numbers are expected to increase, with a wide range of roles created through the new Film Studios. The scheme would include the reprovision of housing at the existing Holmes Road Depot site, as well as the reprovision of the Recycling Centre. The proposed development therefore largely aligns with the vision for the site. The depot facilities are not re-provided on the site, so there is partial conflict with the site allocation in this respect, and this point is dealt with further below.

8.31 The proposed development has also been designed to integrate with the wider Kentish Town area and potential future development sites in the surrounding area, by responding to the masterplan for the site set out in the Kentish Town Planning Framework and its addendum. The proposed development provides film studios that would be considered as Sui Generis,

but are a form of industrial use. This specific point is dealt with in more detail below.

Emerging Allocation C4 – Kentish Town Police Station

8.32 A small part of the site in the south-east corner includes the Kentish Town Police Station, which is a draft allocation site in the DCLP under site allocation C4. Figure 14 below shows this area, which contains a grade II listed Victorian police station with a modern annex building attached and the adjacent eight storey Section House. The allocated uses in the DCLP are for police facilities, permanent self-contained homes, and student accommodation – though it is also noted that community uses and small-scale employment may be suitable here.



Map of 'Kentish Town Police Station' emerging allocation C4.

8.33 The draft site allocation sets out a number of development and design principles for proposals to follow. There are eight principles in total, and these include that development must:

- Provide for continued police facilities on this site, either alone, or part of, a mixed-use development of the site. Community uses and small-scale employment uses may also be suitable here;
- Ensure that the introduction of other uses on the site does not compromise police operational requirements;

- Preserve the listed police Station House building and not harm its setting;
- Be designed to address both Holmes Road and Regis Road;
- Seek to provide a safe and attractive walking, wheeling, and cycling route between Holmes Road and Regis Road to improve connections with surrounding communities; and
- Be designed to ensure that the main vehicular entrance to the site is from Regis Road in order to accommodate the Council's wider aspirations for the Holmes Road area.

8.34 The works proposed in the area of the site that is covered by allocation C4 include the demolition of the non-original wing of the police station and the erection of a five-storey building consisting of the new Recycling and Reuse Centre (RRC) and the re-provided residential units. The retained parts of the listed building would be used as either education or a community facility. This would not conflict with the police use of the Section House building, assuming that redevelopment of this site were to be granted permission (see 'relevant history' section para 4.34) – the relationship between Section House and the proposed development is outlined in further detail in Section 10 of this report. The new building would include connections between Holmes Road and Regis Road and address both through its design. It is worth noting that there would be some heritage harm to the significance of the listed building, which is covered in the 'heritage' section of this report. In summary, the proposed works would respond positively to the principles outlined in the draft site allocation.

Conclusion on principle of redevelopment

8.35 Adopted planning policies and guidance identify the Regis Road Industry Area as an area for growth. This site is expected to deliver a significant amount of the new homes and employment space needed in the borough, with a focus on industry and providing opportunities for existing business to be retained. The proposal to redevelop part of this brownfield site and the neighbouring police station site for homes and employment in the form of the film quarter is therefore broadly in accordance with policy which is focused on making efficient use of land. Where there is conflict is that adopted policy and guidance envisage comprehensive redevelopment for the Regis Road site, but what is proposed in this case is piecemeal and not all existing businesses will be retained.

8.36 Whilst comprehensive redevelopment of the site remains the most logical way to optimise the site and ensure a co-ordinated and logical masterplan, the appeal decision on Alpha House has not supported this approach. To ensure piecemeal development is co-ordinated and delivers on the Council's strategic objectives for the site, the Council prepared and adopted the Regis Road Area Guidance (an addendum to the Kentish Town Planning Framework). Throughout the report consideration will be given to given to how closely the proposals align with the vision set out in those documents,

in order to ensure that this scheme does not undermine delivery of all the objectives of the policy. Whilst the recycling centre and existing homes are to be re-provided, not all of the existing businesses and facilities on site will be, in particular the depot and the car pound will need to be replaced off-site.

8.37 The proposals are considered to be in general accordance with the specified development and design principles set out in the various draft site allocations.

8.38 The following paragraphs consider in more the nature of the land uses lost and proposed.

Industrial and Employment Space (Sui Generis/Class B8/Class E)

8.39 The London Plan includes policies to protect industrial land, with Policy E4 aiming to ensure that sufficient industrial land is retained to meet current and future needs. However, the policy does also recognise that not all industrial land is of equal quality or strategic importance and allows for the release of industrial land in appropriate circumstances; this may include proposals that would result in a more efficient use of land, modernised employment space, and wider public benefits.

8.40 Through policy G1 of the Local Plan the Council have already identified that this industrial land is expected to deliver significant growth through redevelopment, but should continue to include employment space, retain existing industrial businesses on site as far as possible, and not compromise the operation of businesses. However, this must be read in conjunction with the policies of the Local Plan that relate to economy and jobs, outlined below.

8.41 Policy E1 of the Local Plan aims to safeguard employment sites and maintain a stock of premises suitable for a variety of business uses, whilst encouraging proposals for the intensification of employment sites where these would provide additional employment and other benefits, including in the Kentish Town Industry Area (the application site is not within this designated area, it is an identified growth area). Policy E2 of the Local Plan relates more specifically to business premises, stating that higher intensity redevelopment of premises or sites will be supported where:

- The level of employment floorspace is increased or at least maintained;
- The redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
- It is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to

CAZ functions or Camden's local economy and will be to a sustainable location;

- The proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
- The scheme would increase employment opportunities for local residents, including training and apprenticeships;
- The scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
- For larger employment sites, any redevelopment is part of a comprehensive scheme.

8.42 The application site is currently low-density employment use, it is land identified for higher intensity employment proposals with the inclusion of other priority uses (such as housing, affordable housing, and open space). The proposed development responds to that policy requirement.

8.43 Currently, the site consists of approximately 13,849 sqm of industrial floorspace, which comprises the Camden Depot, the Kentish Town Industrial Estate (which includes the Recycling Centre and car pound), and the Asphaltic Site. This land would be redeveloped as part of the proposals, with new employment uses consisting of the Camden Film Studios building (including the film production and office space within) and commercial units throughout the site, such as cafes and restaurants. In total, the proposal would result in the addition of 101,288 sqm of employment floorspace, which is a significant net increase of 87,439 sqm. As such, the level of employment floorspace would see a significant increase of more than seven times the current offering. It should be noted that the majority of the proposed employment space would comprise of the film studios, with some smaller retail, café, and restaurants units. Although the film studios fall under Sui Generis use due to the presence of multiple non-ancillary uses within the site, film production, sound recording, and post-production facilities are acknowledged to be a form of industrial provision.

8.44 The proposed development would not re-provide space for the existing industrial uses except the recycling centre (also the depot and car pound are to be taken off-site) instead favouring an alternative employment offer in the form of a film production use and in this regard there is some conflict with policy. The majority of the commercial floorspace will be for film production and post-production purposes in the form of studios and workshops, which would be considered industrial uses. It could be argued there is some conflict with policy in that the proposed development does not provide floorspace that specifically falls under an industrial use class, but officers do not agree this is the case as it does provide for industrial use and

it would support a growing and important sector and allow for increased job opportunities.

8.45 The UK entertainment industry makes a huge contribution to the national economy, as well as the economies of London and the borough of Camden. Film and television production plays a significant part in this, though it is typically rare for studio space to be provided in dense urban areas – not due to these locations being inappropriate, but given there is a lack of physical space and the complexities that often arise with urban brownfield sites. The majority of larger studios are located outside of urban areas, so there tends to be a more acute lack of studio space in strategically located areas, which offer benefits in terms better connectivity and access to supporting functions.

8.46 Therefore, the proposed development presents an opportunity to deliver the highest quality of film studio provision that meets a need currently underprovided for in London. A number of objections have raised the concern that this is not an appropriate location for a film studios use, however there are exceptional advantages presented by the site's location, notably the proximity to the creative cluster in Central London, easy access to regional and national transport links, and the substantial workforce in and around London that would be available and attracted to the proposed development. Additionally, the proposal's delivery of large, high-quality facilities within modern, purpose-built buildings, as well as the provision of and close relationship with the adjacent film school are significant advantages to the site location, as these features would not necessarily be possible at other sites elsewhere. The specific requirements for film studios include excellent accessibility, proximity to the creative heart of London, and a large site that can accommodate the requirements of the film studios, ancillary needs, and infrastructure requirements – all of which the application site is able to accommodate.

8.47 The proposed use as part of the Camden Film Studios would intensify the employment provision of the site and provide an alternative form of industrial use, alongside the associated creative, educational, and workspace uses, all of which would fall under Sui Generis and Class E uses. Therefore, despite the development not proposing space that falls under an industrial use class, it would still continue to deliver industrial use and would be compliant with the policies of the development plan. Camden already has a strong creative economy, and the creative industries are recognised in both the London Plan and the Local Plan as a key driver of economic growth. The proposed studios would provide specialist infrastructure to enable the expansion and growth of this sector, responding to a recognised shortage of facilities in London.

8.48 There would be a significant uplift in employment density and capacity as a result of the increase in employment floorspace and new uses brought through the creation of the film studios. This includes a large increase of jobs directly associated with the film studios, including production, technical, administrative, and support roles. The full details of the employment offering are detailed in Section 15 of this report.

8.49 The proposed Film Studios building and associated studio space located within Inkerman Gardens will also provide space for smaller businesses and startups, including affordable workspace, as required under Local Plan policies. This would be secured as an obligation through the Section 106 legal agreement, which would detail the location of affordable workspace, quantum of floorspace, and level of discount provided. Further assessment of the employment and training strategy, including the relocation and/or retention of existing businesses, is provided in section 15 of this report.

8.50 Within the proposed development, there are also a small number of Class E units, primarily located at the ground or lower levels of buildings. These are intended to provide activation at the ground level of the development and are typically planned to be uses such as cafes and restaurants, some of which would be supporting the film studio and cultural uses within the buildings. The quantum of Class E premises is limited and would not have any negative impact on the viability and vitality of the nearby Town Centre.

8.51 Turning to the existing displaced industrial uses, as set out above the Recycling Centre will be relocated from its existing building into one of the new buildings – this is detailed later in this section and elsewhere in this report, and would be secured by S106 legal agreement.

8.52 Alternative sites for the Camden Depot and the car pound have not yet been finalised, but discussions are underway to confirm the permanent relocation of the uses, prioritising proximity to the area wherever possible, as well as ensuring that the new site provides an offering that is equal to or exceeds the current provision. The provision of the replacement depot and car pound will be secured by planning obligation to ensure there is no loss of those facilities until such time that planning permission for the replacement/relocated depot has been granted, and the consented scheme has been built out and is in operation. This is detailed further later in this section and in Section 10 of this report.

8.53 The applicant has also submitted a retention and relocation strategy with the application, which outlines the approach that has been taken to engage with other existing occupying businesses and identify an appropriate strategy for either retention or relocation. An obligation is attached securing a Relocation Strategy to aid the businesses on site – this is covered in Section 15 of this report.

8.54 The development proposals do not include the whole of the Regis Road industry area and whilst the whole area is earmarked for redevelopment, it is still necessary to ensure that the proposals would not prejudice the successful operation of industrial businesses remaining in the area in the interim. The main two uses that currently remain in the immediate area are Royal Mail (who operate the Kentish Town Delivery Office) and UPS. Both had lodged representations to the application, which are detailed in section 6 of this report.

8.55 The main concerns noted by Royal Mail relates to the interaction of the proposed residential units and the Royal Mail operation, which is therefore covered later in this section. UPS raised concerns about the impact of the development on the service road that would be shared by UPS and the film studios, as well as how construction and operation of the development would interact with UPS services. The film studios would operate with restrictions so that their use of the service road would not conflict with UPS, and planning obligations such as the Construction Management Plan would deal with any issues surrounding construction. Further detail on the use of the service road is provided in section 10 of this report, but it is considered that the proposed development would not restrict the successful functioning of the existing businesses in the immediate area. In line with adopted policy the proposed development seeks to make better use of employment land, intensifying and diversifying the employment offer and allowing for other priority uses to come forward. Significant weight should be placed on the quantitative and qualitative improvement to the site's employment provision. The scheme would redevelop an employment site to provide modern workspace for an emerging and important industry and would reprovide industrial land that suits this proposed use, meaning there would not be a net loss of industrial uses. There is a partial conflict with policy in that not all existing businesses are to be retained on site (the exception being the recycling centre), there would not be the space to do this, but mitigation is provided, s106 obligations will secure the reprovision of key council facilities in the form of the depot and car pound off-site and the relocation strategy will aid other displaced businesses to find new premises.

Residential use - Self-contained homes (Class C3)

8.56 Policy H1 of the London Plan seeks to increase housing supply and meet the borough's housing targets. Camden's target for net housing completions from 2019/20 to 2028/29 is 10,380. Additionally, the policy goes on to state that boroughs should deliver housing by optimising the potential for housing delivery on all suitable and available brownfield sites, especially where the following apply:

- Sites with existing or planned PTALs 3-6 or which are located within 800m distance of a station or town-centre boundary; and

- Housing intensification on other appropriate low-density sites in commercial, leisure, and infrastructure uses.

8.57 In addition to the London Plan policies, polices H1, H3, H4, H6, and H7 in the Camden Local Plan and Camden Planning Guidance are relevant to the provision of housing. Residential use is the Council's priority land use and is strongly supported; existing residential homes are expected to be protected or reprovided and proposed housing is supported, assuming that the proposed residential is acceptable when assessed against other material considerations. Existing affordable homes are protected, and proposals are expected to deliver further affordable housing wherever possible. The application site is identified in the Local Plan as a growth area where new housing should be delivered.

8.58 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 three years. The government's most recently published figure is for 2023, when the measurement for Camden was 53%. This means that Camden's development plan polices are being treated as out-of-date in relation to housing provision.

8.59 The presumption in favour of sustainable development in paragraph 11 of the NPPF is engaged, and great weight should be given to the provision of new 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.

8.60 The proposed development includes the provision of a significant amount of residential floorspace, delivering a significant increase on the existing site, which is shown in the table below.

Site	Existing floorspace (sqm)	Proposed floorspace (sqm)	Existing number of homes	Proposed number of homes
Station House	0	2,895	0	28
Heathgate	0	23,156	0	240
Inkerman Gardens	4,797	26,173	25	245
Total	**4,797**	**52,224**	**25**	**513**

Net change in residential floorspace across the development

8.61 The proposed development would increase the amount of residential floorspace on site by 47,427 sqm (GIA). The proposed residential comprises 513 homes, of which 25 are re-provided floorspace and 495 are additional new homes. Of the proposed additional 495 homes, 271 will be delivered as affordable, which constitutes approximately 23,570 sqm (GIA) of the total floorspace; this consists of 163 social affordable rented homes and 108 intermediate rented homes.

8.62 The site currently has very limited housing, with the only units being the 25 of which 20 are affordable (the remain 5 being leasehold) located above the Holmes Road Depot. The proposed development would therefore deliver a significant amount of additional housing to help meet the borough's housing needs. It achieves this by optimising underutilised and low-density industrial land that is in an accessible area and bringing forward residential units as part of a comprehensive mixed-use scheme, an approach supported by policy.

8.63 As set out above, the proposed 485 additional homes (and total delivery of 513 units) are strongly supported under the policies G1 and H1 of the Camden Local Plan. The supply of new housing and the principle of housing on the site is therefore considered to be compliant with policy. Taking account of the Council's position with regards to its housing land supply and performance against the HDT, significant weight has been attached to the delivery of this housing. The provision of affordable housing is also given significant weight, as this has the greatest need in the borough and is the highest priority land use. Tenure and unit size mix are dealt with in the relevant sub-sections of Section 14 of this report. In line with the NPPF this application should only be refused where the adverse impacts of the proposed development significantly and demonstrably to outweigh the benefits.

Hotel use (Class C1)

8.64 Policy E3 of the Local Plan sets out the Council's approach to supporting tourism and providing accommodation for those visiting the borough. It sets out how the Council expects new large-scale tourism development and visitor accommodation to be located in Central London and smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town, and Finchley Road/Swiss Cottage. New visitor accommodation must:

- Be easily reached by public transport;
- Provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;
- Not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and

- Not lead to the loss of permanent residential accommodation.

8.65 London Plan policy E10 relates to visitor infrastructure, recognising the importance of tourism to London and seeking to promote it by ensuring that visitor attractions are easy to reach and complemented by supporting infrastructure including visitor accommodation.

8.66 The proposals would provide a 116-room hotel to be operated in association with the Film Studios; this would be located at levels 10-12 of the Film Studios building and would serve primarily as support accommodation for the film production use taking place throughout the building. Where film studios typically include temporary facilities such as trailers, caravans, and mobile dressing rooms, the Camden Film Quarter would provide this permanently onsite in a purpose-built structure. The support accommodation would include suites, bedrooms, and green rooms, allowing for cast, crew, and production teams to stay overnight when working onsite. It is an important component of the scheme and is needed for the film studios to function. Access would be provided through a ground floor lobby and circulation core from Regis Road. It is also intended that, when not in use associated with ongoing production, the accommodation would be able to serve visitors to the site and general public which is why it has been classified as Class C1 hotel rather than just ancillary overnight accommodation to the film studio.

8.67 The development would not provide space for taxi or coach drop offs due to a lack of space around the site, the intention is to promote sustainable transport wherever possible, the site is located in an accessible area, with easy access to Kentish Town station (as well as other bus and train services in the nearby area). Given that this is a highly accessible location by public transport the lack of drop-off space is considered acceptable. The development would be secured as car- and coach-free to ensure that there is no disruption to the local transport network, which is covered in further detail in the 'Transport' section of this report (section 17).

8.68 Due to the site's location close to Kentish Town Road, it is considered that the introduction of a hotel use would be appropriate in land use terms, this is a town centre high street characterised by a mixture of different uses, with good public transport. The proposed use would not involve the loss of any residential accommodation and would bring benefits to the area in terms of attracting footfall, supporting the Film Studios as well as local businesses in the service sector, and maintaining a level of vibrancy on the periphery of the town centre, including outside of typical office hours.

8.69 Further details on the impact of the proposal on neighbouring amenity are outlined in Section 14 of the report, and Section 16 covers mitigation measures to manage the impact of the hotel in terms of transport. Additionally, an Operational Management Plan is secured by Section 106

legal agreement to ensure that the operation of the hotel does not cause undue disturbance to surrounding residential homes or the local community. This would be required to include details of travel arrangements, public access strategy, deliveries and servicing, staffing, promotion of public transport, security, and how noise and disturbance will be managed.

8.70 Overall, the proposed hotel use is considered acceptable in this location and would in accordance with Local Plan and London Plan policies.

Education uses and non-residential institution (Class F1)

8.71 The London Plan encourages the provision of educational facilities, with Policy S3 supporting schemes that improve existing and provide new education space, particularly where the location is accessible through sustainable transport means.

8.72 Policy C2 of the Camden Local Plan seeks to protect community facilities, which includes social infrastructure providing a service to the community, such as education and adult learning and training uses. The policy requires that the Council will support new community uses that are accessible and for which any impact is mitigated. It is also noted that the investment plans of educational bodies to expand and enhance operations will be supported, taking account of the social and economic benefits these generate for Camden, London, and the UK. It highlights the importance of balancing the impact proposals might have on residential amenity and transport infrastructure.

8.73 The proposed development includes the creation of new education floorspace both within the Camden Film Studios building and as part of the School Building and Pavilion. This will comprise 7,103sqm and will provide training space for young adults aged 16-19 that are looking towards a career in film and television production, establishing a new campus for the London Screen Academy (LSA). The new LSA campus will include schooling space and seminar rooms, dedicated training studios, a cinema (which can operate independently but is linked to this use), flexible event spaces, and editing suites; the purpose-built campus will provide state-of-the-art facilities to help provide a pathway into the film and television production industry, including for Camden's young people.

8.74 Similarly, the proposal also includes a dedicated London campus for the National Film and Television School (NFTS) within the main film studio building. The NFTS has operated for 50 years and offers advanced courses for film, television, and games professionals. The proposed London campus as part of the Camden Film Studios will allow for people including local residents and existing professionals to train and work towards roles in the industry.

8.75 The proposed education uses provide space for specialist institutions associated with the film studios, which will strengthen the economic offering of the scheme as well as support jobs, apprenticeships, and training opportunities for Camden's residents. Further assessment of the employment and social value resulting from the proposal is given in Section 15 of this report.

8.76 The retained listed 'Station House' is also proposed to include flexible education or community floorspace. Although a specific use within this use class has not yet been defined, the principle of providing space for social and community uses that is available to the public (which would fall under Class F1a) is supported. The proposed use would not conflict with adjacent uses and would ensure that this part of the site is activated and able to engage with the surrounding area.

8.77 Overall, the proposed education and community based uses are supported by policy and would be appropriate in land use terms in this highly accessible location, complementing the wider scheme and mix of proposed uses. In particular, the education uses would support skills development in association with the film studios and would therefore bring economic and cultural benefits. It is not considered that the proposed educational uses are of a scale which is likely to impact negatively on residential amenity and are one of a number of proposed uses in this new mixed-use neighbourhood. The provision of education space would comply with the policies of the London Plan and Local Plan and would therefore be acceptable in land use terms.

Reprovision of recycling centre (Sui Generis)

8.78 Policies SI8 and SI9 of the London Plan require that existing waste management sites are safeguarded, with their capacity optimised where possible. The policies also note that proposals for relocated waste sites will be acceptable where strategic waste management outcomes are achieved and should be supported where it can be ensured that the relocated site is appropriate in terms of scale, location, and impact on surrounding amenity.

8.79 At the local level, Policy CC1 of the Local Plan supports development that enables sustainable resource management and optimisation, whilst Policy CC5 aims to support Camden's waste management. The latter policy specifically requires that the existing waste site at Regis Road is safeguarded unless a suitable compensatory waste site can be provided that replaces the maximum throughput achievable at the existing site.

8.80 The North London Waste Plan outlines sustainable waste management for the period until 2036, covering seven boroughs in the north of the city and including Camden. The Plan includes Policy 1, which requires that all existing waste management sites are safeguarded for waste use, with

applications for non-waste uses only supported where it can be clearly demonstrated that compensatory capacity will be delivered elsewhere in North London, in line with the Plan requirements. The replacement facility should meet and, where possible, exceed the maximum achievable throughput of the existing site.

8.81 As part of the redevelopment of the site, the existing Regis Road Recycling Centre is proposed to be demolished and reprovided through a new Recycling and Reuse Centre (RRC), located adjacent to the retained part of the listed police station building. This would continue to provide residents of the borough with a facility to dispose of materials that can then be recycled and/or reused.

8.82 The proposed RRC is located in close proximity to the existing facility and would be arranged within the curtilage of the 'Station House' building, with residential units located above (similar to how the existing residential units are located above the Depot). The re-provided facility would be purpose-built to allow for vehicular access from Regis Road and in such a way that the uses are clearly and physically separated, allowing for any amenity impacts to be more easily managed, ensuring that the mix of uses would be acceptable. The re-provided RRC has been developed through a working group with representatives from the North London Waste Authority (NLWA), London Energy Limited, and the applicant team. The initial representation submitted by the NLWA, identifies certain early reservations that are being worked through; however, it must be noted that whilst slightly smaller in floorspace the facility is different in that it is now within an internal space and, to ensure Regis Road is suitable for active travel and greening, no queuing is proposed, rather it would be run with a booking system that manages access for visitors and servicing. The design development that has taken place through this has established the appropriate requirements of the re-provided facility, such as sufficient capacity, appropriate space for operational and ventilation activity, and appropriate access for both vehicles and pedestrians, which would be an acceptable replacement of the existing centre. In order to ensure that there is a continued and uninterrupted operation for residents, a planning obligation would prevent any works to the existing facility until the replacement RRC has been constructed and is in operation, which is detailed in Section 10 of this report.

8.83 As previously noted, the proposed RRC is located in an easily accessible location that can be reached by vehicles or by foot, allowing residents from the proposed development and surrounding area to make use of its services. In land use terms the proposed use and its location is considered acceptable. The proposed host building has been designed with appropriate separation from sensitive residential elements, with building design ensuring that there is limited impact, including in terms of noise, odour, and disturbance. Full assessment of amenity impact is given in Section 14 of this

report and review of the transport considerations is given in Section 16. Further details relating to waste considerations are provided in Section 21 of the report.

8.84 In summary, the proposed development would provide a satisfactory reprovision of the existing waste facility, ensuring that residents benefit from an easily accessible and purpose-built RRC that makes efficient use of land and safeguards essential infrastructure. Overall, it is considered that the re-provided RRC would not conflict with other adjacent land uses and would be acceptable in land use terms.

Other Sui Generis uses

Visitor and Cultural Attraction

8.85 The London Plan provides strong support for creative industries, with Policy HC5 supporting the development of new venues, facilities, and uses that can support London's rich cultural offer. Similarly, Policy C3 of Camden's Local Plan promotes the creation of new cultural and leisure facilities, particularly as part of major and mixed-use developments. Policy E3 of the Local Plan also notes the importance of the visitor economy to Camden, and states that tourism development will be supported where accessible and not harming the balance and mix of uses in the area.

8.86 An integral part of the Camden Film Studios is the creation of a visitor attraction that is clearly linked with the film studios use and creative industries operating on site. This makes up approximately 11,240 sqm of the film studios building (so approximately 10% of the film studios building). The thematic link to the wider development is crucial to its providing footfall and generating interest in the film studios, whilst still ensuring an appropriate amount of activity for the site to avoid conflict with nearby land uses.

8.87 The creation of a visitor attraction as part of the wider development would bring both economic and cultural benefits, contributing to Camden's already strong cultural offering. Due to the site's highly accessible location and proximity to the 'Kentish Town' town centre, it is considered that this would be an appropriate use of land and would be easily accommodated within the existing area. The attraction would ensure that the site is activated outside typical working hours and in a way which complements and supports the town centre rather than competing with it, contributing to a vibrant and mixed development and a successful town centre.

8.88 In summary, the proposed visitor attraction would complement and integrate well with other land uses at the site particularly the film studios and would be appropriately located to ensure it is both accessible and complementary to the nearby town centre. Detailed concerns relating to noise and operation are assessed in Section 16 of this report, but the principle of land use for the visitor attraction is acceptable and complies with relevant policy.

Cinema (Sui Generis)

8.89 As noted above, both Policy HC5 the London Plan and C3 of the Camden Local Plan encourage the provision of cultural and leisure facilities, supporting the development of uses such as this where they are in accessible locations, easily reached by public transport and where the impacts on the local community and surrounding area can be managed.

8.90 The proposed development would also include a cinema, which would be available for members of the public, as well as utilised as part of the education use. The cinema would be operated as part of the wider cultural and visitor offer associated with the film studios, being available for film exhibitions, screenings, and related events.

8.91 The proposed cinema would help give rise to increased footfall and activity within the site, particularly during evening hours (when showings and events typically take place). Due to the location of the use and the nature of the mixed-use development, it is considered that the mix of uses would be appropriate and any impact, including in terms of amenity and transport, would be able to be appropriately managed; a full assessment of these considerations is provided in Sections 16 and 19 of this report. Therefore, the proposed cinema use would be an efficient and appropriate use of land that would integrate with the wider development and be acceptable in land use terms.

Energy Centre

8.92 The London Plan promotes sustainable development, with an emphasis on reducing carbon emissions and supporting low-carbon energy infrastructure; Policies SI2 and SI3 specifically require that major developments should be net zero carbon and provide a detailed energy strategy to demonstrate how this will be achieved. The Camden Local Plan builds on this, with Policies CC1 and CC2 supporting development that incorporates onsite energy infrastructure and that achieves the targets set out in the London Plan.

8.93 The proposed energy centre located to the north-west part of the site is a key infrastructure element of the masterplan, and would provide energy to support heating, cooling, and hot water for the film studios. It has been designed so that future development can be incorporated in through an ambient heat exchange loop, including the other sites as part of this application and future development that may come forward at adjacent sites. This allows for the proposal to meet the sustainability targets in policy.

8.94 The location of the energy centre as a standalone structure minimises the potential for any conflicts with sensitive uses, and the structure has been appropriately sized to meet the energy requirements of the application site. The proposed location is acceptable in land use terms, and any impacts to

amenity or servicing requirements are dealt with in Sections 16 and 19 of this report, respectively. It is considered that, especially given the contribution that the energy centre allows the development to make towards meeting sustainability goals, the proposed use is acceptable in land use terms and complies with relevant policy.

Land use conclusion

8.95 In conclusion, although the proposal would involve the loss of existing industrial uses and require the re-provision of existing Council facilities, it is considered that the underutilisation of the existing industrial site and the significant public benefits in terms of homes, employment, culture and economy that would arise from the proposed mixed use development would mean the proposal is acceptable in land use terms. The proposal aligns with the Council's aspirations for the site as set out in the Local Plan an area specifically designated for growth.

8.96 Provision has been made on site for a new Recycling and Reuse Centre (RRC) as required by policy and will continue to meet local need. The car pound and depot facilities will be re-provided for off-site and this will be secured through planning obligations. The exact location for them has not yet been agreed and the obligations therefore will be onerous requiring that a location has been determined before any works can start on site which would lead to their displacement.

8.97 The new film studios would bring to the area new industrial uses with significant activation and employment benefits, supporting a growing and vibrant industry, both in relation to the borough and the city more widely. It is important that the economic benefits from the use are felt by all and that employment opportunities derived from the scheme benefit local people which is dealt with in Section 15 of the report.

8.98 The provision of 513 homes, 485 of which are new homes (25 existing homes are re-provided) and 271 of which will be affordable homes, is welcomed and will significantly contribute towards Camden meeting its housing targets. Taking account of the policies of the NPPF and the Council's performance under the HDT significant weight should be attached to the delivery of new homes in the planning balance.

8.99 The other land uses that also form part of the proposed development would be acceptable and complement both the film studios and residential. The provision of education space, visitor and cultural facilities will create a vibrant neighbourhood which activates the local area without negatively impacting, the good accessibility of the site and its proximity to a town centre contribute to the acceptability of these uses. They are also important in terms of the overall public benefits that can be delivered by the Film Quarter, the site becoming an ecosystem for education, skills, training and

employment in the film industry. A cultural and community use plan will be secured by S106 to ensure that the community benefit from access to spaces and a programme of events associated with the permanent uses and a meanwhile use strategy to activate the spaces in the interim.

9. INFRASTRUCTURE AND PHASING

Scheme delivery

9.1 As a result of the significant scale of the development site and the various constituent parts of the scheme, the proposed development would be delivered in phases. This is necessary both due to the size of the site, but also due to the interdependencies of certain elements of the works; for example, Inkerman Gardens is proposed where the existing depot is located, so will only be able to be constructed once the depot has been reprovided off-site and the replacement homes provided at Station House. Similarly, the Film Studios requires relocation of the Recycling Centre and Car Pound so these will need to be re-provided before work can start on those parts of the site and to deliver the replacement recycling centre the existing Police Facilities would need to have moved to their new facilities in Section House. The sequencing is critical and complex and will need to be tightly controlled and managed through planning obligations. The delivery of the site through a phased approach will help to alleviate the impact on existing and future residents from demolition and construction, as the impact can be spread over a period of time so that it is less affecting.

9.2 The development will be split into the following four phases, each of which is subsequently described in detail:

- Phase 1a: Station House, Heathgate, and Energy Centre
- Phase 1b: Camden Film Studios
- Phase 2a: Inkerman Gardens
- Phase 2b: School Building and Pavilion

Phasing plan of proposed development site (n.b. elements of the scheme shown here have since been revised, such as the energy centre, but the phasing order remains the same).

9.3 These phases include six separate sites, as previously set out in section 2 of this report. For clarity, these are:

- Station House
- Energy Centre
- Heathgate Residential
- Camden Film Studios
- Inkerman Gardens
- School Building and Pavilion

Site infrastructure

9.4 Key elements of infrastructure are essential for the delivery of phases, so will be required to be secured prior to commencement. These include both connective infrastructure (within and into the site) and green infrastructure (such as public open spaces). These will be discussed throughout the rest of this section, including the mechanism by which they will be secured, but for clarity, will include the following:

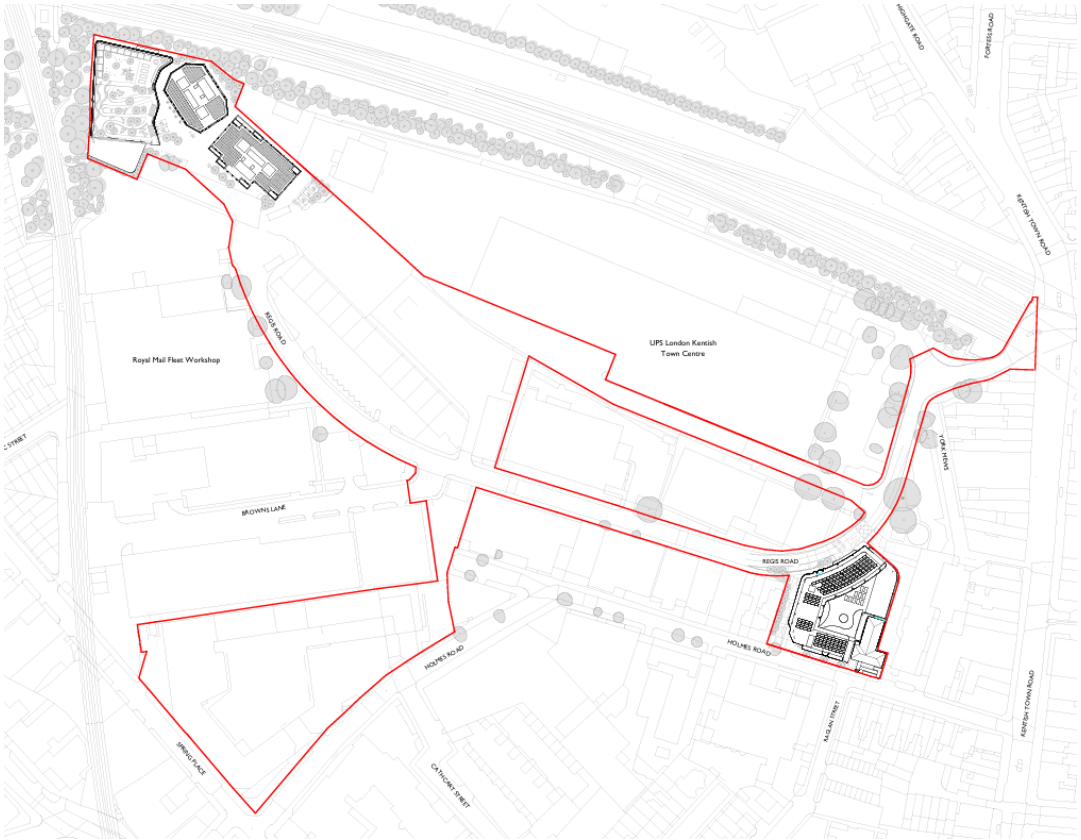
- 'Heath Line' bridge link
- Regis Road improvements (including Kentish Town Road junction)
- Holmes Road / Regis Road pedestrian link

- Film Studios Service Road
- Energy Centre
- Arctic Street / York Mews link
- Access to Browns Lane
- Connection to Kentish Town City Farm

9.5 The proposed development will be subject to an Infrastructure Delivery Strategy and an Area Wide Infrastructure Strategy to cover the infrastructure requirements that must be required in order for the development to be able to be implemented, as well as specific obligations for particular works, where necessary.

Phase 1a: Station House, Heathgate, and Energy Centre

9.6 The first phase to be delivered by the development would include Station House at the south of the site on Holmes Road, and the residential Heathgate buildings and energy centre, both located at the north-west of the site. The map below shows the construction proposed as part of the Phase 1a works.



Map showing proposed works as part of Phase 1a

9.7 The north-west portion of the site, including the Energy Centre and the Heathgate residential buildings, would be delivered as part of the first phase of development. This area of the site is currently occupied by the asphaltic site, which would be demolished to enable the construction of this phase. There is no requirement to reprovide or relocate the existing use (the

asphaltic site) prior to construction of the residential buildings and Energy Centre, so this part of the Phase 1a works would be able to commence immediately if planning permission were granted (subject to the discharge of any relevant planning conditions or obligations). This would enable the delivery of approximately half of the much-needed proposed homes at an early stage. Additionally, the Energy Centre could be delivered prior to the rest of the scheme coming forward, which would provide essential infrastructure that supplies energy to the entire development.

9.8 A crucial component of this part of the site is safeguarding the delivery of a pedestrian bridge link across the railway to the north, which would link with the Murphy's development site. The provision of a pedestrian bridge is a key part of the Regis Road Area Guidance (RRAG) SPD, where it is referred to as the 'Heath Line Bridge', with the ultimate aim of providing a route to the Heath from Kentish Town through this site and neighbouring development sites. In order to ensure that the proposed development can facilitate the Heath Line Bridge, a planning obligation would secure the safeguarding of land required for this piece of vital infrastructure . The applicant would also be required to make an initial payment to the Council towards the delivery of the Heath Line Bridge as part of a separate obligation , as well as work in collaboration towards its delivery. The RRAG is clear that all major development in the area will be expected to contribute a proportionate amount towards the Heath Line bridge, so a payment of £2.5 million would be sought at this stage, which is based on a current estimate of the total cost. Other major development sites will be expected to contribute including Murphy's and Joseph Homes.

9.9 The Station House site will also be delivered in the first phase, in order to prioritise the reprovision of the recycling centre and the existing 25 homes that are currently located at 76 & 78 Holmes Road (and subsequently unlock other phases of work). However, the new building at the Station House site that includes the reprovided recycling centre and new homes, is situated on land currently occupied by the side extension and existing car park of the Kentish Town Police Station. The Metropolitan Police are currently in the process of reorganising their facilities into Section House, which sits immediately to the east of Station House. A separate application (currently pending determination – see 'relevant history' section of this report at para 4.34) will therefore, if approved, lead to the vacation of Station House so that the site can be redeveloped as part of this proposed development.

9.10 Given the above, the development at Station House cannot commence until the application proposing the relocation of the Police Station into Section House has been approved and implemented, in order to ensure that there is no detrimental impact to the operations of the Metropolitan police. Therefore, an obligation will be secured by Section 106 legal agreement to ensure that a scheme at Section House has been approved, commenced,

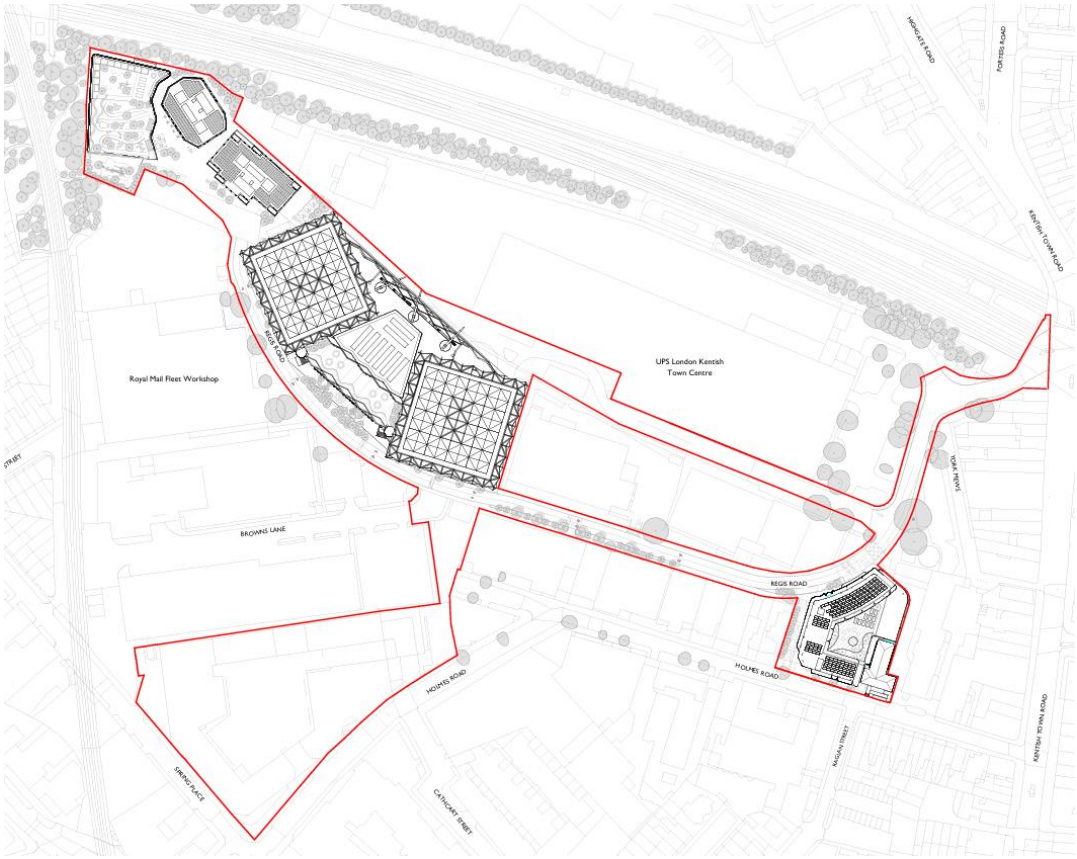
and has been implemented to a stage that the car park and modern wing of the listed building are no longer in use and can be developed without negatively impacting the operation of the police station.

9.11 Similarly, the future use of Station House itself will need to be secured prior to implementation of this part of the site. Although the new recycling centre and residential building will be constructed immediately adjacent to the retained part of the listed building, the two will be separate units and not physically connected in any way. However, it will be essential to confirm that, prior to the implementation of works at Site 1, the future use of the listed building is secured. The application includes the change of use of Station House, but given its listed status and that the exact nature of the future use is unknown at this point, the works needed to facilitate the future use are not included in this application. As such, a separate planning obligation will require the submission and approval of a planning permission and listed building consent submission to secure the use of Station House and any alterations that may be necessary to facilitate this .

9.12 The development of the Station House site also provides a pedestrian link between Holmes Road and Regis Road. Details of how this will be delivered will be set out as part of the aforementioned infrastructure delivery strategy. This will ensure that details of the approach and design of the link are provided prior to implementation of Phase 1a.

Phase 1b: Camden Film Studios

9.13 The Film Studios building will be constructed under Phase 1b and is the largest part of the scheme in terms of scale, so will likely be the phase that takes the longest to deliver. The building will be located on the site of the existing recycling centre, car pound, and industrial estate (which includes a series of smaller commercial units). As such, the car pound and recycling centre will need to be reprovided prior to the implementation of Phase 1b works. The recycling centre would be reprovided on Holmes Road. The car pound would need to be reprovided off-site.



Map showing proposed works as part of Phase 1b

9.14 The existing recycling centre is being reprovided nearby, as part of the new Station House building. As noted above, this will be delivered within Phase 1a, so it will be necessary to ensure that the works at the Station House site have been completed, and the new recycling centre is in operation prior to the commencement of Phase 1b works. This is to avoid a situation in which there is no operational recycling centre in the area. An obligation will secure the reprovision of the recycling centre and the cost of the fit out of this (or else payment to the Council to cover the cost of the fit out).

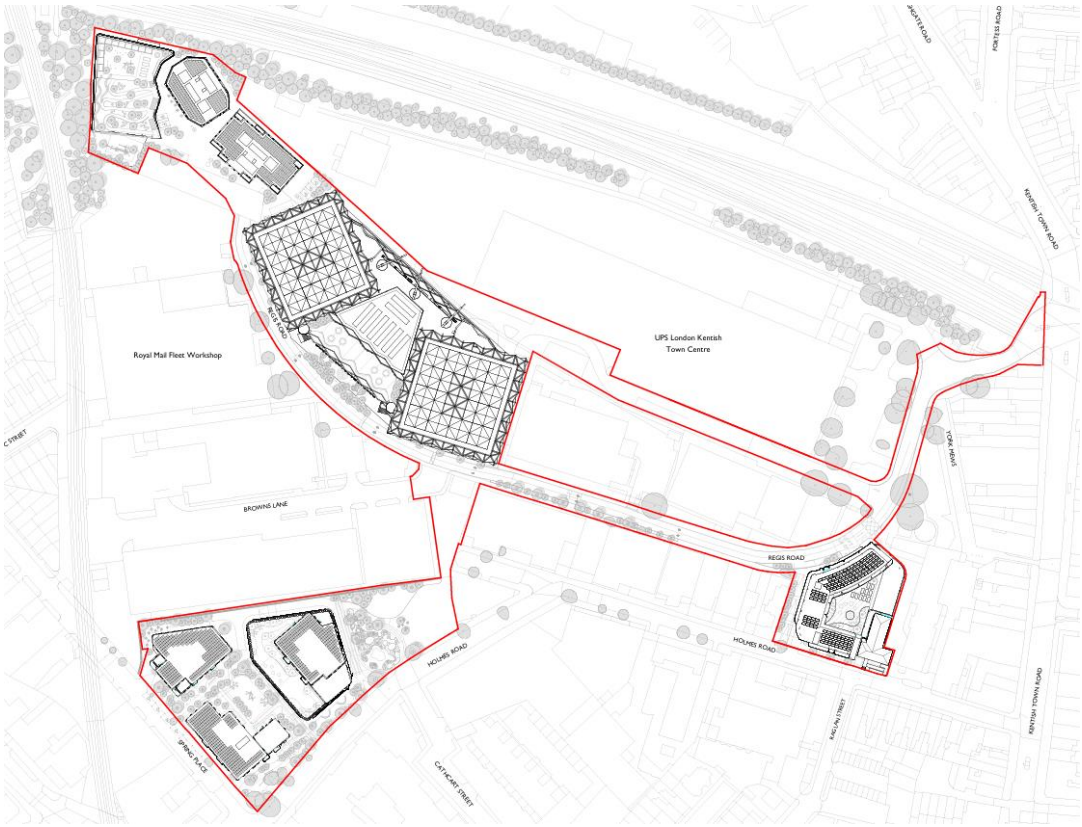
9.15 The relocation and reprovision of the existing car pound will also need to be provided prior to the commencement of works at the film studios site, in order to ensure that residents do not suffer from interrupted access to facilities. As with the recycling centre, an obligation will secure the relocation of the car pound and the cost of the fit out of this (or else payment to the Council to cover the cost of the fit out). The car pound would need to be relocated off-site.

9.16 The rest of the film studios site is taken up by the Kentish Town Industrial Estate. As noted above, this largely consists of smaller businesses falling within Class E and B uses (see Land Use section of this report) within a mixture of two and three storey buildings, along with an associated car park. The applicant has submitted a business retention and relocation strategy, which will be secured by the Section 106 legal agreement and will ensure

that opportunities are provided for existing businesses to find an alternative location that does not negatively impact their operation or the local economy. Further details of this are provided in Section 14 of this report.

Phase 2a: Inkerman Gardens

9.17 The next phase to be delivered will be Inkerman Gardens (Site 5), which is located in the south-west of the site, where Holmes Road intersects with Spring Place and Willes Road. The existing area is currently taken up by Camden Council's Holmes Road Depot, as well as the 25 existing homes at 76 & 78 Holmes Road. The proposed Inkerman Gardens will consist of three residential buildings with commercial at the lower levels.



Map showing proposed works as part of Phase 2a

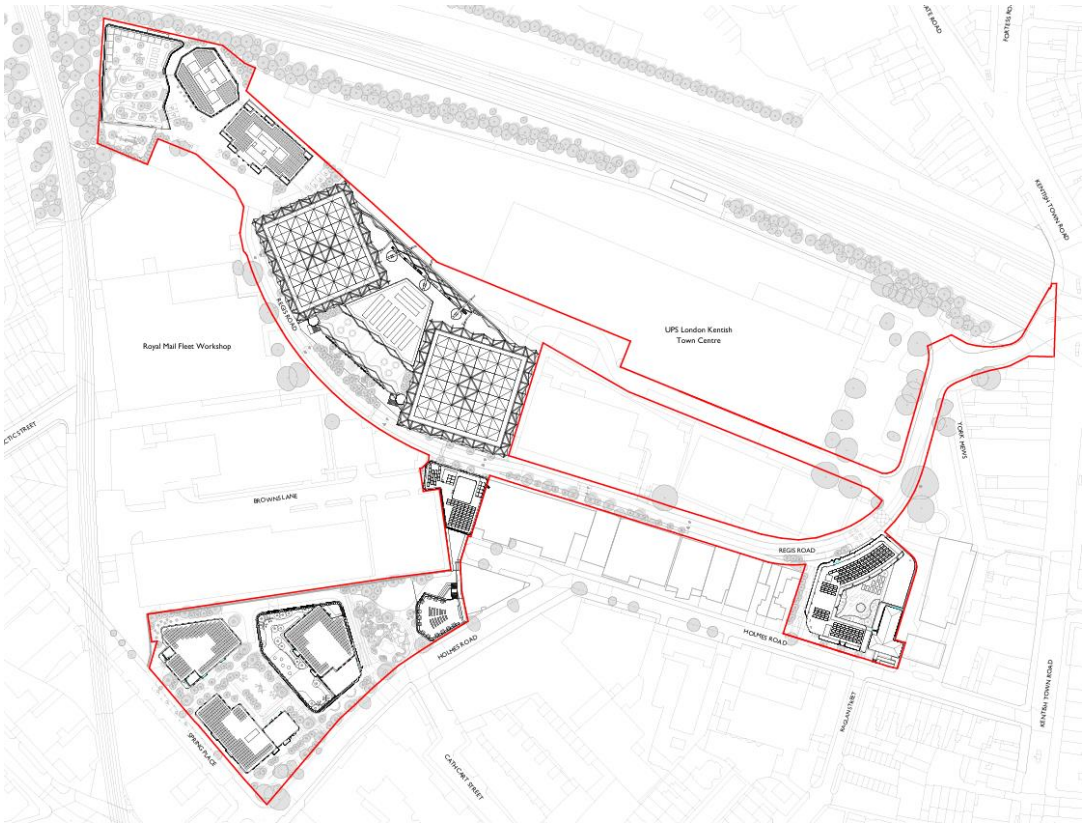
9.18 The development at the Station House site will provide the replacement homes for residents at 76 & 78 Holmes Road, so Phase 1a will need to have been completed and occupied prior to the commencement of works in Phase 2a, as well as to ensure there is no interruption of Depot services for residents. This will be secured by the Section 106 legal agreement to ensure that residents have been appropriately relocated and there is no loss of housing.

9.19 The replacement Holmes Road Depot will need to be reprovided and in operation prior to the commencement of works at the Inkerman Gardens site, in order to ensure that the operation of the Depot services is not interrupted. Therefore, the reprovision and fit out (or else payment to the

Council to cover the cost of the fit out) of the Depot will be secured by Obligation. This will need to have been implemented, and the new replacement Depot be in use before any works at the Inkerman Gardens site can commence, to ensure that Camden and its residents retain the Depot's services consistently. Whilst it would have been preferable to know the exact location of the replacement depot prior to consideration of the application, suitably restrictive obligations can address this and would allow the first phase of the scheme to move forward delivering much needed homes for the Borough. The obligation would ensure that the Depot remains operational either on or off-site.

Phase 2b: School Building and Pavilion

9.20 The final phase of development includes the provision of the School Building and Pavilion and is located in the approximate centre of the site. Currently, the only building in this part of the site is a motor vehicle dealer.



Map showing proposed works as part of Phase 2b

9.21 The existing business in this part of the site will be included in the business retention and relocation strategy, and this strategy and the aforementioned obligation securing it will be relied on to ensure that these businesses are able to be relocated in a way that does not harm their operation or the local economy.

9.22 The construction of the School Building will also potentially block access to Browns Lane onto Regis Road (the spur of Regis Road that leads in the

direction of Spring Lane). This would likely block access from the southwest of the site for residents of Heathgate (who would therefore have to access their homes via the Kentish Town Road junction). As such, it is essential that alternative provision is secured to allow continued access for residents of Heathgate from Spring Lane via Browns Lane. This would be secured as part of the planning obligations detailed below to ensure that there is no negative impact on the connectivity infrastructure from the construction of this final phase of development.

Connectivity infrastructure (routes and connections)

9.23 The impact of development necessitates essential infrastructure to be delivered that would be necessary for future residents and businesses. The Infrastructure Delivery Strategy and Area Wide Infrastructure Strategy will be crucial in delivering this; the former will secure the necessary infrastructure within the site, and the latter will provide the infrastructure connecting the site to the surrounding area and allowing future access both into and out of the proposed development.

Infrastructure Delivery Strategy

9.24 In order to mitigate the impact of development and ensure that the proposed scheme can be implemented, specific infrastructure is required to be delivered within the site, which would be crucial to the success and operation of the film studios, the accessibility of the site for sustainable modes of transport, and the creation of an inclusive and pleasant place to live for future and existing residents. The delivery and trigger for delivery of this infrastructure will be secured by Obligation alongside a Infrastructure Delivery Strategy (IDS) which will also require further details of the design of each piece of infrastructure, hereafter collectively referred to as the IDS obligation.

9.25 It will be essential that Regis Road is able to accommodate the proposed development, so key improvements will be secured to the highway so that it can continue to operate as the main access route from Kentish Town Road. Regis Road improvements will be required to prioritise pedestrian and cyclist access into the site in accordance with the RRAG SPD, as well as being capable of integrating into future plans for an enhanced 'Kentish Town Gateway', at the eastern end. This application has given limited detail on the design of Regis Road, this is so that it can be designed at a later date to work with this and future proposals that are expected to come forward. Alterations that will be supported and should form part of the Regis Road design when the IDS obligation comes forward for discharge include widened pavements, space for cycle infrastructure, and improved junction arrangements for pedestrians and cyclists. Improvements to Regis Road would need to come forward before occupation of the studio building and it is essential that Regis Road remains usable throughout the entirety of the

development so that full access can be provided to occupiers of the Heathgate residential buildings.

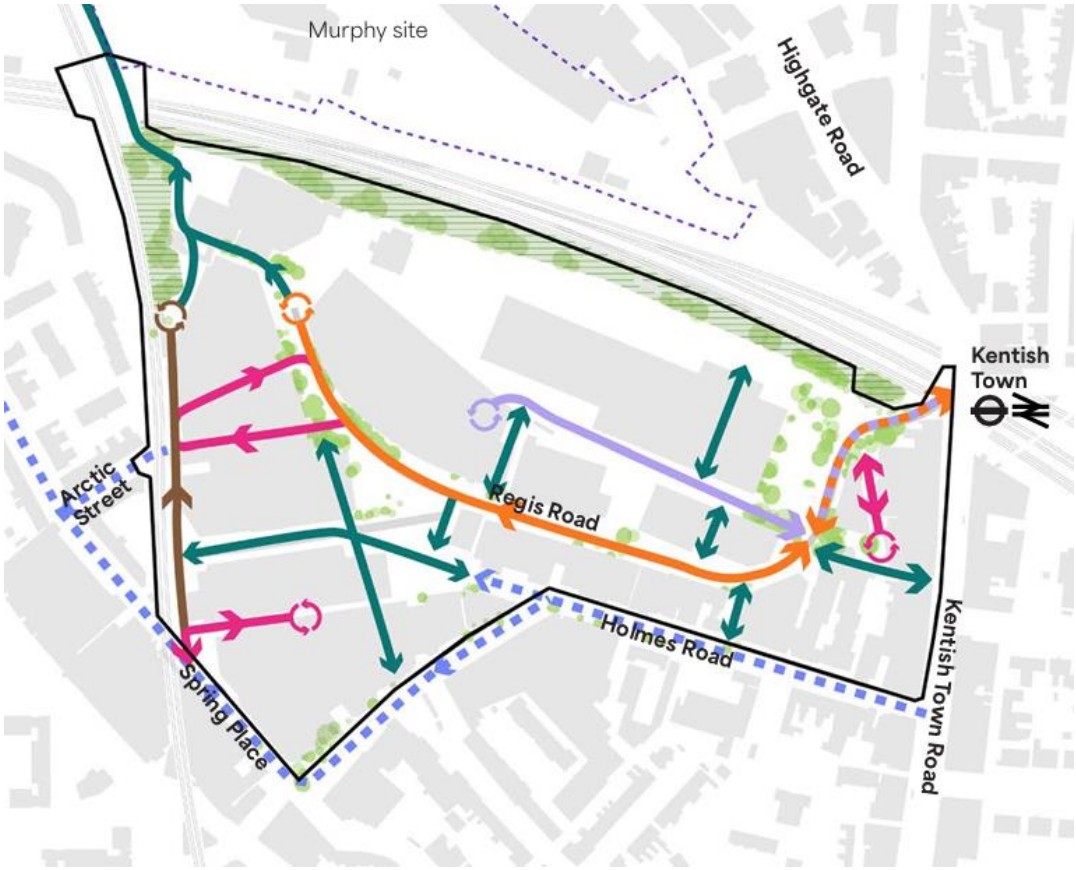
9.26 It is also essential that the UPS service road that runs west from Regis Road to the film studios is delivered ahead of the occupation of the film studios. The film studios would not be able to operate without this critical piece of infrastructure, as all vehicular movement and all primary servicing would take place via the service road. This includes HGVs and other large vehicles, which need to be able to be accommodated. As such, the detail of the service road will need to be provided as part of the IDS obligation discharge prior to the commencement of Phase 1b, including how it will be designed to accommodate all movements and avoid significant impact on the operation of the UPS site to the north.

9.27 Other crucial infrastructure includes the Energy Centre (which is an essential requirement to provide energy to the proposed development), the Holmes Road / Regis Road link (which must be provided pre-occupation of Station House) and the east-west route along Browns Lane that will link to Spring Place and allow alternative access for residents of Heathgate, instead of having to travel from Kentish Town Road. These will all form part of the IDS obligation and, and as with all the IDS infrastructure pieces, are essential to the success of the scheme. This critical infrastructure is crucial to meet the strategic objectives of policy and guidance and the scheme could not be delivered without it.

Area Wide Infrastructure Strategy

9.28 The infrastructure connecting into and out of the site is also essential to the long-term success of the development and will be secured by way of an Area Wide Infrastructure Strategy (AWIS). Unlike the IDS, the AWIS will be focused on setting out the infrastructure required for wider integration with the Regis Road Growth Area and Kentish Town Industrial Area. This will include a requirement to work in collaboration with the Council and a Landowners Forum, bringing the various land interests in the surrounding area together to enable delivery of the infrastructure set out in the area-wide strategy. The AWIS will include elements such as the following:

- A full east to west route from York Mews to Arctic Street (shown by the orange and pink routes in the Figure 20 map);
- The bridge link to the north (shown by the green route in the northeast of the Figure 20 map);
- The potential connection to Kentish Town City Farm from Regis Road.



Map to show aspirational routes and connecttions required to support comprehensive redevelopment of the Regis Road Area

9.29 For all of these works, the coordination between landowners will be essential to successful delivery, and this will be secured by planning obligation prior to the implementation of the whole scheme, resulting in a coherent and clear strategy for all necessary supporting infrastructure).

10. PLACEMAKING AND DESIGN

Policy context

10.1 At the national level, the NPPF places significant emphasis on achieving high-quality design, with placemaking principles embedded within section 12 of the framework. It is made clear that well-designed, high-quality, and sustainable buildings and places are fundamental to planning in order to create better places to live and work. The framework also requires that planning decisions are made to ensure that developments are visually attractive, sympathetic to local character and history, establish a strong sense of place, optimise the potential of the site for an appropriate amount and mix of development, and create safe, inclusive, and accessible places.

10.2 The London Plan also includes policies to position design quality and placemaking at the heart of development. Policies D3 and D4 require proposals to follow a design-led approach to optimise the capacity of sites, giving consideration of design options to determine the most appropriate

form of development. This includes delivering buildings that respond positively to local distinctiveness through layout, orientation, scale, appearance, and form, as well as encouraging and facilitating active travel throughout. Proposals should also be of high-quality architecture that has considered the practicality of use, flexibility, safety, and accessibility, and has been designed with high sustainability standards in mind. In accordance with policies D5, D8, and D9, proposed development should also aim for the highest standards of accessible and inclusive design in both buildings and the public realm, seeking to provide safe, attractive, and accommodating environments for all people. Where tall buildings are proposed, this should also involve the consideration of impacts such as visual, functional, environmental, and cumulative impacts. Policy D9 specifically says tall buildings should only be developed in locations identified in the development plan.

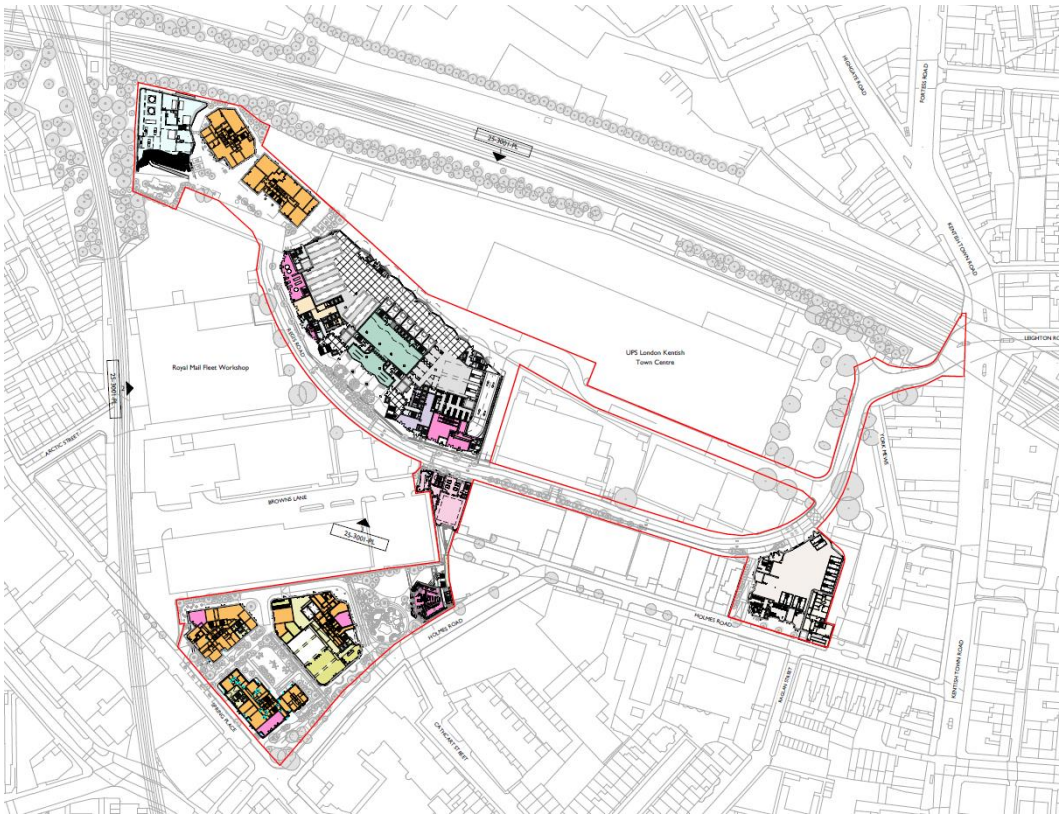
10.3 At the local level, Policies D1 and D2 of the Camden Local Plan are relevant to design and placemaking. These require that development is respectful of local context and character, is sustainable in design and construction, utilises materials and details that are high-quality and respond to the site and surrounding area, and promote safety and health for the borough's residents. Similar to the policies of the London Plan, this also involves consideration of tall buildings and seeking to meet the highest standards of accessibility and inclusivity. Policy D2 specifically relates to Camden's heritage assets and their settings, requiring that development protects these from harm, unless it can be demonstrated that public benefits outweigh any harm or loss (Heritage is more fully covered in Section 12).

10.4 The adopted local plan does not identify the site as a location for tall buildings. However, in emerging local policies including the emerging site allocations of the Draft Local Plan, the site has been identified in principle as a potential location for tall buildings. The Regis Road Area Guidance also identifies this site as a location where tall buildings may be appropriate, with tall buildings (above 30m) to be located away from more sensitive interfaces (such as lower rise townscapes and railway corridor natural habitats). These are both material considerations.

Masterplan considerations and routes

10.5 The site is, in effect, a land assembly made up of severed parcels connected by roads, so the proposal cannot be assessed on its own as a comprehensive masterplan. Rather, this assessment takes into consideration how the proposed development fits into the wider masterplan developed in the Regis Road Area Guidance (RRAG) SPD. As such, the proposal must demonstrate how it has been designed to be part of a comprehensive scheme, rather than presenting a masterplan for the entire allocation area. In particular, the proposed development should be designed to facilitate and allow links to any future development of adjacent sites, with

opportunities for enabling comprehensive wider development of adjacent sites fully explored.

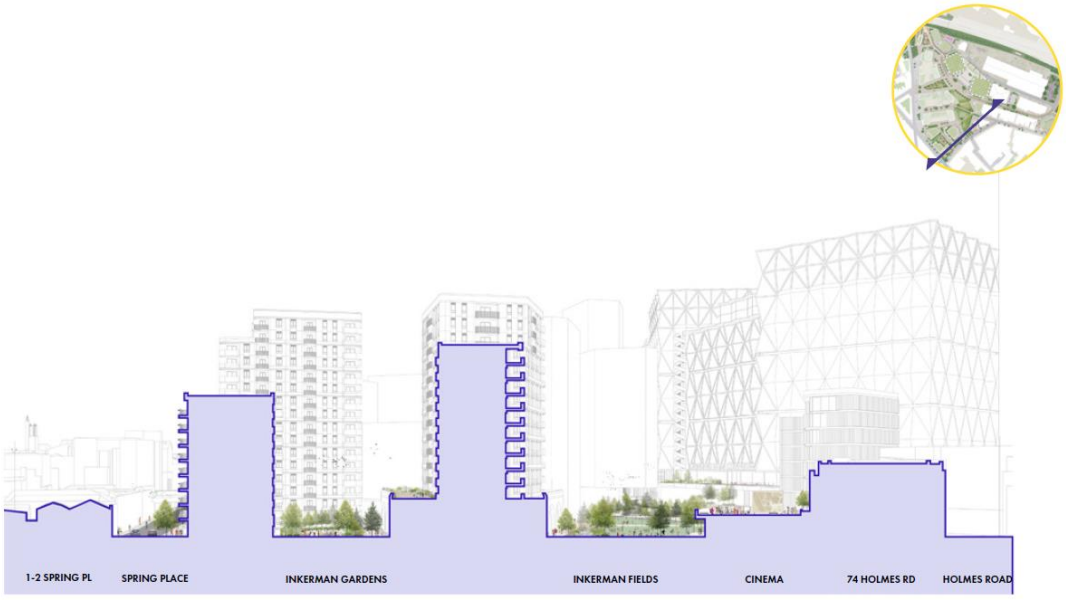


10.6 The proposed layout of the development responds well to the RRAG. Buildings are appropriately placed with respect to their location enabling appropriate routes and connections, uses, and the surrounding landscape. The site layout has also been designed to integrate with future development at adjacent sites, including through the placement of the South-West Public Open Space and the accommodation of space for a pedestrian link bridge to the north and reinstated Arctic Street link to the west. These support the creation of routes and connections into and out of the site such that the site is able to connect with proposals that are expected to come forward at the Murphy site and Joseph Homes land, as well as the existing residential area to the west.

10.7 The current proposal does not provide substantial detail as to how the site will integrate with the long-term aspiration to improve the east-west pedestrian route, including the continuation of York Mews. This is a core objective outlined as part of the spatial strategy in the RRAG. However, the obligations detailed in the previous section of this report, specifically the Infrastructure Delivery Strategy, would ensure that the final design of Regis Road and the Kentish Town Gateway would allow the development to improve Regis Road as a key route and connection across the Growth Area.

02 The Application Scheme shown within the wider masterplan vision. Elements shown outside of the application buildings represent the wider masterplan vision and are indicative.

Proposed masterplan axonometric



Proposed site section with proposed building elevations beyond including the Education Building and Camden Film Studios to the right

10.8 Given the proposed development site is only part of the Regis Road Growth Area and wider Kentish Town Area, the cumulative impact of heights and massing from future and as yet unconsented proposals is important to consider. The most significant structures within the proposed development are the Camden Film Studios (which is an equivalent height of 23 residential

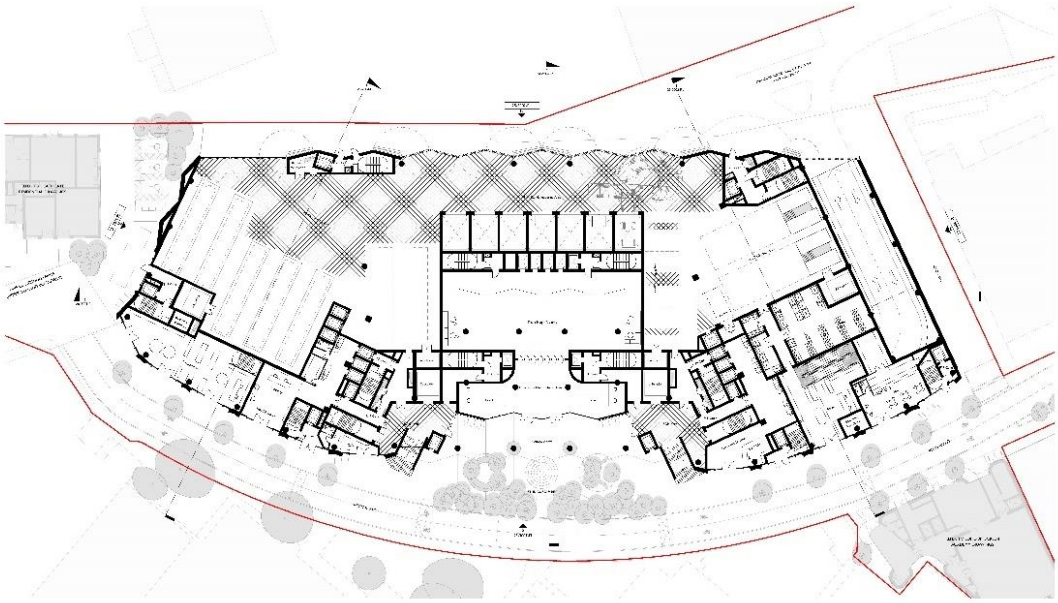
storeys), the Heathgate towers (which are 23 storeys at their highest), and the Inkerman Gardens towers (which are 16 storeys at their highest). As noted above there is some conflict with D9 (B) (3) of the London Plan as the sites are not identified in the Local Plan for tall buildings, but they are in emerging policy and guidance and the GLA has raised no strategic objection to tall buildings in this location. The principle of tall buildings is therefore accepted. Some of these buildings exceed the recommended maximum height given in the adopted RRAG, which gives a potential height range of 12-52m (or 4-16 storeys), and directs potentially taller buildings centrally and towards the north of the area. All buildings above the 30m threshold trigger Policy D9 of the London Plan, which requires that such structures are of exemplary architectural quality and design standards. The height of each of these buildings, taking account of that, are discussed in the relevant sub-section below.

10.9 Although it is noted that the Film Studios building in particular will be visible in longer distance views and could risk becoming dominant and overbearing on the streetscape, the context of the site as a large and underutilised brownfield site with significant growth potential is an important consideration in considering more substantially scaled development. The following sub-sections assess aspects such as the scale, massing, typology, and architectural detailing of the proposed development.

Camden Film Studios

Layout and typology

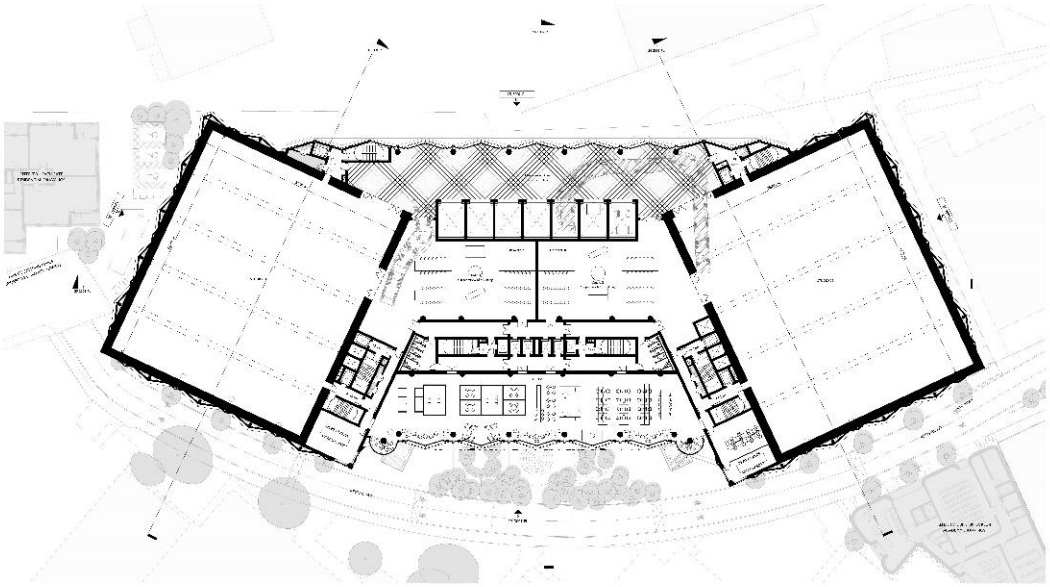
10.10 The Camden Film Studio building is the centrepiece of the proposed development, consisting of one single structure measuring up to 23 residential storeys in height. It has an efficient and clear typology, with two sets of stacked studios forming cuboid structures to the east and west. The space between these is used as a servicing core, workshops, workspaces (known as the ‘beehive’), a restaurant, and a public terrace. The top two storeys of the building provide for a hotel and an auditorium/orchestra space, and the basement and lower floors of the building include car parking facilities, an extra two film studios, additional workspace, and a ‘Studio Tour’ exhibition space.



Proposed ground floor plan of the proposed Camden Film Studios

10.11 The proposed building footprint steps forward of the existing Regis Road building line, beyond the building line of the approved 'Big Yellow' storage facility (currently under construction), and forward of the street line assumed in the RRAG. The wider street line in the SPD is given to improve the quality and functioning of Regis Road, in order to provide a pleasant, comfortable, green, and safe road for pedestrian and cyclist users. The proposed building footprint means Regis Road would have a width of 11.5m where there are overhanging upper floors and 12.5m to the east, where visitors would arrive from Kentish Town Road. The building overhangs the highway (both pavement and road) in places, with a varying distance of up to circa 6m over the pavement and under 2m over the road to the west of the building.

10.12 The form of the building follows the curve of the existing Regis Road layout so that its front faces onto the future public open space, as envisaged in the RRAG. Although the studios result in an efficient 'stacked' structure that would seemingly conflict with the curve of the road, the building footprint has been positioned and oriented such that it allows for a comfortable relationship with Regis Road; although parts of the road are tighter due to the physical constraints of the road shape and the film studios, the layout does not impede highway users.



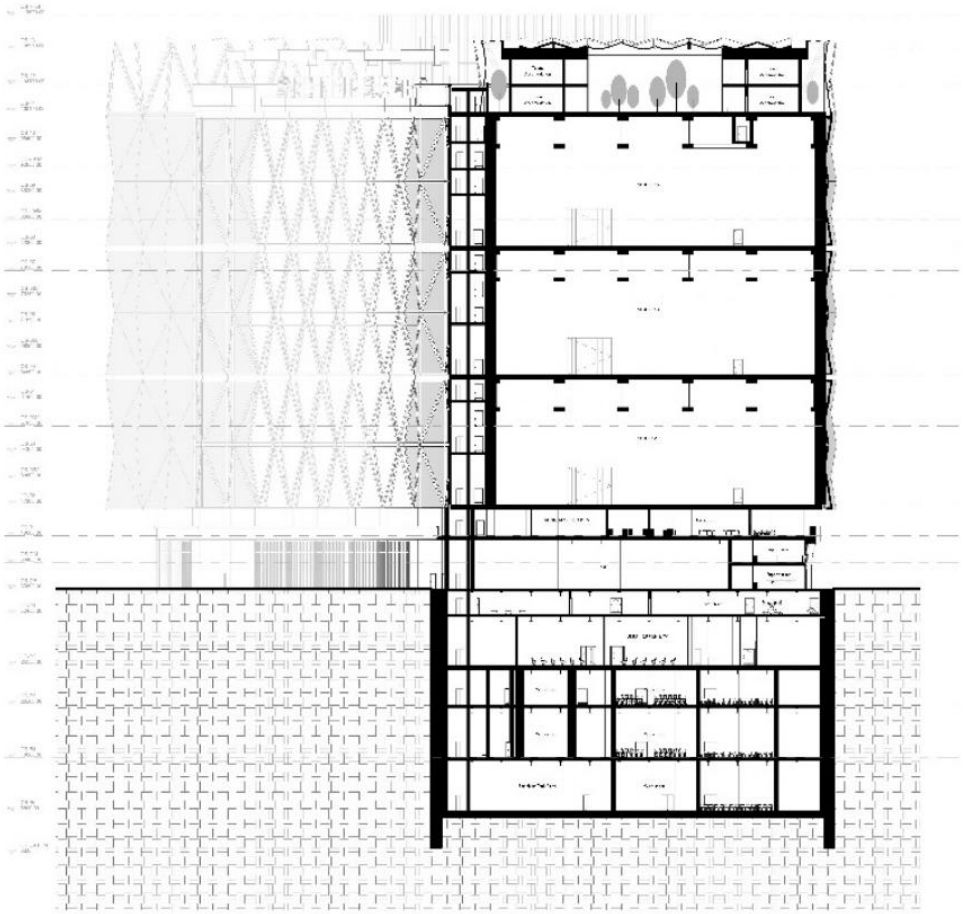
A typical plan (2nd floor plan) of the proposed Camden Film Studios

10.13 At ground level, there are a number of points of activation throughout the building that engage with Regis Road and contribute to an improved public realm. These include commercial units at the eastern and western points of the building, the hotel entrance lobby, the orchestra entrance and lobby, the entrance lobby to the studio tour, and the staircases up to the first-floor terrace and studio entrance. Additionally, the recessed massing at the middle of the building allows for a welcoming public realm, providing a sense of welcome that leads to the cultural and visitor attraction at ground floor level and invites the public up the stairs and lift to the deck at first floor.

10.14 The deck at first floor is 11m deep with a ceiling height of 3.6m, meaning it has a depth of over three times its height. This proportion would mean that the terrace cannot be considered open space for amenity and as such cannot contribute to the calculation of the provision of public open space.

10.15 It should be noted that the public realm to the front of the studios would not be negatively impacted by vehicle movement and/or servicing; the building would be serviced via the UPS land to the north, which provides a direct route from the eastern end of Regis Road through to the rear of the building. This means the rest of Regis Road would not be impacted by large vehicular traffic associated with the film studio use, which would be accommodated by the area to the north and the deep basement. There is also an alleyway to the east of the studios building that leads northwards to the rear. The building presents a blank façade so, whilst this alley would be inaccessible to the public and would not be used for primary servicing, further details relating to boundary thresholds, materials and window openings would be secured by condition to ensure a high quality design passive surveillance and safety along Regis Road.

10.16 The upper floors of the building provide an accessible restaurant and terrace, the latter of which would be free to enter for the public. To avoid conflict between the film studio use and members of the public, the management of this space would be secured as part of a Building Management Plan, in order to ensure that this space is still a successful part of the public realm, without impacting on the functioning of the studios. This would also cover the operation of the hotel and orchestra studio, as well as the publicly accessible terrace at roof level adjacent to these uses.



Section through the proposed Camden Film Studios showing the 73m high stacked studios (x3) with Studio Tour below and hotel provision above as well as c.30m high basement.

Massing, height, and scale

10.17 The film studios would have a height of between 73m and 77m, which is equivalent to 22 to 23+ standard residential storeys. The façade length would exceed 160m long and 50-60m deep. As previously noted, this height and massing is greater than set out in the RRAG, which recommends 16 storeys as the target scale. Although the proposed development exceeds

these targets, there have been a number of design choices made to attempt to alleviate the impact of the larger building.

10.18 The proposed massing comprises two cuboid-like blocks that have been angled to follow the existing curve of Regis Road; by offsetting these two parts at an angle, the structure reads from the south as a more segmented building, rather than one single and solid form. The recessed massing to the centre of the building contributes to this effect, breaking up the façade so it has a less dominant appearance. The top two storeys of the building (which are approximately 13m of its total height) are mostly glazed with a solid block at the centre (though this is set back from the front façade). This accommodates the orchestra and hotel spaces, and the change in materiality from solid to glass attempts to alleviate the impact of the height at the higher level.

10.19 It is unavoidable that the scale of the film studios building means its height, length, and mass is clearly visible from the surrounding area. Given the lower density nature of the surrounding development, in some places this will also mean the building appears as dominant in context – in particular in certain local views. These are detailed in full in the 'heritage' section of this report. The massing of the building will also clearly be appreciated when approaching the site along Regis Road from the east.

CGI of proposed Camden Film Studios building with the two Heathgate towers beyond, seen from high up above Kentish Town Road railway bridge

The proposed Camden Film Studios seen from the east from Regis Road to the right with the proposed Education building to the left.

CGI aerial view of the proposed Camden Film Studios with the Western Gardens seen in the foreground (not part of this application), the Education Building to the

right and the Heathgate residential towers to the left (private 23st tower to the rear and affordable 16st between the two buidlings)

10.20 The proposed massing is nearly (but not exactly) symmetrical. The central set-back would open up onto a welcoming public realm, both on Regis Road and to the future envisioned park ('Western Gardens' in the RRAG), which is expected to come forward in future development proposals at adjacent sites.

Architectural detail

CGI: South façade of the Camden Film Studio building with Regis Road in the foreground as well as the future Western Gardens (not part of this application) and the proposed education building in the background.

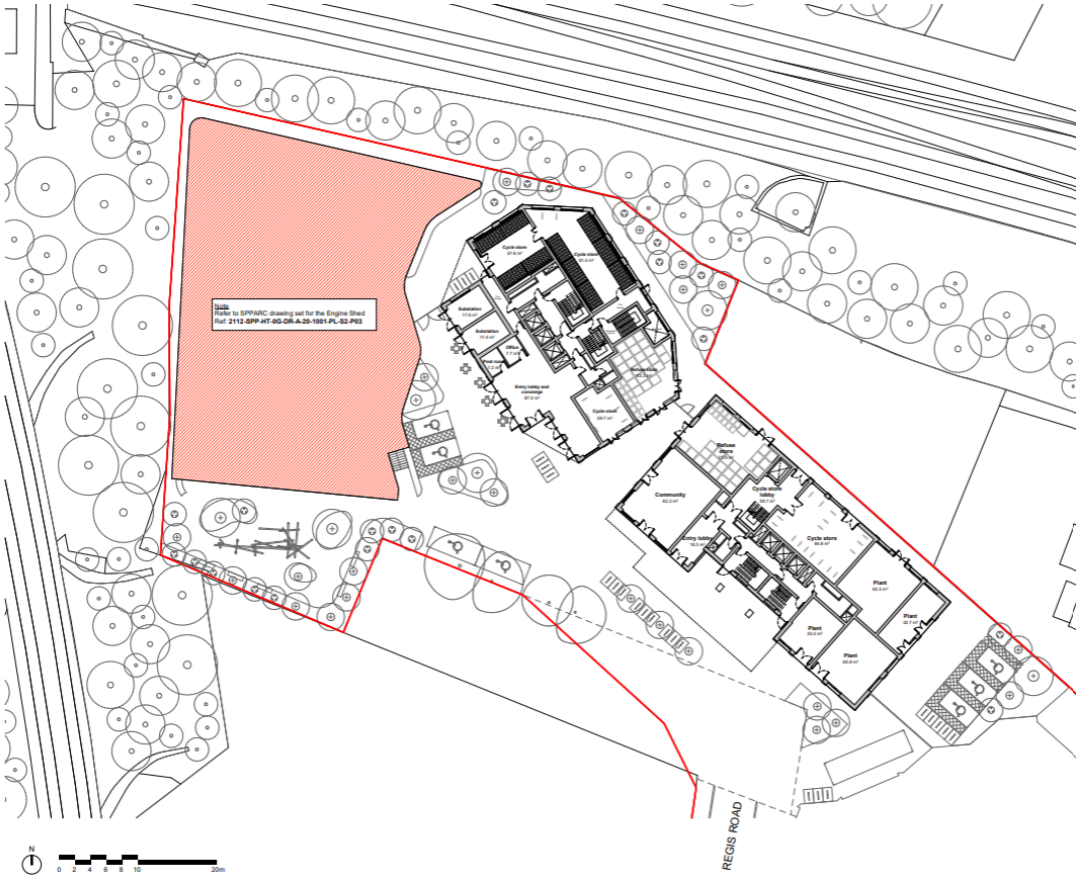
10.21 The main parts of the film studios building are made up of the two 73m high stacked studios, which are designed to be clad with diamond-shaped brick-faced concrete panels. The architectural language and unique appearance creates visual interest and variations for what would otherwise be blank facades, which are necessary due to the use within. The diamond panels are positioned over an arched brick plinth that forms the ground floor, and the top floors and central part of the building (connecting the studio stacks) are fully glazed, also with a diamond-shaped structure for the glass. Two concrete spiral staircases frame the central glazed façade, and a corten steel blank box sits above the central section of the building at roof level to house the orchestra auditorium. Further details to meet sustainability

credentials of the fully glazed facades to provide natural ventilation and solar shading, and of the large brick clad concrete panels construction are to be secured by condition.

10.22 Overall, the building architecture has a formal character with a clear concept of expression of internal uses, using a series of various materials and shapes for distinct elements, sometimes using local references (ground floor brick arches that reference the local railway character), and sometimes imported from elsewhere.

10.23 The ground floor openings create a relationship between the active uses and the public realm with glazed openings onto Regis Road. These are framed within repeating arches to create an attractive frontage and attempts to create an active and welcoming building. To ensure the building's success in establishing a civic space that responds to the surrounding area in the most successful way possible, further details are secured by condition. These will require detailed drawings and samples of all materials used in the building façades, and may require small changes to the proportions of openings at ground level to provide a clear hierarchy of entrances and ancillary doors.

Heathgate Buildings



Proposed Heathgate ground floor plan showing the railway and SINC to the north and west and the CFS to the south east (bottom left) and the Engine Shed location hatched in red

Layout and typology

10.24 The Heathgate site is made up of two residential buildings, one of which is 22 storeys tall and the other 16 storeys. The taller of the two towers is situated to the north and is entirely private tenure, with views over the railway and the Murphy's site, and towards Hampstead Heath to the north. The shorter of the two towers is entirely affordable in tenure and is located between the film studios building and the other Heathgate tower.

10.25 The distance between the affordable tower and the film studios is approximately 8.5m at the closest point, and the distance between the two residential towers is 3.2m at the closest point and 8m at the widest point. This is much closer than would typically exist on traditional streets, however the towers have been oriented such that the windows and balconies of flats do not directly align.

10.26 At ground level, the frontages do not align or follow an existing streetscape, but instead prolongate the curve of Regis Road in a meander that leads to the stairs and ramp of the Energy Centre, which is intended to accommodate a connection to a future pedestrian bridge (see Section 9 of this report). The ground floor layout of both towers includes plant, substations, refuse stores, and cycle storage, as well as a small community space within the affordable tower opening onto the west and providing active frontage to the amenities and play spaces. Entrance lobbies open onto the public realm outside the towers and provide access to publicly accessible playspace, south of and above the energy centre. This was revised from an earlier version of the scheme, which proposed a less successful layout around the bases of the towers; previously the distinction between public and private realms was not clear and the community space did not have a direct relationship with the amenity and play spaces. The revisions have resulted in a clearer public and better activated public realm.

10.27 Due to the layout of the buildings, refuse vehicles would be required to drive past the affordable tower and turn between the two towers, which would therefore impact on the quality of the public realm. To alleviate this, the area surrounding the towers would be carefully managed and access restricted to other vehicles through the use of removable bollards. Details of the hard and soft landscaping that would be used to achieve a successful public realm in this area are secured by condition.

10.28 The cycle stores for the residential buildings are accessed via the rear and sides of the buildings as well as through the entrance lobbies. The rear alleyways are extremely long and may feel unsafe (for example behind the affordable housing - at 30m long and 2m wide). Further details would be provided in regards to thresholds treatment and management , which would seek to promote use of the entrance lobbies and ensure a safe space to the rear

10.29 The housing layouts of the Heathgate buildings provide a majority of homes as dual aspect and have been designed to comply with Nationally Described Space Standards (NDSS). The proposed homes within the Heathgate buildings are acceptable and would be appropriately situated within this part of the site; a full assessment of housing quality is provided in Section 13 of this report.

CGI view from Regis road looking west towards the Heathgate towers with the CFS to the right

CGI view of the two towers seen looking east (note Engine shed seen to the left is superceded)

Massing, height, and scale

10.30 The proposed buildings are higher than the recommendation made within the RRAG, however it is noted that they are located at the northernmost point of the site and with railways, the SINC to the north and open space to the west. This location of height mitigates the impact on neighbourhing amenities. It should also be noted that the increased height allows the optimisation of proposal to make the most efficient use of land and deliver more homes; crucially, the Heathgate towers support the delivery of 120 affordable homes.

10.31 The size of the floorplates of the two towers are proportionate to the height of each tower, and result in two structures which are relatively elegant and slim. Their design (particularly the northern tower, which is the taller of the two) contributes to this effect, mitigating the height from chamfered massing and integrated corner balconies. When viewing the site from the north, such as when approaching over the potential future pedestrian bridge, visitors would be met with the edge of the northern tower, which would provide an appropriate and well-located moment of height as a key entrance landmark.

10.32 Although the height of the two towers is substantial (particularly when viewed in combination with the massing of the Camden Film Studios), efforts have been made through their detailed design to mitigate the risk that this reads as a blank façade or a wall of height. This is detailed further below, but the orientation, form, and massing of the Heathgate towers have been carefully considered to ensure that the buildings do not negatively impact on the surrounding streets outside of the area and respond positively to the site edges to create a coherent neighbourhood.

Architectural detail

10.33 The two towers have a similar but varied approach to architectural façade treatment, with two different tones of colour. A robust material palette has been developed with a rich variation of colours and materials. The primary facing material for both is brick, which is found throughout the local area and is appropriate and robust for residential buildings.

10.34 Block A (the taller ‘private’ block) is predominantly constructed of white bricks with green elements, whilst Block B (the smaller ‘affordable’ block) is primarily red brick with light grey elements. Interest and richness is added to the façades through a variation of the coloured bricks, precast cills and string courses, ‘folded’ feature brickwork and precast panels, as well as metal profiled screening to balcony balustrades. High brick parapets are used at roof level to screen roof plant and PVs, with feature brickwork ensuring that the architectural treatment is coherent and that the towers are well ‘topped’. Details of the materials for both towers are secured by condition, which would require detailed drawings and samples to be provided prior to commencement. These will ensure that the materials used

and the architectural detailing of the buildings are of the high quality that is shown in the application.

10.35 At ground level, the elevations have been designed to ensure that there are clear hierarchies between communal entrance doors, private entrance doors, and service doors. The ground level is double storey for both buildings, which would benefit the communal entrances and the proposed community space in the affordable block, ensuring that there is a generous sense of welcoming to the buildings. However, the double height framing repeats for all openings at ground level, meaning that there is a lack of legibility and hierarchy between spaces. Further details of the ground level entrances would be secured by condition to ensure that the proportion and finishes are able to indicate the use within and create a rational hierarchy.

The Engine Shed (Energy Centre)

Proposed roof plan (landscaped) of the Engine Shed shown in relationship with the Heathgate towers ground floor plans to the east and the existing neighbourhing car parking site to the south

Proposed ground floor plan of the Engine Shed

10.36 In the northwest of the site, it is proposed to install an Energy Centre that will service the entire development. This has been incorporated into the landscaping of the site and to allow for future connections to the north via the envisaged pedestrian bridge link. The Energy Centre would therefore be embedded into a sloped area of public space, which would provide a step-free path up to a raised pergola garden. In addition to creating an access route, this slope would incorporate playspace throughout, as well as at the top and bottom of the slope.

10.37 The design of the Energy Centre has been altered from when the application was originally submitted. Originally, it was proposed to construct a low rise building in this location which would accommodate the equipment and functions of the energy centre. However, revisions have been made to partially set this within the ground, increase the soft landscaping surrounding the centre, and remove a café/restaurant pavilion from the first floor. These changes result in an improved public realm that avoids underutilised and private spaces to prioritise public, accessible, and inclusive open space. The revisions also mean that any future pedestrian bridge benefits from step-free access without the need for a lift (which would have energy requirements and necessitate greater maintenance).

10.38 The Engine Shed building rises from the south and its three facades (east, north and west) are made our of brick including hit & miss brickwork that conceal the required louvred ventilation. Ribbon clerestory windows are incorporated all along the length of the three walls, a glazed door to the east allows to peek in the plant room. The balustrade around of the rooftop public open space is made out aluminium and is 1.565m high and bends outwards along its full length. Details of the materials for the building are secured by condition, which would require detailed drawings and samples to be provided prior to commencement. In regards to the balustrading in particular further details regarding safety whilst providing a high-quality design, without a defensive feel, would be secured by condition.

10.39 The landscaping that accommodates the Energy Centre would incorporate play equipment, the details of which would be secured by condition. This would achieve a pleasant play area that is within close proximity to the homes at Heathgate; as such, it would benefit from passive surveillance and avoid children having to take long routes to access play provision. The early delivery of this playspace provision would ensure that residents of the Heathgate towers have adequate amenities in particular during the construction phase of the Camden Film Quarter and hence mitigates the impact of the construction on the residents. It is anticipated that some amendments would be required to the landscaping together with the pedestrian bridge application at a later stage. This should ensure that adequate playspace is retained or reprovided elsewhere, further detail on phasing and delivery are to be secured by condition including a long term play strategy to be provided prior to commencement.

Isometric view of the Engine Shed showing brick wall, ribbon clerestory windows and folded railings

Inkerman Gardens

Layout and typology

10.40 The proposal at Inkerman Gardens consists of three separate blocks that are all linked by a 15m basement (the equivalent of five storeys) that runs

underneath a central publicly accessible courtyard garden. The three blocks are all primarily residential and vary between five and sixteen storeys in height. This site also delivers a small part of the Western Gardens to the west of the housing blocks.

10.41 With respect to building typologies, Block A is a point block, Block C is similar to this but sits above a commercial/community use 2-storey plinth, and Block B is an L-shaped block that wraps around the central garden.Block A and B are located to the west by the railway and provide 123 affordable homes, Block C is located to the east and overlooks the proposed Western Gardens and provides 122 private homes. The figure below demonstrates the mix of typology at Inkerman Gardens.

Landscaping ground floor plan of proposed Inkerman residential site

Proposed first floor plan of Inkerman Gardens residential blocks with Western Gardens ('Fleet Fields) to the East (right) and education pavillion

10.42 The buildings, and in particular the south-east elevations of Blocks B and C, create a clear street line onto Holmes Road, whilst establishing a public landscape that provides green space and play areas, with provision for future connections to the initial partial phase of the 'Western Gardens' envisaged by the RRAG, (which is expected to fully come forward as part of a separate proposal to the north of Inkerman Gardens). There are also stepped street frontages on Spring Place to the south-west, engagement with a potential new future street to the north, and frontages onto a new park to the east (Western Park).

10.43 At the ground level, Inkerman Gardens consists of a mixture of residential communal entrances to the flats above (one per block), alongside entrances to ancillary areas such as plant, substations, refuse stores, and cycle storage, private entrances to ground floor flats and maisonettes, and commercial and community uses. There are also two amenity and play spaces: one intended for use by the affordable blocks and located in the central garden and publicly accessible, and one for the private block, located on the second-floor terrace that looks down on the central garden. The latter is only accessible to private residents (due to access being from within the building), whilst the former is publicly accessible for all.

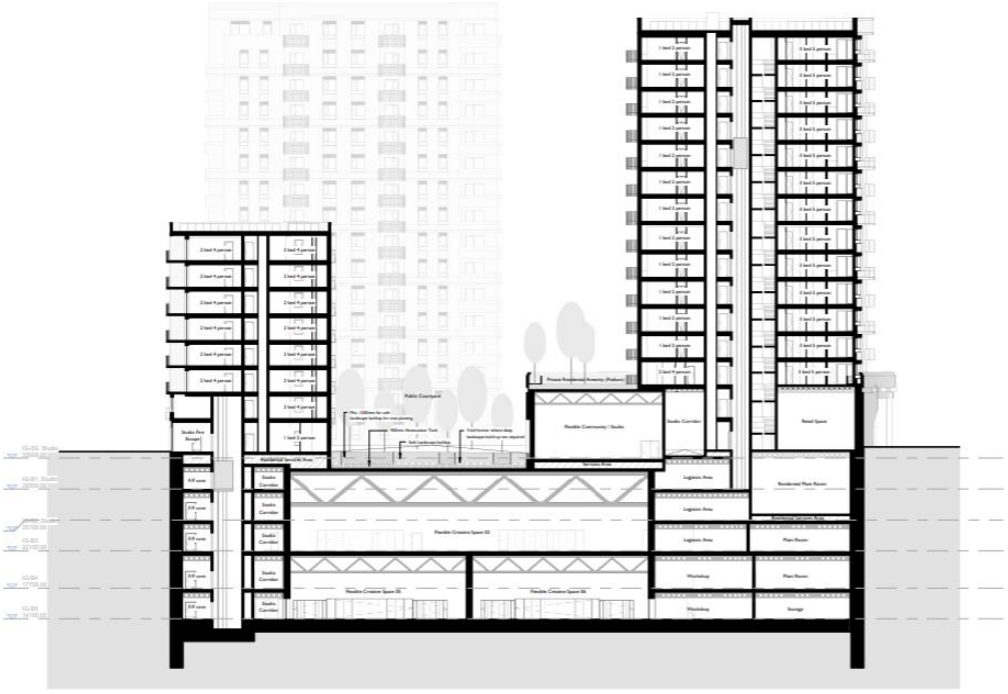
CGI view of the publicly accessible courtyard garden and playspace with Block B to the right and Block A beyond.

10.44 Block A provides its communal residential entrance facing onto Spring Place, with a community residents' space at the corner of the building, facing partly onto Spring Place and partly onto the new street to the north. This is well-positioned to be utilised as an active corner, activating the masterplan entrance to 'Makers Lane'. High quality and safe design of boundary design and thresholds will be secured via conditions. This will also include management plan details. The ground level of Block A also provides private entrances into two ground floor flats, one of which faces onto Spring Place and the other which faces towards the central courtyard.

10.45 Block B provides its communal residential entrance as a 'through entrance' that can be accessed either from the central courtyard or from Holmes Road. This allows easy access for residents both into the courtyard garden and its play facilities or out into the surrounding streets. There are also two maisonettes that are accessed from the façade facing Holmes Road and include defensible space and a commercial unit on the corner of Holmes Road and Spring Place. The commercial unit is well-positioned so as to activate the junction of Holmes Road, Spring Place, and Willes Road, which already exists as a neighbourhood corner with a restaurant and a school.

10.46 Block C provides its communal residential entrance facing onto the future new park to the east (Western Park), which leads up to the flats above. Unlike the others, there are no private residential entrances at ground level. Block C is situated atop a podium and the ground level consists primarily of commercial uses; namely a large studio unit at the south-west corner and an entrance lobby that leads to the five-storey basement at the south-east corner. The ground floor uses would be expected to serve the local community rather than standard commercial uses, and as such, the studio space within the building is intended to be used as a community-oriented production and exhibition space. A management plan for the use of the studio spaces would be secured by planning obligation to ensure that they continue to operate for the benefit of the local community .

10.47 The housing layouts of the Inkerman Gardens buildings provide a majority of homes as dual aspect and they have been designed to comply with Nationally Described Space Standards (NDSS). The proposed homes within Inkerman Gardens are acceptable and would be appropriately situated within this part of the site; a full assessment of housing quality is provided in Section 13 of this report.



Proposed section of Inkerman Gardens with Block B to the left and Block C to the right, including basement and Block B elevation in the background

CGI view from Holmes Road of Block B and Block C beyond

Massing, height, and scale

10.48 The Inkerman Gardens buildings are set below the London Plan LVMF corridor (view from Parliament Hill), so the maximum 16 storeys of these buildings sits just within the constraints set by the framework to enable a clear view of St Paul's Cathedral. However, the buildings do slightly obscure the middle ground from the panorama view in front of it at the highest point.(See further details in Section 12 Heritage below). Elsewhere, the buildings step down to 5-8 and 1-8 storeys onto Holmes Road for Blocks B and C, respectively.

10.49 The buildings of Inkerman Gardens therefore have a clear difference of scale from surrounding development (including that of the nearby conservation areas), which is typically around 3 storeys. However, this is mitigated by the proposed width of Holmes Road, which varies between 21m to 29m, providing a generous space for the public realm, which includes greening and play space outside the existing school.

10.50 The height and massing of the buildings have been shaped with set-backs and steps, which breaks up the overall weight of the built form and allows it to read as less of a dominant addition. The proposed massing footprint creates a new clear streetline, with three ways into the shared courtyard garden at the centre of the three residential blocks. Although the buildings

are generally tall (especially in relation to surrounding development), the use of stepping and the activation of the street level ensure that the height and scale is appropriate for the location and is therefore acceptable.

Architectural detail

10.51 All three blocks of the Inkerman Gardens site use a white brick base of 1-2 storeys, which provides a rational base to ground the structures and engage with the street level. Beyond this, a robust material palette has been developed to complement the immediate surroundings, adding to the rich variety of masonry and materials already apparent in the local vernacular. The proposed materials respond contextually to the established palette in the area and are welcomed in this proposal.

10.52 The primary facing material is brick, which is found throughout the local area and is appropriate for residential buildings. It is an appropriate choice due to its robustness and ability to stand the test of time. Interest and richness is then added to the facades through a variation of red tones and white coloured bricks, contrasting pre-cast banding, string courses, cills, soldier courses, and stacked brickwork, as well as solid brick corner and metal balustrade projecting balconies. High brick parapets screen roof plant and PVs in the same brick as the primary facades, which ensures the architectural treatment is coherent.

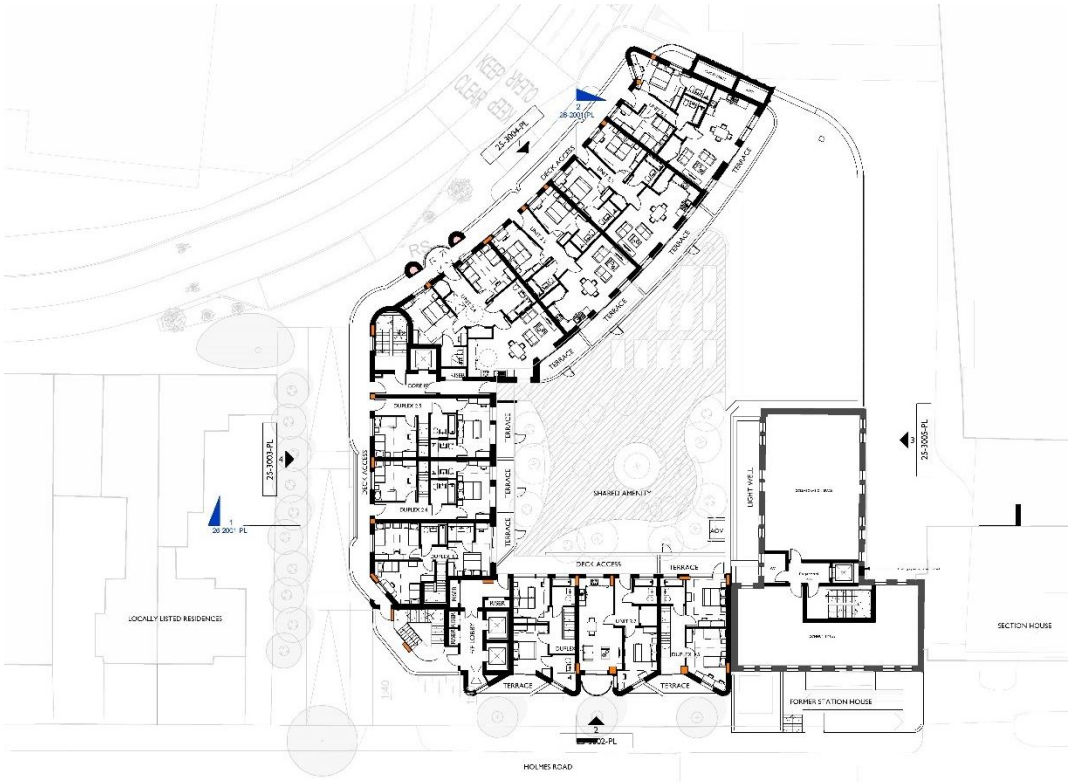
10.53 The ground floors of Blocks A and B have been designed with clear hierarchies between communal entrance doors, private entrance doors, and service doors. At Block C, large brick arched openings have been incorporated into the plinth/podium that face onto Holmes Road to the south, the internal courtyard to the west, the new park to the east, and the new road to the north. These have been designed to reference the context of the railway (immediately to the west) and the base of the main Film Studios building. These frame the studios and community uses and help to animate the ground level. Although these are effective in engaging with the surrounding public realm and adding visual interest to the building, there is a slight lack of hierarchy and legibility in distinguishing the different uses within the building, particularly where the same scale arches are accommodating building entrances alongside ancillary service doors and louvres. To resolve this, details of the ground floor façade are secured by condition, which would require detailed drawings and samples to be provided to ensure that the overall appearance of the building is as high quality as possible. This will include changes to the door openings proportions and be coordinnated with signage proposals, where necessary. Details of the materials for the building are secured by condition, which would require detailed drawings and samples to be provided prior to commencement.

Station House (RRC and housing reprovision)

10.54 Station House is a new five-storey mixed use building that includes the reprovided council recycling facilities at ground level and affordable residential units above. The site also includes the partial demolition and partial retention of the listed Station House police station. The proposed layout is therefore based on a land split of the Police Station use, which is considered in the context of the application at the adjacent site for the Section House refurbishment, which will accommodate the police station (ref. 2025/5479/P – see planning history section above).

Isometric section of the proposed new Station House Recycling Centre with housing above

Proposed ground floor plan of Station House showing proposed recycling centre with access from Regis Road to the north, access to residential from the north-west and south-west and the retained part of the Listed Building to the east.



Proposed second floor of Station House housing, shared roof terrace amenity space and retained part of Listed Building to the east.

10.55 The proposed new building is a deep plan ground floor, which optimises the depth of the site for new recycling centre facilities and deck-access housing on the floors above, which are organised around a shared terrace. The new building is set forward of the historic Holmes Road building line, by over 2m on the upper floors and by 0.3m on the ground floor, ahead of the listed Station House. Although this does result in the building having more prominence than the listed Station House, the partial demolition of the listed building to remove the non-original wing means that it and the new building are clearly distinct from one another and have separate characters.

CGI view of the proposed new residential building as seen from Holmes Road looking East, showing the proposed alleyway in the foreground (left), the residential core entrance at the corner with exposed stairwell and the façade of the retained Listed Station House in the background.

10.56 The proposed building is a five-storey structure, with the top three-storeys oriented in a 'U' shape around the roof of the two-storey recycling centre and roof terrace above. The proposed height is generally consistent with the height along Holmes Road, specifically of recent developments (which are mostly 5-7 storeys). Whilst the height is a step up from the building's immediate listed and locally listed neighbours, it will appear appropriate to the existing varied street context.

10.57 The streetscape is impacted by the three street-facing façades, all of which have deck access on the upper three storeys. While these are prominent in the street, they allow for the residential units to engage with the public realm and ensure that there is passive surveillance of the surrounding streets.

10.58 The site layout also includes a new north-south link that connects Holmes Road with Regis Road, which provides a beneficial pedestrian link for the future phases of the RRAG masterplan. The proposed building is set a reasonable distance away from its adjacent residential neighbour at 20 Holmes Road, ensuring that the site has been optimised for new homes, whilst mitigating the impact of the built form on neighbouring residential amenity.

10.59 The massing is also varied by open stairwells at the corners of the building, solid brick balustrades at the second and third floors, a stepping-back in massing on the upper floor made out of pigmented concrete (smooth and fluted finishes), and vertical brick pier elements that tie the storeys together. A range of high-quality facade materials treatments are proposed including fluted concrete to the top floor and glazed bricks and ribbed texture glass for the ground floor. Full details and finishes of the building façades materials, including detailed drawings and samples of facing materials, will be secured by condition to ensure the proposed high-quality finish of the building is delivered.

CGI view from Regis Road of the proposed new homes above Recycling Centre entrance with the new police station vehicular entrance gate to the left (as part of a separate planning application)

10.60 Main and secondary entrances to the housing above are clearly separated from the recycling centre facilities and are well placed on street corners to bring activation. Pedestrian access to the recycling facilities are separated from the vehicular access on Regis Road, but would still be provided along Regis Road, rather than Holmes Road. This allows for a pleasant pedestrian environment that is not impacted by the use of the recycling centre.

10.61 On the upper floors, residential units are arranged around a central shared courtyard garden over the recycling centre roof, which is accessed via the

communal core. Residential units are accessed via two separate naturally lit staircase cores and along deck access on the north and west facades. The management of this shared roof terrace would be secured as part of a Management Plan , which would ensure that all the homes in this building would benefit and help create a successful residential community.

10.62 Housing layouts have been designed to provide a majority of homes as dual aspect and comply with Nationally Described Space Standards (NDSS). The proposed homes are acceptable and would be appropriately situated within this part of the site; a full assessment of housing quality is provided in Section 13 of this report.

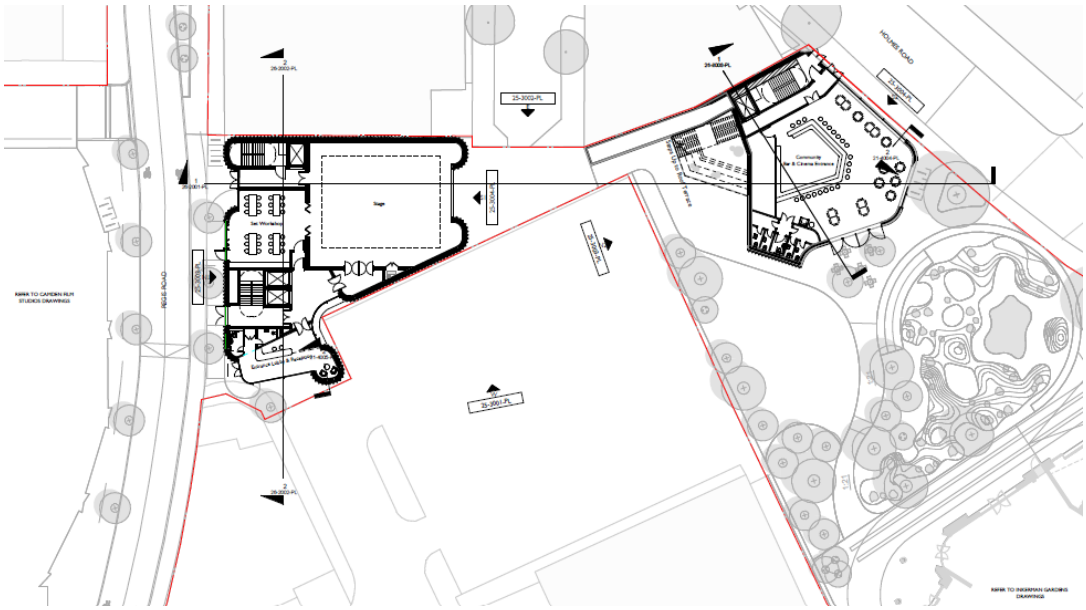
10.63 It should be noted that the proposals for the existing Station House consist of demolition of the rear part of the building and the non-original extension, which currently includes stairs and a lift. This would remove the only accessible circulation to the upper floors of Station House, meaning that the listed building would no longer have step-free access within the building which would be required for accessibility and flexibility of the proposed community use. In order to ensure that the future use of the building is feasible, that it will include accessible design and consider fire safety, the design of the internal changes to the Listed Building has been altered from when the application was originally submitted to incorporate new staircases and lift going through the listed building as well as the insertion of new partitions to ensure the design meets fire safety. (Refer to Section 11 on heritage impact) A planning obligation will require listed building consent application to be submitted in respect of all alterations beyond the demolition to safeguard the future occupation of the listed building prior to the commencement of this site . This is detailed further in Section 9 of this report.

School building and pavilion

10.64 The layout of the education facilities spans across two buildings. The first is an eight-storey building to the north that fronts Regis Road, and the second is a single-storey pavilion building located to the south, facing onto Holmes Road. The building frontages follow the prevalent building frontages of the neighbouring buildings on the street, notably the Mary Brancker House Student Housing and the Simone House housing.

10.65 The footprint of the two buildings follows the red line of ownership, which does appear to create some unusual corners and protrusions in the layout. However, this has been designed in the context of the wider RRAG masterplan, and the intention would be that these would integrate with the public open space that is expected to come forward at the development site immediately adjacent. However, the buildings have been designed such that they are not dependent on future development coming forward, such as by orienting entrances so that the principal access is via Regis Road and

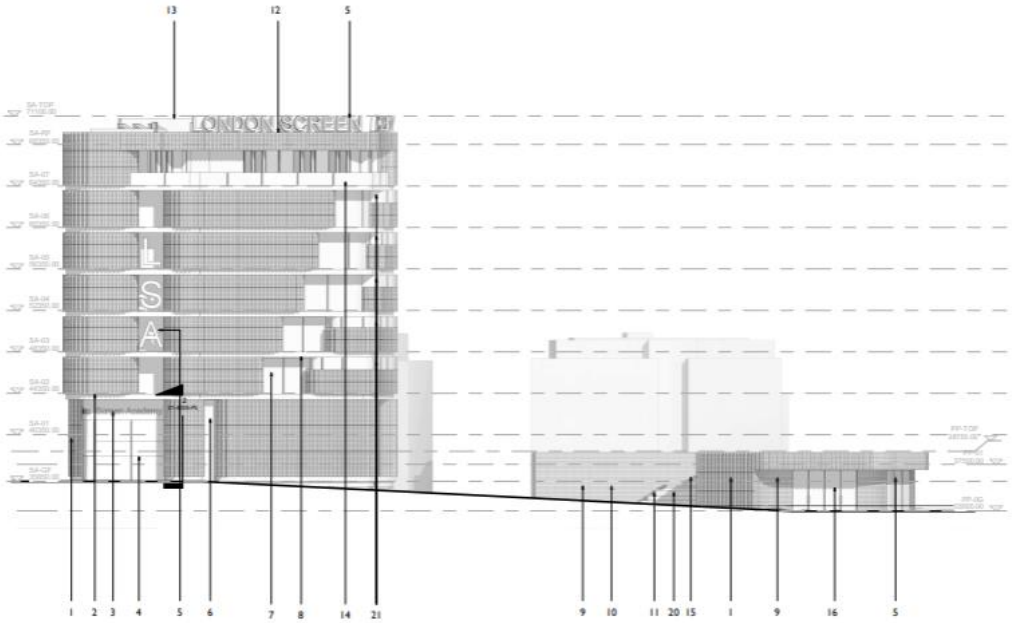
Holmes Road, and access to the buildings is not reliant on the adjacent site having been developed and in operation.



Proposed ground floor plan of Education Building (to the north – left) and the pavillion (to the south – right)

10.66 The eight-storey building follows the Regis Road and Holmes Road building lines and therefore integrates well into its surroundings. It rises up slightly higher than the adjacent five- to six-storey buildings, though due to its position at the end of the road and its location in the context of the proposed 'Western Gardens' park (envisaged by the RRAG), the increased height would be acceptable. The building signals a clear end point to the built form and creates a boundary with the open space. The footprint of the two buildings follows the boundary line and creates a varied massing, as well as increasing useable public realm through the incorporation of the stepped outdoor seating leading up to the roof. The two buildings are connected via a basement, which runs in a straight line and allows access to the cinema screen underneath the pavilion building from the education building.

10.67 The pavilion layout proposes a nook with stairs and stepped seating that faces north, with the stairs leading up to a roof terrace, which would have green landscaping and seating. The intention is that this is used as a screening area in association with the education use within, however it also provides a valuable opportunity for community use. A plan for the use and management of this space is secured by planning obligation to ensure that the area can be effectively used in a way that benefits the local community throughout the year, including what measures may be used when weather is poor or the area is otherwise less usable.



Proposed elevation of Education Building (to the north – left) and the pavillion (to the south – right)

10.68 The layout on the upper floors of the school building consists of numerous flexible educational rooms. Whilst some clerestory windows have been added during the planning application process as many of these do not have access to natural daylight due to the nature of the proposed use (many film production activities require darkness or limited light, the internal level of daylight has not been tested for standard classroom comfort This means that the building cannot be resilient or repurposed for future alternative uses, so further details are secured by condition to demonstrate that the building is to be constructed in a way that enables it to be adapted for alternatives uses in the future, including uses that require typical levels of daylight is required. These details will include a plan to set out potential building alterations that ensure a sufficient quality of adaptable space, alongside illustrative drawings.

10.69 The proposed building facades consist of large areas of solid materials primarily of pre-cast glazed brick panels and pigmented pre-cast concrete. Details of the materials for the building are secured by condition, which would require detailed drawings and samples to be provided prior to commencement.

CGI of proposed glazed brick Education building seen from Regis Road with future Western Gardens in the foreground (not part of this application)

Public Realm, Open Space, Play Space, and Landscaping

Public open space

10.70 The development plan seeks to secure open space of high quality in new developments. Policy G4 of the London Plan states development should create areas of publicly accessible open space, and Policy D8 requires that appropriate management and maintenance arrangements are in place for the public realm, minimising rules governing the spaces in accordance with the Public London Charter. Policy G4 also states that new developments should provide public open space in areas of deficiencies.

10.71 Policy A2 of the Local Plan 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. Policy A3 also seeks to protect, enhance, and improve access to Camden's parks, open spaces and other green infrastructure, as well as protect existing trees, secure additional trees and vegetation, and protect and promote biodiversity. These policies are supported by the 'Biodiversity' CPG.

10.72 Policy D8 is the key London Plan policy in this topic area. Policy D8 contains provisions relating to the design, function, operation, and maintenance of proposed public realm within developments and the relationship between

buildings and public realm; part A sets out that '…development proposals should encourage and explore opportunities to create new public realm where appropriate'.

10.73 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)

10.74 The proposed development clearly meets the residential and commercial triggers for a POS contribution, as there are significantly more than 11 homes and 1,000m^2 of new commercial floorspace being provided. Developments must provide 9m^2 of POS for every new occupant and 0.74m^2 for every worker in the new employment space.

10.75 The residential requirement for the POS is 9m^2 x 1174 (number of homes x the average dwelling occupancy for the ward) = **10,566m^2.** The commercial requirement for the POS is based on an anticipated employment density of 3961m2 per worker, so the commercial requirement is 0.74m^2 x 3961 = **2,931.14m^2**.

10.76 As such, the total POS requirement is therefore **13,497.14m^2**.

10.77 The proposed development includes a total onsite provision of 4,961m^2 of POS, which approximately equates to 37% provision. This means there is a significant shortfall in POS of 8,536m^2. The CPG makes clear that, where there is a shortfall of open space provision, developments will be expected to justify and explain this, with any shortfall being offset by a financial payment in lieu, to compensate for the deficit.

10.78 The site is notably very constrained due to the urban environment and the partition of land ownership. Additionally, the proposed development only makes up a portion of the masterplan area set out in the RRAG; as such, there are significant parts of the site allocation that are not included within the red line boundary. Importantly, the RRAG establishes two main areas of new public open space; an area between Holmes Road and Regis Road known as 'Western Gardens', and an area close to the junction with Kentish Town Road known as 'The Eastern Park'. Both of these areas fall outside the site boundaries, as 'Western Gardens' sits just north of the Pavilion and Inkerman Gardens sites, and 'The Eastern Park' sits within UPS land to the north of the Film Studios. As such, the majority of open space that is expected to come forward within the wider Regis Road Area falls outside of the application site boundaries. The areas that do fall within the site boundary, such as the southern portion of 'Western Gardens' and the Heathgate corner (close to the SINC) have been provided as open space and form part of the 37% provision.

10.79 Taking into consideration the constraints of the site and the need to deliver significant mixed use development including over 500 homes and substantial commercial floorspace, it is considered that the proposed development has sought to balance the delivery of many competing policy objectives, and it would not be possible to deliver a greater proportion of the site as public open space without negatively impacting other considerations or deviating from the masterplan principles as set out in the RRAG. Additionally, the fact that the site has delivered as much of the open space areas designated in the masterplan as is reasonable within the application site boundary is an important consideration, as the wider public realm proposals that are envisaged to come forward through adjacent site proposals are expected to help contribute to any current deficit.

10.80 In view of the above, it is considered appropriate in this instance to accept a payment in lieu to compensate for the POS shortfall which, based on the CPG, would be calculated as **£2,304,702.00**. This would be used for improving existing open spaces in the vicinity of the site, and which are accessible on foot and cycle. The contribution would be secured as part of the Section 106 legal agreement.

10.81 Details of the management and maintenance of the open spaces throughout the site will also be secured through a planning obligation, and the detailed design and landscaping of open spaces will be secured through planning conditions. These are also covered in further detail later in this section.

10.82 As such, it is considered that the proposed scheme would make an adequate contribution to POS, in line with the development plan.

Play space

10.83 Developments for over 100 dwellings trigger the GLA play requirements under the London Plan, with Policy S4 requiring 10m^2 of play space per child. This policy makes clear that such space should be (a) stimulating, (b) safe to access independently, (c) integral to the neighbourhood, (d) green, (e) overlooked, and (f) should not be segregated by residential tenure. Developments should also incorporate accessible routes to existing surrounding play provision and other infrastructure and incorporate incidental play wherever possible.

10.84 Provision for children's play space is provided throughout the site, notably at the Energy Centre in the north-west of the site (as part of the interim sloped landscaping), directly south of the Energy Centre, within the courtyard of the Inkerman Gardens site, and within the portion of 'Western Gardens' located adjacent to the Pavilion building.

10.85 In total, the proposed development provides 2,730m^2 of play space, which exceeds the total required play space of 2,518m^2 across the entire site. Additionally, each residential site (Heathgate, Inkerman Gardens, and Holmes Road) individually meets the required play space quantum, so there is no shortfall at one site that is made up for elsewhere.

10.86 Within the provided play space, 1,148m^2 is provided as 'doorstep' play (for 0-5 year olds), 925m^2 is provided as 'local' play (for 5-11 year olds), and 657m^2 is provided as 'youth' play (for 12+ year olds). This is a good mix of provision that ensures that children of all ages benefit from inclusive and diverse play opportunities. The quality of the play space is covered in further detail later in this section.

10.87 In summary, the play provision is in excess of policy requirements and, as such, is considered acceptable.

Landscaping and open realm

10.88 The proposal includes landscaped areas throughout the whole development, including within each of the constituent sites (with the exception of the film studios building), as well as alterations to the existing public realm and highways. The design of the public open spaces cater for a range of users, with play equipment provided for children as well as landscaped green spaces that can be used by a range of ages.

10.89 The application states that the proposed development will provide landscaping such as greening, play equipment, and street furniture – however, limited detail is given of these various elements. In order to ensure that the public realm is of high quality and benefits all users, details of hard and soft landscaping are secured by condition, which would include the aforementioned elements .

10.90 The proposed public realm includes changes to the existing Regis Road and pavement, with a new pedestrian route linking Regis Road to the north and Holmes Road to the south (adjacent to the Station House building). Additionally, there would be a realignment of the carriageway with the film studios building, given it steps forward of the existing pavement line. These alterations would support and improve the pedestrian environment throughout the site by creating new routes. Where it would be necessary to reduce the width of existing pavements to facilitate development, the impact would be offset by the provision of public open space; the 'pinch' point created by the changes to the highway outside of the Film Studios building would be alleviated by the central forecourt of the same building.

10.91 The public open spaces proposed at the Heathgate site consist of several pockets left over from the stepped footprint of the two towers and the landscaping around and atop the energy centre. This area was also designated as POS within the RRAG; as such, the area directly to the south of the Energy Centre provides a soft landscaping play space, the top of this slope includes an area of doorstep play for Heathgate residents, and the sloped surface of the Energy Centre provides an area of soft landscaping that simultaneously serves as access to a potential future pedestrian bridge, amenity space for residents, and play space for all ages. When the bridge comes forward for planning permission as well as the adjoining land parcel, there are likely to be changes to the landscaping and therefore play so it is accordingly assessed as an interim solution that will be taken into account when we consider future relevant planning applications.

10.92 The open spaces here are within easy reach of the residential units and are overlooked to ensure safety. They have been designed to be accessible, attractive and functional, and full details of the landscaped areas, including play equipment, street furniture, and planting, will be secured by condition. The obligations noted in Section 9 of this report would also ensure that the play space is provided at an early stage of implementation, to ensure that residents would be adequately provided.

10.93 In addition to the above condition, a separate condition will require further details of the thresholds, materials, and location of boundaries in the area surrounding the Heathgate buildings. This will ensure that the areas of public and private access are clearly defined to achieve a successful space for residents and visiting members of the public.

CGI view from Holmes Rd looking north of the playspace on Western Gardens (or 'Fleet Fields') doubling up as a rainwater attenuation feature in the foreground and a lawn in the background.

10.94 The public realm provided around the Inkerman Gardens development includes an enlargement of the existing Inkerman Gardens on Holmes Road (which is currently a small area of greenery outside the Depot building), the creation of a landscaped courtyard, and the initial phase of 'Western Gardens' (as set out in the RRAG), with the rest of this open space to be provided through separate future applications. The portion of 'Western Gardens' delivered through this application connects with Holmes Road to the south and is aligned with the opening to Cathcart Street, benefiting from direct southern sun in the late morning and midday due to its position and relationship with existing and proposed buildings. The portion of the POS is split into two main areas: a landscaped water attenuation area and a multi-functional lawn, both of which also serve as play space.

10.95 As part of the residential buildings, a central courtyard garden is proposed within the public realm, which spans over the basement of Inkerman Gardens. This courtyard is approximately 300m^2 in area, and would provide play space for the residential units. It is also publicly accessible via gaps between buildings, allowing access from Holmes Road, Spring Place, and the new road to the north. This play space will be slightly shaded due to the proposed massing and heights of adjacent buildings, however it is considered that this is an acceptable compromise to allow for a sufficiently overlooked and more appropriately secured amenity space within the residential development (and with the changing climate a shaded space for play may be beneficial). Greening and trees are also proposed within the courtyard to provide a defensible buffer surrounding the ground floor residential amenity areas.

10.96 Full details of the hard and soft landscaping of areas across Inkerman Gardens will be secured by condition , including boundary treatment (heights, types, and details), play provision and equipment, street furniture, and planting. It is noted that the overlap of the drainage system infrastructure and play space may result in issues with usability of the latter, so the details provided when seeking discharge of conditions will need to ensure that an adequate solution is provided to satisfy both drainage and design concerns. Similarly, the overlap of play and other uses such as lawns and accessible features would require further detailing to ensure that the development makes the best possible use of space.

10.97 Subject to the above conditions, it is considered that the provision of open space and landscaping is acceptable and would result in a high-quality public realm for residents and visitors to the site. Further assessment of landscaping considerations is provided in Section 18 of this report.

11. HERITAGE

Legislation and policy context

11.1 Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 requires that special regard must be given to the desirability of preserving listed buildings or their settings where affected. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.

11.2 Section 16 of the aforementioned Act makes clear that the LPA has a statutory duty to consider the special interest of listed buildings when granting or refusing listed building consent.

11.3 The National Planning Policy Framework provides a range of policies relating to heritage protection at paragraphs 202 to 221, making clear that any harm arising from proposed development should be mitigated as far as possible. Considerable weight and importance must be given to any harm to designated heritage assets and any harm identified should be outweighed in the balance by considerable public benefits. It is important that harm is sought to be mitigated prior to any balancing against public benefits.

11.4 Paragraph 215 of the NPPF states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

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

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

11.6 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision making. Likewise, Policy HC1 of the London Plan and Policies D1 and D2 of the Local Plan require that development preserves or where possible enhances the character of heritage assets, including conservation areas and listed buildings.

11.7 The London Plan also includes Policies HC3 and HC4, which protect both strategic and local views, specifically by requiring development proposals to have an acceptable impact on the contribution these views have and the ability to recognise and appreciate Strategically Important Landmarks in these views. These policies are supported by the SPG 'London View Management Framework'.

11.8 The development plan focuses on the potential impact of new development on the built environment, but also the impact on archaeological remains which may often be unidentified but discovered in the future. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets. The ES considers impacts on heritage both in terms of the built environment and archaeology.

Heritage Impact Summary

11.9 The heritage impacts have not been found to cause substantial harm to any degree. However, within the category of less than substantial harm impacts have been found to fall within all levels of the scale: High, medium, low and neutral. Where the proposal is not visible the effect is considered to be nil. The tables below summarise the impact of the proposed development on relevant heritage assets, the paragraphs which follow set out the assessment which have led to those conclusions.

Key to levels of less than substantial harm
High
Medium
Low
Neutral or Nil

Impact on listed buildings

Asset	Grade	Impact
Kentish Town Police Station	II	Less than substantial harm at a high level of that scale

Impact of proposed development on special architectural and historic interest of listed buildings onsite (2025/5084/L)

Setting of listed buildings

Asset	Grade	Impact
Church of St Martin and St Martin's Church Hall	I and II	Nil
Church of St Luke with St Paul	GII*	Less than substantial harm to setting at the low level of that scale
Kentish Town Police Station and attached lamp and railings	GII	Less than substantial harm to setting at a medium level of the that scale
Kentish Town Centre, Kingsway College and Attached Walls	GII	Less than substantial harm to setting at a medium level of that scale
The Forum	GII	Neutral
1 to 7 Highgate Road	GII	Neutral
Bull and Gate Public House	GII	Neutral
Christ Church Apostolic Church former Church of St John)	GII	Neutral
1A Laverton Place	GII	Neutral
The Assembly House Public House	GII	Less than substantial harm to setting at a low level of that scale
1 and 3 Leverton Street	GII	Less than substantial harm to setting at a low level of that scale
20, 22; 24; 26, 27, 28, 37, 64, 66, 68, 70 Leighton Road	GII	Less than substantial harm to setting at a low level of that scale
St Pancras Public Baths and attached railings and walls	GII	Less than substantial harm to setting at a medium level of that scale
Kentish Town Sorting Office	GII	Neutral
Gothic Bollard at Anglers Lane	GII	Neutral

Richard of Chichester Catholic Secondary School and Gates and Railings	GII	Neutral
K2 Telephone Kiosk outside the Hope Chapel	GII	Neutral
96 and 98 Fortress Road	GII	Neutral
98 Castlehaven Road and 51 Kelly Street	GII	Nil
St Martin's Church Hall	GII	Neutral

Impact of proposed development on setting of listed buildings

Asset	**Grade**	**Impact**
St Paul's Cathedral	I	(View 42 and 43) Less than substantial harm to setting at medium level of that scale
The Palace of Westminster	I	(View 42 and 43) Neutral
BT Tower	I	(View 42 and 43) Neutral
St Pancras Railway Station	I	(View 42 and 43) Neutral

Impact of proposed development on setting of listed buildings outside 500m study area

Asset	**Grade**	**Impact**
Kenwood Registered Park and Garden	GII*	(View 42) Less than substantial harm to setting at a low level of that scale
Primrose Hill Registered Park and Garden	GI	(View 43) Less than substantial harm to setting at a low level of that scale

Impact of proposed development on setting of registered Parks and Gardens

Asset	**Impact**
Inkerman Conservation Area	Less than substantial harm to setting at a medium level of that scale
Kentish Town Conservation Area	Less than substantial harm to setting at a low level of that scale
Bartholomew Estate Conservation Area	Less than substantial harm to setting at a low level of that scale

Rochester Conservation Area	Less than substantial harm to setting at a low level of that scale
Kelly Street Conservation Area	Less than substantial harm to setting at a low level of that scale
West Kentish Town Conservation Area	Neutral
Mansfield Conservation Area	Less than substantial harm to setting at a low level of that scale
Dartmouth Park Conservation Area	Less than substantial harm to setting a low level of that scale

Impact of propsoed development on setting of conservation areas

View	Impact
2A.1 (Parliament Hill Summit to St Paul's Cathedral): St Paul's Cathedral is set within a miscellany of buildings, in both its foreground and background. The dome and peristyle are visible, but some development in the background diminishes the viewer's ability to recognise and appreciate the landmark, particularly in poor weather conditions. However, the Shard with its distinctive shape and high quality materials provides a strong orientation point to allow the viewer to recognise St Paul within the wider panorama.	The panorama is sensitive to large-scale development in the foreground and middle ground. The proposals would preserve the view of the silhouette of St Paul's Cathedral. However, they would alter the appreciation of the topography of the Thames valley in which it sits through visually foreshortening of the foreground (due to the height and mass of the proposed development) between the foot of Parliament Hill and the longer vista to the City. The key elements of the view of St Paul's would be preserved but the appreciation of its historic topographical setting would be harmfully altered. The harm caused to the appreciation of the landmark would be at a medium level (harm to the setting of the Cathedral as a listed building has also been identified as falling at a medium level).
2A.2 (Parliament Hill Summit to the Palace of Westminster): The view corridor ensures that no tall buildings or new developments are erected that would obscure, clutter, or visually compete with the silhouette and architectural integrity of the Palace of Westminster from this vantage point. The Palace of Westminster is positioned behind the Euston Tower and the BT Tower. Only the Central Lobby Lantern and the Victoria Tower are visible. The latter's turrets and finials contrast with the simple housing blocks in the middle ground.	The viewer's ability to perceive the visual relationship between the Clock Tower, the Central Tower and the Victoria Tower should be maintained or enhanced. Any development proposals that would undermine this relationship should be refused. A Protected Vista, incorporating the full width of the Palace of Westminster, reinforces this requirement. The proposals would not obscure any of the elements of the Palace itself and would not impinge upon views towards it to the point that the appreciation of the Palace and its wider topographical setting would be serious harmed. The impact of the proposed development on this view is neutral.
3A.1 (Kenwood Gazebo to St Paul's Cathedral): The LVMF SPG highlights the contrast between background and foreground: 'The middle ground consists of a wooded ridge, generally free of buildings. There is an abrupt contrast between the parkland in the foreground and middle ground and the modern commercial tower buildings of central London. Hills beyond the City form the background.'	The proposals would preserve the view of the silhouette of St Paul's Cathedral. However, they would alter the appreciation of the topography of the Thames valley in which it sits through visually foreshortening of the foreground (due to the height and mass of the proposed development) between the foot of Parliament Hill and the longer vista to the City. The key elements of the view of St Paul's would be preserved but the appreciation of its historic topographical setting would be harmfully altered. The harm caused to the appreciation of the landmark would be at a medium level (harm to the setting of the Cathedral as a listed building has also been identified as falling at a medium level).

Impact of proposed development on LVMF views

Address	Impact
20-22 Holmes Road	The Proposed Development will cause harm to the setting of the locally listed buildings at a low level of that scale
41-43 Holmes Road	The Proposed Development will cause harm to the setting of the locally listed buildings at a low level of that scale
61 Grafton Road	Neutral
Raglan House, 1 Raglan Street	The Proposed Development will cause harm to the setting of the locally listed buildings at a low level of that scale
Post Box outside 5 Fortress Road	Neutral
14-18 Fortress Road and 28-34 Fortress Road	The Proposed Development will cause harm to the setting of the locally listed buildings at a low level of that scale
11 Fortress Road	The Proposed Development will cause harm to the setting of the locally listed buildings at a low level of that scale
81A Highgate Road	Neutral
Kennistoun House, Leighton Road	Neutral

Impact of proposed development on setting of locally listed buildings

Designated and non-designated heritage assets

11.10 The proposed development directly impacts and proposes alterations to the Kentish Town Police Station, which is a Grade II listed building. No part of the site is located within a conservation area. The part of the site including the listed police station has a setting relationship with the Grade II listed 'Kentish Town Centre, Kingsway College and attached walls', however they are not seen in the same view together and their setting relationship is one of evidential value due to the relationship in the development of this part of Kentish Town in the later nineteenth century.

11.11 The proposed development is also within the setting of a range of listed and locally listed buildings, and conservation areas. While the architectural and historic character of these areas varies from residential to commercial, and Victorian middle class suburbia to lower-middle and working class areas, the core element of the significance of all of these conservations areas, both individually and in combination, is as a piece of historic townscape

representative of the development of suburban London in the period c.1800-1914. These areas achieve this significance through their urban grain, materials, scale, architectural design, private and public green spaces, street widths, and long views. Where the generally two-to-five storey scale of these conservation areas is broken it is usually by the tower and spire of a religious building (positively), or a post-war building (often harmfully). The general character, by volume, of all of the surrounding conservation areas is comprised of streets of C19th terraced and semi-detached housing.

11.12 The heritage assets affected by the proposed development are outlined in the following section, including the level of harm (if any) to each. The assessment of setting which follows has been carried out under the Historic England Setting of Heritage Assets (2017). This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

Kentish Town Police Station – Less than substantial harm

11.13 The proposed development includes the partial demolition of the Grade II listed Station House, fronting Holmes Road. This also involves associated works and the development of the adjoining land to provide a new building to comprise a new recycling waste disposal facility and residential units.

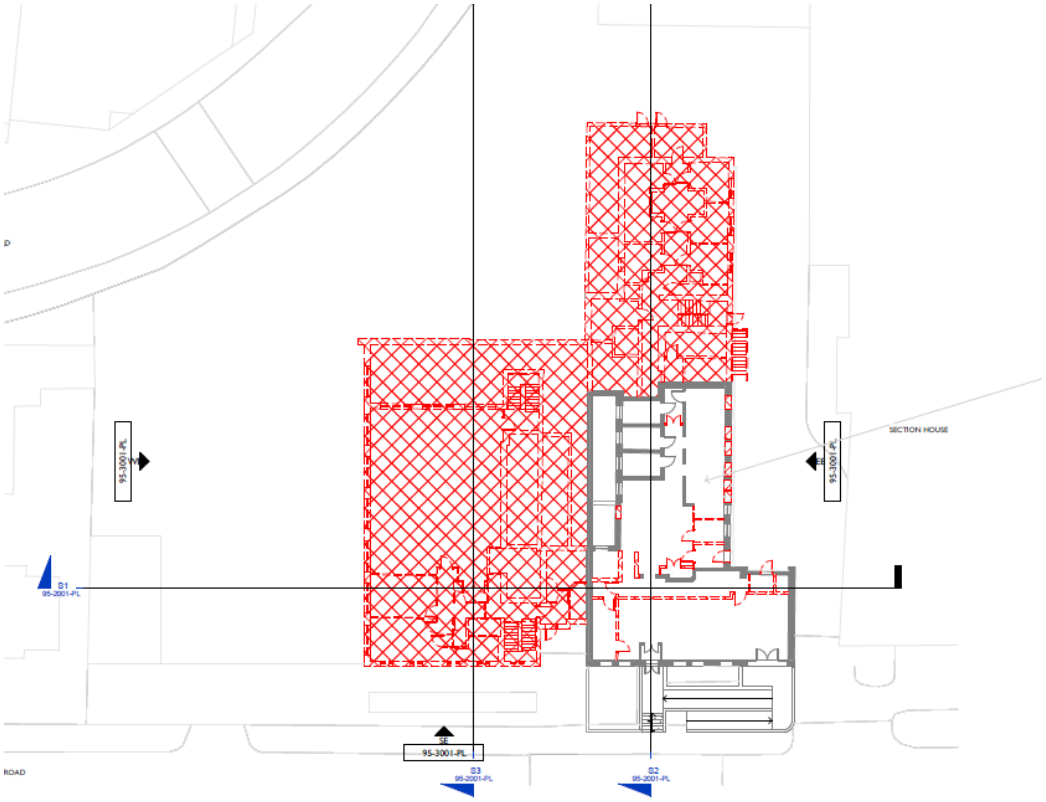
11.14 The impact of the demolition and construction stage of the proposed development would have a direct impact on the Grade II listed Police Station. The Police Station was designed in 1894-1896 by Norman Shaw (who designed a number of Metropolitan Police Stations and the original Scotland Yard on the Thames Embankment). While the station has undergone internal alteration and demolition and rebuilding to the rear throughout the C20th, the majority of the fabric of the building dates from the 1890s and its prevailing character is very much that of a late C19th London police station. Its significance includes its architectural design and materials, the 1890s parts of its fabric and planform, its evidential value as both a local police station and part of a network of London police stations, its positive townscape contribution, and its community and historical (cultural) significance within the public life of the area it was intended to serve.

11.15 The works include the demolition of some of the structure to the west and north of the building, specifically the three-storey flat roofed part of the rear. This part of the structure is original to the building, although it has been previously truncated and partly replaced by a late 20th century cell block. There is an element of Edwardian infill to the facade of this part of the

building which is in the same style as the Norman Shaw elevations and which would be demolished. The demolition is shown in Figure X below.

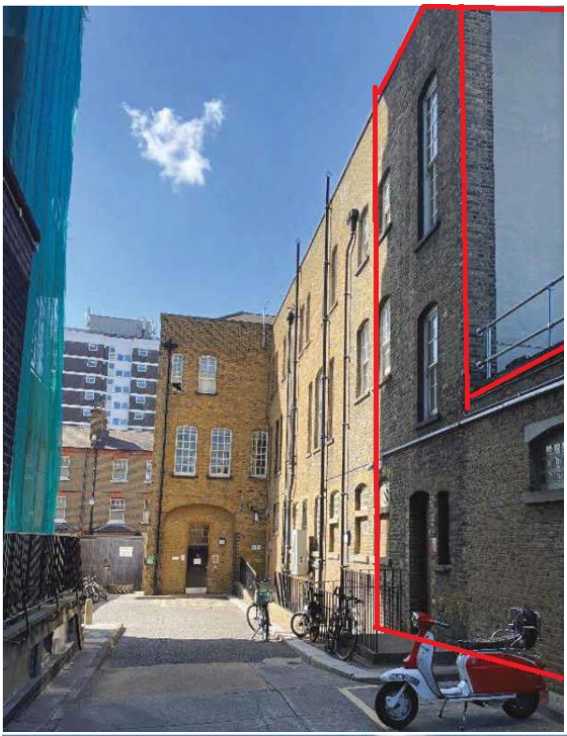
Demolition elevation, with area to be demolished shown in red. The parts original to the C19th construction of the building are outlined in green

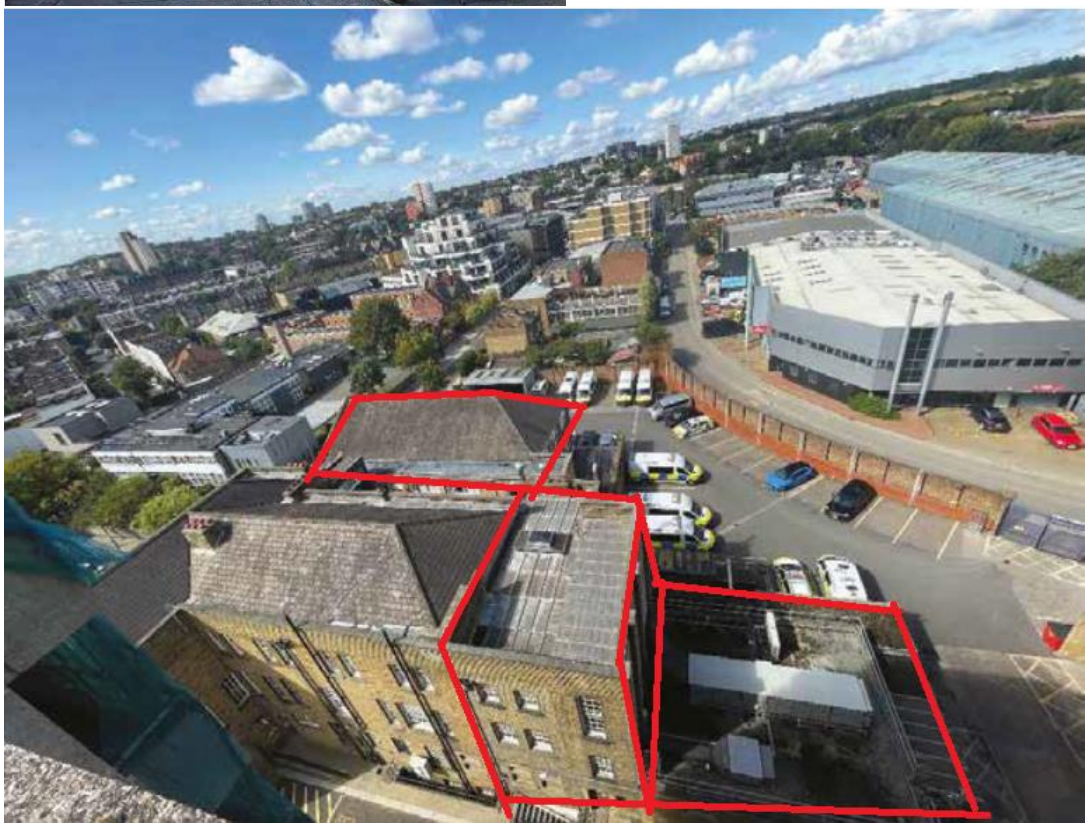
11.16 The demolition of this part of the building would result in the loss of an internal stone cantilevered staircase which is part of the original Norman Shaw design. The loss of original and historic fabric would result in harm to the significance of the listed building through the loss of the fabric itself, the resultant impact on the external appearance of the listed building (which would become smaller and further truncated from its original scale), the loss of part of the planform including an element of its vertical circulation (i.e. the rear staircase), and the consequent diminishing of the evidential value of the site as a late 19th century police station to designs by Norman Shaw.



Demolition plan with area to be demolished shown in red.

11.17 The proposed demolition of the late-20th century flat roof extension to the rear of the building removes a cell block which was built in the 1980s. The demolition of this structure will have no effect on the special architectural and historic significance of the listed building.





Photographs showing fabric to be demolished as outlined in red. The historic part of the building is the three-storey flat–roofed part.

11.18 The effect of the proposed demolition of the rest of the listed building (i.e. the parts dating from the 1890s) on the significance of the listed building would be harmful. The majority of the listed building would still remain extant; however, the effect of the proposed demolition would result in less than substantial harm at a very high level of that scale due to the loss of

fabric known to be part of the Norman Shaw design and the associated loss of evidential value as a late 19th century police station.

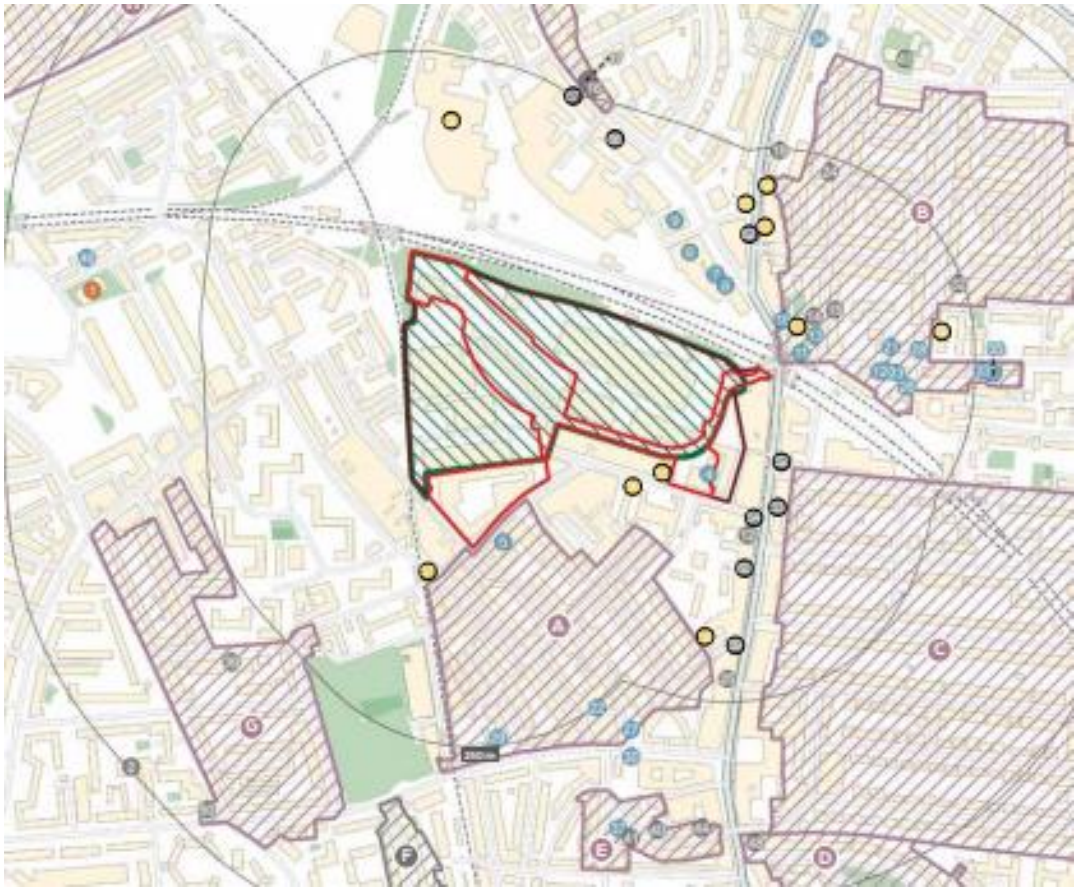
11.19 The works relating to the demolition of fabric and the making good of retained fabric have been made subject to a number of conditions. While the proposed plans of the adjacent site under planning application 2025/4861/P show proposed plans for the interior of the listed building, these are not of sufficient detail to assess elements requiring listed building consent and consequently none are hereby consented (beyond the demolition drawings). Conditions attached to the listed building consent will secure details of the method of demolition, details of replacement materials, and proposed internal works. Any further alterations to the interior of the listed building hereafter will require a new application for listed building consent.

11.20 The proposed works in relation to the construction of the recycling centre and residential block would also result in harm to the setting of the retained listed building, which is identified in the section of this report relating to the setting of listed buildings.

11.21 In summary, the proposed works would cause less than substantial harm to the special architectural and historic interest of the Grade II listed police station at a high degree of that scale. There would also be less than substantial harm to the setting of the Grade II listed building, at a medium level.

Conservation Areas

11.22 The map below shows the key conservation areas surrounding the site. The closest are the Inkerman conservation area (located directly to the south of the site), the Bartholomew Estate conservation area (located to the southeast of the site), and the Kentish Town conservation area (located to the east and northeast of the site). Further away are the Rochester, Kelly Street, Harmood Street, West Kentish Town, Mansfield, and Dartmouth Park conservation areas. The impact to the setting of these arising from the proposed development is assessed below.



Map of proposed site (shown outlined in red) and surrounding conservation areas (shown hatched in purple)

Inkerman Conservation Area – Less than substantial harm

11.23 The Inkerman Conservation Area is a historic part of Kentish Town defined by its dense grid of Victorian streets with consistent building heights and plot widths. This results in a strong townscape quality, with architectural uniformity and original detailing and materials contributing to the area's special interest.

11.24 In particularly sensitive views that reflect the well-preserved 19th century townscape with no visual intrusion of later development, such as those along Willes Road (View 20) and Alma Street (View 21), it is considered the proposed development will create a detracting feature. This is because it will introduce new development that is at odds with the consistent residential character and 19th century typology of the streetscape.

11.25 When considered within the context of the Conservation Area as a whole, the magnitude of impact of the proposed development is medium. This is because of the degree of visual change caused across the Conservation Area but noting that the change would not be visible across every part of the Conservation Area. The development would therefore have a harmful effect on the setting of the Inkerman Conservation Area at a less than substantial level, on the medium part of that scale

View 20 (Willes Road)

View 21 (Alma Street)

View 24 (Inkerman Road)

Kentish Town Conservation Area – Less than substantial harm

11.26 The Kentish Town Conservation Area includes the historic core of Kentish Town and is defined by its layered development from the late Georgian period through the Victorian and Edwardian eras. In particular, the area includes long terraces of well-detailed mid-19th century houses, generally three to four storeys in height. Its special interest derives from its character and appearance as a fairly uniform piece of townscape in terms of building ages, typology, and materials. The area (and more widely, the surrounding area) also includes some architectural diversity due to war-time bombing and 20th century slum clearance, with a large amount of post-war development surrounding the area.

11.27 The magnitude of impact varies across the Conservation Area, but in the context of the setting of the Conservation Area as a whole, the effect is limited. This is because the proposed development will be visible from parts of the Conservation Area where there is already an understanding of its wider commercial setting. The development would cause a degree of harm to the setting of the Conservation Area given that it adds further accretion of modern tall structures from areas of 19th century townscape, but the degree of harm caused is less than substantial, and at a low level.

Figure X: View 2 (Leighton Road at Torianno Avenue)

View 3 (Leighton Grove and Leighton Road)

View 4 (Leighton Road at green)

Bartholomew Estate Conservation Area – Less than substantial harm

11.28 The Bartholomew Estate Conservation Area is a compact and distinctive residential area characterised by consistent building heights, unified terrace compositions, and the use of traditional materials such as London stock brick with restrained decorative detailing. The area is noted to be very homogenous with a very clearly defined boundary. Fundamental to the Conservation Area's character and appearance is the balance of built and unbuilt space.

11.29 The proposed development will be visible above the consistent roofline of the villas along Caversham Road. This is particularly evident in View 11 of the Viewpoint Study, which currently allows for an appreciation of the Grade II* listed Church of St Luke with St Paul within its Victorian residential setting. In these key views within the Conservation Area, the visibility of the proposed development would introduce an awareness of new development that is not consistent with the residential use and the general character of the Conservation Area. This may in turn alter one's appreciation of the well-preserved 19th century townscape and its relationship to the setting of the Grade II* Church of St Luke with St Paul, which is currently the only vertically dominant element in the skyline. The proposed development will therefore cause a less than substantial degree of harm to the setting of the conservation area, at a low level.

View 11 (Caversham Road at Oseney Crescent [GII listed church on right] and proposed development rising over Victorian terraces to centre of image)*

Rochester Conservation Area – Less than substantial harm

11.30 The Rochester Conservation Area is a small and compact residential area that has retained a historic street pattern and building form, resulting in a coherent townscape. Its special interest lies in the consistency of scale, materials, and detailing of the predominantly residential housing.

11.31 The proposed development will be visible within part of the Rochester Terrace Gardens in views orientated north towards the Site. Whilst this will cause a visual change from within the Conservation Area, this change is peripheral and limited to a very small area and does not impact one's ability to appreciate the composition of mid-19th century uniform villas and semi-detached dwellings arranged around a central garden. The impact on the setting of the conservation area is less than substantially harmful, but in a very focused view. Therefore, the harm falls at the low end of the scale.

View 16 (Kentish Town Road at Rochester Road)

Kelly Street Conservation Area – Less than substantial harm

11.32 The Kelly Street Conservation Area is a very small area centred around Kelly Street and its intersection with Castlehaven Road. It contains a high proportion of listed buildings, notably forming part of a cohesive mid-19th century terrace that has been designed as a single architectural composition. The area's special interest lies in the uniformity of the terrace, consistency of building heights, and distinctive townscape, all of which contribute to a valuable example of an intact Victorian terrace.

11.33 The proposed development will be visible in views northward along Castlehaven Road from within the Conservation Area, as shown in View 18 of the Viewpoint Study. The upper storeys of the studio buildings will be visible to the left of the Grade II listed St Pancras Public Baths in this view. Whilst the impact of the proposal on the setting of listed buildings is assessed later, it is noted that the Kelly Street Conservation Area, especially Castlehaven Road, is also part of the setting of the listed building. The impact of the development on the setting of the Conservation Area is harmful due to its impact on the 19th century visual relationship between the listed building and Castlehaven Road, but the harm to the setting of the Conservation Area is at a less than substantial level, at the low end of the scale.

West Kentish Town Conservation Area – Neutral impact

11.34 The West Kentish Town Conservation Area is a predominantly residential area that is largely characterised by long terraces of mid-19th century houses, with some commercial properties, most located on Malden Road. Buildings within the Conservation Area are generally in the late Georgian style, of a consistent height of around three to four storeys high and sit within

regular plot widths. Usage of traditional materials such as London stock brick is common, as are features such as decorative brickwork, stucco detailing, and traditional roof forms.

11.35 Visibility of the proposed development will be mostly limited to views east from Talacre Road, which forms the eastern boundary of the conservation area. Due to the north-south alignment of many of the streets within the Conservation Area, there will be no visual change caused by the proposed development. Where visible, the upper storeys of proposed buildings will appear above the trees and built form that defines the western edge of Talacre Gardens. From this position, there is an awareness of other large scale 20th century development that sits outside of the boundaries of the Conservation Area. The impact of the proposed development on the setting of the Conservation Area is therefore neutral.

View 29 (Talacre Gardens - Existing)

View 29 (Talacre Gardens - Proposed)

Mansfield Conservation Area – Less than substantial harm

11.36 The Mansfield Conservation Area is broadly split into two separate character areas; the portion around Fleet Road that is busier and more urban in character, with commercial premises mixed with residential development, and the residential areas intersecting with Fleet Road, which are set out in a grid pattern and more domestic in nature. In the residential parts of the area, there are consistent building lines and repeated terrace forms, with a largely uniform scale that contributes to the special interest of the Conservation Area.

11.37 The upper storeys of the proposed development will be visible to the east of the Conservation Area in views orientated towards the Site, as represented in Views 35 and 36 of the Viewpoint Study, creating a visual change within the setting of a very small area of the Conservation Area where there is already an awareness of later 20th and 21st century redevelopment outside of the Conservation Area boundaries. However, the proposed development adds to the harm already caused by these developments and the effect on the setting of the Conservation Area is therefore harmful, but at a less than substantial end of the scale and at a low level.

View 36 (Gospel Oak Station at Gordon House Road)

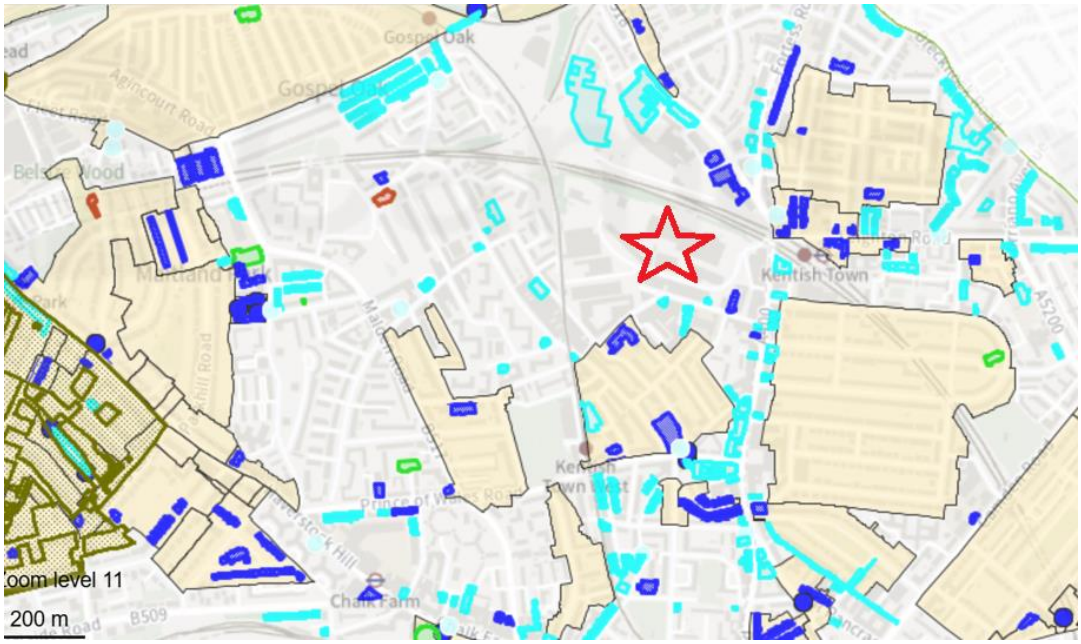
Dartmouth Park Conservation Area – Less than substantial harm

11.38 The Dartmouth Park Conservation Area has a varied and complex character that demonstrates the history of development from the late 18th century to the present, though is predominantly residential throughout. Development varies from terraced housing to large mansion blocks and detached villas, and the variety of built form makes a significant contribution to the special interest of the area. The townscape of the area also benefits from the presence of mature trees and the semi-rural quality due to its proximity to Hampstead Heath.

11.39 Intervisibility between the Conservation Area and the proposed development is limited to the south of the area and along Highgate Road, due to its alignment with the subject site. The proposed development will be visible in an area of the Conservation Area where the character is less well defined and more varied due to later redevelopment. However, the proposed buildings add to the harm already caused by these developments and the effect on the setting of the Conservation Area is therefore harmful, but at a less than substantial end of the scale and at a low level.

Setting of listed buildings

11.40 There are a large number of listed buildings in the vicinity of the site that have the potential to be impacted by the proposed development; these vary from those in direct proximity to those in the general area. The impact to the setting of relevant listed buildings is assessed below.



Map of heritage assets surrounding site (vicinity of application site indicated by star). Grade I listed buildings shown hatched in red, Grade II shown hatched in green, and Grade II shown hatched in dark blue. Conservation areas shown hatched in pale yellow.*

Church of St Martin (Grade I) – Neutral impact

11.41 In views standing along Vicar's Road and looking south past the chancel to the east of the church, the upper storeys of the proposed development will be glimpsed in long-range views. This is a minor visual change within the wider setting of the listed building and the proposed development will not impact key views of the church, including those that are positioned to the west and allow for appreciation of its prominent tower that affords its landmark status, or in views east and west along Vicar's Road that allow for an appreciation of its physical and historic relationship with the Grade II listed St Martin's Church Hall. Therefore, the impact of the proposed development on the townscape setting of the Grade I listed church is neutral.

Church of St Luke with St Paul (Grade II*) – Less than substantial harm

11.42 The proposed development will cause a visual change in the wider setting of the church, by appearing above the roofline of the terraces along Caversham Road in views from the church looking north-west, as shown in View 12 of the Viewpoint Study. The visibility of the proposed development will not impact the key view of the church orientated east along Caversham Road, or the ability to appreciate its primacy within the surrounding context. However, the church was built to serve a suburban community on what was then an outer-suburb of London. The proposed development would create a more urban (i.e. taller) backdrop to the street scene of the terraces which the church was built to serve. The effect on the setting of the Grade II* listed church is within a more distant view, and the proposed development does not rise directly behind the church itself. As such, the church remains the

dominant element in the streetscape, so the proposed development will cause a less than substantial degree of harm to the setting of the Grade II* church at a low level owing to the harm it causes to the suburban character of the historic environment which was built at the same time as the church.

View towards proposed development with Church of Luke with St Paul in foreground to the right of frame.

Police Station and attached railings and lamp (Grade II) – Less than substantial harm

11.43 In addition to the assessment already made above regarding the police station and the impact of the works on its listed historic fabric, there will also be an impact to the setting of the listed building. Following the proposed demolition to the west and north of the building, the proposed new build development will infill the open space surrounding the retained building to the west and north. In terms of the impact on setting, there will be a loss of the former open space that characterised the historic yard area to the rear of the building, partly eroding legibility of its former use and historic context. The part of the proposed development site for the Station House element was initially used as a carriage and wagon workshop for the railway, with semi-detached houses fronting the street (one pair still exists at the locally listed Nos. 20-22 Holmes Road). However, even when the semi-detached housing was in situ at the same time as the Police Station, it was of a much lower height than the Police Station.

11.44 This space will be partly occupied by the proposed new build development (the housing block and recycling centre). The upper three storeys of the proposed building wrap around the south, west, and north edges of the plot. The lightwell to the police station is retained, meaning that the station will chiefly be visible in views looking east along Holmes Road (minus the

element to be demolished). The western elevation of the police station is already partly concealed by the existing three storey extension and its link, but the sense of it forming a return elevation is perceptible due to the set-back nature of the 1960s link, and the existing side extensions are subservient in scale.

11.45 The proposed building would conceal the western return elevation of the space. It will be taller than the listed building which will reduce its prominence in the street scene. Its historic character as a suburban police station will be eroded by the changes to its setting, placing it in a much denser urban context than was historically the case. There will be resultant harm to the setting of the listed building. This partly results from the changes to setting that will be publicly visible and also from the loss of the curtilage space surrounding the building. The harm caused will be less than substantial as the primary elevation of the station will still be fully visible, as will the retained part of the return elevation to the west. The level of harm will therefore be at the medium end of the scale.

Existing view looking east on Holmes Road to Grade II listed Police Station

Proposed view looking east on Holmes Road with Grade II listed Police Station shown to the right of the image.

Kentish Town Centre, Kingsway College and attached walls (Grade II) – Less than substantial harm

11.46 Due to the proximity between the listed building and the site, there will be a notable visual change within the setting of the listed building. The proposed 'Inkerman Gardens' residential buildings will sit opposite the listed building in views along Holmes Road. While the existing site appears to make very little contribution to the setting of the listed building, it is nonetheless similar to the historic scale of the setting of the listed building which was originally comprised of railway stable buildings. The proposed buildings have a significant effect on the setting of the listed building due to their scale. The listed building will lose the remaining sense of the historic scale of its Holmes Road setting, which was primarily that of a low-scale residential and light industrial area, and this change will be perceptible in views beyond Holmes Road, such as the junction of Willes Road and Spring Place. The proposed development introduces a much more urban and dense scale of development into the setting of the listed building, thereby alerting its historic setting as a school building built to serve a C19th residential population. The impact of the proposed development on the setting of the listed building is harmful, at a less than substantial degree on that scale, but at a medium level.

View 26 showing proposed buildings opposite the listed buildings (behind trees to the left)

The Forum (Grade II) – Neutral impact

11.47 The proposed development would be visible in oblique views of the listed building looking south along Highgate Road. There would be a visual change within the setting of the Forum and the two would be seen in conjunction with one another. The proposed development would not visually interfere with the principal façade of the building, and the distinctive roofline would continue to be read against the sky and appreciated within the local streetscape. The Forum is a commercial building of a typical townscape typology which has little relationship to the prevailing 19th century townscape character of Kentish Town. It is of national significance, but it is not especially contextual to the prevailing character of the local townscape. The impact of the proposed development on the setting of the listed building is low, with the effect on the significance of that setting being neutral.

1 to 7, Highgate Road (Grade II) – Neutral impact

11.48 The proposed development would be visible in oblique views of the listed buildings looking south along Highgate Road. Whilst this would be a visual change within the setting of the terrace and the two would be seen in conjunction with one another, the proposed development would have a limited relationship to the townscape setting of the listed terrace, as it would not visually interfere with the principal façade of the terrace and would not rise above it in longer views. The impact of the proposed development on the setting of the listed building is low, with the effect on the significance of that setting being neutral.

Bull and Gate Public House (Grade II) – Neutral impact

11.49 The proposed development would be visible in oblique views of the listed building looking south along Highgate Road. Whilst this would be a visual change within the setting of the public house and the two would be seen in conjunction with one another, there would be some distance between them. The historic setting of the listed building is better appreciated in views north, which encompass 1-7 Highgate Road and the Forum, giving a rich townscape characterised by the earlier development around Kentish Town and the later development of this part of the street as an entertainment area. The impact of the proposed development on the setting of the listed building is low, with the effect on the significance of that setting being neutral.

Christ Apostolic Church (Former Church of St John) (Grade II) – Neutral impact

11.50 The proposed development would be visible in oblique views of the listed building looking south along Highgate Road, but at quite some distance and not in a manner in which it could be easily understood to form part of the significance of the setting of the church. The church would primarily be seen as the dominant building within its immediate townscape setting and the proposed development would not impact the appreciation of its historic townscape context or its current streetscape presence. The proposed development therefore results in a neutral impact to the setting of the church.

1A Leverton Place (Grade II) – Neutral impact

11.51 The elements of the setting of 1A Leverton Place that contribute positively to its significance are situated to the east of Kentish Town Road, including the historic character of Leverton Place and the wider area encompassed by Kentish Town Conservation Area, to the north-east of the receptor. The proposed development would be clearly visible within the wider setting of the listed building in views looking west across Kentish Town Road and across the railway bridge. Whilst the proposed development will cause a visual change within the setting of the building, the two are visually and physically separated by the busy Kentish Town Road. The effect on the significance of the setting of the listed building is neutral.

The Assembly House Public House (Grade II) – Less than substantial harm

11.52 The proposed development will create a visual change within the setting of the public house, in views looking south-west across the junction and towards the open area afforded by the railway and bridge. In these particular views, the Camden Film Studios building will be most visible, marking a notable uplift in scale and height within the site. However, the turret and French Chateau style of the listed building is best appreciated in views from the south moving towards the building along Kentish Town Road. Nonetheless, the townscape dominance of the listed building will be

challenged by the proposed development in the vicinity of the main traffic junction and in views west along Leighton Road. The effect of the proposed development on the significance of the setting of the listed building will be harmful, but to a less than substantial degree and at a low level.

1 and 3 Leverton Street (Grade II) – Less than substantial harm

11.53 The proposed development would appear behind the buildings in oblique views from Leverton Street, orientated south-west towards the site. The significance of the setting of the buildings is what remains of their early 19th century townscape setting (i.e. the vista to Hampstead). There is already an awareness of the wider and more recent urban expansion of Kentish Town in views along Leverton Place, where both the UPS building and Bacton Tower are visible in conjunction with the listed buildings. These urban expansions have harmed the setting of the listed buildings, and the proposed development would add to this harm and worsen it. The effect of the proposed development on the setting of the listed buildings would be less than substantial harm, at a low degree on that scale.

Numbers 20 and 22 and attached railings to front; Numbers 24 and railings to areas and steps; 27 Leighton Road; Numbers 26 and 28 and attached railings; 37 Leighton Road; 64 Leighton Road; Numbers 66, 68, and 70 and area railings to numbers 68 and 70 (all Grade II) – Less than substantial harm

11.54 The proposed development will be visible in a context that is already read and understood as the transition between the wider residential area of Kentish Town to the bustling centre, which is characterised by different uses and a varied townscape. However, it is at a very much greater scale than the existing development and of an unprecedented scale in terms of the townscape of the immediate area. The significance of the setting of the buildings is what remains of their early 19th century townscape setting (i.e. the vista to Hampstead). The proposed development will harm the setting of the listed buildings, but to a less than substantial degree and at a low level.

St Pancras Public Baths and attached railings and walls (Grade II) – Less than substantial harm

11.55 The views northward along Castlehaven Road towards the principal façade of the building are a key aspect of its setting that contribute to its significance. View 18 of the Viewpoint Study illustrates that the proposed development would be visible, appearing behind the roofline of the baths and creating a distracting feature in this key view of the listed building. The proposed development harms the setting of the listed building by detracting from its townscape prominence and harming the largely intact 19th century townscape setting which currently exists in most views towards the listed building. The effect of the proposed development on the significance of the setting of the listed building is harmful, at a less than substantial degree but at a medium level.

View from Castlehaven Road looking towards Grade II listed St Pancras Public Baths (deep red brick building at end of junction) with proposed development rising behind)

View towards Grade II listed Baths from vicinity of Prince of Wales Road and Willes Road junction

Kentish Town Sorting Office (Grade II) Neutral impact

11.56 In views west along Leighton Road, the proposed Film Studios building will be visible as a terminating feature at the end of the street. However, due to separating distance and street trees, the proposed development will appear as peripheral development within the setting of the listed building. The listed building was designed as part of the postal network, constructed in 1903 and its site was chosen for functional reasons rather than townscape design.

Its primary townscape setting is the terraces among which it sits, and the proposed development is not considered to have an impact on this or, more broadly, the significance of the setting of the listed building.

Gothic bollard at junction with Anglers Lane (Grade II) – Neutral impact

11.57 The scale and nature of the bollard mean that the proposed development does not form a significant part of its setting and will have no impact.

Richard of Chichester Catholic Secondary School and gates and railings (Grade II) – Neutral impact

11.58 The proposed development would be visible within the wider setting of the listed building in views northward along Ryland Road, where it would appear above the roofline of the buildings to the east of the street. It would not rise above the listed building itself and would not be appreciable in views looking towards the listed building. The impact on the significance of the setting of the listed building would be neutral.

K2 Telephone Kiosk outside Hope Chapel (Chapel not included) (Grade II) – Neutral impact

11.59 The scale and nature of the kiosk means that the proposed development does not form a significant part of its setting and will have no impact.

96 and 98 Fortess Road (Grade II) – Neutral impact

11.60 The proposed development will be visible on the opposite side of the street to the listed buildings, at some distance, and largely behind existing buildings – all of which post-date the listed buildings. It is not considered to affect the significance of the townscape setting of the listed buildings.

98 Castlehaven Road and 51 Kelly Street (Grade II) – Neutral impact

11.61 In all views towards the listed buildings, the proposed development is behind the viewer and therefore would have no impact on the significance of the setting of the listed buildings.

St Martins Church Hall (Grade II) – Neutral impact

11.62 Looking south along Vicar's Road, the upper storeys of the proposed development will be glimpsed in long-range views. This is a minor visual change within the wider setting of the listed building. As already assessed above, the proposed development will not have an impact on the setting of the Grade I listed church. The distance of the proposed development from the listed building and the very limited visibility results in a neutral impact to the significance of its setting.

Locally listed buildings

11.63 Although not designated heritage assets, there are also a number of locally listed buildings in proximity of the site. As noted above, the NPPF states that the effect of proposed development on these non-designated heritage

assets should also be taken into account. As such, the impact to nearby locally listed buildings is assessed below.

20-22 Holmes Road – low level harm

11.64 The proposed development seeks to develop the site directly east of these locally listed buildings, which is currently an area of hardstanding used for open air parking by the Metropolitan Police Service. This part of the proposed works will contain a new five storey building consisting of a reprovided recycling centre and residential accommodation. As a result, there will be a notable uplift in scale on the site, creating a clear visual change within the setting of the locally listed buildings and infilling the open space that historically characterised the setting to the east of the building. The proposed development will cause harm to the setting of the locally listed buildings at a low level.

41-43 Holmes Road – low level harm

11.65 The proposed development will be opposite these locally listed buildings. It will cause harm to the setting of the locally listed buildings, but it would not affect the appreciation of the townscape value of the buildings themselves. As such, there would be some harm to setting at a low level.

61 Grafton Road - neutral

11.66 The proposed development will be visible in views east from the locally listed building. There will be a notable uplift in height and massing on the site that will create a visual change within the setting of the receptor. However, the building's position within the local streetscape that give it a landmark quality is best appreciated in views north along Grafton Road and orientated away from the application site. Where visible in these views, the proposed development will be peripheral and not impact how the locally listed building is understood in its surrounding 19th century context. The impact on the setting of the locally listed building would be neutral.

Raglan House, 1 Raglan Street – low level harm

11.67 The proposed development will create a visual change in the setting of Raglan House; it will not impact one's appreciation of the setting relationship the building shares with the surrounding 19th century terraces, but it will affect the setting of the street as a whole and has some effect on the significance of the townscape setting of the locally listed building. Therefore, the impact on the setting of the locally listed building would be harmful, at a low level.

Post Box – Outside 5 Fortess Road - neutral

11.68 The nature of the asset does not make it sensitive to townscape change of the type caused by the proposed development. Therefore, the impact on the setting of the local listing would be neutral.

14-18 Fortess Road, 28-34 Fortess Road – low level harm

11.69 In views southward along Fortess Road, the proposed development will be visible above the roofline of the locally listed buildings fronting the west of the street. The impact on the significance of the locally listed buildings will be harmful but at a low level.

11 Fortess Road – low level harm

11.70 In views southward along Fortress Road, the proposed development will be visible above the roofline of the buildings fronting the west of the street. The impact on the setting of the locally listed buildings will be harmful but at a low level.

81A Highgate Road (off Sanderson Close) - neutral

11.71 The proposed development will be visible within the setting of the locally listed building in views south over the railway line. Whilst there will be a visual change within the setting of the locally listed building, the locomotive sheds' context is not one of designed townscape, but of association with the railway line. The proposed development will not impact the appreciation of the intrinsic visual and physical relationship the former sheds share with the railway line and the effect on the setting of the locally listed building is therefore neutral.

Kennistoun House, Leighton Road - neutral

11.72 In views west along Leighton Road, the Film Studios Building will be visible as a terminating feature at the end of the street. However, as a 20th century apartment block, Kennistoun House primarily derives its townscape value from the contribution it makes to the townscape rather than the contribution the townscape makes to it. As such, the effect of the proposed development on its setting would be neutral.

London View Management Framework (LVMF) and heritage receptors located outside of the 500m study area

11.73 There are certain designated views across London from parks and other public spaces that take in important buildings and landscapes that help define London. The London Plan protects these as part of the London View Management Framework (LVMF), providing a basis for more detailed guidance on each view. This is supported by policies HC3 and HC4 of the London Plan. Development proposals should not harm the characteristics and composition of strategic views and their landmark elements.

11.74 The view from Parliament Hill is identified as one of the London Panoramas in the LMVF. It offers an elevated view across central London and several of the city's most important landmarks. Views 2A.1 and 2A.2 orientate towards the strategic landmarks of St Paul's Cathedral and the Victoria Tower of the Palace of Westminster, respectively; these are Protected Vistas and are shown in the figure below. This includes views of two

additional identified landmarks: the BT Tower (Grade II) and the Shard. Other sites identified in the panorama include the City cluster, Canary Wharf and St Pancras Station (Grade I).

Map to show designated views in proximity of site (outlined in red)

11.75 The proposed development will not obscure the drum of St Paul's Cathedral (this is the large circular storey that the dome sits on – between the main roof of the cathedral and the curved dome), however the Heathgate residential buildings and the Film Studios building in particular would result in a harmful impact on the appreciation of the view of this landmark due to their height and massing which distracts from the existing prominence of St Paul's Cathedral and has the effect of foreshortening the vista from the Heath to the City . In the case of the Studios building, the impact is worsened by the combination of the scale and massing, in addition to height. The proposals would not directly obstruct St Paul's Cathedral, which is a highly significant landmark in this view, but the proposed development (and specifically the Inkerman Gardens block) will rise directly beneath the threshold of the cathedral in the middle ground of the view, which reduces the visual impact of St Paul's Cathedral in the panorama. This is shown in the figures below.

Parliament Hill LVMF View 2A.1 as existing (St Paul's Cathedral at red cross-hair)

Parliament Hill LVMF View 2A.1 as proposed (St Paul's Cathedral at red cross-hair)

11.76 The panorama is sensitive to large-scale development in the foreground and middle ground. Development in the foreground, middle ground, or background of a London Panorama should provide an appropriate setting for Strategically Important Landmarks (i.e. St Paul's Cathedral) by not crowding in too close to them and by not contributing to a canyon effect either side of the Protected Vista. The proposals would preserve the view of the silhouette of St Paul's Cathedral. However, they would alter the appreciation of the topography of the Thames valley in which it sits through visually foreshortening of the foreground (due to the height and mass of the proposed development) between the foot of Parliament Hill and the longer vista to the City. The key elements of the view of St Paul's would be preserved but the appreciation of its historic topographical setting would be harmfully altered. There would be a canyon effect on either side of the protected vista. The harm caused to the appreciation of the landmark would be at a medium level (harm to the setting of the Cathedral as a listed building has also been identified as falling at a medium level).

11.77 In View 2A.2 The viewer's ability to perceive the visual relationship between the Clock Tower, the Central Tower and the Victoria Tower should be maintained or enhanced. Any development proposals that would undermine this relationship should be refused. A Protected Vista, incorporating the full width of the Palace of Westminster, reinforces this requirement. The proposals would not obscure any of the elements of the Palace itself and would not impinge upon views towards it to the point that the appreciation of the Palace and its wider topographical setting would be seriously harmed. The impact of the proposed development on this view is neutral.

11.78 View 3A.1 is the viewing gazebo in the grounds of Kenwood House. This includes a Protected Vista orientated towards St Paul's Cathedral. The views of the Cathedral dome benefit from an absence of development in the foreground. In View 3A.1 The proposals would preserve the view of the silhouette of St Paul's Cathedral. However, they would alter the appreciation of the topography of the Thames valley in which it sits through visually foreshortening of the foreground (due to the height and mass of the proposed development) between the foot of Parliament Hill and the longer vista to the City. The key elements of the view of St Paul's would be preserved but the appreciation of its historic topographical setting would be harmfully altered. The harm caused to the appreciation of the landmark would be at a medium level (harm to the setting of the Cathedral as a listed building has also been identified as falling at a medium level).

Kenwood Gazebo view 3A.1 as existing

Kenwood Gazebo view 3A.1 as proposed

11.79 The proposals would therefore impact the strategic view of St Paul's Cathedral from Parliament Hill and Kenwood House and cause harm to its wider London setting as a listed building.

11.80 The GLA and Historic England have both commented on the impact of the proposed development on strategic views.

11.81 In their consultation response of 19th November 2025 Historic England responding on this particular point stating:

> *"It appears clear that the current proposals would impact the strategic view of St Paul's from Parliament Hill and, as a result, would affect its setting. The scale of development would dominate the middle ground of the panorama, foreshortening the view and impacting its overall composition. There is the potential for this impact to be compounded by future development on the wider Regis Road site. The proposals would not directly obstruct St Paul's Cathedral, which is a highly significant landmark in this view. However, the location of the Inkerman Road block directly beneath the threshold of the cathedral in the middle ground of the view would make the cathedral harder to perceive and would further erode its presence in the panorama. Nighttime views have not been included in the submission material, and the location of the site in relation to St Paul's Cathedral means that it is possible that the impact of the proposals on the Cathedral's setting could be more pronounced at night with the illumination of residential buildings in the foreground of the view...."*

"Historic England goes on to state that:

> *"the development has the potential to undermine the legibility of the panorama as a means to understand the urban composition and character of London, and the context of its key landmarks. This*

panoramic view over central London is of considerable public importance, experienced by millions and one of the most beloved views of London, with huge public value. These impacts would run counter to policies in both the London Plan and the Camden Plan."

"Historic England has concerns regarding the application on heritage grounds... as the proposals do not encompass the whole of the Regis Road Site, which is divided into multiple ownership, it is essential going forward that a coordinated approach to the development of the site is adopted between the different landowners. This would help ensure that the overall composition results in a cohesive new addition to the London skyline."

11.82 The scale of development brings large scale development into close visual proximity to the views across London from the Heath and will dominate the middle ground of the panorama and reduce the panoramic impact of the London-wide vista as currently enjoyed. This effect would be equally perceptible at night when the studio building in particular would have considerable visibility from Parliament Hill. (Nighttime visualisation shown below)

Visualisation of proposed development at night-time

11.83 In their representation, Historic England also stated:

"It should also be noted that there is the potential for the impact of the proposed development on strategic views and protected vistas to be compounded by future development within the wider Regis Road site (i.e. the Regis Road Growth Area). The impact from development that may come forward through other sites within this area clearly cannot be assessed as part of this application, but it is an important consideration with regards to the impact of the scheme on protected views and vistas."

11.84 The GLA has also responded regarding the impact on the aforementioned views and has noted the following impacts:

11.85 “The submitted documentation has provided a view analysis of the impacts on LVMF Views 3A.1 (Kenwood Gazebo to St Paul’s Cathedral) and 2A.1 (Parliament Hill summit to St Paul’s Cathedral). It appears the development sits below the dome, peristyle and drum of St. Paul’s Cathedral, and therefore it allows the view to still be appreciated in line with the LVMF. It is noted the development would be visually prominent in the panorama of each view, however would not distract from the panorama when viewed as a whole.” The GLA has however also noted that the views from Parliament Hill to St Paul’s Cathedral are part of the setting of the Grade I listed building and that the proposals would cause less than substantial harm to the setting of the Cathedral at a low-medium level.

11.86 The City of London has responded regarding the impact on the aforementioned views and has noted:

> *“In reviewing the impacts to LVMF 2A.1 Parliament Hill, St Paul's Cathedral is identified as the Strategic Landmark and the City cluster of tall buildings are also noted within the view. The redevelopment proposals are very conspicuous within the foreground and there would be significant change to the current panoramic experience. In relation to the Cathedral the Inkerman Gardens element has the potential to distract from and erode the ability to appreciate and recognise the Cathedral as the Strategic Landmark. The Heathgate Building and the Studio Buildings would almost entirely occlude the City cluster of tall buildings. We would suggest LB Camden pay close attention to the LVMF visual management guidance set out paras 99, 100 and 101 and in doing so ensure their intentions are complied with to safeguard the composition of this important metropolitan view and the landmark elements within it.”*

11.87 Officers have had regard to the LVMF SPG (referred to as the “visual management guidance” in the City of London’s response. In particular the following paragraphs:

> *“99: The panorama is sensitive to large-scale development in the foreground and middle ground.*
>
> *100: St Paul’s Cathedral and its western towers should be recognisable in the panorama. A Protected Vista is applied in this view.*
>
> *101: New development should preserve or enhance the viewer’s ability to recognise and appreciate the Palace of Westminster in this view. A Protected Vista is applied in this view.”*

11.88 *As identified in the assessment of the application within this report, harm has been found to occur as a result of the proposed development in respect of* LVMF *Views 2A.1 and 3A.1*.

Archaeology

11.89 The site is not located in an Archaeological Priority Area, and the Greater London Archaeological Advisory Service (GLAAS) raised no objection when consulted on the application. Their consultation response confirmed that, upon review of the proposal, it would be unlikely to have a significant effect on heritage assets of archaeological interest.

Conclusion

11.90 The application site is in proximity to a number of conservation areas that are mostly predominantly residential in character. As such, the addition of buildings of significant scale and massing, has an effect on the setting of a number of these conservation areas, by introducing development that is of a more urban character with a much higher density of buildings than currently exists. Given the size of the proposed development, it would be directly visible from a number of the nearby conservation areas; in many cases, this leads to a more significant impact to the setting of the conservation areas.

11.91 This assessment has identified that in all but one conservation area assessed, the impact to the setting would be less than substantial harm, ranging from the lowest end of the scale to the medium part of the scale. West Kentish Town Conservation Area is the only of those assessed that the proposed development would have a neutral impact on.

11.92 This assessment has also identified harm to the listed Kentish Town Police Station, which falls within the site boundaries. The proposal involves the demolition of part of this structure, and it has been concluded that this would result in less than substantial harm to the special architectural and historic interest of the building, at a high degree of that scale.

11.93 There would also be less than substantial harm to the setting of various other listed buildings resulting from the development, as assessed above. This would primarily be at a low level.

11.94 However, less than substantial harm at a medium level has been found in respect of the setting of the following listed buildings:

11.95 <u>St Paul's Cathedral (GI)</u> Less than substantial harm to setting at a medium level.

11.96 <u>Kentish Town Police Station (Grade II)</u>. There would be less than substantial harm to the setting of the Grade II listed building, at a medium level.

11.97 Kentish Town Centre, Kinsgway College and attached walls (Grade II) The impact of the proposed development on the setting of the listed building is harmful, at a less than substantial degree on that scale, but at a medium level.

11.98 St Pancras Public Baths and attached railings and walls (Grade II) The effect of the proposed development on the significance of the setting of the listed building is harmful, at a less than substantial degree but at a medium level.

11.99 For remaining listed buildings that would be impacted by the proposal, the proposed development would have a neutral impact on their setting.

11.100 In accordance with Sections 16, 66, and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant case law, great weight has been given to the identified harm to the conservation areas and listed buildings in the planning balance. The NPPF and local policies (policies D1 and D2 of the Local Plan and policies HC1, HC2, HC3, and HC4 of the London Plan) require that any harm (following mitigation) to designated heritage assets must be clearly and convincingly justified and outweighed by public benefits.

11.101 The proposed development has also been assessed to cause harm to the setting of a number of locally listed buildings, at a low level. In accordance with the NPPF, the effect of development on the significance of non-designated heritage assets must be taken into account, with a balanced judgement having regard to the scale of harm or loss and the significance of the asset.

11.102 The protected views from the LVMF, although not a designated or non-designated heritage asset, would be impacted by the proposed development, with harm caused to the strategic view of St Paul's Cathedral from Parliament Hill (and also its setting) and Kenwood Gazebo.

11.103 The proposed development has evolved through and iterative process during pre-app which has sought to mitigate the harm identified, however, further reductions in height and mass to the buildings that are causing the most significant harm which are Inkerman Gardens, Heathgate and the Film Studios would result in a reduction in housing delivery and potentially undermine the 'ecosystem' which the applicant states is critical to the film quarter and the many economic benefits it would deliver in terms of jobs and education in this industry.

11.104 In weighing the less than substantial harm to designated heritage assets including listed buildings and Conservation Areas, the harm to the LVMF views and to non-designated heritage assets, identified above against the public benefits of the proposal, it is considered that the significant and

convincing public benefits associated with the scheme are sufficient to outweigh the identified harm. The public benefits are summarised throughout the report, but two key elements are the delivery of a significant number of new homes (and affordable housing) and the substantial economic benefit that the Film Studios would bring to Camden and London more widely. This is set out in the planning balance at Section 29 of this report.

11.105 Given the above, the proposal conflicts with the development plan in respect of heritage impact, most notably policies D1 and D2 of the Local Plan and policies HC1, HC2, HC3, and HC4 of the London Plan. The statutory duty and policy requirement to give considerable weight to the conservation of heritage assets has been fully applied in this assessment.

12. AFFORDABLE HOUSING

Policy context

12.1 The London Plan provides detailed policies on housing delivery, including those that relate specifically to the creation of affordable housing. These set out the Mayor's targets for the provision of affordable housing quantum and tenure priorities, with the overarching aim that 50% of all new homes within London are genuinely affordable.

12.2 Policy H4 of the London Plan sets out that major developments that trigger affordable housing requirements should provide this through the 'threshold approach', which is explained in detail by Policy H5. The 'threshold approach' requires that residential development should provide a minimum of 35% on-site affordable housing, with this figure increasing to 50% where development would result in a net loss of industrial capacity (in this case there is a net increase in industrial land) or where development includes public sector land. Where this 50% figure is met (along with other policy requirements and complying with the relevant tenure split), applications can follow the 'Fast Track Route', meaning that a viability assessment is not required at application stage. GLA housing targets are based on habitable rooms.

12.3 The London Plan is supported by the 'Threshold Approach to Affordable Housing on Public Land' practice note, which sets out further information and details on how the affordable housing threshold should be implemented where public land is involved. This confirms that, where development includes a mix of both private and public land (as is the case here), the 35% threshold should apply to the proportion of the site that is not public land, but the threshold for the overall site should be a combination of both thresholds. The guidance also provides a formula for calculating the relevant threshold, based on the established acceptable mix for public and private land:

((public land site area / total site area) x 50))
+ ((private land site area / total site area) x 35))

12.4 Policy H6 of the London Plan also relates to affordable housing, setting out the acceptable tenure mix. This confirms that there should be a minimum of 30% low-cost rented (either London Affordable Rent or Social Rent – Social Affordable Rent), a minimum of 30% intermediate (including London Living Rent and shared ownership), and the remaining 40% as low-cost rented homes or intermediate products.

12.5 At the local level, policy H4 of the Local Plan and the 'Housing' CPG set out the appropriate level of affordable housing for schemes. These confirm that a target of 50% (based on floorspace) applies to sites with a capacity of 25 or more homes, with a guideline split of 60% social-affordable rent and 40% intermediate rent. Policy H8 of the Local Plan also confirms that demolition of affordable housing should only be permitted where it is being replaced with an equivalent amount of affordable housing floorspace. Social rent housing must be re-provided as social rent housing where a right of return for tenants is provided, and replacement affordable housing should seek to provide an uplift in affordable housing and be integrated into proposed development to ensure mixed and inclusive communities. This is relevant in this case because affordable homes at Holmes Road Depot are being demolished as part of the proposal, and reprovided at Station House.

12.6 The Council has adopted a 'Planning Statement on the Intermediate Housing Strategy and First Homes', which indicates that some affordable housing tenures, including First Homes, would not be affordable to median income residents in Camden, and consequently First Homes and other unaffordable tenures will not be sought in the borough. Any homes delivered as part of the proposal, whether on site, off-site, or through funds arising from PIL and deferred affordable housing contributions, are expected to contribute to the Council's preferred affordable housing types identified by Local Plan Policy H4 and CPG Housing 2021, namely social-affordable or intermediate rented housing.

12.7 In March 2026, the Greater London Authority adopted new London Plan Guidance, called 'Support for Housebuilding in London'. This sets out a package of measures to encourage the delivery of new housing, including adjusting the percentage of affordable housing that private land is required to deliver without providing a viability assessment to 20% from 35%, assuming certain eligibility criteria area met and public land from 50% to 35%. Although the applicant is not relying on this new guidance, the measures do exist as a material consideration and would entail a lower requirement for affordable housing provision.

Affordable provision and tenure

12.8 The required affordable housing contribution for the scheme would be 43.8% as affordable homes, which equates to 21,304.8m^2, or approximately 595 habitable rooms. This is calculated based on the London Plan's 'Threshold Approach to Affordable Housing on Public Land' practice note, as the site consists of both public and private land. This note establishes that the affordable threshold is slightly different where there is a mix of both private and public land, giving a formula for calculating this threshold, as previously noted. Applying this formula to the development site results in the following figure:

((13,150m^2 / 24,045m^2) x 50) + (10,895m^2 / 24,045m^2) x 35) = ***43.8%***

12.9 The formula above gives a site-specific threshold of 43.8% affordable housing to be provided under the threshold approach. Therefore, even when excluding the DMS units from the affordable total, the percentage of affordable housing exceeds the relevant policy requirement, and a viability assessment is not required. The applicant does not intend to rely on the emergency housebuilding measures.

12.10 The proposed development is intended to deliver 513 new homes. Of these, 28 are provided within the Station House site, and are intended to re-provide the 25 existing homes located at 76 & 78 Holmes Road. The 28 reprovided homes are all social rented. The remaining 485 homes will be delivered as part of the Heathgate and Inkerman Gardens sites. Of these 485 homes, 243 will be affordable, which constitutes 50.1% by floorspace. On a habitable room basis, 682 of the 1,358 habitable rooms will be affordable, which constitutes 50.2%.

12.11 The 243 affordable homes proposed consist of 135 social affordable rent, 90 intermediate rent, and 18 Discount Market Sale Units. The applicant has set out in their Affordable Housing Statement that this results in a total of 50.1% affordable homes, as noted above.

12.12 The Council does not consider Discount Market Sale (DMS) units as truly affordable housing. This is because they, like First Homes, are not affordable to median income residents in Camden, given that the discount applied is a reduction against market value. Due to the high cost of housing in the borough, a 20% reduction against market value is still not an affordable product, and as such the DMS units are considered not to be appropriate to use when giving the number of affordable units. However, Members are also advised that DMS is within the GLA income cap and consequently would be treated as affordable under London Plan Policy. So the GLAs detailed assessment of affordable housing provision within this scheme would be different and higher than Camden's.

12.13 Using the Council's definition of affordable housing there would be 225 affordable homes (rather than 243), which equates to 46.4% of the proposed homes as being affordable by habitable rooms (excluding the 28 reprovided homes at Station House). The DMS units provided a further 1580.11m^2 of the proposed residential floorspace and constitute 45 habitable rooms, but are not counted in the affordable housing assessment.

12.14 When the DMS figures are removed from the overall affordable housing offer, the correct quantum of affordable floorspace and number of affordable habitable rooms across the entire development becomes 21,989.7m^2 and 637, respectively. This would mean that the affordable provision is 45.2% in terms of floorspace and 46.9% in terms of habitable rooms, as shown in the table below. This is clearly lower than the 50% affordable housing target set out in policy, but meets the threshold approach applicable to this application.

	Floor Area (GIA)	**Habitable Rooms**
Affordable provision	21,989.7m^2	637
Affordable split	45.2%	46.9%
Market provision	26,651.4m^2	721
Market split	54.8%	53.1%
Total	48,641.1m^2	1,358

Proposed affordable housing provision across application site

12.15 Across the development, the proposal includes a mix of unit sizes, with an appropriate mix of larger and smaller homes. This is outlined in more detail in Section 13 of this report.

12.16 The application proposes a mix of affordable and market throughout the two residential sites, Heathgate and Inkerman Gardens. Both sites include a mix of affordable and market, and the tables below demonstrate the split in terms of both floor area and habitable rooms. These have been amended from the tables provided in the submitted Affordable Housing Statement to reflect that the Council does not consider the DMS units provided within Inkerman Gardens to be affordable housing in the context of its policies. The Station House site provides 28 social affordable rent units, replacing 20 existing social affordable rents units and five leasehold units at Holmes Road. As such, all of the existing social affordable rent units are being reprovided, in accordance with policy.

	Floor Area (GIA)	**Habitable Rooms**
Affordable provision	10,985.2m^2	322
Affordable split	47.6%	50.3%

Market provision	12,084.4m^2	318
Market split	52.4%	49.7%
Total	23,069.6m^2	640

Proposed affordable housing provision at Heathgate

	Floor Area (GIA)	**Habitable Rooms**
Affordable provision	11,004.5m^2	315
Affordable split	43%	43.9%
Market provision	14,567m^2	403
Market split	57%	56.1%
Total	25,571.5m^2	718

Proposed affordable housing provision at Inkerman Gardens

12.17 As demonstrated above, both residential sites meet the threshold for affordable housing in terms of habitable rooms. The Inkerman Gardens site is slightly below the threshold in terms of floor area, however only marginally (by approximately 0.8%). Also, the Mayor measures affordable housing by habitable rooms, rather than floorspace. As such, the quantum of affordable homes is acceptable.

12.18 All affordable units in each site would be provided within one building, rather than split between different blocks; Block A of Inkerman Gardens and Block A of Heathgate would provide the affordable homes for each respective site. Within Inkerman Gardens, Block A would provide 63 social affordable rent units and 42 intermediate rent units. At Heathgate, Block A would provide 72 social affordable rent units and 48 intermediate rent units. Across the site, there would be 135 social affordable rent units and 90 intermediate rent units.

12.19 Given that intermediate rent units are considered as intermediate products, this would result in a tenure mix based on unit number of exactly 60% social-affordable and 40% intermediate-affordable, complying with policy.

12.20 The social affordable rent units delivered through the Station House site would be allocated for existing residents from 76 & 78 Holmes Road, who would be able to move directly into the new building, minimising movement and displacement resulting from the scheme. There are currently 25 homes comprising 20 social rent homes and five leasehold homes on the Holmes Road site. The existing and proposed provision is shown in tabulated form below. The applicant proposes replacing these homes with 28 Social Rent Homes, which exceeds the quantum of homes displaced. Part of the reason

for this is the household size of some of the existing homes exceeds the available space, which will be homed in a suitably sized unit to accommodate their needs and partly to accommodate circumstances where two or more households need to be rehomed from a single existing household. Therefore, the reprovision exceeds the social rent homes to be displaced and is welcomed; however, as the scheme as a whole meets the target for affordable housing and the additional units are not required by policy.

Unit Tenure	Existing – Holmes Road (Social Rent)	Existing – Holmes Road (Leasehold)	Proposed – Station House (Social Rent)
Studio / 1-bedroom	5	2	11
2-bedroom	8	2	13
3-bedroom	6	1	4
4-bedroom	1	0	0
Total	**20**	**5**	**28**

12.21 Across the development, there would be a policy-compliant mix of homes in terms of the affordable tenure split, as well as the quantum of affordable housing. The provision of affordable housing, including the specific amounts of social-affordable rent and intermediate-rent homes, would be secured as part of the Section 106 legal agreement . Additionally, irrespective of whether the DMS units are considered to be affordable or not, the Section 106 legal agreement would also secure the DMS units and require that they are appropriately discounted to ensure that they will be affordable for residents earning below £90,000 per annum . Subject to these obligations, the development would be acceptable in terms of its affordable housing provision.

13. HOUSING MIX AND QUALITY

Policy context

13.1 The Local Plan seeks to promote an appropriate mix of housing, with Policy H7 requiring that developments include a mix of differently sized homes, including large homes (those defined as 3 bedrooms or more) and smaller homes. The proposed unit mix should also aspire to align with the priorities set out in the Dwelling Size Priorities Table that forms part of Policy H7 (and is reproduced in the table below). However, the Policy states that the Council will apply the priorities flexibly, having regard to the characteristics of the location and the development. In particular, paragraph 3.201 of the supporting text recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development and states that the Council will consider adjusting the mix of dwellings (particularly the mix of

market dwellings) to achieve the maximum reasonable amount of affordable housing floorspace on the site.

	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

Dwelling Size Priorities (Local Plan Table 1)

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

13.3 In addition to achieving an appropriate mix of housing, the Local Plan supports the creation of high-quality housing; Policy H6 aims to support the creation of mixed, inclusive, and sustainable communities through the delivery of high quality and accessible homes. This ensures that Camden's housing mix includes a variety of housing that is suitable for both existing and future households within the borough. Additionally, Policies A1 and A2 of the Local Plan encourage opportunities to provide private amenity space and protect the amenity of occupiers in relation to factors such as privacy, outlook, light, and noise. This is supported by Policy A4, which says that suitable noise and vibration measures should be incorporated in new noise sensitive development, such as new dwellings.

13.4 The London Plan's policies also seek to provide high quality housing, with Policy D5 stating that 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. Policy D6 of the London Plan requires that housing development is adequately sized and provides good quality conditions, including providing dual aspect dwellings wherever possible and ensuring a sufficient level of daylight and sunlight. The policy also sets minimum standards for dwelling space that should be followed.

Housing mix

13.5 The proposed development includes a total of 485 new homes (excluding the 28 reprovided homes at the Station House site). Of these new dwellings, 225 will be affordable homes, with a tenure split of 60% social rent and 40%

intermediate rent, and 18 units will be Discount Market Sale, which is an alternative intermediate affordable product.

13.6 The proposed unit sizes across the entire scheme and broken down by affordable and market homes are as follows (notwithstanding that DMS is not considered affordable housing in terms of the assessment against policy H4, it has been grouped with affordable homes in the summary table):

Home size	Market homes	% of Market	Affordable homes	% of Affordable	Proportion of total homes
Studio	0	0%	30	12.4%	6.2%
1-bed	89	36.6%	50	20.7%	28.7%
2-bed	120	49.4%	94	38.8%	44.1%
3-bed	34	14%	68	28.1%	21%
Total	**243**	**100%**	**242**	**100%**	**100%**

Dwelling mix summary for market and affordable homes (excluding 28 homes at Station House site)

13.7 As shown by the table above, the significant majority of market homes would be one- and two-bedroom properties (86%), which broadly aligns with the dwelling size priorities set out within Policy H7 of the Local Plan. Although one-bedroom market homes are noted as a lower priority in the current dwelling size priorities table, it is noted that the Draft Local Plan which is a material consideration has been revised to consider market one-bedroom and studio homes as high priority. Although there is a lower amount of three-bedroom market homes (14%), this is still a sizeable minority, with more than one in ten market dwellings being a larger home. It is considered that the overall market housing mix is acceptable and would broadly ascribe to the borough's dwelling size priorities.

13.8 Within the 28 homes delivered at Station House, 50% would be one- and two-bedroom homes, with approximately 14% being larger three-bedroom homes. As above, this is considered appropriate in the context of Policy H7, but been designed with specific regard to the household needs of the relocated existing residents at Holmes Road.

13.9 The unit sizes for the affordable homes proposed by the development, split by social-rent (SR) and intermediate affordable (IA) homes are as follows (DMS units have been grouped with the IA homes in the table below):

Home size	Number of SR homes	% of SR homes	Number of IA homes	% of IA homes
Studio	6	4.4%	24	22.2%

1-bed	16	11.9%	39	36.1%
2-bed	51	37.8%	39	36.1%
3-bed	62	45.9%	6	5.6%
Total	**135**	**100%**	**108**	**100%**

Dwelling mix summary for affordable homes, split by social affordable rented and intermediate

13.10 With regards to social affordable rented homes, the priority in both the adopted and draft dwelling size priority tables are two-bedroom and three-bedroom homes. The proposed development would deliver 45.9% of the social affordable rented homes as three-bedrooms, which is just short of the 50% target outlined in the 'Housing' CPG. The unit mix is mostly very close to Camden's preferred mix, with two-bedroom homes (37.8%) being just larger than the 35% target and one-bedroom homes (16.3%) being just larger than the 15% target. Together, two- and three-bedroom homes constitute approximately 84% of the social affordable rented homes, which complies with the borough's adopted and draft dwelling size priorities (both are high priority), as well as Local Plan policies and guidance.

13.11 With regards to the intermediate affordable homes, the priority is primarily for one- and two-bedroom homes (as noted in both the adopted and draft dwelling priority tables). The 'Housing' CPG supports this, stating that a 'substantial proportion' as studio and one-bedroom homes is expected. In accordance with this, the proposed development would provide over half of the intermediate affordable homes as studio and one-bedroom dwellings (58.3%) and a sizeable minority as two-bedroom units (36.1%). In total, smaller homes would make up approximately 94% of the intermediate affordable homes, which complies with the borough's adopted and draft dwelling size priorities, as well as Local Plan policies and guidance.

13.12 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 Policy H7 of the Local Plan.

Housing quality

13.13 In line with Policy D6 of the London Plan and Policies H6, A1, A2, A4, and D1 of the Local Plan, housing should be high quality and provide adequately sized homes and rooms, maximising the provision of dual aspect dwellings. Additionally, new homes should seek to provide adequate amenity for new residents and protect that of existing residents. Homes are also expected to provide the highest standard of accessible and inclusive design.

Design and layout

13.14 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. Policy H6 of the Local Plan confirms that new residential development should conform to the Nationally Described Space Standards, and this is reflected in London Plan Policy D6, which sets the same minimum space standards in Table 3.1 (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

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

13.15 Across the site, the new residential units would meet or exceed the minimum space standards outlined above. This includes the reprovided homes at the Station House site, as well as the new homes at Heathgate and Inkerman Gardens. The new units would also have good floor to ceiling heights, with a minimum of 2.5m across the site. New dwellings are typically well laid out in with rational plan forms and useable spaces, and the majority of flats are able to provide dual aspect and private amenity space.

13.16 At the Station House site, the proposed dwellings are located at first floor level and above and the residential portion of the building is set out in a curving shape to the west of the structure around an internal courtyard. Access is provided to the units via shared external decks on both the outside and inside faces of the building, and all homes have their own secure front door. The units are served by two residential cores with two staircases and three lifts (including a firefighting lobby). There are cycle stores and bin stores located at ground level.

13.17 Due to the curved shape of the residential portion of the Station House building, 27 of the 28 dwellings are able to be dual aspect, with openings facing out towards the surrounding streets (Regis Road, Holmes Road, and the pedestrian link between) and the internal courtyard shared amenity space. The shape of the building also avoids direct overlooking and ensures

privacy for occupants, and all flats have access to private outdoor amenity space in the form of a terrace or balcony. These outdoor spaces are appropriately sized and would exceed the London Plan requirement of 5 sqm for 1-2 person dwellings (and an extra 1 sqm for each additional occupant).

13.18 The nature of the Station House building design means that there would be limited opportunities for direct overlooking, with facades angled in such a way that openings do not provide unobstructed or clear views between habitable rooms. There is also sufficient separation distance between the proposed dwellings, as well as any existing nearby properties.

13.19 At the Heathgate site, both of the two buildings are almost entirely residential, with entrance lobbies, bike stores, bin stores, and plant rooms located at the ground level. Block B (which provides the affordable housing) includes a small commercial unit intended for community use. The floors above ground level in both buildings are completely residential, with units set out around two separate cores, comprising two staircases and three lifts. These cores provide protected firefighting lobbies.

13.20 Within both Blocks A and B at Heathgate, flats are positioned around the centrally located cores, with communal corridors providing access to private and secure front doors. Within Block A, there are typically six flats on each floor, with the exception of the upper floors, which have fewer flats to allow for larger homes; in total, there are 120 flats within Block A. Within Block B, all floors have eight flats on each level, totalling 120 flats. Due to the restrictions of the building floorplates, a minority of flats would be single aspect; approximately 70% of units within Block A and 63% of units within Block B would be dual aspect. All units that would be single aspect are one-bedroom apartments, and every unit would still benefit from a balcony, allowing access to light, ventilation, and views. The orientation has also been considered so that single aspect homes are positioned not to be north facing, wherever possible. Every unit across both blocks would have access to private external amenity space, ranging in size from 5 sqm to 19.8 sqm (dependent on unit size). This complies with the London Plan requirements.

13.21 The contextual location of the two blocks at Heathgate means there is currently little opportunity for overlooking or privacy impacts to and from existing dwellings, as there are none nearby. To ensure that the two blocks avoid unacceptable impacts from overlooking between each other, the buildings have been angled and positioned so that there are no direct views between openings. Although the separation distance is relatively small between the two blocks, there are only oblique views between windows. Additionally, amenity spaces have been positioned so that they do not directly overlook one another, and it is noted that the separation distance is

not consistent due to the buildings' facades moving further apart due to the orientation of the buildings, rather than running parallel to each other.

13.22 The three blocks that make up Inkerman Gardens are mixed use, including studio space, community facilities, and commercial units, primarily at basement and ground level. Blocks A and B provide homes at ground level too, whilst Block C sits atop a podium, with residential homes starting from the second floor upwards. The bike stores, refuse stores, and plant rooms for the residential units are located at ground level or within the basements of the buildings, and all three blocks are positioned around two separate cores, each with two staircases, three lifts, and protected lobbies.

13.23 Across all three blocks of Inkerman Gardens, every dwelling has a private and secure front door, and all have access to a private amenity space, whether in the form of a balcony or a garden. These range from 5.7 sqm to 48.4 sqm, depending on unit size, which fully aligns with the London Plan requirements. In addition to private amenity spaces, all units will also have access to the communal amenity space located in the middle of the three buildings. The number of flats on any given floor of the blocks ranges from 2 to 8 and across all three blocks, there are a total of 245 homes; of these, approximately 70% of units in Block A, 61% of units in Block B, and 78% of units in Block C are at least dual aspect. All units that would be single aspect are one-bedroom apartments, and every unit would still benefit from a balcony, allowing access to light, ventilation, and views. Single aspect homes have, where possible, been oriented so as not to be north facing.

13.24 The three blocks have been oriented and angled such that there are good levels of separation and minimal direct overlooking between dwellings. At the point where buildings are closest (between Block A and B), the separation distance is still approximately 10m, which is considered sufficient for the dense urban context. The proposed flats have also all been oriented around the cores of the respective blocks such that they all benefit from a good level of outlook and avoid instances of habitable rooms and their windows directly facing each other.

13.25 Overall, the proposed homes and amenity space comply with policy and would result in a high-quality development and provision for future occupiers.

Noise and vibration

13.26 The proposed development is mixed-use in nature, and many of the residential units will be in close proximity to studio facilities and the creative space provided as part of the Camden Film Studios. In particular, the dwellings located at Inkerman Gardens would be situated above the large studio located at the basement levels, as well as multiple commercial and community space units. As such, it is expected that, particularly during

standard working hours, there could be an element of noise associated with these uses, given the processes involved and nature of the creative uses. Likewise, the dwellings at Station House are positioned directly above the reprovided Recycling and Reuse Centre, which is expected to generate noise during opening hours due to the large amount of equipment, plant, and ventilation that its use would require, this has been a concern raised by local residents.

13.27 Furthermore, the site is surrounded by uses and activities that could potentially present disturbances to new residents at the site, including the ongoing operations of Royal Mail and UPS. This also includes noise from moving trains to the north and west of the site, road noise (particularly to the east along Kentish Town Road), and noise and dust from the industrial uses at adjacent industrial sites, such as Murphy's Yard. There are also a number of large construction sites nearby that are either currently in the process of coming forward or expected to come forward in the near future.

13.28 As such, the proposed development has been designed to ensure the residential accommodation is well-protected from existing and future noise and related disturbances. This includes incorporating sound insulation throughout all elements of the building envelope, insulating internal walls and roofs/floors, utilising high performance glazing, and minimising the number of balconies and external amenity spaces facing towards noise emitting sources. The noise emitting spaces will also be sound-proofed and insulated to ensure that noise breakout is limited. All dwellings will also rely on mechanical ventilation to provide clean air when windows are closed, allowing residents to benefit from fresh air without needing to open windows and expose themselves to potential noise and disturbance. Non-physical measures will also be utilised such as management of the hours of operation of studio uses and other sources of noise disturbance. All relevant noise mitigation measures will be secured by condition.

13.29 Some balconies at the Heathgate buildings have an unscreened line of sight to railway lines, and as such would have noise levels that are generally in excess of recommended levels when exposed to passing trains. Balconies have been designed to ensure that noise levels are minimised as far as possible, including additional screening where appropriate, which is included in . Quieter shared open spaces such as the area surrounding the energy centre are available in close proximity, and the internal environments for dwellings have been carefully designed to experience minimal noise disturbance as a means of offsetting any noisier external balconies.

13.30 The Council's Environmental Health Officer (EHO) has reviewed the application and confirmed that the appropriate noise guidelines have been followed in the building's design, given its siting close to transport noise and with due regard to the relevant British Standards and World Health

Organisation guidelines. As such, it is considered that it is possible to achieve the internal noise standards for residential units – compliance with which is secured by condition ().

13.31 The impact of vibration from the railway lines has also been assessed and it is noted that this is expected to be negligible for the residential buildings. To ensure that the impact is minimised further, details of vibration mitigation will be secured by condition to ensure that suitable mitigation will be provided if necessary.

13.32 Noise emissions and vibration from mechanical plant and equipment associated with the development would be controlled by condition to be within acceptable limits .

13.33 Therefore, the dwellings are considered to be constructed to a high standard that would ensure that the occupiers are not unduly impacted by noise from either inside the buildings or outside the buildings, in accordance with the development plan.

Daylight

13.34 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 ‘Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice’ (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.

13.35 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. 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.

13.36 An Internal Daylight, Sunlight, and Overshadowing Report by Point 2 has been submitted with this application. It summarises and applies the relevant guidelines to the proposed units across the entire development. This has been reviewed for the Council by an independent third-party assessor at Lichfields Planning and Development. Lichfields raise no objection to the methodologies used in the report.

13.37 Daylight assessments have been undertaken using CBDM assessments, utilising local climatic data to review two scenarios; Scenario 1 assesses if the proposed development were to be built out with no adjacent development, and Scenario 2 assesses if the proposed development were to be built out and development were also to come forward at the adjacent (Joseph Homes) site.

13.38 In reviewing Scenario 1, the assessments show that 1342 (92%) of the 1452 rooms assessed across the proposed development will meet the BRE targets for daylight, which is a good level of provision. More specifically, Scenario 1 would see 631 (86%) of the 735 rooms at Inkerman Gardens, 639 (99%) of the 640 rooms at Heathgate, and 72 (94%) of the 77 rooms at Station House complying with the daylight targets.

13.39 In reviewing Scenario 2, the assessments show that 1216 (84%) of the 1452 rooms assessed across the proposed development will meet BRE targets for daylight which, although lower than Scenario 1, is still a good level of provision, particularly when considering the urban nature of the site and density of proposed surrounding development. More specifically, Scenario 2 would see 564 (76%) of the 735 rooms at Inkerman Gardens, 581 (91%) of the 640 rooms at Heathgate, and 71 (92%) of the 77 rooms at Station House complying with the daylight targets.

13.40 Although the residential units have been designed to maximise daylight wherever possible, the CBDM data shows that the large majority of transgressions occur where rooms are located at lower levels of proposed buildings or due to overhanging features that provide private amenity space, such as balconies and deck access. These transgressions also tend to appear in rooms such as living-kitchen-diners, which are typically deeper spaces that are more likely to experience lower lux levels further into the room. Whilst features such as private amenity space can reduce daylight penetration, they also perform important roles in the overall design strategy. Deck accesses act as buffer zones which help to separate living spaces and provide screening from sources of external noise, which reduces the direct transmission of noise into habitable rooms. Decks and balconies also help to reduce overheating. In the case of this development, wider decks would be provided that include passing space for families with buggies and wheelchair users. The provision of external amenity spaces is an important trade-off between amenity and daylight amenity when interpreting the results of the CBDM assessment, and it is considered an acceptable compromise given the transgressions are limited and necessary to allow units to benefit from private amenity space.

13.41 Some of the limitations are also to bedrooms which are not considered overly significant, as these rooms are not main habitable rooms of the homes. Restricted daylight amenity is also not uncommon for dense urban

sites such as this, so the nature of the development site coupled with the rationale noted above would mean that the level of daylight for the proposed homes is considered acceptable in this case.

13.42 As such, given the urbanised nature of the local area, and noting that this is likely to increase with forthcoming development at adjacent sites, the level of daylight for the proposed homes is considered acceptable. This includes when reviewing both scenarios for the development of adjacent sites, and takes into account the need to provide elements such as external amenity spaces and deck access.

Sunlight

13.43 The BRE guidance recommends that an interior space should receive a minimum of 1.5 hours of direct sunlight. It recommends that at least one habitable room per dwelling should meet these conditions and notes that, whilst all rooms of all orientations should be considered, rooms that face north of due east or west are unlikely to meet the recommended target, and the main requirement for sunlight is in living rooms, as it is considered less important in bedrooms and kitchens.

13.44 The Point 2 sunlight assessment demonstrates that Scenario 1 would result in 431 of the 513 residential units proposed across the entire development meeting or exceeding the BRE's target of 1.5 hours received to at least one habitable room between 1st February and 21st March. This equates to approximately 84% of all homes across the development.

13.45 Due to the site constraints and the number of units proposed across the development, it is not possible for all units to have a southerly orientated outlook, so some units will unavoidably be more challenged in sunlight availability. Within this context, the percentage of homes with sunlight exposure that exceeds BRE requirements is considered to be more than adequate, particularly given the urban location of the site.

13.46 Scenario 2 would result in 426 of the 513 residential units proposed across the entire development either meeting or exceeding the BRE's target for sunlight exposure. Compared to Scenario 1, this would mean only five additional units would not meet BRE targets, which would still leave a high proportion of 83% of all homes across the development BRE-compliant with respect to sunlight exposure. This is considered to be a good level of sunlight for proposed homes and is acceptable.

Overshadowing

13.47 The BRE guidance recommends that at least 50% of the area of any of the amenity spaces should receive at least two hours of sunlight on 21st March (the spring equinox). To assess this, a 'Sun on Ground' (SoG) assessment

has reviewed the quantum of direct sunlight reaching the proposed amenity spaces in the context of both Scenario 1 and Scenario 2.

13.48 The SoG for overshadowing demonstrates that, in Scenario 1, nine of the ten outdoor amenity spaces will receive at least 120 mins of direct sunlight on 21st March. The only area falling short of this target would be the area to the north of Inkerman Gardens, which would receive at least two hours of sunlight to 40% of its area, so slightly below the target. This is not a principal amenity space and is in close proximity to a number of other larger amenity spaces that residents can use.

13.49 The SoG for overshadowing also assesses Scenario 2, which demonstrates nearly exactly the same results, though notably would see some reductions at the Heathgate open spaces, due to the buildings that are envisaged to come forward through the Joseph Homes scheme at the adjacent site. Additionally, in Scenario 2, the full open space north-east of Inkerman Gardens would be expected to come forward, which would benefit from 100% of its area receiving at least two hours of sunlight. Although one of the amenity areas at Heathgate would no longer meet the BRE guidance, 46% of its area would still receive at least two hours of sunlight, which is very close to the 50% target. As such, the majority of the amenity spaces in Scenario 2 would still meet or exceed BRE guidance, and the only transgressions are minor. Therefore, the SoG for overshadowing demonstrated that the proposed amenity spaces would mostly comply with the BRE guidance and therefore would be acceptable.

13.50 Although the public amenity space around the Energy Centre has been slightly revised since the provision of the Internal Daylight, Sunlight, and Overshadowing Report, the results are not expected to deviate from the conclusions of the report. If anything, the south-facing slope of the open space that is now proposed at the energy centre would likely result in a larger percentage of this area receiving at least two hours of sunlight.

Accessible homes

13.51 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).

13.52 Across the entire development, the proposed homes have been designed to accommodate 10% of all dwellings as M4(3) of the Building Regulations, with 53 of the 513 homes delivered meeting this requirement. The M4(3) standard refers collectively to "Wheelchair User Dwellings". This includes Wheelchair Adaptable Dwellings under M4(3)(2)(a) (those which can be easily adapted for a wheelchair user), and Wheelchair Accessible Dwellings

under M4(3)(2)(b) (those which are fully adapted for a wheelchair user when constructed).

13.53 Additionally, each accommodation site is also compliant with the 10% target; Heathgate provides 11% of units as M4(3), Inkerman Gardens provides 14%, and Station House provides 11%. The development has also been designed to ensure level access throughout, including to communal and outdoor spaces. Conditions would secure the provision of the accessible and wheelchair dwellings .

13.54 It is noted that the provision of fully adapted wheelchair homes for those in affordable housing, where occupants are more likely to be disabled (a protected characteristic under the Equality Act), would benefit disabled residents and enable a more inclusive community.

Conclusion

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

14. EMPLOYMENT AND SOCIAL VALUE

Policy context

14.1 Policies E1 and E2 of the Local Plan seek to ensure that development proposals provide employment and training opportunities for local residents and create the conditions for sustainable economic growth and to promote a successful and inclusive economy in Camden. This includes through providing sufficient employment space for businesses, supporting SMEs and providing employment and training schemes as part of proposals.

14.2 These policies of the Local Plan are supported by CPG ‘Employment sites and business premises’, which sets out that the Council will utilise Section 106 legal agreements to secure local employment and training initiatives including the provision of affordable workspace.

14.3 The proposed development is for a mixed-use scheme, the creation of the Camden Film Studios is an important component and will be a significant new employment site for the creative and cultural sector. The studios are expected to generate a substantial number of jobs, both directly and indirectly and through both the construction and post-construction phases.

14.4 As set out in the ‘land use’ section of this report, the scheme involves a loss of existing low density, low job number existing industrial space, but a significant increase in new industrial floorspace and jobs through the creation of the film studios, as well as ancillary uses throughout. The

applicant team has engaged in discussions with the Council's Inclusive Economy Team both at pre-app and during the course of the application to ensure that the development delivers benefits relating to employment, training, and social value in line with planning policy. It is important that local residents and businesses benefit from the proposed development (if permission is granted). The following section outlines the commitments that have been made as part of the application, as well as noting where further details are required and are to be secured through planning obligations that form part of the Section 106 legal agreement.

During construction

Apprenticeships

14.5 The applicant will be expected to recruit one construction apprentice, paid at least London Living Wage, for every £3million of build costs (or every 1,000sqm GIA new build) 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. With an estimated build cost of £720 million across the entire development, this would result in a requirement for 240 construction apprentices and a £408,000 support fee.

14.6 Given the significant number required, officers have advised that when providing construction stage apprenticeships, they would accept roles throughout the construction supply chain, rather than insisting on specific construction opportunities. Apprenticeships that are related to the built environment will also be acceptable, such as architecture, planning, and community engagement roles. This requirement would be set out in the Section 106 legal agreement.

Construction Work Experience Placements

14.7 The applicant will be expected to provide construction work placement opportunities of not less than 2 weeks, to be undertaken over the course of the development construction. These would be recruited through the Council's Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG. The final number of construction work experience placements is calculated to be 284, which is calculated based on the net additional employment floorspace and the net additional housing, which have requirements for 260 and 24 placements, respectively. This will be secured as part of the Section 106 legal agreement These figures are based on the net uplift of employment floorspace and housing units, with one placement required per 500sqm of net additional employment floorspace and additional 20 housing units, in line with the 'employment sites and business premises' CPG.

14.8 The partner overseeing housing construction, Places for People (PfP), has additionally set out that it will provide further work experience and apprenticeships opportunities. Their approach includes support apprenticeships for women, residents from ethnic minority backgrounds, and those with a disability, which is strongly supported, as well as engagement with local schools, such as Parliament Hill School, Camden School for Girls, Acland Burghley School, William Ellis School, and Regent High School. This engagement would include career talks, site visits, CV workshops, and design competitions, with a minimum of four school events delivered annually. PfP's offer of 10 work placements to those aged 14-18 years old and their collaboration with the Euston Skills Centre to promote career pathways and training opportunities is welcomed and would form part of the agreement secured by Section 106 legal agreement.

Local Recruitment and Procurement

14.9 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. Section 61 of the 'Employment sites and business premises' CPG also sets a local procurement target of 10% of the total value of the construction contract.

14.10 The Employment and Training Strategy (ETS) submitted with the application confirms a commitment to Camden's standard local recruitment opportunities in the construction phase, which is welcomed. However, the ETS does state that the target for local recruitment is 10%, which is incorrect, as the benchmark is 20% established by the Construction Industry Training Board (CITB). Therefore, the total number of local construction jobs will not be 110 (as given in the ETS), but 218, as this is 20% of the expected average construction workforce of 1,090 jobs.

14.11 As per the CPG requirements outlined above, the applicant must also sign up to the Camden Local Procurement Code. The ETS confirms that the standard local procurement approach will be followed, and sets a target of 20% local procurement, which exceeds the policy requirement. This will be achieved through consultant appointments, sponsorships, local supplier events, and one 'Meet the Buyer' event to support SME in tendering for contracts. The Council's Inclusive Economy Team will liaise with and assist the developer to provide details of local suppliers and subcontractors. The local recruitment and procurement targets will be secured by S106 legal agreement.

Construction phase summary

14.12 The commitments during the construction phase outlined above would be secured as part of an Employment and Training (Construction Phase) Plan, which would be secured by Section 106 legal agreement . In summary, this would include:

- 240 construction apprenticeships.
- £408,000 construction apprenticeship support fee.
- 284 work placements.
- PfP additional offer for 10 work experience and apprenticeships targeted at women, ethnic minority groups, disabled and engagement with schools.
- 20% local employment target (218 jobs in total).
- 20% local procurement.
- School engagement programme (including minimum of 4 annual events).

End use / Occupation phase

14.13 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements. The CPG advises that this applies to major commercial developments which will result in a net increase of 1,000sqm (GIA) or more of employment space including office, hotel, and leisure developments.

14.14 The proposed development includes the provision of 97,562sqm of commercial floorspace, which includes a mixture of uses such as film studios, a visitor attraction, a hotel, and a café/restaurant. Although these vary in their designated use class, they are all commercial and employment-generating in nature.

Employment, training, and education

14.15 The applicant's submitted ETS confirms that, in terms of direct employment, the proposed development would provide 3,775 full-time equivalent jobs in the occupation phase of development. These would be spread across the multiple uses, though a sizeable minority (31%) would be expected to come directly from the film production supporting spaces.

14.16 Given the figure of 3,775 direct FTE jobs and in accordance with the formula given in section 73 of the 'employment sites and business premises' CPG, the development would trigger an employment and skills contribution of £1,108,463. This money would help support initiatives that create and promote employment and training opportunities in Camden and would be secured by Section 106 legal agreement .

14.17 The ETS commits to the delivery of end use apprenticeships, internships, T Level placements, and work experience placements. It is also targeted for an appropriate level of FTE job opportunities to be filled through local employment. Although exact figures for these targets are not provided in the ETS, the officers have negotiated the following package of occupation stage employment measures in line with policy, all of which would be secured for 10 years following first occupation of the Film Studios and would include:

- 5 x apprenticeships per year;

- 5 x paid work experience / internship opportunities per year – these are to be ring-fenced for Camden Youth Mission priority cohorts (i.e. care-experienced young people, disabled young people, young people involved in the youth justice system);
- 5 x T-Level placements per year;
- Annual STEAM work-experience week reaching 100 students;
- 5 x unpaid work experience placements for over 18-year-olds per year;
- Agree a bespoke STEAM Pledge with Camden that focuses on engaging youth with the creative industries and providing opportunities for experience and placements; and
- Recruit locally through Good Work Camden (GWC) and commit to a target of 20% local employment at occupation stage across the whole site.

14.18 The above commitments would include occupier participation mechanisms including lease obligations and/or operator commitments, as well as formal monitoring and reporting to ensure that the targets are kept to. In addition to this, a Programme Manager would be appointed to coordinate occupiers and ensure that the occupation-phase obligations are successfully delivered. They would effectively serve as the operational link between the site-wide occupiers/operator partners and Camden Council, and their appointment and retention would be secured as part of the Section 106 legal agreement.

14.19 The education-led occupation targets and commitment to support post-16 vocational pathways is strongly supported. Early engagement with schools would be encouraged to ensure and encourage future student uptake.

14.20 A key part of the proposed development is providing a Camden location for the National Film and Television School (NFTS), which is currently mainly located in Buckinghamshire, with a small base in London. The proposed development would provide a dedicated campus in close proximity to operating film studios and would allow for the creation of a dedicated Film & TV Careers Hub, in association with the London Screen Academy (LSA).

14.21 The Film & TV Careers Hub would be supported, though it is assumed that the offer would be wider than Camden, with courses and places offered nationally. As such, the Council would look to secure a minimum offer for Camden, including ring-fenced opportunities for Camden residents and engagement with local schools, alongside establishing borough partnerships. The ETS also notes that a bursary scheme will be in place for the NFTS to support local students to access postgraduate creative education, as well as apprenticeships in the film and television industry. Both of these offerings would be strongly supported and secured as part of the planning obligation for the occupation-phase offering.

14.22 Although the ETS targets five schools in particular, all ten secondary schools within the borough should be included in events to enable inclusivity across the whole of Camden. Primary and special schools should also be recognised in engagement, which would equate to an additional 45 schools. Therefore, the applicant should be aiming to accommodate the participation of 55 schools in total across the range of activities in-school and at the site through access and outreach work, and this target would be secured as part of the Section 106 legal agreement.

14.23 The specific commitment in the ETS to T-Level placements with Acland Burghley School for Media and Broadcasting is welcomed, however flexibility should be provided to allow that courses and school provision can change and expand. To ensure a long-term and equitable approach across the borough, the planning obligation securing the employment and training plan would specify that T-Level placements would be from across Camden schools and in a multitude of creative and business subjects, with this commencing with Media and Broadcasting at Acland Burghley School.

14.24 As part of the STEAM pledge, the ETS notes that an annual Year 12 work experience and open day will be provided; whilst this is very positive, the Council's Inclusive Economy team have advised that there is an increasing demand for work experience opportunities for Year 10 students, as well as bespoke or tailored placements. Therefore, the final pledge will also include placements and opportunities for this age group.

Affordable workspace

14.25 Given the substantial increase in commercial floorspace, Policy E2 of the Local Plan and the 'employment sites and business premises' CPG make clear that the development would also be required to contribute to the provision of affordable workspace.

14.26 The ETS states that the proposed development will offer affordable workspace for SMEs and artists alongside a community use bookings policy. Whilst the commitment has been made, limited details of the affordable workspace offer have been provided. It is important that the affordable workspace offering includes creative space that is able to accommodate things like rehearsals and exhibitions, rather than just desk/office space. It has been agreed with the applicant that the affordable workspace will be accommodated within 'The Beehive', which forms part of the Film Studios building (specifically the central glazed portion of the building). 10% of The Beehive's creative workspace will be reserved as affordable workspace for Camden-based SMEs and local creative enterprises. The detailed unit distribution and specification will be confirmed as part of the Section 106 legal agreement, but this will have to provide, at a minimum, 10% of The Beehive's floorspace as affordable, which is 1,019 sqm.

14.27 With respect to the level of discount, the Camden benchmark is 20% of the space at 50% market value, though this can be adapted, dependent on the site context. The Council is willing to accept a smaller quantum as the applicant has proposed, however it would need to be at a larger discount, especially if the space offered is designed for creative SMEs and artists, which is what would be assumed given the cultural focus of the development. Given that the amount of affordable floorspace is approximately 10%, the discount would be expected to larger to ensure that the policy requirement is met.

14.28 The London Affordable Artists Studio Network have recently proposed a formula for calculating the cost of artists' studios (which is likely to be the use of the affordable workspace). That model looks at artists' studio derived incomes, suggesting that no more than 20% of income should go towards property/studio costs and that the average studio size of 335sqft. At the lowest income estimates (i.e. where affordability is most needed) this results in a monthly cost of £228pcm. The final agreed discount for the affordable workspace would be expected to be roughly in line with this level of reduction.

14.29 It is also noted in the ETS that the scheme will deliver a co-working space as part of the NFTS building intended for education use. The listed 'Station House' is also proposed to provide education/community space. Both of these locations present an opportunity to provide additional affordable workspace (particularly for different types of affordable workspace, such as studio or rehearsals space). Whilst, these would be in addition to the accepted AWS offer, securing additional affordable workspace at either or both of these locations is welcomed and this would also be discussed with the Council's Inclusive Economy team and secured as part of the Section 106 legal agreement as appropriate.

Occupation phase summary

14.30 The commitments during and throughout the occupation phase outlined above would be secured as part of an Employment and Training (Occupation Phase) Plan, which would be secured by Section 106 legal agreement . In summary, this would include:

- Employment and Training Contribution of £1,108,463;
- Programme Manager for occupation phase obligations
- 20% locally employed jobs
- 5 x end use apprenticeships
- 5 x end use work placements
- 5 x T-Level placements
- Annual STEAM work experience
- 5 x unpaid work experience for >18 year olds
- Film and TV Careers Hub

- Bursary scheme for local students
- Outreach programme with 55 schools
- Bespoke STEAM pledge;
- Affordable workspace provision – 10% (1,019 sqm) of 'Beehive' space reserved for local creative SMEs and artists, discount based on 20% of artist studio income.
- Co-working hub within film studios for NFTS graduates
- Potential for additional affordable housing in Station House.

Business retention and relocation

14.31 The applicant has provided a 'Business Retention and Relocation Strategy', as previously discussed in earlier sections of this report. This document sets out how the proposed development will seek to manage existing businesses that would potentially be displaced by the development in order to ensure that any relocation would not negatively impact their operations.

14.32 It should also be noted that the Council's economic needs assessment (December 2023) indicated that the demand for industrial space in Camden is expected to decline. Notwithstanding the matters discussed in Section 9 of this report regarding the principle of developing industrial land, it is considered that the retention of industrial space in the form that currently exists at the site is not critical.

14.33 The Retention and Relocation Strategy gives a clear approach as to how the various businesses existing at the site have been considered and engaged with, noting their specific requirements, vulnerabilities, and functions. Each business is assessed to consider whether retention is feasible (or desirable) or if relocation will be required. It is expected that most businesses will be most appropriate to be relocated, in which case options for relocation in the nearby area have been explored. This strategy will be secured by section 106 legal agreement to ensure that businesses onsite are appropriately managed (including relocation, where applicable) without negatively impacting their operation or the local economy.

Conclusion

14.34 The measures outlined above would be included in separate Employment and Training plans for the construction and occupation phases of development, respectively. These would each be secured by the Section 106 legal agreement, and an overall Employment and Training Strategy for the entire site would be secured by a separate obligation to ensure the long-term commitment to the significant benefits that would be delivered. The scheme has been reviewed by the Council's Inclusive Economy team, whose view is that the package of education, employment, and training benefits represents a significant opportunity for Camden's residents to build careers in this important sector responding to the requirements of policy and guidance.

15. IMPACT ON NEIGHBOURING AMENITY

Policy context

15.1 Policies A1 and A4 of the Camden Local Plan and the 'Amenity' CPG are relevant with regards to the impact on the amenity of existing and proposed residential properties. In this case it also necessary to consider the potential impact on homes which are expected to come forward in the surrounding area in accordance with the site allocation. Consideration must be given to the impact of development on light, outlook, privacy, and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section of this report, in Section 18. The thrust of the policies is that the quality of life of current and future occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused. Development should not jeopardise the ability to bring forward good quality new homes on adjacent development sites, as this would prohibit the Council achieving comprehensive redevelopment of the Regis Road site.

15.2 Policy D9 of the London Plan relates directly to development involving tall buildings, and states that daylight and sunlight conditions in the neighbourhood must be carefully considered where these are proposed.

Daylight, sunlight, and overshadowing

15.3 A Daylight, Sunlight, and Overshadowing Report has been submitted as part of the application, which details any impacts upon neighbouring properties. Additionally, Chapter 12 of the Environmental Statement assesses the impact of the proposed development on daylight, sunlight, overshadowing, and solar glare.

15.4 The technical information in the daylight, sunlight, and overshadowing report, as well as the methodology, has been reviewed for the Council by an independent third-party assessor, Lichfields. The Environmental Statement has been separately reviewed by Land Use Consultants (LUC).

15.5 The development plan supports the use of Building Research Establishment (BRE) guidance for assessment purposes, however it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement. The BRE provides the leading industry guidelines on daylight and sunlight, published in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE).

15.6 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

15.7 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:

- **Vertical Sky Component (VSC)** – 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

15.8 The BRE guidance recommends using significance criteria to allow for a clearer understanding of what and where the most significant impacts are, as set out in the table below. This is the approach recommended by BRE guidance in the case of EIAs and the council's independent assessor has endorsed the approach, with officers using the criteria in the table below, which is also outlined in paragraph 3.5 of the opinion report.

BRE compliant (≤ 20% reduction)	20.1% to 30% reduction	30.1% to 40% reduction	More than 40.1% reduction

Negligible	Minor Adverse	Moderate adverse	Major adverse

Impact criteria

15.9 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context. This approach is supported by the London Plan; the London Plan Housing SPG states that:

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

15.10 BRE guidance suggests that alternative targets for skylight and sunlight access may be adopted where there is a need to take account for urban contexts, for example basing these targets on street width to building height instead. In reviewing the submission documentation, Lichfields have advised that their assessment of significance is based solely on standard BRE targets, remaining a predominantly numeric application of BRE guidance with determination of the appropriateness of alternative values left to the Local Planning Authority.

15.11 The daylight and sunlight chapter of the environmental statement does acknowledge that alternative target values have been used in a number of planning appeals and recent planning consents within Camden, noting that these establish the acceptability of more significant light loss within the context of an urban location. It is claimed that retained VSC levels in the mid-teens are considered to be acceptable for an urban location and alternative target values are commonly recorded within such places in London.

15.12 Although the development site is currently a low-density industrial area, it is allocated for higher density development by the Camden Local Plan, in order to deliver a large number of homes, alongside employment uses. As such, a lower than standard retained VSC value of between 15-20% would be considered appropriate for the context of the site, irrespective of the existing lower density; whilst the lower targets that are specific to much denser urban areas are not representative of the wider context of the site as currently exists, they are appropriate when considering the allocations for the site and surrounding areas. These targets are also consistent with those that have been applied to other schemes in Camden.

15.13 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 summary

15.14 The reports that have been assessed consider the impact of the proposed development on 87 neighbouring properties where natural light impacts on occupants may be noted. Just over 1 in 10 of the tested properties (13%) would see either 'Moderate Adverse' or 'Major Adverse' effects.

15.15 The assessments have also considered the impact resulting from different scenarios; the main assessment (Scenario 1) measures the impact from the proposed scheme in isolation, but the impact from the proposed scheme in combination with the development of the adjacent Joseph Homes Masterplan scheme is also assessed (Scenario 2). The applicant has relied on an iteration of the design at a point in the pre-app process that could be subject to further review.

15.16 The baseline (existing position) demonstrates that:

- 20 (23%) of the 87 properties tested will meet both the VSC and NSL base daylight criteria (27% VSC and 80% of each room seeing direct sky view);
- 32 (73%) of the 44 tested properties will meet the base sunlight criteria (25% APSH of which 5% occurs in winter);
- 20 (56%) of the 36 amenity spaces tested will comply with the BRE report guidance (50% of area sees 2 hours of sunlight access on 21 March).

Scenario 1 – Proposed development only

15.17 In summary, the studies show that the Scenario 1 scheme would result in the following impacts:

- 875 (78%) of the 1120 windows tested will meet BRE Report guidance for VSC;
- 710 (89%) of the 795 rooms tested will meet BRE Report guidance for NSL;
- 146 (98%) of the 149 rooms tested will meet BRE Report guidance for APSH.

15.18 Overall, the analysis of Scenario 1 therefore shows that:

- 63 (72%) of the 87 properties studied will comply with BRE Report daylight (VSC and NSL) criteria ('Negligible' effect);
- 43 (90%) of the 44 properties will comply with sunlight (APSH) criteria ('Negligible' effect).

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

- 76 properties will see either a 'Negligible' or 'Minor Adverse' effect;
- 5 properties will see a 'Moderate Adverse' effect;
- 6 properties will see a 'Major Adverse' effect.

Scenario 2 – Proposed scheme plus adjacent 'Joseph Homes' masterplan development

15.20 In summary, the studies show that the Scenario 2 scheme would result in the following impacts:

- 600 (54%) of the 1121 windows tested will meet BRE Report guidance for VSC;
- 670 (85%) of the 793 rooms tested will meet BRE Report guidance for NSL;
- 141 (96%) of the 147 rooms tested will meet BRE Report guidance for APSH.

15.21 Overall, the analysis shows that:

- 29 (33%) of the 87 properties studied will comply with BRE Report daylight (VSC and NSL) criteria ('Negligible' effect);
- 41 (93%) of the 44 properties tested will comply with sunlight (APSH) criteria ('Negligible' effect).

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

- 49 properties will see either a 'Negligible' or 'Minor Adverse' effect;
- 12 properties will see a 'Moderate Adverse' effect;
- 26 properties will see a 'Major Adverse' effect.

15.23 Although 13% and 44% of properties would see either 'Moderate' or 'Major' adverse effects in Scenario 1 and Scenario 2, respectively, this level of impact is not unusual or unexpected given the significant change in height and form between the current low-density site and the proposed development. Whilst the Scenario 1 impact is reasonably limited, the Scenario 2 impact is considered significant.

15.24 With regards to sunlight access to amenity spaces, Scenario 1 would have very limited impact, with only one space (Garden 2, 13 Arctic Street) experiencing a meaningfully significant impact. However, Scenario 2 would result in a greater number of significant effects, with 'Major Adverse' impact recorded at 13 Arctic Street, 13 Spring Place, and 15 Spring Place. Although these impacts are more significant, the areas would still benefit from good sunlight access in the summer months, and the effects, whilst noteworthy, are not considered to require mitigation.

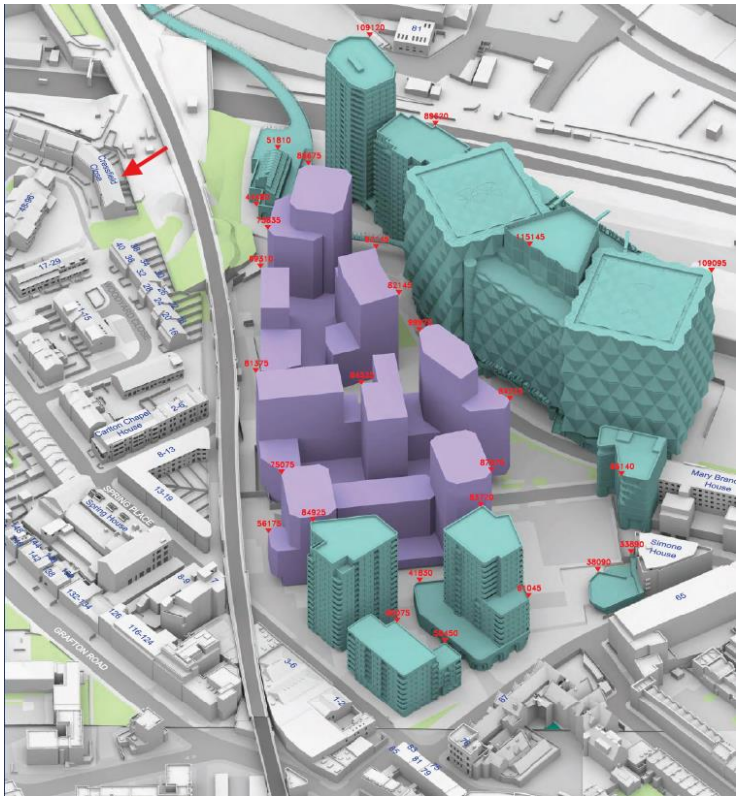
15.25 Additionally, the most significant of these impacts are focussed on a small group of properties located around the edge of the site, primarily over the rail viaduct. Officers have identified the conflicts with Policy A1 in relation to these buildings, which are assessed below.

Daylight and sunlight impacts

15.26 As noted above, most of the surrounding properties would be compliant with BRE guidelines and would only experience a negligible or minor adverse impact, and are therefore not discussed further. The remaining buildings that include properties that would experience a moderate or major adverse impact as a result of Scenario 2 (considered to be the 'worse case' scenario) are discussed below, although it should be remembered that this application only seeks permission for the works which for Scenario 1.

69-101 Cressfield Close

15.27 This building is located to the west of the Heathgate site over the rail lane and is primarily oriented with the rear of properties facing eastwards. With respect to daylight, 18 out of 30 windows (60%) that have been assessed with regards to daylight would meet the strict application of the BRE Guidelines. The building does not contain windows or rooms that have an orientations within 90 degrees of due south, so sunlight is not assessed.

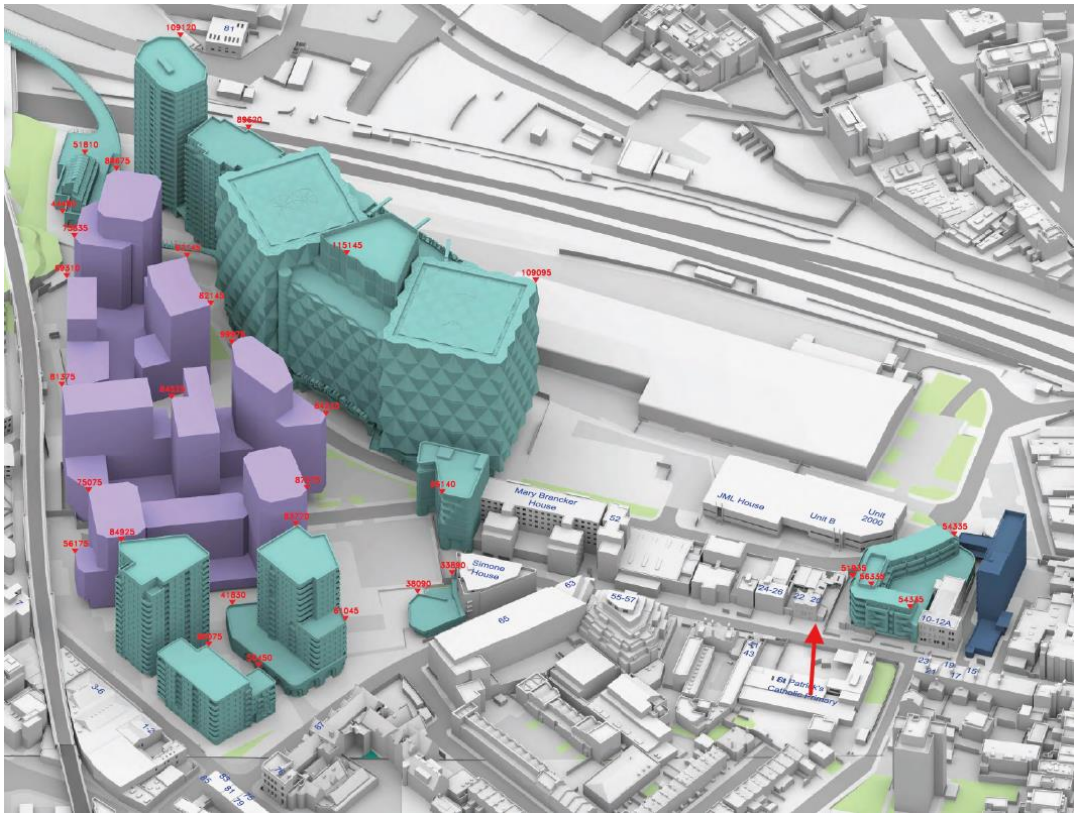


Cressfield Close properties shown with a red arrow above

15.28 Of the 12 windows that do not meet the BRE Guidelines for daylight, 8 are considered minor adverse and therefore not significantly impacted. The remaining 4 windows record alterations that would be considered moderate adverse, though the average retained VSC for each respective room that is served exceeds 18%. It should also be noted that these 4 windows are all either recessed or heavily overhung by the floor or eaves above. As such, this self-constraining design feature does affect the daylight tests; when omitted (as with a 'no-balcony' exercise), the windows all record full BRE compliance, so the impact should instead be considered minor adverse.

20 Holmes Road

15.29 This building is a semi-detached property that is situated immediately to the west of the Station House site. 15 of the 20 windows (75%) assessed meet the strict application of the BRE Guidelines. The overall sunlight effect of the proposed development on the property records full BRE compliance.



20 Holmes Road shown with a red arrow above

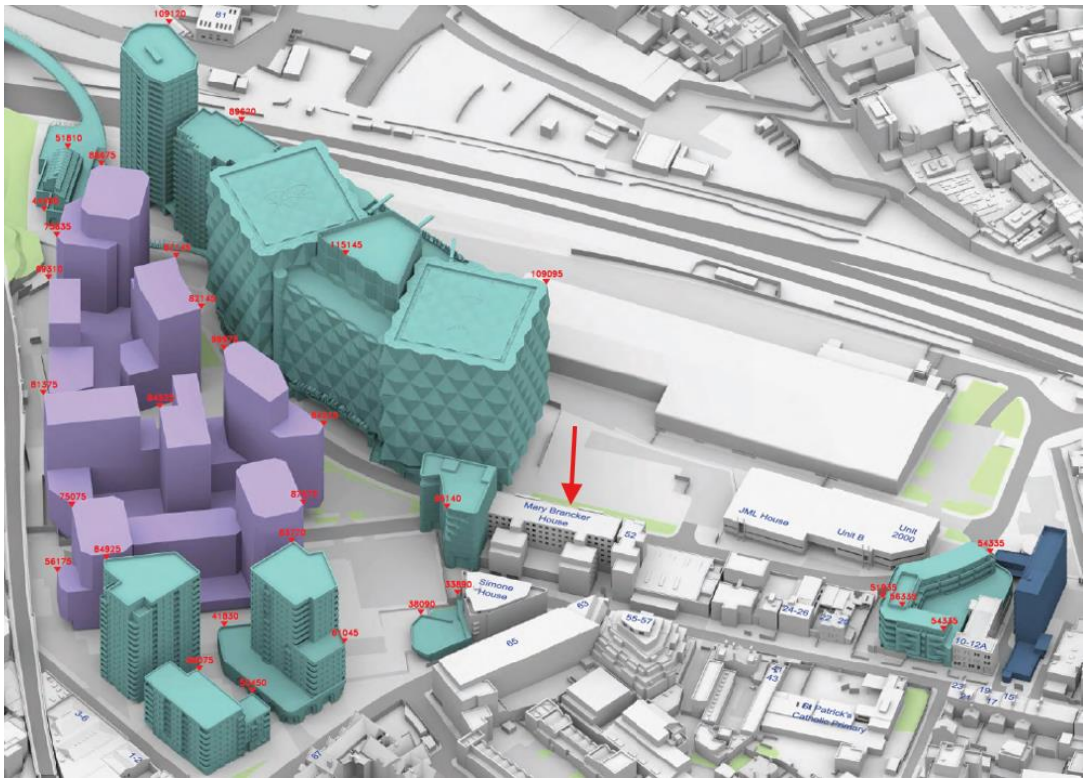
15.30 Of the 5 non-compliant windows, 3 serve rooms to which the main window either meets BRE guidelines or retains a VSC in excess of 20%, meaning the impact to these rooms would not be significant. The 2 remaining affected windows would experience a moderate adverse impact, though both serve the same kitchen.

54-74 Holmes Road – Mary Brancker House

15.31 This building is a student housing block located on Holmes Road to the southeast of the Film Studios building. The building includes a number of windows facing towards the School Building and Pavilion site, as well as others to the north that are close to the Film Studios building (though not directly facing it). It should be noted that student accommodation tends to host more transient occupiers, so impact on amenity is generally given less weight than to permanent residential.

15.32 Of the 214 windows considered, the VSC assessment shows that 121 of them (57%) will meet the strict application of the BRE Guidelines. A further 59 windows retain a VSC in excess of 18%, which would be considered a minor adverse effect. The remaining 34 windows record VSC levels below 18%, with the worst performing window recording a VSC level of 1.1%. However, it is worth contextualising that the design of the building means that the windows that are most affected are mirrored on the opposite side of the building (facing in the opposite direction to the proposed development), where the existing situation means that these windows record values as low

as 2.7%. Therefore, the proposed development would result in a daylight impact that is broadly comparable to the existing context at the opposite side of the building. Nonetheless, the aforementioned 34 windows would see major adverse impacts in terms of daylight.



Mary Branker House shown with a red arrow above

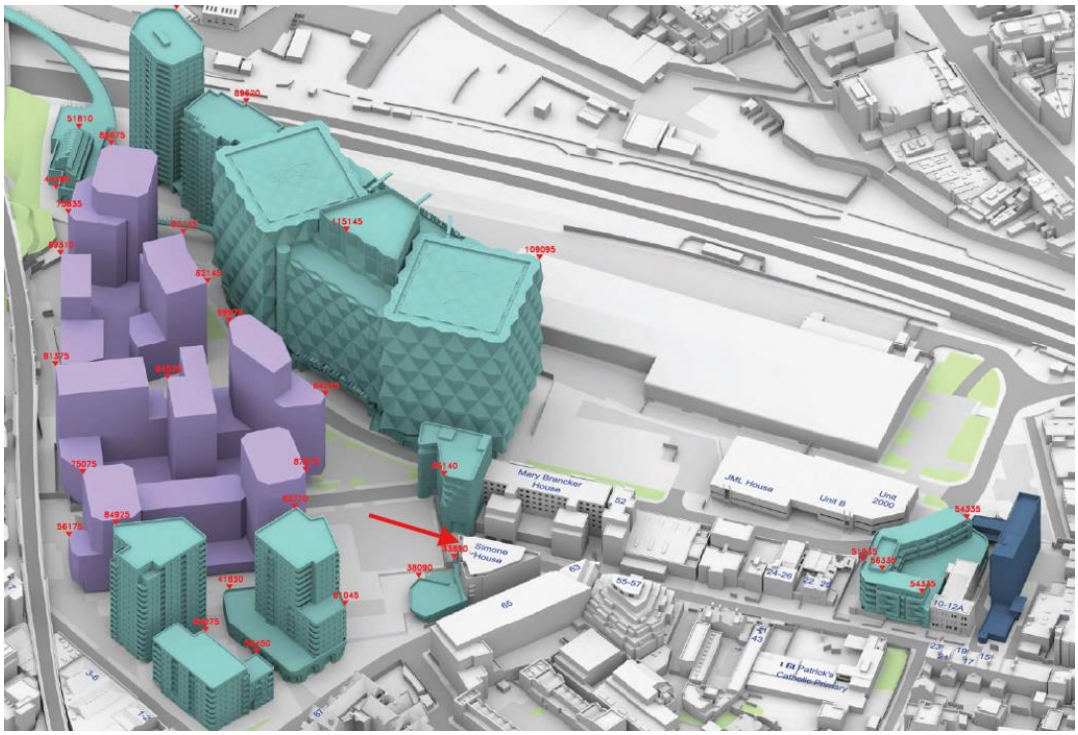
15.33 The result of the NSL assessment demonstrates that 149 of the 192 rooms assessed (78%) will meet the strict application of the BRE guidelines. Of the 43 affected rooms, 24 will retain a daylight distribution exceeding 50% of the working plane within the room, which is not uncommon for urban environments such as this. It should also be noted that all affected rooms are bedrooms, which is a use that is recognised to have a lower requirement for natural light compared with main living spaces. Nonetheless, 19 rooms would see major adverse impacts in terms of daylight.

15.34 The results of the APSH demonstrate that 5 of 7 rooms tested (71%) would meet the strict application of the BRE guidelines. The remaining 2 rooms would fall below the criteria and would experience major adverse impacts with respect to sunlight.

74A Holmes Road – Simone House

15.35 The building is a residential block located to the northeast of the Inkerman Gardens site and immediately adjacent to the Pavilion building. Of the 36 windows tested through VSC assessment, 5 windows (14%) would meet the strict application of the BRE Guidelines. Of the 31 non-compliant windows, 29 would retain VSC values in excess of 18%, which is considered not to be

a significant impact. The remaining 2 windows record VSC values below 18%, meaning that there would be a moderate adverse impact for these.



Simone House shown with a red arrow above

15.36 It should be noted that the VSC assessment shows Scenario 2 to result in 4 additional transgressions not experienced in Scenario 1, however the individual windows all retain VSC values exceeding 18% and the significance criteria is therefore the same for both scenarios. For clarity, the figures given above are for Scenario 2.

15.37 The NSL assessment demonstrates that 18 of the 30 rooms within the building (60%) will meet the strict application of the BRE guidelines. Of the 12 rooms not meeting these guidelines, 7 are bedrooms that therefore carry less expectation for natural light due to their use. The remaining 5 affected rooms are living-kitchen-diners, and record percentage alterations from 20% to 40%, meaning they would experience major adverse impacts.

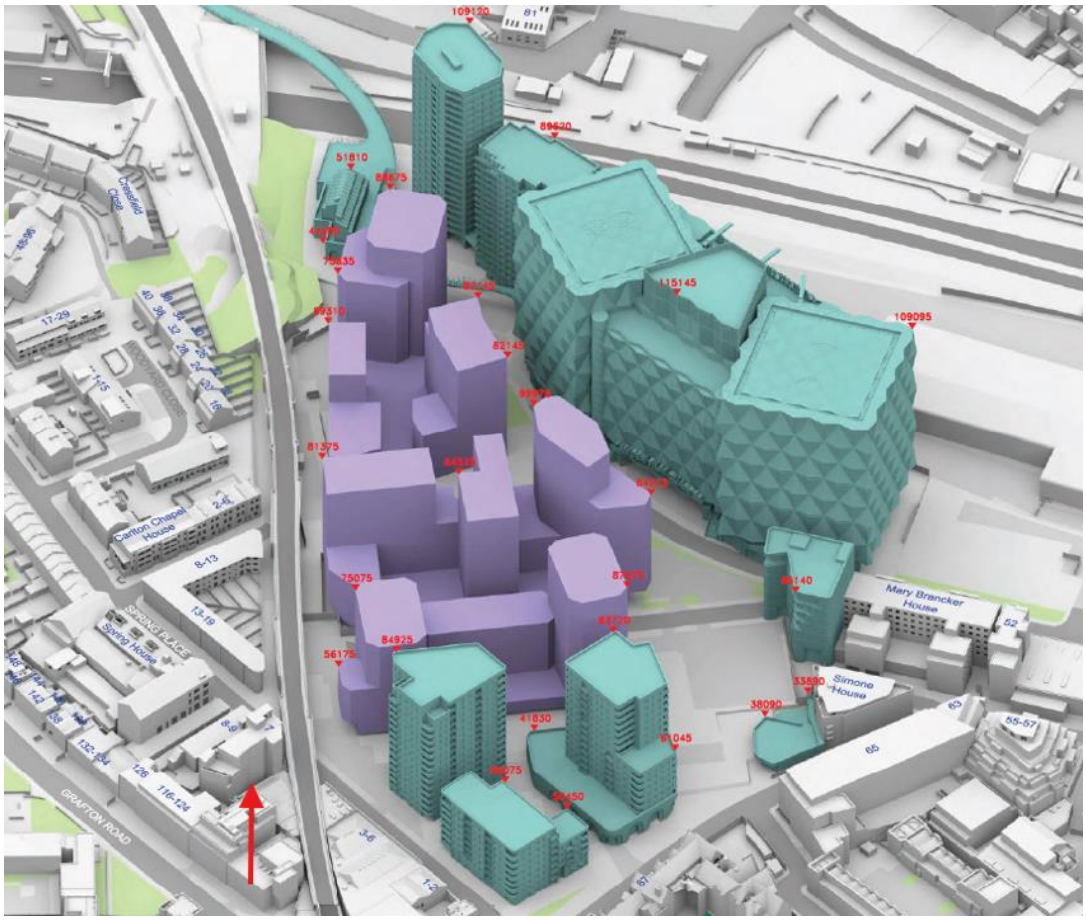
15.38 With respect to sunlight, the APSH assessment records full BRE compliance for this building.

7 Spring Place

15.39 This building is a residential block located over the rail viaduct/bridge to the immediate west of the Inkerman Gardens site and is oriented such that one of its elevations faces directly towards the proposed development.

15.40 Of the 14 windows assessed with regards to daylight, 3 windows (21%) would meet the strict application of the BRE guidelines, with 6 of the 11

affected windows meeting the criteria for a minor adverse impact. As such, 5 windows would record retained VSC values from approximately 13% to 17%. The result of these transgressions mean that these 5 windows would see moderate or major adverse effects.



7 Spring Place shown with a red arrow above

15.41 The results of the NSL assessment show that 1 of the 13 rooms tested (8%) would meet the strict application of the BRE guidelines. However, 9 of the 12 affected rooms retain a daylight distribution in exceedance of 50%, which is not uncommon for an urban site such as this. The remaining 3 rooms would see major adverse impacts.

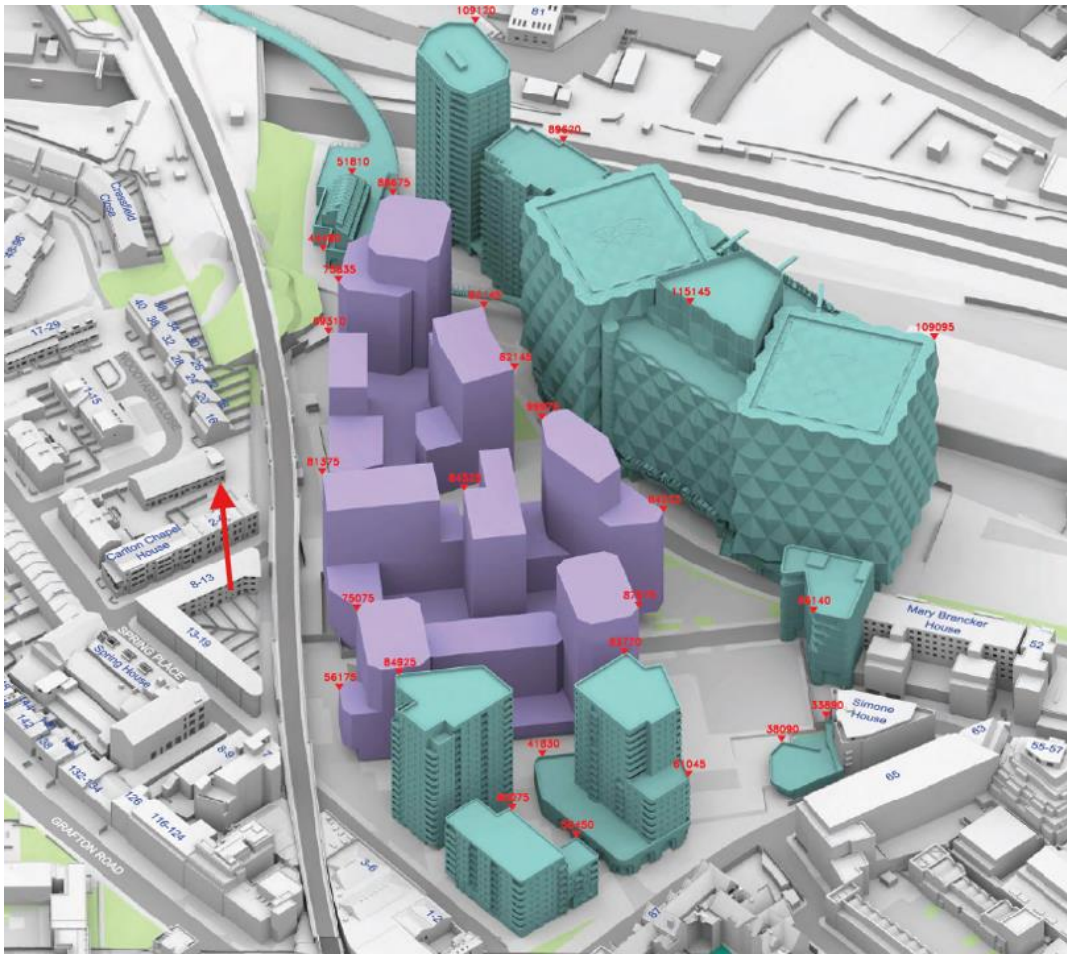
15.42 None of the rooms have an orientation within 90 degrees of due south, so none have been tested by an APSH assessment.

14 Woodyard Close

15.43 This building is an end-of-terrace residential house located to the west of the Heathgate and Film Studios sites over the rail viaduct. It is oriented with its rear elevation facing south, towards the Inkerman Gardens site.

15.44 Of the 6 windows assessed through a VSC assessment, 2 would meet the strict application of the BRE guidelines; of the 4 affected windows, 2

windows serve the same room and retain VSC values exceeding 20%, so would be considered as experiencing a minor adverse impact. The other 2 windows serve separate rooms and retain VSC values of 16%. They would therefore each experience moderate adverse impacts.



14 Woodyard Close shown with a red arrow above

15.45 The NSL assessment demonstrates that 3 of the 4 habitable rooms will meet the strict application of the BRE requirements. The only room that does not meet the guidelines would record a percentage change in NSL of 21%, which would be a minor adverse impact. Nonetheless, the property would still experience moderate adverse impacts given the VSC changes.

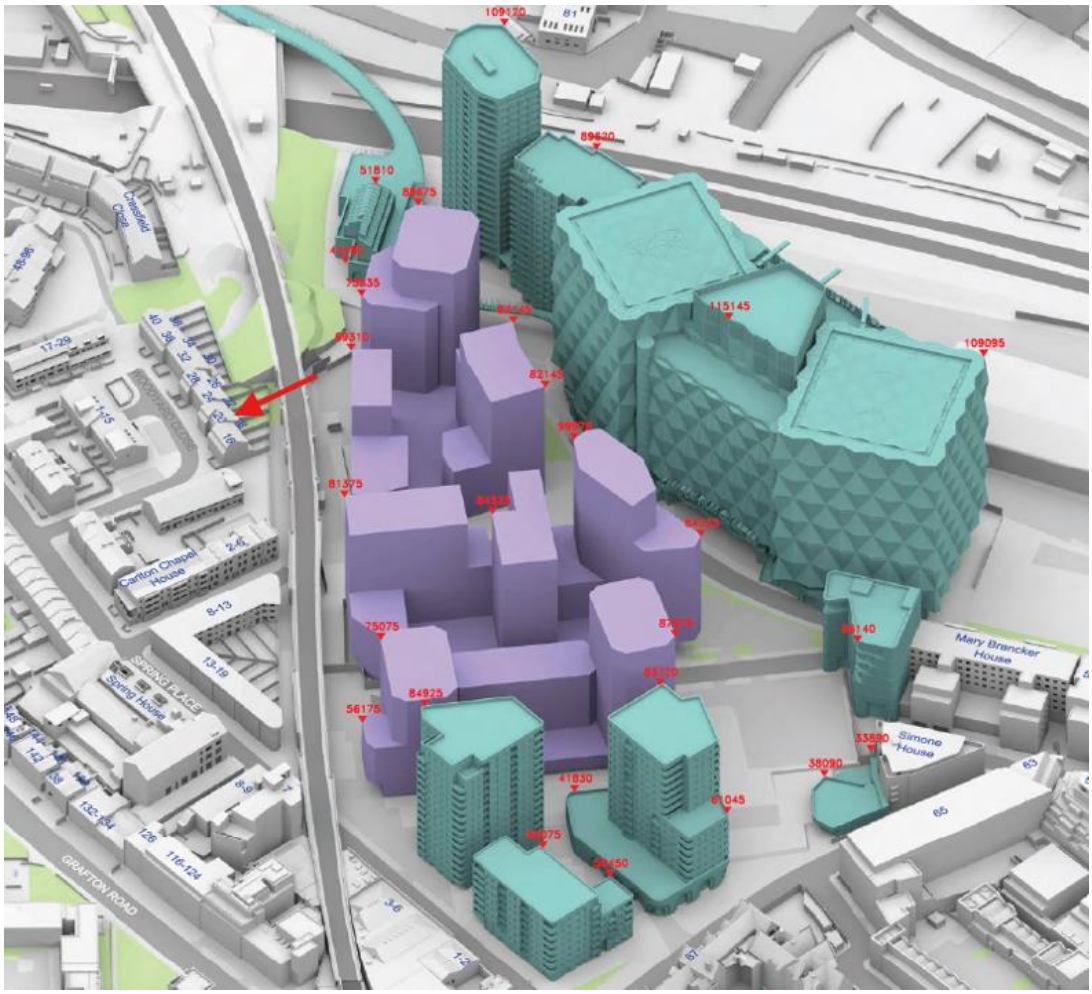
15.46 With respect to sunlight, the APSH assessment records full BRE compliance for this building.

20 Woodyard Close

15.47 This building is a terraced residential house located to the west of the Heathgate and Film Studios sites also above the rail viaduct. It is oriented with its rear elevation facing towards the proposed development.

15.48 2 windows have been assessed with regards to daylight, and the VSC assessment shows that neither would meet the strict application of the BRE guidelines. Both windows serve the same room, and though neither meet the aforementioned criteria, one window does retain over 18% VSC. In accordance with the BRE guidelines, as the affected window adjoins the compliant window, the effects are considered to be minor adverse and therefore not significant.

15.49 The NSL assessment demonstrates that the single room that is assessed would not meet the strict application of the BRE guidelines. The affected room would see a loss exceeding 40%, which means that the 1 room would see a major adverse effect in terms of NSL.



20 Woodyard Close shown with a red arrow above

15.50 The property does not have rooms with an orientation within 90 degrees of due south, so an APSH assessment has not been carried out.

Overshadowing impacts

15.51 The proposed development would impact a number of amenity spaces in the surrounding area, four of which would record significant effects, ranging

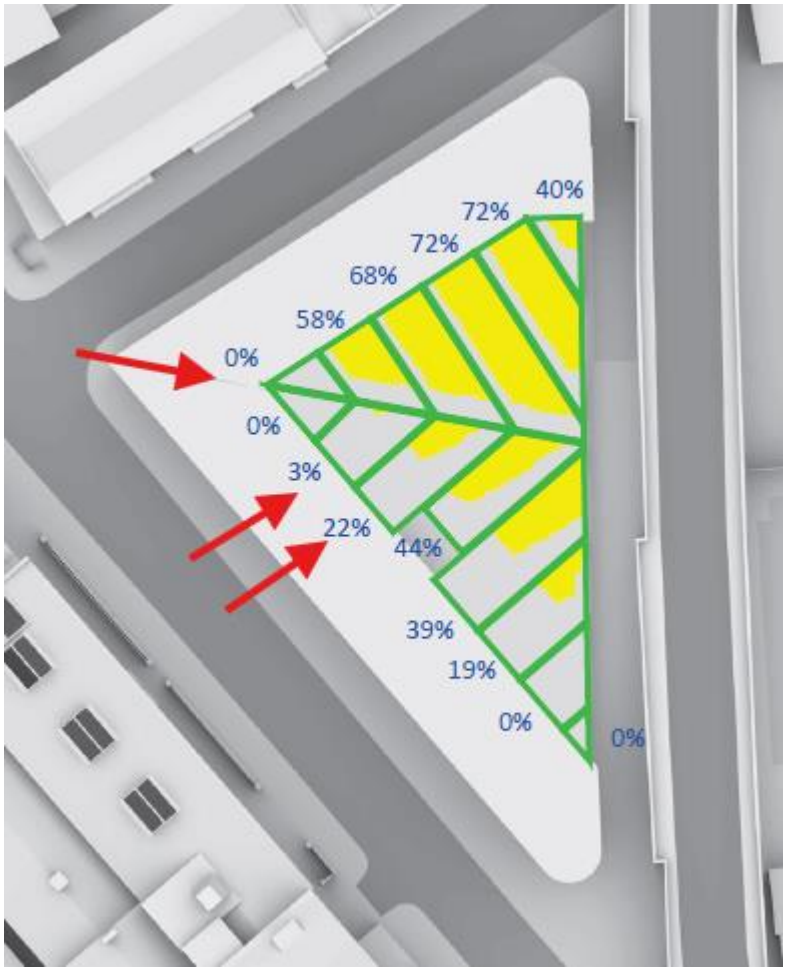
from moderate to major adverse. All four of these amenity spaces are located to the rear of the same residential terrace. These are discussed below and, as with daylight and sunlight above, have been reviewed assuming that Scenario 2 is implemented, in order to understand the 'worse case' scenario, but recognising that this application is solely for the works which are assessed under Scenario 1.

Overshadowing impacts from cumulative scenario on 21st March

13 Arctic Street – Gardens 1 and 2

15.52 These amenity areas are rear gardens located to the south of the host property and positioned to the west of the proposed development. Gardens 1 and 2 record existing 21st March percentages (achieving at least 2 hours in direct sunlight) of 7% and 0.7%, respectively.

15.53 As a result of the proposed development, the amenity spaces would experience an absolute reduction of 7% for Garden 1 and 0.7% for Garden 2 – meaning a relative reduction of 100% in both cases. However, it is worth noting that the existing baseline is very low within these amenity spaces, meaning the impact of the development, whilst significant, would likely not be perceptible by users of the space. Nonetheless, the gardens would both experience a major adverse effect.



Overshadowing impacts on 21st March to gardens for Arctic Street (top arrow), and 13 (middle arrow) and 15 (bottom arrow) Spring Place

13 Spring Place

15.54 This amenity space is a rear garden located to the east of the host property and positioned to the west of the proposed development. It records an existing 21st March percentage (achieving at least 2 hours in direct sunlight) of 18.1%.

15.55 As a result of the proposed development, the garden would experience an absolute reduction of 15.5%, which equates to a relative reduction of 85.7%. This would be a significant reduction and would mean the amenity space sees a major adverse impact.

15 Spring Place

15.56 This amenity space is a rear garden located to the east of the host property and positioned to the west of the proposed development. It records an existing 21st March percentage (achieving at least 2 hours in direct sunlight) of 31.9%.

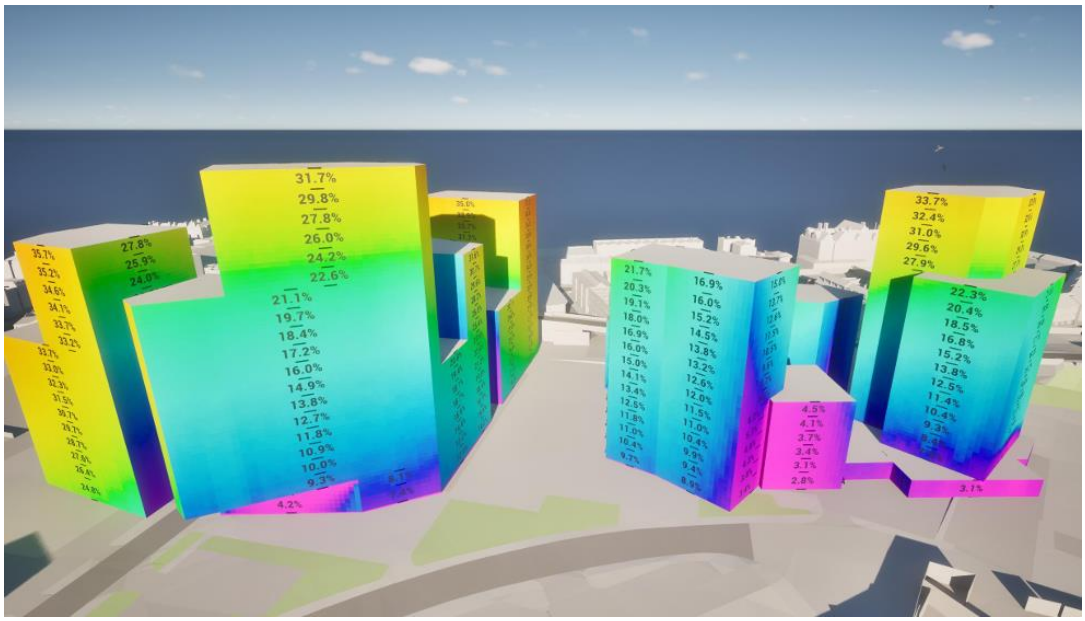
15.57 As a result of the proposed development, the garden would experience an absolute reduction of 9.7%, which equates to a relative reduction of 30.4%.

This reduction marginally exceeds the minor adverse threshold, meaning it would be considered to be a significant and major adverse impact.

Impact on Joseph Homes site

15.58 Concerns were raised by Joseph Home about the potential impact of the proposed development on adjacent land expected to come forward for development within the Growth Area. Joseph Homes are preparing development proposals for land to the west of the application site to bring forward residential accommodation providing a range of housing options including student housing. They have expressed concern that the height, scale and mass of the proposed development, particularly the film studio and Heathgate buildings might jeopardise the development potential of their site because of the restricted access to light and outlook.

15.59 Officers asked the applicant for the application to assess the impact on light to the neighbouring development plots and in response the applicant has provided a façade study. Acknowledging that the Joseph Homes site has yet to submit a full planning application, this study investigates indicative massing and the anticipated VSC scores that would be experienced at each level of the Joseph Homes building, assuming that this proposed development is constructed. The findings of this study are important in terms of whether piecemeal development of the growth area (noting that policy seeks comprehensive) is accepted. Jeopardising the future development potential of neighbouring sides would undermine the Council's ability to deliver all the strategic priorities for the Regis Road growth area, including significant housing delivery.



VSC Façade Assessment showing Joseph Homes elevations facing the proposed development

15.60 As shown by the image above, the façade study demonstrates that the elevations closest to the proposed development (which would be anticipated to be the most affected elevations) would experience VSC values exceeding 10% at most storeys above the first three floors. These figures are not atypical of a dense urban environment, so the lower VSC scores are considered to be acceptable. The analysis is a crude and worst case scenario, it does not take account of form and detailed design of the buildings, the layout of the accommodation, the rooms windows might serve or if those rooms are served by other windows because that level of detail does not yet exist.

15.61 The Joseph Homes scheme is still at pre-app and has not yet been submitted for planning, so it is difficult to fully assess what the impact of the proposed development would be. However, the most important consideration is that the proposed development would not restrict the ability to develop adjacent sites. The façade study that has been prepared is sufficient in demonstrating that, whilst the proposed development will undoubtably have an impact on the maximum VSC scores that can be achieved at the Joseph Homes site, the figures are largely still in line with BRE guidance on sites of this nature. It is also considered that the detailed design, form and layout of that scheme will allow the opportunity to maximise light and outlook and ensure that the housing continues to provide a good quality of accommodation. In addition, further collaboration between the applicant and Joseph Holmes has shown that a small pivot to the plan of certain buildings could improve daylight condition. This option may also be worth exploring further as part of on-going pre-application discussions.

Conclusion – daylight, sunlight, and overshadowing

15.62 Although the proposed development would affect surrounding properties with notable and, at times, moderate and major adverse impacts, this would be commensurate with the local context, the nature of development in this area, and the regeneration expected to come forward in this location. Regis Road and the Kentish Town Industrial Area are key opportunity sites for growth, including to deliver much-needed housing within the borough and make the most efficient use of land.

15.63 Many objections to the application that were received during consultation raised the issue of daylight and sunlight reductions, and it is accepted that there will be impacts to the surrounding area. However, the relative reduction (as opposed to the absolute reduction) is largely in compliance with BRE guidance and the development has been designed to limit and minimise the impact to existing residents and properties wherever possible.

15.64 As has been assessed above, there are 38 properties surrounding the site that would experience moderate or major adverse impacts, which are predominantly located to the west of the development or immediately

adjacent to the proposed buildings. These should be viewed in the context of over 1,100 windows and nearly 800 rooms having been tested under the analysis. Nonetheless, the impact on these properties would conflict with Policy A1 of the Local Plan, which seeks to protect the amenity of residents.

15.65 It should also be noted that several houses and blocks in the area are council or housing association tenants who will be affected by adverse light impacts. Those with disabilities, older adults (particularly those over 65), and some ethnic groups are more likely to live in social or affordable or affordable housing. Disability, ethnicity, and age are all protected characteristics under the Equality Act.

15.66 As such, the amenity impact on some of the surrounding properties is likely to be greater on those with certain protected characteristics, including disability, age, and race. This should be viewed in the context of the key beneficiaries of the proposed development also being local people sharing those same characteristics.

15.67 In summary, the impacts of the proposed development on daylight, sunlight, and overshadowing would be acceptable on balance. Although there would be areas where moderate and major adverse impacts would be experienced, these have been mitigated and minimised wherever possible through the scheme's design and are considered acceptable in the context of the wider scheme, including its substantial benefits (including homes and jobs) and the need to encourage development at the site.

Solar glare – impact on railways

15.68 The solar glare test is not typically a comparative test so there is no baseline assessment in this instance. It assesses the potential for reflected solar glare to occur in the completed development scenario. For the purposes of the assessment, the only façade material that is considered capable of producing specular reflections is the glazed windows, which is assumed to have specular reflectance of 13%. There is no specific guidance on defining the effects of solar glare, except to say that all effects are considered adverse, with the scale of effect directly correlated to the magnitude of impact. Significance has been assigned to instances where solar reflections may be visible to road or rail operators.

15.69 The assessment presented by the application are limited to potential glare studies and there are no detailed intensity assessments. It is the relative intensity of reflection when compared to ambient light levels that leads to the potential for dangerous glare to occur. The analysis that has been presented shows that sunlight may be reflected from the developments within the viewing direction of drivers, particularly along Queens Crescent and Holmes Road. There will also be some potential instances of solar

reflections cast across the railway lines to the west and north, but these will generally be far from the direction of travel and any likely viewing direction.

15.70 The assessments show that reflected sunlight will be within 30 degrees of the centre of view for a number of assessed viewpoints. These mostly vary between negligible and minor adverse, with just one viewpoint (Viewpoint 3) considered to be minor adverse but have the potential to be major adverse, due to the potential need for train drivers to look directly at instances of solar glare. If Network Rail were to confirm that it would be necessary to do, a more detailed study would be required to track duration and distance along this section and confirm the level of impact and whether mitigation is required. A condition will require this to be confirmed with Network Rail and TfL Asset Protection teams to ensure the impact of solar glare is safely managed in this location .

15.71 Lichfields have reviewed the solar glare studies and confirmed that any mitigation required will most likely take the form of modifications to the glazing specifications. As such, it is considered that solar glare impacts are a matter that can be investigated further and mitigated as appropriate through the aforementioned condition and are otherwise acceptable.

Noise and vibration

15.72 With respect to potential operational noise impacts, the proposed development includes a number of noise generating uses – most notably the Film Studios and the Recycling Centre. Although the Film Studios building is physically separate from any residential use, it is in close proximity to the Heathgate homes. Studio space is also proposed within the basement levels of the Inkerman Gardens buildings. Throughout the site, the development includes mechanical plant for ventilation and cooling measures and emergency plant such as smoke extract fans, to be located on rooftop areas.

15.73 Chapter 10 of the Environmental Statement assesses 'Noise and Vibration', reviewing the existing baseline and the predicted noise environment resulting from proposals. This notes that the main existing sources of commercial noise are well established operations, including UPS and Royal Mail, and it is not expected that the proposed development would result in changes to their operation that would increase noise levels.

15.74 Whilst the demolition and construction phase is expected to result in moderate and major adverse impacts to nearby residents, this is very typical of large development sites such as this. The impact of construction would be managed and mitigated as far as possible (noting it is not possible to fully mitigate all noise and disturbance from construction) by way of obligations (such as to secure the Construction Management Plan) and conditions

(detailed throughout this report). The noise and vibration impact from construction is acceptable.

15.75 At operation phases of development, the noise impacts would be controlled to be in accordance with the policy requirements of the Camden Local Plan. The Film Studios will, by definition, limit noise breakout through its construction and design; given that it is important that the building is well insulated against external noise to avoid noise spill into the studios, the insulation will limit noise spill out of the building. Additionally, there is sufficient separation between the studios and the nearest residential receptors.

15.76 The Class E and Class F2 retail and community use units are located throughout the proposed development, often being sited at the ground level of residential buildings. The noise and vibration chapter of the ES confirms that predictions of noise breakout from these uses are sufficiently below the existing sound pressure levels at the closest receptors. The building facades and internal construction will also be designed to provide adequate sound insulation and limit internal noise transfer, with acceptable internal noise environments to be secured by condition .

15.77 The noise levels from building services plant associated with the proposed development will also be controlled to minimise impact on nearby noise sensitive receptors. These have been designed to follow relevant guidance and local policy to ensure an acceptable impact on nearby sensitive receptors, including by siting this away from noise sensitive external and internal spaces, utilising suitably quiet, non-tonal, and appropriately sized plant, and installing acoustic louvres and screening where possible.

15.78 The Council's Environmental Health Officer has reviewed the noise information submitted with the application and raised no objections to the proposed noise levels, subject to conditions. These include controls on hours of use, equipment noise, and vibration controls, which will ensure an acceptable impact is achieved in relation to noise.

Outlook and privacy

15.79 The proposed development is well located with respect to its relationship with existing properties, ensuring that a sufficient separation distance is achieved to reduce the risk of overlooking or impacts to privacy. It is noted that this is an urban area that will, in places, have a smaller separation distance due to existing street layouts, however the proposal does not reduce separation distances to an unacceptable standard anywhere across the site and broadly maintains the existing and historical context. The site is also bounded by railway lines to the north and west, which helps to increase the distance from the development to sensitive receptors and reduce the impact of the proposal.

15.80 It should be noted that the Inkerman Gardens site is more constrained than other areas of the proposed development given its proximity to residential areas. However, the existing separation distances of the street are retained and the outlook and privacy of existing sensitive units preserved, as far as possible for a densifying urban regeneration scheme. The proposed development would also provide active surveillance in areas that do not currently benefit from this, which should be viewed positively.

15.81 There would be some additional overlooking to the Collège Français Bilingue de Londres, which faces the south of the Inkerman Gardens building, but the separation distances are still sufficient and it is not unusual to have a degree of overlooking to and from schools in urban areas. This is therefore unlikely to have a detrimental impact on the school or the children (age being a protected characteristic) and any impacts can be carefully considered and managed at detailed design stage.

15.82 Outlook, overlooking, and privacy within the proposed development and of the proposed residential units is reviewed in Section 13 of this report.

Artificial light

15.83 The internal lighting from the new homes and commercial spaces is not anticipated to be excessive and would not adversely affect neighbouring properties, given the existence of diffuse lighting from homes and streetlights in the area already. Additional lighting from the development including security lighting and lighting to the public realm is expected to improve the safety of the area and will be designed so as not to impact negatively on private residencies.

15.84 It is acknowledged that the Film Studio use may result in more substantially increased lighting, particularly at the lower levels and podium entrance, where illumination will be required in association with the proposed uses. These will be designed and managed so that the impact is acceptable on both the nearby residential properties and the nearby SINC. Specific details of lighting and light spill in the area will be secured as part of the lighting strategy that the applicant will be required to submit and have approved by the council .

Microclimate

15.85 Policy A1 of the Local Plan acknowledges the impact that large developments can have on the local climate. CPG Amenity requires that new development considers the local wind environment, local temperature, overshadowing, and glare – both on and off site.

15.86 National guidance from TFL's Healthy Streets for London recommends that streets should design in opportunities for sun, shade, and shelter from high winds to create places that can be enjoyed all year round.

15.87 Policy A2 of the Local Plan recognises that the quality of open spaces is closely linked to the degree to which they are overshadowed and Policy D9 of the London Plan says that daylight and sunlight conditions in the neighbourhood must be carefully considered when tall buildings are proposed.

15.88 The proposed development introduces substantially taller buildings and a denser urban form than currently exists on the site. As such, there is potential for the development to create overshadowing and alter local wind conditions through downdrafts, acceleration around building corners, funnelling effects between buildings, and changes to airflow patterns across public spaces.

Overshadowing of private and public areas

15.89 The BRE's guidance set out in "Building Site layout planning for daylight and sunlight: a guide to good practice (BR 209 2022)" provides an industry standard framework for assessing and understanding light impacts of development. BRE guidance recommends that for amenity areas to appear adequately sunlit throughout the year, at least 50% of a garden or amenity area should receive at least two hours of sunlight on the 21st of March.

15.90 The impact of the proposed development with respect to overshadowing is detailed in Section 14 (Housing mix and quality), as well as earlier in this Section (Impact on neighbouring amenity) of the report. The applicant has submitted a full Daylight, Sunlight, and Overshadowing Report as part of the application, which details any impacts upon neighbouring and proposed properties. Additionally, Chapter 12 of the Environmental Statement assesses the impact of the proposed development on daylight, sunlight, overshadowing, and solar glare.

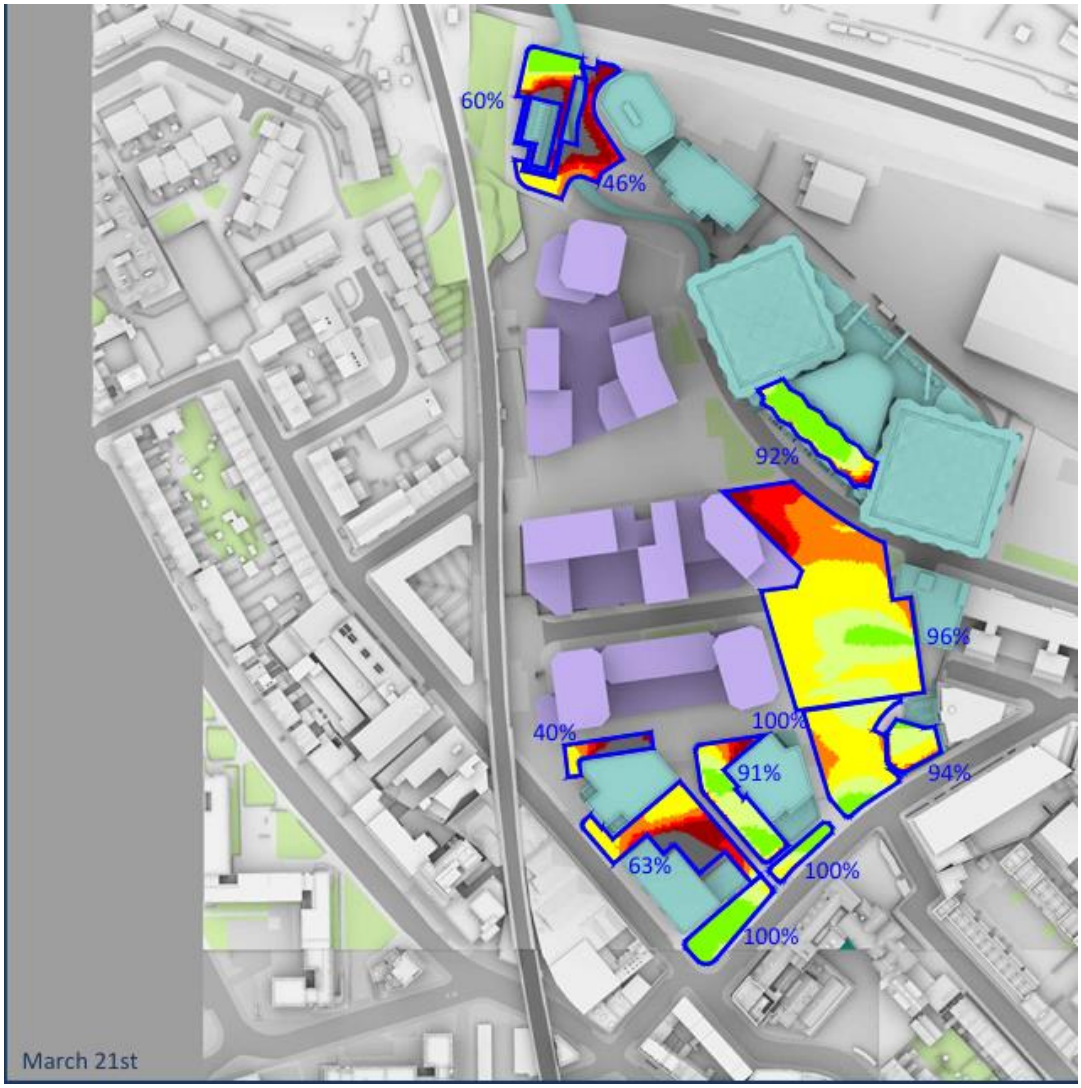
15.91 As assessed in Section 14 of this report, the majority of the new public amenity areas will have at least 2 hours of sunlight on 21st March, and are therefore BRE compliant. This includes when the assessment takes into account the cumulative impact of adjacent sites being developed. Table X below demonstrates the percentage of each proposed amenity area that would meet this target.

Amenity area	**Proposed development**	**Proposed development + adjacent sites**
Inkerman Gardens - North	40%	40%
Inkerman Gardens – doorstep play courtyard	63%	63%
Inkerman Gardens – doorstep play south	100%	100%
Inkerman Gardens – South	100%	100%

Inkerman Gardens – podium doorstep play	91%	91%
Pavilions – local/youth play	100%	100%
Pavilions – podium	94%	94%
Camden Studios – roof terrace	92%	92%
Heathgate – local play	84%	46%
Heeathgate – podium doorstep play	77%	60%

Summary of BRE 2-hour sun on ground assessment for proposed amenity areas

15.92 Although two of the amenity spaces (Inkerman Gardens – North and Heathgate – local play) would not meet the BRE guidance target when the proposed development is considered alongside the adjacent development sites, both are close to the 50% target. It should also be noted that the more significant transgression, at 'Inkerman Gardens – North', is not a primary amenity space, and there are a number of surrounding spaces that would provide alternative amenity and would receive in excess of 2 hours of sunlight to over 50% of their area throughout the year. The map below shows the amenity areas and the percentage of area with more than 2-hours sunlight on March 21st that is achieved (this includes 'Inkerman Fields', which records a percentage of 96% but would not be delivered as part of this application).



Map to show tested amenity spaces and % of area with 2-hours or more sunlight on March 21st

15.93 The proposed scheme has been designed to minimise overshadowing and the layout and massing means that the significant majority of the main public spaces are well lit throughout the year. Further details of the landscaping design of these spaces are secured by condition (as detailed in Sections 11 and 19 of this report), and would ensure that the layout, design, and planting of these amenity areas maximise their suitability and usability.

15.94 Overall, the layout of the proposed development means the levels of sunlight on the ground are good. The levels of sunlight experienced in the overshadowed areas or areas between buildings (such as between the separate structures of Inkerman Gardens) are difficult to improve without a substantial reduction in the height or massing of the blocks, which would reduce the amount of homes and affordable homes that could be delivered. Given the nature of those spaces, it would not add proportionate amenity value to the scheme when considered on balance, particularly when considering the delivery of additional public open space that would be

required to come forward as part of adjacent application sites within the Regis Road Area.

Wind microclimate

15.95 The submitted Environmental Statement includes a chapter on the wind microclimate, which sets out how Computational Fluid Dynamics (CFD) modelling has been used to inform the evolution of the massing strategy and identify areas potentially susceptible to adverse wind conditions or poor pedestrian comfort. This in turn informed the subsequent detailed wind tunnel assessment and assisted in identifying locations where mitigation measures may be required.

15.96 The Lawson Comfort Criteria is also commonly used as the accepted benchmark and scale for assessing pedestrian safety and comfort associated with wind conditions. If development would result in the measured wind conditions exceeding the threshold wind speed for more than 5% of the time, then they are unacceptable for pedestrian activity. The safety criteria categorises areas as either safe or unsafe, whilst the comfort criteria categorises wind conditions as suitable for different activities such as sitting, standing, strolling, or walking, which all have different thresholds for wind speed; walking can allow for the highest wind speed to be tolerated, whilst sitting has the lowest wind speeds as tolerable. To this end, a ‘strolling’ comfort category would be acceptable for transitional or low sensitivity areas such as pedestrian routes, whilst a ‘sitting’ comfort category would be expected for anywhere that members of the public would be expected to remain for extended periods.

15.97 A desk-based review was initially conducted, which was informed by CFD modelling, with the subsequent principal assessment consisting of physical wind tunnel testing. This involves using a scale model of the site and the surrounding area, with a radius extending approximately 450m from the centre of the site and including other development sites. This radius is considered sufficient to capture all relevant surrounding buildings and topographical influences on local wind conditions. Wind tunnel testing is generally considered the most robust and established methodology for assessing pedestrian-level wind conditions associated with large-scale development proposals.

Model used to assess local wind conditions and for wind tunnel testing

15.98 The assessment measured wind speeds at a pedestrian height equivalent to approximately 1.5m above ground level. Measurements were undertaken for 36 wind directions at 10 degree increments and combined with long-term meteorological data for the London area, derived from Heathrow and London City Airport weather stations.

15.99 The assessment considered the existing baseline scenario against the completed development scenario, as well as taking into account the effect of consented schemes and schemes likely to come forward (such as the adjacent Joseph Homes site).

15.100 The existing wind environment across the site is established as generally achieving conditions suitable from sitting to strolling during the windiest season, with no strong winds that would exceed the 15m/s annual safety threshold at ground level.

Demolition and construction phase

15.101 The demolition and construction phase would not give rise to any significant change to the existing wind microclimate on or off site. The conditions would be considered suitable for a working construction site and any impact would be negligible, so no design or management mitigation measures would be necessary. As the construction continues, the wind conditions at the site would gradually transition to the expected conditions of the completed development.

15.102 Although the wind microclimate assessment sets out multiple scenarios of development to account for the development in isolation compared to if

cumulative development at adjacent sites has been constructed, this report considers the latter only. This is because it is, in effect, a 'worse-case' scenario, assuming that the maximum measured level of development has been implemented.

Proposed development conditions – ground level

15.103 The wind assessment demonstrates that the pedestrian routes throughout the development would achieve wind conditions ranging from 'sitting' to 'walking' use during the windiest season. There are some areas of the site that would experience wind conditions that are one category higher than required – specifically around the northeast and southern corner of the Heathgate buildings and the northern and southern corners of the Camden Film Studios building. At these locations, mitigation would be required (discussed later in this section).

15.104 Building entrances located through the development would have wind conditions ranging from 'sitting' to 'strolling' use during the windiest season, which would largely be suitable for their use. Whilst the Lawson criteria identify 'standing' conditions as appropriate for entrances, any entrances that are categorised as having 'strolling' conditions would be secondary entrances such as cycle stores and refuse stores, so the higher wind conditions would be considered tolerable. There would be one location at the southern façade of the southern wing of the Camden Film Studios building where the wind conditions would be one category winder than required, so would require mitigation to ensure suitable conditions. Otherwise, entrances have been carefully designed with recessed entrances, canopies, and orientations that reduce the impact of wind on users.

15.105 The ground level conditions would generally be acceptable across the development site. There is no location where an 'uncomfortable' category is recorded and the development generally records 'standing' category conditions. Where higher wind speeds are shown, the proposed landscaping strategy would be expected to play an important role in moderating wind conditions. In particular, there would be some instances of strong winds exceeding the safety threshold at the Heathgate area of the site, though it is considered that mitigation would be able to reduce the occurrence of strong winds to ensure this is acceptable.

15.106 It is considered that the overall usability or comfort of the public realm and ground level of the development would be acceptable, with conditions to secure further details of any required wind mitigation measures .

Proposed development conditions – above ground (roof, balconies, terraces)

15.107 The proposed development includes a significant number of raised amenity spaces such as balconies, podium gardens, roof terraces, and

elevated landscaped areas. Given that these spaces are more likely to be used most intensively during warmer weather, users are also more likely to experience calmer wind conditions when using them – the target condition for these therefore above-ground spaces is therefore ‘sitting’ and ‘standing’ during the summer season. All podium level amenity and balconies, and rooftop areas would provide ‘sitting’ and ‘standing’ wind conditions, which would be suitable for their use. It is considered acceptable for the larger roof terraces to experience ‘standing’ conditions as these would be expected to support a variety of activities, and seating areas can be located within the calmer portions of the space.

15.108 It is also noted that balconies and rooftop amenity areas will also include elements such as parapets, balustrades, perimeters screens, and planters. These would all be expected to provide some form of mitigation that would further improve the wind conditions experienced by users of these spaces; in particular, this would help ensure that all balconies can achieve ‘sitting’ conditions wherever possible, rather than ‘standing’. As with the ground level, details of mitigation in above-ground amenity spaces (including balconies and terraces) would be secured by condition . It is considered that the wind conditions at elevated terraces, balconies, and podiums would be acceptable, subject to further detail.

Proposed development conditions – off-site

15.109 The assessment also considers the impact of the development on offsite locations, such as surrounding streets and neighbouring properties. It has been demonstrated that the proposal would not give rise to significant adverse wind conditions within the surrounding area, with the exception of instances of strong winds that exceed the safety threshold at the car park to the north of the Film Studios building in UPS ownership. This adjoin site is hard surfaced informally used for UPS vehicle parking and has a vehicle repair building. It is likely to come forward for development as the last part of the Regis Road growth area and mitigation (likely to be landscaping/tree planting) can be assessed at that point depending on the nature or the redevelopment proposal. Given that this part of the site abuts the servicing point of the film quarter building, it is unliely to be proposed for wind sensitive use. Within the application site, mitigation measures would be required to reduce the occurrence of strong winds, detailed below.

Mitigation summary

15.110 The proposed development would require mitigation measures to reduce the impact from wind levels, particularly around the ground level of the Heathgate buildings and some areas surrounding the Film Studios building. Similarly, some of the above ground amenity areas would be able to achieve improved comfort categories, though are largely acceptable as currently proposed.

15.111 Whilst these areas of the development show there to be potentially unsuitable wind conditions, these are not significant transgressions, with the target comfort category only being missed slightly. To this end, it is considered that measures such as detailed entrance design, planting and soft landscaping, wind screens, parapets, balustrades, and location of seating areas can be carefully considered to ensure an acceptable impact. The details of these will be secured by the aforementioned conditions and will ensure that the development achieves an acceptable impact with respect to wind microclimate, with any impacts able to be managed and mitigated through careful design and landscaping.

Conclusion

15.112 In summary, there will be some significant impacts to the surrounding properties due to impact on daylight and sunlight as a result of the proposed development. In particular, the proposed buildings would result in adverse impacts on some of the nearby properties, largely located to the west and south of the site. As reviewed above, this would result in moderate or major adverse impacts to 12.6% of those properties surveyed when the proposed development is built out. This increases to 43.7% of properties when the development and adjacent cumulative development are assessed together. With respect to these affected properties, there is a conflict with Policy A1 of the Local Plan insofar as it relates to protecting the amenity of neighbours.

15.113 However, the retained levels of light are generally appropriate for the context of this Central London location, and the requirement to optimise development on this underutilised site does mean that there will inevitably be some adverse impact on existing homes.

15.114 Outlook and privacy impacts are appropriate as a result of the proposal design and separation distances. Noise, vibration, and light spill impacts (including solar glare) are not expected to be significant and can be adequately managed through conditions.

15.115 The proposed development has been designed to ensure that amenity spaces are not significantly overshadowed and wind conditions on spaces between buildings and on elevated amenity spaces will be comfortable and fit for purpose, subject to further wind mitigation measures.

15.116 As a result of the above, the amenity impact on neighbouring properties is considered acceptable given the site context, significant need for new housing, the need to densify and make the most efficient use of land, and the NPPF requirement to encourage a significant uplift of residential development on previously developed land. It is acknowledged that there is partial conflict with Policy A1 of the Local Plan resulting from the light impact, but in other respects the development complies with Policy A1 in terms of

the impact on neighbouring amenity. That conflict needs to be considered in the planning balance.

16. SUSTAINABILITY AND ENERGY

16.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The current Camden Climate Action Plan 2026-2030 seeks to respond to the urgency of the climate crisis, enabling zero carbon and a climate resilient borough.

16.2 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

16.3 In assessing the opportunities for retention and refurbishment developers should assess the condition of the existing building and explore the future potential of the site. The development plan promotes circular economy principles and CLP policy CC1 and LP policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building and to optimise resource efficiency.

16.4 The NPPF, at paragraph 124, promotes the effective use of land, prioritising previously developed (brownfield) land wherever possible. Paragraph 125 says substantial weight should be given to using brownfield land, promoting and supporting development of under-utilised land and buildings. Optimising density will often involve the need for demolition, which is reflected in the development plan, including the London Plan as quoted above.

16.5 The development plan requires a condition and feasibility assessment which should consider the existing buildings to understand the reuse potential and what is the best use of the site, and should take into account the hierarchy set out in Energy Efficiency and Adaptation CPG chapter 9. Consideration should be given to resource efficiency, and developments which are referable to the Mayor are also required to provide a Circular Economy Statement which should include a pre demolition audit.

16.6 A pre-redevelopment audit was conducted to establish whether the existing buildings, structures and materials could be retained, refurbished, or incorporated in the new development.

16.7 The pre-demolition audit undertaken in September 2025 noted that the existing buildings are approaching the end of their serviceable life. Structural systems, façades, and internal finishes were recorded as being dated, while

mechanical and electrical services were found to be inefficient and not in line with current performance standards. These findings highlight the limited adaptability of the existing building stock to accommodate modern or higher-intensity uses. As such, it is stated that the existing buildings are unsuitable for retention or adaptation. The construction methods, servicing infrastructure, and internal layouts are stated to be not capable of meeting the technical, spatial, or environmental performance standards required for the proposed development. It is also considered that were the existing buildings and structures retained it would significantly reduce the ability of the site to deliver the level of growth expected in both homes and intensified industrial space.

16.8 While retention of a majority of the existing structures is stated to not be feasible for this project, the development is stated to be committed to embedding a circular economy approach within both the demolition strategy and the design of the new scheme. This includes maximising opportunities to reuse and recycle any suitable materials arising from the demolition process, wherever possible. The Grade II listed Station House building is being partially retained and repurposed.

16.9 Targets for waste diversion have been set in the Circular Economy Statement, as follows:

- 95% diversion from landfill of non-hazardous construction and demolition waste. Subject to technical feasibility;
- 95% of excavation waste to beneficial use (46% on site if achievable);
- 20% of the building material elements to be comprised of recycled or reused content;
- Target 65% of operational waste to be diverted from landfill by 2030 through adequate on-site dedicated storage space for recyclable waste; and
- Target zero biodegradable waste to landfill.

16.10 It is stated that despite the need for demolition, designing out waste remains a core principle of the Proposed Development. A pre-demolition audit and detailed material inventory have been undertaken to identify opportunities for reuse, recycling, and recovery of existing site materials, which is conditioned as discussed above. The proposed Energy Centre, is a focal point for circularity within the masterplan. This building offers the potential to integrate recovered materials directly from the demolition process.

16.11 It is noted that the excavation waste estimate is very high at around nine times the median value of the GLA Circular Economy Guidance Appendix 4. It is welcomed that 45% is proposed to be reused onsite, however the estimate remains very high due to the large volumes of subterranean spaces

required for the studios. With the volume of excavation waste identified as around 685,570 tonnes of material as shown in the table below, the reuse of this waste presents an opportunity to reduce the significant environmental impact associated with material extraction. It is proposed that where ground conditions and material suitability allow, excavated earth from the site could be processed and reintroduced into the development as architectural elements. This includes potential for the production of façade bricks and brick slips, unfired earth blocks for internal partitions, and earth-based finishes such as screeds and soffit panels. This would reduce the need for virgin materials and retain the material within the built form, reducing the environmental impact. It is proposed that further feasibility assessment and material testing will be undertaken in the next design stages to determine the technical and aesthetic potential. To ensure that this material is managed appropriately, a condition will require at least 45% of excavation material to be reused onsite, where feasible .

Component	Excavation quantities (m^3)	Excavation quantities (tonnes)
Excavation material (Camden Studios)	270,594.62	476,246.53*
Excavation material (Inkerman Gardens)	111,899.96	196,943.93*
Excavation material (Heathgate)	7,033.88	12,379.63*
* 1760kg/m^3 density assumed		

Excavation quantities across the masterplan

16.12 The Circular Economy Statement sets out how the development will adopt strategies including: 'Building in Layers' to give access to areas requiring higher maintenance, designing out waste with prefabricated products with standard dimensions being prioritised; 'Design for Longevity' with the concrete elements designed to have a longer than average design life and hard wearing materials in high transit areas; 'Design for Adaptability' and flexibility through structural loading and physical proportions allowing future changes; and Design for Disassembly with replacement of elements without affecting the rest of the superstructure and dry connections to facilitate recyclability. Preliminary overviews of recycled content in concrete and other key materials (see tables below) have been considered based on current understanding of the supply chain. Initial calculations indicate that 46% of the value of the materials would be from reused or recycled content. These are subject to review and will likely be adjusted as the design progresses.

Element	GGBS content
Ground beams	40%
Capping beams	40%
Pile core caps	40%
Pile caps	40%
Basement floor slab	40%
Typical slab	25%
Roof slab	25%
Columns	25%
RC upstand beams	25%
Retaining walls	25%
Core walls	25%

GGBS content in construction features

Material	% Recycled content
Concrete RC 20/25	40% GGBS
Concrete RC 40/50	40% GGBS
Concrete RC 50/60	40% GGBS
Concrete RC 32/40	40% GGBS
Steel rebar	100% (Celsa Circular)
Gravel/backfills	100% from crushed waste

Key materials recycled content

16.13 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.

16.14 In this case, the proposals are to demolish and rebuild, except for the partial retention of the Grade II listed Station House. It is proposed that 99% of the 10,154 tonnes of demolition waste is recycled offsite, 45% of the 685,570 tonnes of excavation waste is reused onsite and 50% reused offsite, and 95% of the 25 tonnes of construction waste is recycled offsite. The proposed development also aims to target 20% of the building material elements to be comprised of recycled or reused content.

16.15 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, with 45% being used on site .

Whole Life Carbon

16.16 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 includes its demolition and disposal. This is split into modules that assess each stage of the building's life.

16.17 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).

16.18 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).

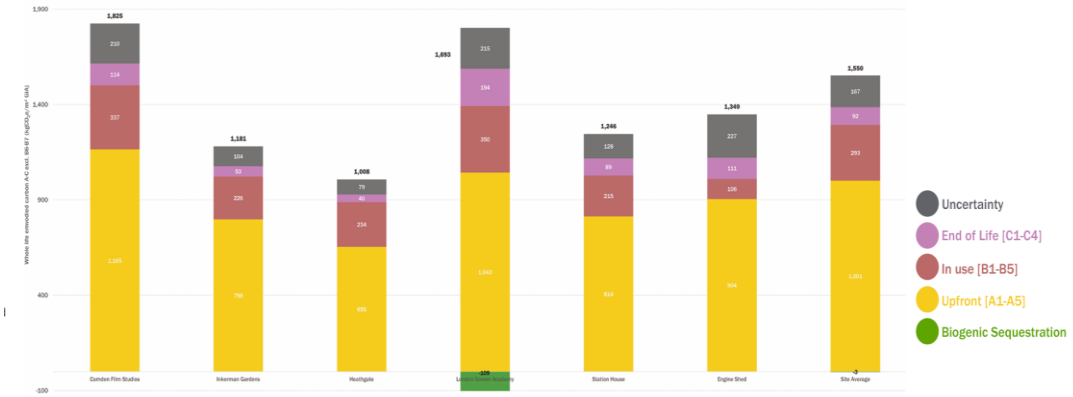
16.19 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).

16.20 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.

16.21 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent ($kgCO_2e/m^2$ 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. It should be noted that these targets are in guidance rather than policy and so failure to comply is not a policy conflict. There is no benchmark for industrial or film studio use type. Comparison has been made to the closest available typology which is offices. No separate assessment has been made for the residential or educational areas which do have separate benchmarks

Modules	Min benchmark for OFFICE ($kgCO_2e/m^2$ GIA)	Aspirational Benchmark for OFFICE ($kgCO_2e/m2$ GIA)	Proposal ($kgCO_2e/m^2$ GIA)
A1-A5	<950	<600	1146
B-C (excl B6 & B7)	<450	<370	407
Total A-C (ex B6&B7 inc sequestration)	<1400	<970	1550

Summary of Whole-Life Carbon results for the whole development



Whole life embodied carbon A-C excl. B6-B7 breakdown by life cycle stage ($kgCO^2e/m^2$ GIA)

16.22 In this case, the development does not meet the benchmarks as shown in the table above for the site as a whole.

16.23 The Whole Life Carbon Assessment Report also shows the breakdown by building. However, this November 2025 report varies from the updated December 2025 GLA spreadsheet. It does indicate that the Film Studios and LSA buildings are the highest WLC impact buildings. The LSA building closest architype would be for school/university with a benchmark of 1,000 $kgCO^2e/m^2$ GIA, but this would be significantly exceeded at 1,693 $kgCO^2e/m^2$ GIA. The benchmark for residential use is 1,200 $kgCO^2e/m^2$ GIA, which the WLCA indicates Inkerman and Heathgate would meet at 1,181 and 1,008 $kgCO^2e/m^2$ GIA, respectively. However, Station House would potentially exceed this with 1,246 $kgCO^2e/m^2$ GIA, despite retaining some of the original building. So based on the information submitted none of the buildings, with the exception of the residential, perform that well against the GLAs guidance on WLC.

16.24 Consideration has been made to lower-carbon concrete mixes, high-recycled-content steel and the reuse of excavation waste where feasible. However, it is noted in the WLCA that the:

> *"central studio has the highest upfront embodied carbon impact, primarily due to the high material intensity of its superstructure. This is driven by the acoustic performance requirements necessary to fulfil it's intended use as a film studio. To achieve this, the stacked internal studio spaces employ a 'box-in-box' structure, which is inherently high in embodied carbon. It requires duplicated structural and acoustic elements including separate walls, floors, and ceilings constructed independently from the main building shell. To meet the required level of sound isolation, these assemblies incorporate dense materials such as concrete, steel, and multiple layers of plasterboard, as well as specialist components such as acoustic mounts, floating floors, and vibration isolators. The high material intensity and the inclusion of additional structural and acoustic elements significantly increase the total material use and, consequently, the embodied carbon intensity of the building." Further the design including multi-layer basements impacts the whole life carbon and it is stated that "the substructure represents the second largest carbon hotspot on site, accounting for approximately 18% of all upfront emissions. Basements are included in several buildings, with a single-storey basement in the London Screen Academy and Heathgate buildings, and multiple basement levels in the Central Studio and Inkerman buildings to accommodate subterranean filming studios. These basement designs have been optimised to include secant piled walls around the perimeter, bearing piles, and retaining walls, but the nonetheless still involve substantial quantities of concrete and steel reinforcement. This material intensity explains the relatively high carbon contribution of the substructure."*

16.25 The assessment captures at least 95% of capital cost per building element category. Where detailed cost data is not yet available, carbon from unquantified items has been estimated using an appropriate methodology. A contingency margin has also been applied to reflect early-stage uncertainty and potential variation in material quantities. The assessment also identifies further opportunities to reduce the WLC emissions through substituting concrete mixes, for all rebar to be Celsa Circular EAF Rebar, and to utilise kenoteg for 20% of all bricks which could provide a reduction of around 44kg/CO2e/m2GIA from the current proposal. It is stated that this approach will be refined in the pre commencement WLCA once full quantity information is received from the Cost Consultant. A condition would ensure that pre commencement an updated WLCA is provided with updated quantity information and which should report the distinct areas of the development against relevant typology benchmarks. The educational and residential

buildings should not exceed their respective GLA typology benchmarks, unless clearly justified.

Energy and carbon reductions

16.26 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).

16.27 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

16.28 The following summary tables shows 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)	**Min policy target**	**Proposal reductions**
Be lean stage (low demand): LP policy SI2	n/a	8.7%
Be green stage (renewables): CLP policy CC1	20%	59.7%
Total carbon reduction: LP policy SI2 and LP CC1	35%	63.2%

Site wide carbon saving targets and the scheme results

Policy requirement (on site)	**Min policy target**	**Proposal reductions**
Be lean stage (low demand): LP policy SI2	10%	14.6%
Be green stage (renewables): CLP policy CC1	20%	62.5%
Total carbon reduction: LP policy SI2 and LP CC1	35%	68%

Inkerman Residential carbon saving targets (for majors) and the scheme results

Policy requirement (on site)	**Min policy target**	**Proposal reductions**
Be lean stage (low demand): LP policy SI2	10%	- 0.8%
Be green stage (renewables): CLP policy CC1	20%	28.4%
Total carbon reduction: LP policy SI2 and LP CC1	35%	27.8%

Inkerman Non residential Carbon saving targets (for majors) and the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	17.1%
Be green stage (renewables): CLP policy CC1	20%	60.5%
Total carbon reduction: LP policy SI2 and LP CC1	35%	67.3%

LSA non residential Carbon saving targets (for majors) and the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	19.5%
Be green stage (renewables): CLP policy CC1	20%	49.5%
Total carbon reduction: LP policy SI2 and LP CC1	35%	59.4%

Station House Residential Carbon saving targets (for majors) and the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	5.1%
Be green stage (renewables): CLP policy CC1	20%	61.1%
Total carbon reduction: LP policy SI2 and LP CC1	35%	63%

Film Studios Non Residential Carbon saving targets (for majors) and the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	17.1%
Be green stage (renewables): CLP policy CC1	20%	61.9%
Total carbon reduction: LP policy SI2 and LP CC1	35%	68.4%

Heathgate Residential Carbon saving targets (for majors) and the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	25.4%
Be green stage (renewables): CLP policy CC1	20%	67.2%

Total carbon reduction: LP policy SI2 and LP CC1	35%	75.5%

Energy Centre, Carbon saving targets (for majors) and the scheme results

16.29 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

16.30 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.

16.31 This is charged at £95/tonne CO_2/yr (over a 30-year period) which is 587.373 tonnes x £95 x 30 years = £1,674,013. This includes £1,245,612 for the non-residential buildings and £428,891 for the residential buildings. This amount will be spent on delivery of carbon reduction measures in the borough. As the development will be undertaken in phases a breakdown of the carbon offset for each building is provided below.

Building	**Carbon tonnes to be offset**	**Offset amount (tonnes x £95 x 30 years)**
Inkerman	Resi: 72.567 Non resi: 47.103 Total: 119.67	£341,060
London Screen Academy (LSA)	24.987	£71,213
Station House	10.353	£29,506
Film Studio	363.343	£1,035,528
Heathgate	67.568	£192,569
Energy Centre	1.452	£4,138

Table X - Carbon saving targets (for majors) and the scheme results

16.32 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline

now includes low carbon heating (like ASHP) for non-residential developments.

16.33 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.

16.34 In this case, site wide the development meets the policy target of 35% reductions, achieving an overall on-site reduction of 63.2% below Part L requirements as shown in the table above. Generally the residential areas (Inkerman, Station House and Heathgate) meet the aspirational **50%** target with 68%, 59.4% and 68.4% respectively. The non-residential areas of LSA and Central Studios meet the 35% reduction on site with 67.3% and 63% respectively, however, the Inkerman non-residential areas only achieve 27.8%, whilst this is disappointing it is acknowledged to be harder to achieve as the new Part L assumes low carbon heating as standard as well as notional solar PV and given the site wide reductions this is considered acceptable in terms of policy. The carbon offset of £1,674,013 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)

16.35 London Plan policy SI 2 sets a policy target of at least a 10% (residential) and 15% (non-residential) reduction through reduced energy demand at the first stage of the energy hierarchy.

16.36 In this case, the site wide development achieves a reduction of 8.7% at Be Lean. The residential areas all exceed the policy target of 10% however the Inkerman non-residential areas and the Film Studios do not meet the 15% policy target for non-residential areas, with -0.8% and 5.1% reductions, respectively. The proposals do involve high performance insulation, low air permeability, efficient glazing, and consider the requirements of the cooling hierarchy and overheating which can avoid the use of active cooling in the development but cooling is proposed due to noise constraints (see below).

16.37 The ‘Be Lean’ case of the Inkerman Gardens non-residential shows an increase in carbon over the Part L 2021 baseline. It is stated that the way the ambient loop accounts for the heat recovery effectively penalises the cooling energy under the Be Lean stage results, which is the main reason for the higher results under be lean. This is not perceived in the Film Studios due to the mix of uses within the building, which creates the opportunity for savings over the notional buildings in other energy end uses.

16.38 The results are from early-stage design assumptions within the energy modelling which have been deliberately conservative to ensure robustness and avoid over-prediction of performance. These assumptions, particularly relating to thermal bridging and air permeability, have limited the energy

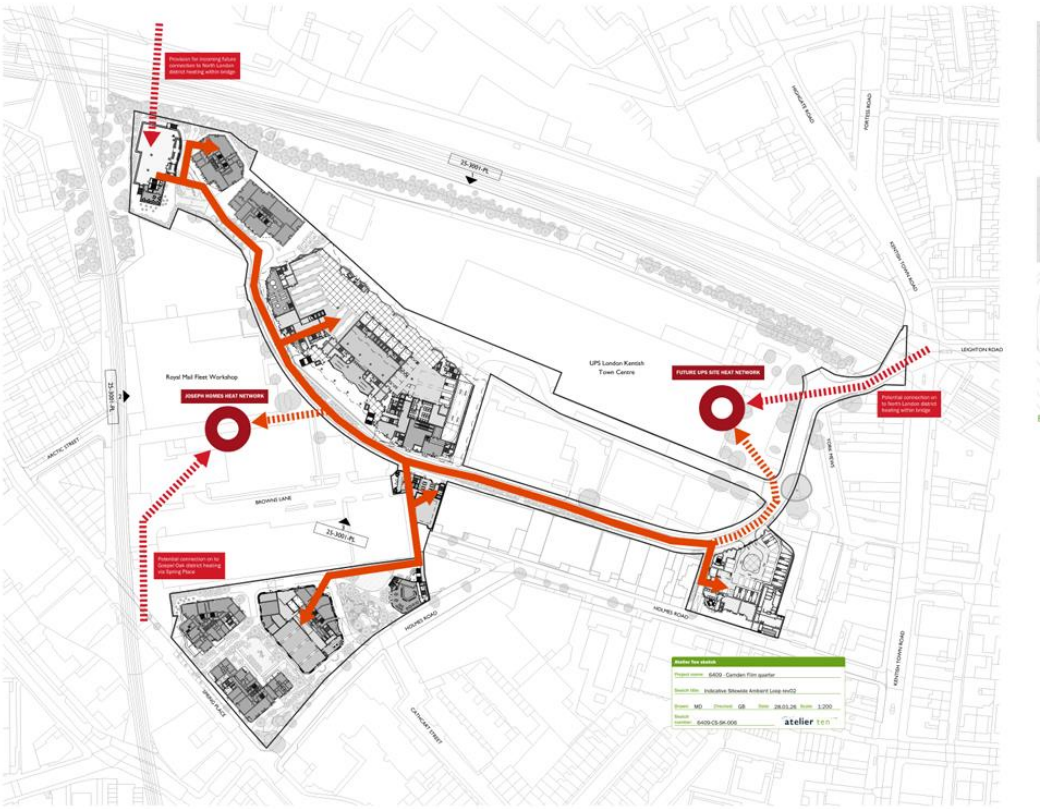
efficiency gains under the ‘Be Lean’ betterment. The applicant has stated that this will be reviewed as the design develops, with opportunities for improvement which could deliver meaningful reductions in space-heating demand. As domestic hot water represents the largest regulated energy end use, the potential incorporation of waste-water heat recovery systems could also be explored at the next design stage. If feasible, this measure could provide significant reductions in hot-water energy consumption and materially improve the ‘Be Lean’ betterment outcomes.

16.39 As not all areas achieve the ‘Be Lean’ reduction targets and it is stated that the results are from early stage assumptions, a condition is attached for revised ‘Be Lean’ modelling to be undertaken , with the aim of reducing the carbon emissions further through detailed design.

Be clean stage (decentralised energy supply)

16.40 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.

16.41 In this case an assessment of the existing heat networks has been made and demonstrated that there are no existing local networks present which could provide a connection. Therefore, it is proposed to provide a site wide heat network which is future proofed with space within the proposed energy centre for future linking to other District Heat Networks (DHNs). As shown in the figure below, it is thought that the most likely connection would come from the north of the site through the anticipated bridge link to Murphy’s Yard, and suitable space would be expected to be safeguarded for pipes to go along this route. Connections to the east (Highgate Road) and west (Spring Place) are envisaged to take place through the adjacent developments as part of the wider Regis Road development. It is stated that the proposed ambient loop heat network at Camden Film Quarter enables multiple connections with hydraulic separation where adjacent networks can share heat and maximise heat recovery across wider areas whilst maintaining separate ownership and management. Details of future proofing connections to heat networks are to be secured as part of the Section 106 legal agreement . Savings from the site wide network are included under ‘Be Green’.



Site wide heat network with potential future connection to district heating networks

Be green stage (renewables)

16.42 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.

16.43 The calculations suggest the development overall meets the policy target of 20%, with emissions reduced by 59.7% at Be Green stage through renewables site wide, when considering the savings from the air, water, and ground source heat pumps, the site wide heat network, and the solar PV. The solar PV savings equate to 2.6% over the notional PV (the amount of PV expected under building regulations) and it is shown that there are extensive solar PV arrays on available roof space (see Figure 5.5 and Table 5.2 from the Energy Strategy below). The proposal includes a total of 1,817 solar PV panels nominal capacity of 818kWp with full details including a meter to monitor the energy output from the approved renewable energy systems to be secured by condition.

16.44 Therefore, the savings from renewables together exceed the 20% requirement and therefore the proposals are considered to be in compliance with the development plan in relation to ‘Be Green’ carbon reduction requirements.

Table 5.2 Photovoltaic system output in the proposed development

Building	No. of potential panels	PV area (m²)	Roof area (m²)	Roof area coverage (%)	Nominal peak power (kWp)	Annual energy output (MWh)
Central Studios	1048	1960	4531	43	472	358
Inkerman (Studios + Gardens)	384	718	1968	36	173	131
LSA	75	140	602	23	34	26
Heathgate	185	345	1442	24	83	63
Holmes Rd	125	233	1599	15	56	43
Total	**1817**	**3397**	-	-	**818**	**621**

Photovoltaic system output in the proposed development

Figure 5.5 Roof plan of the proposed Camden Film Quarter masterplan showing the preliminary PV layout including an illustrative diagram of a biosolar PV module for reference

Roof plan of the proposed development showing the preliminary PV layout including an illustrative diagram of a biosolar PV module for reference

Be seen (energy monitoring)

16.45 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 completed the application stage reporting and has committed to reporting in line with requirements and guidance. The proposal includes installation of energy metering systems. CIBSE TM54 calculations have been undertaken and it is anticipated that the Studios will use 121.2 kWH/m^2/year GIA. This is equivalent to approximately 13,172 MWh/year total energy consumption. The calculations indicate that interior lighting (39%), fans and pumps (30.8%), and small power (15%) consume the highest amounts of calculated energy. This is due to the energy intense lighting used in studios for filming and therefore high internal heat gains from lighting and equipment. However, there is a lower heating demand of only 2.2kWh/m^2/year due to the highly insulated air-tight building fabric and high efficiency ambient loop heating. The LSA is anticipated to have a lower energy demand at 81kWh/m^2/year, equivalent to approximately 562MWh/year total. These are both above the GLA aim for Energy Use Intensity (EUI) values of below 55kWh/m^2/year for non-residential areas.

16.46 Opportunities to further reduce operational energy use are also proposed. The residential buildings have an overall EUI of 57kWh/m^2/year, which is also over the GLA value of 35 but is noted do not include the PV. The space heating demand is 11 kWh/m^2/year overall and therefore within the aim of 15kWh/m^2/year.

16.47 Overall, the proposed development has a very high estimate peak demand of 28MW. Early engagement with UKPN indicated that there is sufficient capacity currently in the network for the development. There is also flexibility potential with demand side options, which could reduce peak demand by 4MW to 24MW.

16.48 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

16.49 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

16.50 BREEAM pre-assessments have been completed for the non-residential areas including the Film Studios, Inkerman commercial areas, LSA, NFTS, exhibition space, and talent accommodation. All areas are expected to meet BREEAM excellent but only just in most cases, and therefore it is expected that all areas will need to target further potential credits to ensure the requirements are met. In addition, the Film Studios, Inkerman, LSA, and

NFTS currently do not meet the requirement for at least 60% of the available credits for Energy to be targeted. However, all sites included can achieve further potential credits and therefore it is expected that these will be targeted and the requirement achieved. BREEAM Excellent with at least 60% for energy for these sites and the targeted credits are set out in the table below. For all other areas, this would be secured as part of the Section 106 legal agreement .

Site	Overall (Excellent = 50%)	Energy (60% min.)	Water (60% min.)	Materials (40% min.)
Film Studios (Industrial)	71.1%	57% (potential for 76%)	62.5%	71%
Inkerman (Industrial)	71.1%	57% (potential for 76%)	62.5%	71%
LSA (Further Education)	70.6%	52% (potential for 76%)	75%	93%
NFTS (Higher Education)	70.6%	52% (potential for 76%)	75%	93%
Exhibition space (Assembly and leisure)	70.8%	66.6%	62.5%	78.5%
Talent accommodation (Residential institution – short stay)	70.6%	66.6%	62.5%	78.5%

BREEAM Pre-Assessment scores

16.51 New residential developments should avoid overheating without relying on active cooling. If security, air quality, or noise prevent window opening, applicants must show all passive design options have been considered and maximised, with façades optimised despite site constraints. To determine if the units are designed to and would stay cool with only natural ventilation and passive measures Dynamic Thermal Modelling has been undertaken for the residential units using CIBSE TM59 methodology, as set out in guidance.

16.52 A base case model with fully openable windows was modelled as required, to show the design would not lead to overheating where natural ventilation is possible. This indicated that if natural ventilation were possible there would be a 95% compliance rate.

16.53 However, due to the proximity of the railway lines to the homes, it is accepted that some homes cannot rely on natural ventilation due to noise and therefore occupiers may choose to keep windows shut at certain times. It is not clear which specific units will be impacted by noise which would prevent natural ventilation. The applicant also argues that natural ventilation is not possible due to poor air quality, but this is not expected for all units and is not supported by the air quality strategy. Further modelling was undertaken which showed that where natural ventilation is not possible a reduced g-value of 0.3, exposed thermal mass, boosted MVHR rates, solar shading (225mm reveals and trim cooling applied to supply air would achieve a 100% compliance rate and therefore would generally prevent overheating for a typical summer in the 2020's (DSY 1). Modelling has also been undertaken of overheating during a very intense single warm spell (DSY 2) or a prolonged period of sustained warmth (DSY 3) weather scenarios. Whilst it is accepted that if window openings are restricted that the proposed solution of MVHR with trim cooling is accepted as a good energy efficient solution to prevent overheating it is not clear which units will exceed the noise levels to the extent that it would prevent natural ventilation. A condition is attached to confirm which units will require trim cooling due to acoustic and or air quality reasons .

16.54 In terms of the non-residential areas the modelling has shown that most areas are expected to overheat without active cooling. During the design process, a series of options to provide solar shading were tested including applying brise-soleil and projecting features. The proposed design adopts an innovative three-dimensional profile to the glazed facade which has been conceived to reduce solar gains through the depth of the framing system. The shading and glazing strategies will be studied in further detail at the next stage with an expectation that measures will reduce dependence on active cooling. It is also envisaged that the facade will be openable and provide opportunities for mixed mode ventilation.

16.55 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.

16.56 The proposed development will minimise the consumption of water with water-efficient fixtures and fittings, such as low dual flush WCs, low flow rate wash hand basin taps, shower heads and kitchen taps, reduced capacity baths, and low water use washing machines and dishwashers, which will all be installed in the proposed development. This will allow the proposed development to achieve at least the BREEAM Excellent standard for the 'Wat 01' water category (i.e. achieve at least a 12.5% improvement over baseline performance standard), meet the target set out in the London Plan, and ensure that the dwellings meet the maximum water consumption of 105

litres/person/day, plus 5 litres allowance for external use (which is also set out in the London Plan and Local Plan). Rainwater and grey-water recycling will be explored as the design develops, particularly within the Film Studios building.

16.57 In this case, the development incorporates SUDS, including blue roofs, green roofs, permeable paving, basins, ponds, and attenuation tanks – details of which will be secured by condition . Water efficiency measures to ensure a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home will also be secured by condition . Flood risk is covered in greater detail in the 'Flood risk and drainage' section of this report, Section 25.

Conclusion

16.58 The proposed redevelopment demonstrates a comprehensive approach to sustainability and energy, aligning with both Camden and London Plan policies.

16.59 There are generally good carbon reductions and resource efficiency is considered, with commitments to circular economy principles and climate change adaptation. The scheme generally meets other key policy targets, including providing future-proofed energy infrastructure, providing site greening, and including measures to mitigate flood risk and overheating. Where it falls down is in respect of WLC targets, the failure to meet the targets which are set in guidance would not be a reason to refuse the scheme and we are confident that the figures can be improved upon, we would expect the WLC targets to be met for the educational and residential buildings.

16.60 Overall, whilst the scale and type of the development will have a significant impact in terms of energy and sustainability, the proposals generally comply with the development plan in terms of energy and sustainability and are considered to be in line with the NPPF and the policies of the London Plan and Local Plan.

17. TRANSPORT

Policy context

17.1 The Mayor's Transport Strategy 2018 (MTS) sets a target for 80% of all Londoners' trips to be made by foot, cycle, or public transport by 2041. The MTS and the London Plan require new developments to promote sustainable transport, reduce congestion, improve air quality, and restrict car parking, especially in areas with good public transport access.

17.2 The policies of the London Plan seek to ensure that proposed development takes a strategic approach to transport and promotes sustainable travel where possible, whilst mitigating any impact on existing transport networks. In particular, Policy T1 requires that development mitigates the impacts on

transport networks and supporting infrastructure and that sustainable transport is encouraged, in order to support the strategic target outlined in the Mayor's Transport Strategy.

17.3 The London Plan also includes other policies of relevance: Policy T2 states that proposals should demonstrate how they will promote Healthy Streets by reducing vehicular dependency and encouraging sustainable methods of transport such as walking, cycling, and using public transport. Policies T3, T4, T5, and T6 concern improvements to transport capacity, specific transport impact mitigation measures, promotion of cycling, and determining the appropriate level and type of car parking. Policy T7 requires that proposals facilitate safe and efficient delivery and servicing, and Policy T9 sets out how transport infrastructure will be funded through planning obligations.

17.4 At the local level, Policy T1 of the Camden Local Plan promotes sustainable transport by prioritising walking, cycling, and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free. Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough, whilst Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road.

17.5 The Draft Camden Local Plan (DCLP) sets out the Council's vision for future development in Camden for the next 15 years, it is a material consideration, and this site is an identified site within that document meaning it is expected to come forward for development (building on aspirations for the site to be a growth area in the Local Plan). With regard to transport matters, the site allocation (C2 – Regis Road and Holmes Road Depot) states that development must, amongst others:

- Ensure that Regis Road is transformed into a green pedestrian and cycling route by moving large vehicles onto a separate service road in advance of any significant commercial development. This should be included as part of the Phasing Plan required for the development;
- Provide a new pedestrian and cycle route between Regis Road and Arctic Street;
- Provide a new connection between Regis Road and Holmes Road;
- Provide a new connection to Spring Place next to the Holmes Road Depot. This should be designed to ensure that it supports both pedestrian and cyclist movement, as well as local servicing in a controlled manner;
- Provide a new north-south pedestrian and cycle route along 'Makers Lane' (the new route proposed between employment premises on

Highgate Road and Kentish Town West) to connect Kentish Town West with the Murphy site and the wider area;

- Significantly improve the junction of Regis Road and Kentish Town Road to create a safe, welcoming, and legible entrance to the new neighbourhood that prioritises the movement of pedestrians and cyclists and provides servicing access for the new employment uses;
- Provide, or facilitate and contribute towards, a new pedestrian and cycle bridge across the railway line to connect the Regis Road and Murphy sites, to provide a connection to the Heath Line, Hampstead Heath, and the wider area;
- Contribute towards improvements at Kentish Town Thameslink and Underground station (including the provision of step-free access, a new station entrance, and an enhanced town square) and Gospel Oak station (including a new eastern access and improved public realm).

17.6 Furthermore, Policy C1 of the DCLP sets out that development within the Central Camden area should support the delivery of several infrastructure schemes that are a priority for this area of the borough. Those that are particularly important to this development site are the following:

- The delivery of step-free access at Kentish Town Underground and Thameslink Stations; Camden Town Underground Station; and Chalk Farm Road Underground Station;
- Public realm improvements in Kentish Town and Camden Town Centres and Queen's Crescent Neighbourhood Centre;
- The creation of attractive and safer pedestrian and cycling routes both into and through the area to deliver the priorities set out in the Council's Transport Strategy and Cycling Action Plan, and;
- The roll-out of the Council's neighbourhood-based Safe and Healthy Streets schemes across this area, delivering through-traffic reduction and other Healthy Streets measures.

17.7 Regis Road Area Guidance SPD, adopted in March 2025, is committed to delivering a development which is '*Seamlessly integrated and well-connected with surrounding neighbourhoods of Kentish Town, Gospel Oak, and Dartmouth Park*'. One of the key infrastructure priority objectives to deliver this vision is the creation of a new pedestrian and cycle bridge over the railway connecting Regis Road and the Murphy site. Nineteen priority infrastructure projects are listed in Table 1 of the SPD, which also includes pedestrian and cycle links on Arctic Street, Holmes Road, and Regis Road.

17.8 Camden's Transport Strategy (CTS) (2019) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets out objectives, policies, and measures for achieving this goal. Camden's priorities include:

- Increasing walking and cycling;
- Improving public transport in the Borough;
- Reducing car ownership and use;
- Improving the quality of our air; and
- Making our streets and transport networks safe, accessible, and inclusive for all.

17.9 In 2024 the Council agreed the delivery plan to implement the next phase of CTS for 2025 to 2028, investing in more environmentally friendly, healthier forms of travel and creating more welcoming streets and neighbourhoods. The strategy includes commitments to:

- Introduce segregated cycle lanes (primary route), public realm and junction improvements along the length of Kentish Town Road between Hawley Crescent/Camden Street and Prince of Wales Road (Phase 1), and then up to Leighton Road (Phase 2), plus wider High Street/public realm improvements and junction upgrades at Regis Road;
- Introduce segregated cycle lanes (primary route), bus lanes, and pedestrian/urban realm improvements along the full length of Fortess Road and Highgate Road;
- Upgrade the Grafton Road modal filter and in-flight Healthy School Street scheme to wider Safe & Healthy Streets intervention with potential further traffic restriction measures and Healthy Streets initiatives (cycle hangars, EVCPs, etc), in the Holmes Road Area/Kentish Town West area, which forms part of a borough wide 'Healthy Neighbourhoods' programme;
- Implement a variety of traffic reduction, public realm, road safety, pedestrian and cycling, urban greening, and Healthy Street measures across the Dartmouth Park area, which form part of Dartmouth Park Healthy Neighbourhood Safe and Healthy Streets scheme, just to the north-east of the site;
- Deliver Better Bus Partnership, which focuses on improving bus journey times and bus passenger experience by implementing upgrades to bus stop/shelter, including Countdown provision, better bus passenger information, and enhanced interchange via Healthy Streets measures to connect bus passengers to/from other public and shared transport services in local areas;
- Provide Green Micromobility hubs across the borough;
- Review Controlled Parking Zone (CPZ) restrictions across the borough with a view to extend hours of controls and/or size of CPZs/sub-zones to deliver various policy objectives;
- Develop a comprehensive network of electric vehicle charging points (EVCPs) that both responds to existing demand for EV infrastructure and provides for and accelerates the uptake of

cleaner vehicles in the future, in line with Camden's Electric Vehicle Charging Point Action Plan;

- Continue to expand the borough's dockless bike and e-scooter hire network and Santander Cycle Hire in the area; and
- Contribute towards the implementation of the CTS Cycling Action Plan and Walking and Accessibility Action Plan.

17.10 Camden's Clean Air Action Plan and Climate Action Plan also contain policies which are relevant to the transport assessment. Camden has also developed a Freight and Servicing Action Plan (FSAP) to support safe, clean, and efficient deliveries, freight, and servicing operations in the borough. It will help the borough to meet the objectives in the Camden Transport Strategy, and the Plan was adopted on 1st July 2024.

Site context

17.11 The site is located to the west of Kentish Town Road, with Holmes Road to the south and National Railway lines running to the north and east, along with London Overground lines running to the west. Regis Road runs through the site and connects it with Kentish Town Road, which forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.

17.12 The site is generally fairly accessible by public transport, though the railway lines block access into and out of the site from the west, meaning there are limited transport options in this direction. As such, the Public Transport Accessibility Level (PTAL) ratings vary between 2 (poor) and 6a (excellent) across the site, with the former to the west and the latter to the east, closest to Kentish Town Road.

17.13 Regis Road is notably only able to be accessed from the east and there is no vehicular access through the site due to the lack of access point to the west. There are also no connecting roads that link Regis Road with adjacent streets; although there is a small spur of Regis Road (commonly known as Browns Lane) that extends towards Spring Place, there is no existing opening between these two roads. Therefore, Regis Road is in effect a cul-de-sac, with all entry and egress from the site needing to take via the junction with Kentish Town Road. The isolated nature of the site is something that policy and guidance seeks to address, it is a strategic priority to improve access to the land and knit it into surrounding communities.

17.14 With respect to surrounding transport infrastructure, the closest London Underground station is Kentish Town, approximately 300m east of the site's centre. Kentish Town station also provides National Rail services. The closest London Overground stations are Kentish Town West and Gospel

Oak, located approximately 1km south-west and 1.3km north-west of the site, respectively. The closest bus stops are located on Kentish Town Road.

17.15 The development site is not well served by the Santander cycle hire scheme, with the nearest docking station located on Bonny Street outside Camden Road Overground Station, approximately 1.5km south of the site. However, proposals which include the installation of a new Santander cycle hire docking station on Castlehaven Road, approximately 400m southwest of the site, were approved by the Director of Environment and Sustainability on 22nd August 2025. This new docking station has planning permission (ref. 2025/0201/P) and is expected to be installed in Summer 2026 subject to statutory processes. Transport for London (TfL) remains committed to expanding the network of docking stations into the area subject to funding availability.

17.16 The nearest dedicated parking bays for dockless rental e-bikes and rental e-scooters are located on Holmes Road and Islip Street. However, these bays are already showing signs of overcapacity and increasing demand. Proposals which include the installation of new dedicated parking bays for dockless rental e-bikes and rental e-scooters at five locations in Kentish Town, including Holmes Road, Kelly Street, and Talacre Road, were approved by the Director of Environment and Sustainability on 22nd August 2025.

17.17 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes, such as Car Clubs, Santander hire bikes, rental E-scooters, and E-bikes. The STAL analysis shows grades between 1B and 5 in the vicinity of the site, which indicates opportunities for improvement, considering it is Camden's aspiration (and target) for the STAL score to be 5. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, along with the Santander "docked" system, with the aim of additional bays being able to be provided in the future.

Trip generation

17.18 The TRICS database was used to derive the anticipated person trip rates for all land uses, with the mode share obtained from 2021 Census.

17.19 The proposed development will result in a significant increase in person trips. The anticipated high volume of the walking and cycling trips are likely to be made from Kentish Town station (for London Underground and national rail services), Kentish Town West and Gospel Oak London Overground stations, bus stops on Kentish Town Road, and Kentish Town, Camden Town, and Chalk Farm town centres. Considering the increase in active travel trips to and from the site, the Council will seek to secure

financial contributions towards the aforementioned priorities in the new Local Plan and the CTS delivery plan.

17.20 An Active Travel Zone (ATZ) assessment included in the TA demonstrates there are opportunities for improvements to the walking and cycling environment, which is pertinent given the Council's commitment to implement the Safe & Healthy Streets programme in the Kentish Town Area (and Dartmouth Park area). This includes a segregated cycle route on Kentish Town Road, Highgate Road, and Fortess Road, and the upgrade of an in-flight Healthy School Street scheme, to wider Safe & Healthy Streets initiatives (cycle hangars, EVCPs, etc), in the Holmes Road Area/Kentish Town West area.

Vehicle trips impact on Regis Road

17.21 Traffic data collected in December 2025 indicates that there are currently up to 4,230 weekday trips on Regis Road. The future baseline consists of a lower 553 trips, which is informed by the removal of the Asphaltic and Kentish Town Industrial Estate uses and their associated motorcycle trips which account for approximately 33% of vehicle traffic from these existing sites. The proposed development is projected to generate 906 trips overall, which would comprise servicing, film studio operational vehicle movements, and taxi trips. This leads to an overall estimated decrease of 604 vehicle trips overall, which is considered acceptable.

17.22 The vehicle trip generation net impact of the proposed development is presented in the table below:

	Regis Road West	Regis Road East	Total
Current Baseline	1743	4230	4230
Future Baseline	197	2684	2684
Future Development	293	906	906
Future Total Trips	490	3590	3590
Net Impact	-1253	-640	-640

Vehicle trip generation net impact of proposed development

Car and cycle parking

Car parking and vehicular access

17.23 The development is proposed as car-free, with the exception of blue badge car parking and Film Studio operational car parking.

17.24 With respect to blue badge parking, the London Plan sets the requirement that a designated disabled persons' space should be provided for at least 3% of dwellings. This results in a requirement of seven disabled parking spaces for Inkerman Gardens (to be located on Spring Place) and seven

disabled parking spaces for the Heathgate buildings (to be located off-street and outside the buildings). These would be secured in perpetuity.

17.25 In total, the film studios would have 118 car parking spaces, which would be contained within the basement of the main studios building. These would be allocated and marked exclusively for operational, maintenance, or prop vehicles associated with the film production. The proposed parking provision is provided in summary table below:

Type of parking	Spaces
Permanent On Site	
Site security, operational and maintenance vehicle spaces	10
Site movement vehicle spaces	5
Production vehicle spaces (pickup and towing vehicles for set movement and filming)	15
Prop vehicle spaces – spaces reserved for prop vehicles such as cars, vans, ambulances, police patrol, and all other set vehicles	25
Total	**55**
Non-Permanent Spaces	
LGV loading space (short stay loading bays only)	6
Temporary short stay for talent trips, private drop-off and pick up, couriers	10
Dedicated accessible bays	6
Spaces for booking by operational staff as needed – hair & makeup vans/cars, trades access for set operations and building, lighting contractors, technical and filming contractors and equipment technicians, costume design, catering, etc.	41
Total	**63**
TOTAL PARKING SPACES	**118**

Total operational parking for the proposed film studios

17.26 As shown by the table above, 55 of the parking spaces would be permanent spaces and 63 would be non-permanent spaces (which includes loading bays, drop-off/pick-up bays and spaces reserved for accessible parking only). The quantum of parking spaces has been compared with parking provision at other film studio sites in London, such as Eastbrook Studios (Dagenham), Quayside Quarter (Southall), Twickenham Studios (Twickenham), and West London Film Studios (Hayes).

17.27 Typically, the above film studios provide between 22 and 95 car parking spaces per sound stage. By contrast, Camden Film Studios will provide 118 parking spaces for eight sound stages, which equates to approximately 15 spaces per sound stage. Whilst the proposed car parking provision is lower, it is important to note that the studios used for the benchmarking exercise are not directly comparable, given these are all located in outer London locations with very low PTAL scores of 0-3.

17.28 The level of car parking is significant given the highly accessible location, however officers accept that this is necessary for the successful operation

of the studios given that the operational demands of film production requires regular visits by large crews, specialist contractors and movement of specialist equipment. It is also understood that the parking provision is significantly lower than the industry norm for London-based film studios, representing a reduction of up to 84% on other studios. Nonetheless, a Parking Operational Management Plan be secured by Section 106 legal agreement , with the long-term aspiration to reduce car parking at the site. This plan will also include (but not be limited to) the following:

- Continuous monitoring of parking demand, utilisation, and compliance, with the intention of reducing the level of onsite parking in the long-term;
- The use of cargo bikes for local trips, small equipment transfers, and last-mile logistics;
- Car sharing aimed at specialist film crew and contractors whose operational responsibilities require them to travel with equipment or at atypical hours;
- Provision of travel information relating to public transport options, active travel routes, site parking restrictions, car sharing opportunities, and the availability of cargo bike rentals for all crew and contractors prior to the start of filming to influence behavioural change.

17.29 In accordance with the standards set out in the London Plan, Electric Vehicle Charging Points (EVCP) should be provided for all on-site parking. This should be 20% active provision (a socket or equivalent connected to the electrical supply system that can be used for vehicle charging) and 80% passive provision (infrastructure in place so that a socket or equivalent for vehicle charging can be easily added at a future date). Details of vehicular charging are secured by condition .

17.30 In addition to the above, two electric vehicle charging points (fast chargers) should be provided on Spring Place, for which a financial contribution of £40,000 is secured by Section 106 legal agreement .

17.31 Given the car free nature of the remainder of the proposed development, there is a requirement to provide at least one car club bay, including one electric vehicle charging point (fast charger). To cover the car club space and electric vehicle charging, a financial contribution of £40,000 is sought, which will be secured by Section 106 legal agreement .

CPZ Review

17.32 The site is located within the controlled parking zone (CPZ) ‘CA-L Outer’, which operates from 08:30-18:30 Monday to Friday only. To the east, it also borders ‘CA-M East Kentish Town’, which also operates 08:30-18:30 Monday to Friday only.

17.33 Objective 2 of the CTS sets out to reduce car ownership, car use, and motor traffic levels in Camden. To this end, it features several measures in support of achieving this objective. One of these (2d) states that the Council will:

> *"undertake a study to provide a robust evidence base using all relevant data and local context to identify where amendments to Controlled Parking Zone (CPZ) hours of control or size will have an impact on car ownership and car use and use that study to help guide future reviews and decisions."*

17.34 In alignment with the above action, Camden's Controlled Parking Zones (CPZ) Review final report, which was published in February 2023, independently appraised all of Camden's CPZs using a multi-criteria assessment. The findings show that there is a greater need to manage parking demand in the borough through the hours of CPZ controls. The CPZ Assessment results show that CPZ 'CA-L' performed poorly in terms of the impact of its current hours of control in helping to manage demand, and was therefore attributed an 'Amber' RAG status, which presents the need and/or justification for increasing the regulation parking. The review recommends, amongst other actions, that the CA-L hours of operation are extended subject to consultation and decision-making processes.

17.35 In 2024, Camden reviewed its progress on the CTS and set out its delivery plan for the period covering 2025-2028, which was agreed by Camden Council's Cabinet. This commits to deliver a package of parking management measures to reduce motor vehicle ownership and use, traffic levels, and vehicle emissions in the Borough, and includes:

- CPZ hours extensions
- Workplace Parking Levy
- EVCP roll out

17.36 The controlled hours of the 'CA-L Inner' CPZ apply only from 08:30 to 18:30, Monday to Friday. It is therefore likely that further reviews will be required to assess whether controls can be extended into the weekends, in line with the 'CA-L St Leonards Square' CPZ, located approximately 200m south of the site. Other adjacent CPZs, such as 'CA-M East Kentish Town' to the east and 'CA-L Inner' to the west, which also operate from 08:30 to 18:30, Monday to Friday only, could also be affected by out of hours parking from the proposed development. This impact on adjacent CPZs would be compounded given the high demand for parking from users of the proposed use as described above. Given the scale and location of the proposed development, it is considered appropriate to require a contribution of £150,000 towards future reviews of the 'CA-L' and 'CA-M East Kentish Town' CPZs which would be secured by legal agreement.

Coach parking

17.37 Coach visits to the hotel could result in significant delays and safety issues on Kentish Town Road and Regis Road. As such, coach parties will not be permitted to access the hotel use (or the wider film studios, including the visitor attraction) and this will be secured by Section 106 legal agreement .

Cycle parking

17.38 The Council requires the provision of high-quality cycle parking in accordance with Local Plan policies and guidance, London Plan policies and guidance, and the London Cycling Design Standards (LCDS).

17.39 The proposed cycle parking provision in terms of quantum is shown below:

Site	Land use	Short stay spaces	Long stay spaces
Inkerman Gardens	Studios	16	106
	Retail	12	3
	Residential	11	439
Camden Film Studios	Studios, office, and orchestra space	41	281
	Visitor attraction	9	61
	Education	16	12
	Hotel	3	8
Heathgate	Commercial	29	4
	Residential	8	417
School Building and Pavilion	Cinema	6	1
	Education	3	40
Station House	Residential	2	51

Total cycle parking in numbers of spaces proposed by site

17.40 The proposed cycle parking quantum is expected to be in accordance with the London Plan standards and will be provided within dedicated cycle parking areas. The cycle parking areas provided are expected to be easily accessible, step-free, and compliant with London Cycle Design Standards guidance. Long-stay provision would include a proportion of Sheffield stands (which are single-tier, and therefore more accessible) and a proportion of spaces designed for larger bikes. Short-stay cycle parking shall be provided off-street where possible.

17.41 The full details of cycle parking would be secured by condition, to ensure that all spaces are fully compliant with policy and guidance . This condition

is structured such that cycle parking for each site can be discharged at the appropriate time, and in each case, prior to the commencement of the relevant site.

Travel planning

17.42 A Framework Travel Plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. Modal share projections should be set for both walking and cycling in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

17.43 The Framework Travel Plans for each phase of development will be secured by Section 106 legal agreement and will include an associated monitoring and measures contribution of £11,348 for each document. Further detailed site-specific Travel Plans (five, one for each distinct plot of the development – the energy centre and Heathgate are considered as one plot) will be required for each development plot, which will also be secured as a planning obligation.

Access, servicing, and deliveries

17.44 The main access to the Regis Road site, including for servicing, is via the junction of Kentish Town Road and Regis Road. As existing, this is the only access point for motor vehicles. Cyclists and pedestrians are also able to access the site from this location.

17.45 The proposed development would be delivered in phases, as outlined in Section 10 of this report. The main access point of Regis Road would continue to be used for servicing throughout all four phases. Although parts of Phases 1a, 2a, and 2b would be accessible by alternative roads (Holmes Road and Spring Place), these would not be used during construction for servicing. Only Regis Road would be used for construction purposes given that it is a larger road that is more readily able to accommodate construction vehicles and movement.

17.46 At occupation phase, servicing would still primarily take place via Regis Road for most development sites. Heathgate, Station House, and the School Building and Pavilion would all be serviced via Regis Road, with the exception of the residential dwellings at Station House, which would be serviced via Holmes Road. The film studios will be serviced via a separate service road which helps to minimise the number of vehicle movements on Regis Road, particularly of larger vehicles that would be associated with the film studio use and present more of a concern to the pedestrian environment. The service road is a key piece of infrastructure required to support the development. There will be no vehicular route through between Regis Road and Spring Place, so servicing related vehicles for Inkerman Gardens will be required to use Spring Place for servicing purposes.

17.47 As previously noted, Regis Road is in effect a cul-de-sac road with only one entrance. As such, it is essential that new connective routes are provided in order to ensure that residents of Heathgate (at the western end of Regis Road) are not located at the furthest point with no alternative means of accessing their homes. Therefore, the development will be required to deliver a pedestrian link from Spring Place to Regis Road, incorporating Browns Lane into a new means of access. This will be secured as part of the proposed development. To improve future permeability into the site, the proposed development must also support the creation of future link connections that would be delivered outside the boundaries of the site, such as the creation of a bridge over the railway line to the north and a pedestrian route through to Arctic Street to the west. This application will secure a pedestrian, cycling and environmental improvements contribution of £6,482,386 which is expected to contribute towards the delivery of these links. These changes are also covered in detail in section 10 of this report.

17.48 A draft Delivery and Servicing Plan (DSP) was submitted with the application. This used a combination of TRICS trip rates for servicing vehicles and the transport consultant's in-house standard servicing trip generation assumptions to calculate the servicing demand generated by the proposed development. The anticipated daily two-way servicing trips for each of the sites are presented in the table below.

Site	D&S Access Road	Daily Unmanaged	Daily Managed
Site 1 – Inkerman Gardens	Holmes Road	120	62
Site 2 – Camden Studios	Regis Road East	461	353
Site 3 – Heathgate	Regis Road West	78	52
Site 4 – Pavilion A (Holmes Road West)	Regis Road East	2	2
Site 5 – London Screen Academy	Regis Road East	12	6
Site 6 – Station House	Holmes Road	2	2
Site 7 – Regis Road RRC (residential)	Holmes Road	8	6
Total		**683**	**483**

Proposed daily two-way servicing trips

Freight consolidation

17.49 The proposed development has demonstrated a commitment to implementing a freight consolidation strategy to reduce the overall vehicular impact of the development to 483 daily two-way servicing trips. The strategy consists of the following:

Off-site consolidation measures (practical examples from other developments are provided in DSP);

- Encouraging residents and commercial tenants to route their deliveries via a consolidation centre

- Encourage deliveries by cargo bikes

On-site consolidation measures

- Lockers (e.g. InPost and/or Amazon)
- Concierge services for Inkerman Gardens and Heathgate residential units, to avoid the need for repeat deliveries.

Proposed servicing strategy

17.50 At the Inkerman Gardens site, servicing and waste collection for the commercial element will take place on-site within the plot, and on Spring Place for the residential accommodation which is considered acceptable in principle.

17.51 The servicing area for Camden Studios includes seven bays and is proposed to be provided within the ground floor, accessed from the service road running east-west along the north of the building (which is located within UPS land and immediately adjacent to the UPS building). Five of these bays can accommodate 16.5 metre articulated vehicles and two bays can accommodate 12.6 metre articulated vehicles. All servicing vehicles will enter the bays by reversing into them, then exit the building in a forward gear. Refuse collection will take place in dedicated bays to the east of the building adjacent to the waste store. The studios will have a private contract for their refuse collection to ensure regular services. The swept path analysis that has been provided for servicing arrangements is acceptable.

17.52 UPS commented on the application to raise concerns regarding the provision of a service road in this location due to the potential impact it could have on their operations. UPS have suggested that the film studios avoid use of the service road between 7am and 9am to avoid excessive conflict between the existing neighbouring and proposed uses. This is considered a reasonable manner of ensuring that both neighbouring uses can co-exist and is secured by condition.

17.53 The servicing and waste collection for Heathgate residential will take place on site and be accessed from Regis Road. The swept paths that have been provided demonstrate that servicing and collection arrangements would not result in any conflict and would be acceptable.

17.54 The servicing and waste collection for the London Screen Academy and Pavilion buildings will take place on site, accessed from Regis Road. The swept path analysis provided is acceptable.

17.55 The servicing and waste collection for the residential component of Station House would take place on Holmes Road, which is the location of a Healthy School Street and other Safe and Healthy Streets measures. As such, motor vehicles travelling westbound are not permitted to proceed beyond the

junction with Raglan Street due to a temporary traffic order associated with the Safe and Healthy Streets scheme. This would mean that, if the scheme were to be made permanent, vehicles servicing the site, including waste collections, would need to approach the site in an eastbound direction from the western end of Holmes Road. It has also been noted that servicing from the kerbside would likely block Holmes Road and therefore appropriate loading bay provision will need to be secured close to the Station House

17.56 The servicing of the recycling centre (including skip collections) component of Station House will take place from within the recycling centre, which is accessible from Regis Road.

17.57 A detailed DSP, including a monitoring fee of £15,000, is required for the site updated at each stage for all of the five plots, in order to ensure successful implementation of the freight consolidation strategy. This will help ensure that any operational impacts associated with delivery and servicing movements could be mitigated, with the main objective of re-timing and reducing the level of servicing traffic. The documents will be secured by Section 106 legal agreement and will, amongst other things:

- Set out the hours within which servicing is expected to be managed;
- Demonstrate the acceptable provision of a loading bay on Holmes Road (in the case of the 'Station House' DSP;
- Provide a target for the maximum vehicle numbers that consolidation is expected to achieve which for many land-uses is in the order of a 50% reduction compared with non-consolidated servicing; and
- Confirm, when known, the off-site consolidation centres.

Construction management

17.58 Construction management plans (CMPs) are used to demonstrate how developments will minimise the impacts from the movement of goods and materials during the construction process (including any demolition works). The Council's primary concern is public safety, but it also needs to be ensured 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.

17.59 The site is located close to Kentish Town Road, which forms part of the strategic road network and strategic cycle route network. 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.

17.60 The proposals will generate high levels of construction traffic. Considering the proximity of the site to Kentish Town, one of Camden's designated Town Centres, it will be necessary to restrict construction traffic arriving and departing the site to between the hours of 0930 and 1630 on weekdays.

17.61 A Construction Logistics Plan was submitted with the application. Full details of construction logistics management will be secured through section 106 legal agreement as part of the construction management plans (CMPs), detailed below.

17.62 Due to the nature and scale of the development, a CMP will be required for the proposed works. Given that the works would take place in four separate phases, a detailed CMP for each phase of construction would be required, which would be secured by Section 106 legal agreement. This would require input from officers at each phase of construction relating to the development and assessment of the CMP for each phase. The obligation would also include Implementation Support contributions of £60,000 and Impact Bonds of £50,000 for each phase.

17.63 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 by Section 106 legal agreement . This will help to ensure that residents and people who work in the area are involved in the preparation and evolution of the CMP prior to approval by the Council. The construction working group will meet on a regular basis (e.g. quarterly) throughout the duration of the construction of all 4 phases of the development.

17.64 The contractor will need to register the works with the Considerate Constructors' Scheme, as well as adhere to the CLOCS Standard for Constructions Logistics and Community Safety.

Pedestrian, cycling, and environmental improvements

17.65 Where major development is likely to have significant impacts on the local area which cannot be mitigated by planning conditions, financial obligations towards transport improvement schemes are sought. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes that are being delivered across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on Camden's ambitious Transport Strategy Delivery Plan for 2025-2028, in which developer contributions have been identified as a key source of funding.

17.66 In line with the increase in walking and cycle trips generated by the proposed development and further promoted by the development Travel Plans, a financial contribution of £6,482,386 will be sought, which would be

secured by Section 106 legal agreement . This would go towards delivery of new links outside the site but within Regis Road growth area and the following improvements in the wider area:

- Segregated cycle lanes (primary route), public realm and junction improvements along the length of Kentish Town Road between Hawley Crescent / Camden Street and Prince of Wales Road (Phase 1), and then up to Leighton Road (Phase 2), plus wider high street / public realm improvements and junction upgrades at Regis Road;
- Segregated cycle lanes (primary route), bus lanes, and pedestrian / urban realm improvements along the full length of Fortess Road and Highgate Road;
- The Grafton Road modal filter upgrade and in-flight Healthy School Street scheme to wider Safe & Healthy Streets intervention with potential further traffic restriction measures and Healthy Streets initiatives (cycle hangars, EVCPs, etc) in the Holmes Road Area / Kentish Town West area, which forms part of a borough-wide Healthy Neighbourhood programme;
- Dartmouth Park Healthy Neighbourhood Safe & Healthy Streets scheme to the north-east of the site; and
- A Better Bus Partnership.

17.67 This contribution reflects the scale and location of the proposed development and would be used to improve active travel conditions in the local area. It is also proportionally consistent with the contributions secured from other developments comprising similar land use classes.

17.68 Infrastructure that will be supported to improve connectivity between the site and the surrounding area will also be secured as part of the obligations detailed in Section 10 of this report.

Step-free access at Kentish Town stations

17.69 Once complete, the development proposals would deliver 513 homes to the area as well as a range of commercial, business, and service uses (Class E), film production uses (Sui Generis), education uses (Class F1), visitor accommodation (Class C1), re-provided recycling facility (Sui Generis), local community uses (Class F2), cinema (Sui Generis), drinking establishment (Sui Generis), and a studio experience / museum use (Sui Generis).

17.70 Taken together, these uses would cumulatively result in a significant increase in pedestrian and cycle trips, and the applicant has undertaken a transport assessment to demonstrate the impact based on modal split. Given that the neighbourhood will be largely car-free with the exception of disabled parking and operational parking for the film studios, it is fair to assume that most residents, workers and visitors will be heavily reliant on

walking, cycling and the public transport network for journeys outside their immediate area. The site is within relatively easy walking distance of Kentish Town (National Rail and London Underground) and Kentish Town West (London Overground) stations. Both stations are well used and currently have no step free access.

17.71 The Council's aspiration, as set out in policy and guidance, is for both Kentish Town and Kentish Town West stations to be upgraded. However, there is no TfL funding currently allocated for these works. The proposed development would create additional pressure on both stations (albeit that the applicant's modelling shows it can be accommodated) and an increased demand for step free provision. Council officers and TfL consider that the impact of the proposed development has been underestimated. The impact of the development on existing public transport infrastructure has been raised as a concern by local residents.

17.72 Even if it were to be accepted that the existing station could theoretically accommodate the additional demand from proposed development, the development would significantly reduce available capacity going forward. The development is only one of several developments that are expected to come forward in the local area in the near future and as such it is reasonable to expect that it contributes proportionally to transport improvements in the local area. Other future schemes nearby will also be required to contribute.

17.73 Taking account of this, a proportionate contribution is sought towards providing step free access and capacity enhancements, which may include alterations such as improvements to the layout, rather than just adding an additional gate line. The required financial contribution has been carefully calculated to consider what is necessary to make the development acceptable in planning terms, how it is directly related to the development, and how it is fairly and reasonably related in scale and kind.

17.74 Kentish Town station is used by 2 million passengers annually (2022/23) or 38,462 passengers weekly and forms a strategically important interchange with London Underground, Thameslink, and bus services. However, there is no step-free access at this station, with the small ticket hall at street level providing access via escalators and staircases to the two London Underground platforms and multiple National Rail platforms. Kentish Town West is used by 1.9 million passengers annually (2023/24) or 36,538 weekly and also forms a strategically important interchange – though in this instance with London Overground and bus services. As with the Kentish Town station, there is no step free access to the two Weaver Line platforms above street level, which are accessed via staircases.

17.75 In view of the above, a contribution of £10 million towards improvements to Kentish Town Station is required to fund step-free access, which would be secured as part of the Section 106 legal agreement . This would help to

ensure the creation of a mixed, balanced, and inclusive community on the site, and the significant sum would cover further feasibility and costing work for improvement options, as well as contribute towards delivery. The expectation is that this would be to progress feasibility work and deliver step free access at Thameslink, but the obligation should have flexibility to allow for funding to be redirected towards alternative public transport improvements, which could include Kentish Town Underground Step Free Access, depending on the outcome of feasibility work. A contribution is only sought towards Kentish Town Station (rather than West Kentish Town) in accordance with the vision set out by the KTPF, which specifically focuses on improvements to the access to Thameslink platforms. Focusing requests for contributions on one of the two projects also gives the chosen project a much greater chance of being prioritised for TfL funding. Both the Council and TfL would commit to exploring other funding options for addressing the funding gap, which might include use of CIL, as set out in policy.

17.76 As part of this recommendation, a Section 106 obligation would require that a 'Kentish Town Station Transport Task Force' is established, which would include representatives from TfL, Thameslink, the Council, and Yoo Capital . These stakeholders would agree the scope and programme of the feasibility work, with the expectation that the funds sought for delivery would be payable in the early phases of the scheme, prior to implementation of the later phases.

Pedestrian and cycle bridge

17.77 A key objective of the Regis Road Growth Area Site Allocation and Regis Road Area SPD is the provision of a new pedestrian and cycle bridge over the railway that would connect the Regis Road site with the Murphy's Site to the north. The bridge should provide ramps and step-free access to enhance pedestrian and cyclist accessibility. This would be delivered privately by developers in the area to adoptable standards and not by the Council. An obligation to secure the delivery of this bridge link would be included as part of the Section 106 legal agreement. This is detailed further in section 9 (Infrastructure and phasing) of this report.

Highways works

Public highway

17.78 Where construction works may result in damage to the public highway, a financial contribution is typically sought by the Council.

17.79 As part of this proposal, significant changes to the junction of Kentish Town Road and Regis Road, including to the existing traffic signals, will be required to facilitate the development. The delivery of these works is secured separately and covered by the Infrastructure Delivery Strategy,

referenced above in Section 9 of this report (Infrastructure and Phasing), therefore those works do not require a highways contribution.

17.80 The public highway on Holmes Road and Spring Place could sustain significant damage as a direct result of the development proposals, if approved and implemented. In addition, any redundant crossovers (dropped kerbs) would need to be removed from Holmes Road and Spring Place.

17.81 Minor changes to Arctic Street will also be necessary to facilitate the development proposals, in order to create a pedestrian and cycling link between Regis Road and Spring Place via Arctic Street. This link is dependent on the application coming forward from the adjacent landowner (the Joseph Holmes site); however, a temporary east to west link is sought via Browns Lane, which is owned by the applicant. This will enable access to Regis Road via Browns Lane from Spring Place. It is particularly important that this be secured as the Heathgate Residential is part of the Phase One works, which would otherwise be at the end of a 'cul-de-sac' with the only access being via Regis Road. These works again are included in the Infrastructure Delivery Plans secured by Legal Agreement (see obligation xx)

17.82 As a result of the impact to the highway detailed above, the Council will seek to secure a highway works contribution of £600,000 by Section 106 legal agreement to ensure that there is funding in place to cover the above works. The alterations will be undertaken by the Council's highways contractor for this part of the borough.

Private highway

17.83 The proposed development includes several changes to Regis Road which, is not currently adopted highway and is privately owned and maintained.

17.84 The detailed design of Regis Road will be secured as part of the obligations discussed in section 9 (Infrastructure and phasing) of this report. The applicant has provided illustrative drawings of the 'main' section of Regis Road, which runs west of the proposed recycling centre towards the northwest of the site These show two lanes shared between motor vehicles and cyclists given that there will be limited vehicular movement along this stretch of road. However, the final design of the road will be subject to the Infrastructure Delivery Strategy, which should also include details of improvements to the cycling infrastructure and integrate with proposals relating to the Kentish Town Road junction that come forward.

Micro and shared mobility improvements

17.85 Parking bays for dockless rental e-bikes and rental e-scooters are located in proximity of the site. However, these provide capacity for existing usage

by residents and people who work in or visit the area and would not be sufficient to accommodate the proposed development.

17.86 The Council also 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, which would be secured through developer contributions.

17.87 As such, a cycle/e-scooter hire improvements contribution of £20,000 would be secured through the Section 106 legal 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, such as by expanding existing bays and providing additional bays. It is anticipated that staff and visitors are likely to use 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.

17.88 The development is not well served by the Santander cycle hire scheme, with the nearest docking station being located approximately 400m southway of the site on Castlehaven Road; this is also yet to be installed, with a target of Summer 2026 subject to statutory processes. However, there are plans to expand the network into the area, so a contribution of £120,000 is sought towards the new docking stations, which will be secured by Section 106 legal agreement .

Conclusion

17.89 Policy and guidance set out that the strategic priority for this site is to make it more permeable and to create an environment which is pedestrian and cyclist friendly. The proposed development will reduce vehicular traffic, larger vehicles which will need to access the site for the film studio will have to use a separate service road and other roads/links will be specifically designed to accommodate the increase in pedestrian and cycle trips. Public transport improvements are proposed to improve accessibility to the site. The proposed development complies with the development plan in terms of transport implications subject to the conditions and obligations set out above.

18. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening, and biodiversity

18.1 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.

18.2 Policy G7 of the London Plan states that trees of value should be retained wherever possible and that adequate replacement trees should be provided if and where tree removal is necessary. Policy A3 of the Local Plan states that replacement trees should be provided where the loss of significant trees occurs and that developments are expected to incorporate additional trees and vegetation where possible. CPG 'Trees' seeks to preserve existing tree and canopy coverage.

18.3 Although the submitted Arboricultural Impact Assessment has surveyed a total of 124 trees, the vast majority of these are in the surrounding area and not within the red line of the site. There are 27 trees in total within the red line of the site, of which 23 are proposed for removal and a further two would require crown reduction. The table below sets out the types and numbers of the 25 trees that are proposed for removal or reduction.

Tree Category (quality)	**No. of affected trees**	**No. to be removed**
Category A (high)	0	0
Category B (moderate)	17	15
Category C (low)	8	8
Category U (poor)	0	0
Total	25	23

Summary of affected trees and proposed removals

18.4 As shown by the table above, a significant number of the affected trees on site would be proposed for removal, and there are only two trees beyond these that are located within the site and are neither proposed for removal or reduction. The trees are required to be removed in order to facilitate the proposed development, as a result of demolition works, construction works, drainage diversion, and landscaping operations. It is worth noting that the other 97 trees that were surveyed due to being in close proximity to the site but not within the site boundary would be retained.

18.5 Of the trees to be removed, 8 are category C (low quality) and 17 are category B (moderate quality). Fifteen of the trees to be removed are Birch, with the rest being other species such as Sycamore, Robinia, and Ailanthus. Collectively, these trees have relatively low visibility outside of the site and the majority are mature examples of relatively smaller and shorter-lived species such as Birch.

18.6 As noted above, the primary driver for the loss of trees would be the layout of the film studios building; a large amount of the trees that are to be removed are located in the forecourt area of the Kentish Town Industrial Estate, which would be built over for the construction of the studios building. Although the loss of trees is regrettable, these currently provide limited amenity value to the wider area and would allow for the delivery of a scheme that brings a net increase in trees across the site.

18.7 Although a significant amount of the existing trees removed on site are proposed for removal, their loss would be of relatively low impact due to their layout, visibility, and the species involved. This is also due to the large number of trees in the surrounding area that are proposed to be protected and retained.

18.8 The impact of the proposal with respect to trees is also significantly alleviated due to the replacement planting proposed as part of the proposed works. Across all four phases of development, it is proposed to plant 231 new trees planted at ground level and an additional 70 on the roof across the site, which far exceeds the loss of the 23 existing trees. As such, the visual appearance of the site would be improved greatly through the tree planting, in addition to the increase in soft landscaping of the site. The proposed landscaping scheme would be a significant improvement on the existing hard landscaping that currently dominates the site as a result of the industrial use. The tree species listed in the proposed schedules would also appear to be appropriate for the location.

18.9 Details of the proposed new trees, including final numbers, species, and sizes will be secured by condition , and will be able to be interrogated in further detail by the Council's Trees and Landscaping Officer and Nature Conservation Officer to ensure suitability for the site, context, and local climate. Details of tree protection to ensure all trees identified for retention on and off the site are protected, would also be secured through conditions and interrogated in detail when applied for discharge .

18.10 With respect to the ecological impacts of the scheme, the proposed development has been assessed by way of an ecological appraisal. This demonstrates that the site is urban in nature and context, and as such is dominated by artificial habitats produced by buildings, rather than natural habitats. There are some semi-natural habitats on site, such as shrub, modified grassland, green walls, and individual trees, which provide some habitat value, as well as opportunities for breeding birds – both within buildings and vegetation. There is limited opportunity for foraging or community bats, though some value for roosting bats within Station House. As such, the required precautions would be taken to ensure there is no impact to roosting bats during demolition and construction work.

18.11 The ecological appraisal concludes that there is relatively little potential for adverse effects on local biodiversity as a result of the proposed development, largely because of the limited value of the existing baseline. Standard considerations of breeding bird, bats, and other wildlife would be required, and conditions would be used to secure provision of ecological enhancements, for example bat and bird boxes .

18.12 The proposed development includes ecological enhancements throughout the scheme as part of its landscaping. This includes green spaces throughout, such as at the energy centre, around the film studio building, and within Inkerman Gardens. This landscaping also integrates trees, shrubs, perennials, pollinator habitats, and green corridors throughout to promote biodiversity wherever possible. The full details of hard and soft landscaping would be secured by condition, which would include a requirement to submit a comprehensive landscape management plan.

18.13 At roof level, green roofs are proposed that would support biodiversity with a high-quality design and sufficient substrate depth to allow for a good level of plant diversity. Buildings throughout the site has extensive coverage, and the full details of green roofs will be secured by condition to ensure their delivery and subsequent ecological benefit.

18.14 The London Plan uses the Urban Greening Factor (UGF) scores to help objectively evaluate the quality and quantity of urban greening delivered by a scheme. Policy G5 of the London Plan sets a target of 0.4 for predominately residential and 0.3 for predominately commercial developments.

18.15 Within the entire site boundary, this scheme would deliver a UGF score of 0.30, which is slightly below the requirement for predominantly commercial developments. However, it is noted that a large amount of the site area is taken up by existing access roads and areas where it is not possible to deliver urban greening. If the UGF score is calculated based on the development sites only (and excluded the large areas of access road), the value would be 0.40, which exceeds the target UGF score for a commercial-led scheme.

18.16 Additionally, it is worth noting that, when the UGF is calculated for each respective site within the development, the scores are as follows:

- Station House = 0.36
- Heathgate = 0.42
- Camden Film Studios = 0.39
- Inkerman Gardens, School Building, and Pavilion = 0.41

18.17 This clearly shows that the residential sites (Heathgate and Inkerman Gardens) achieve the 0.4 UGF target, whilst all the other sites achieve the

0.3 UGF target. As such, it is considered that the achieved UGF score is acceptable, especially when taken in context within the rest of the site. The given scores noted above will be secured as a minimum requirement by condition , which will also require demonstration that efforts have been made to seek further gains, with an aspiration to increase the UGF value as far as possible.

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

Statutory Biodiversity Net Gain

18.19 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).

18.20 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.

18.21 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.

18.22 Based on the information provided, this scheme will require the approval of a BGP before development begins. However, the improvement to biodiversity will be considerable; the biodiversity net gain report demonstrates that the proposed development will provide an increase in habitat units of 189.59% when compared to the baseline position. As such, there would be substantial biodiversity net gain, and the proposed development would clearly exceed the statutory requirement of 10% BNG.

18.23 The statutory condition will not be repeated on the decision notice, in line with guidance, but informatives explaining the statutory obligations will be included on the decision.

Impact on SINC and Nature Corridor

18.24 The proposed development sits in close proximity to the ‘Kentish Town City Farm, Gospel Oak Railsides, and Mark Fitzpatrick Nature Reserve’, which is a designated Site of Importance for Nature Conservation (SINC). The ‘Biodiversity’ CPG establishes that this is a ‘Site of Borough Importance Grade 1’, meaning it is higher quality and of particular importance to the borough. The CPG also states that, whilst protection is important, management of sites of this type should allow and encourage their enjoyment by the public.

18.25 The SINC is located to the northwest of the site, just adjacent to the Heathgate and Energy Centre buildings, and is a valuable ecological area that is required to be retained, protected, and where possible enhanced. It is not currently publicly accessible, except on volunteer workdays or by special arrangement.

18.26 The Ecological Appraisal submitted with the application assesses the character of the SINC, as well as any potential impact arising from the proposed development. The SINC is noted as hosting a variety of habitats such as secondary woodland, scrub, grassland, tall herbs, and a small pond. Whilst the proposed development is in close proximity to the SINC, it does not include any works directly to the designated site, which would be retained as it currently exists. However, the construction works and occupation phase do have the potential to result in indirect impacts, which would need to be carefully considered and, where appropriate, mitigated against. In particular, dust generation, noise impacts, surface water, potential encroachment of construction activities, light pollution, and overshadowing are all potential impacts that must be accounted for.

18.27 The construction-phase impacts on the SINC are primarily associated with noise and dust pollution, as well as activities potentially moving into the designated area and subsequently causing harm. The main mechanism by which this impact on the SINC will be controlled and mitigated against is through planning conditions and obligations relating to construction management and dust monitoring, which are detailed in Sections 15, 17, and 21 of this report. The Construction Management Plan secured by planning obligation will ensure that all activities relating to demolition and construction keep to clearly defined areas and there is no overspill. The impacts arising from noise are not expected to have a significant impact on the SINC or the habitats within, particularly due to the urban context of the site; the existing industrial use, nature of the surrounding area, and type of species present at the site mean that species at the site are already habituated to a certain level of noise. Additionally, the construction phase will be temporary, so a higher level of noise would only be experienced for a limited duration of time.

18.28 Air quality monitoring and controls (detailed in section 21) will also ensure that there is limited impact to the SINC with respect to these concerns. It is also important to note that the existing habitats present within the SINC are not particularly sensitive to dust deposition, as the faunal species present are not notably vulnerable to this impact. Nonetheless, the potential impacts arising from the demolition and construction phases of the proposed development have been robustly addressed through mitigation measures that will be secured by conditions and planning obligations.

18.29 With respect to the occupation phase of the development, one of the main aspects that could potentially have a negative impact on the SINC would be from increased lighting and any subsequent light spill. The Ecological Appraisal sets out how the proposed development will follow the best practice measures provided by the Institution of Lighting Professionals, which will ensure that lighting design is sensitive to the adjacent sensitive site and habitats within, whilst still providing a high quality and safe public realm. The lighting strategy will therefore help to minimise light spill and ensure that the nocturnal species and ecology present within the SINC would not be adversely affected; this will be secured to ensure that the officers are able to review the details and confirm that the impact will be acceptable.

18.30 A separate consideration at occupation phase is any overshadowing caused by the Heathgate and Film Studios buildings (which are closest to the SINC). The height, scale, and massing of the buildings has been determined by a number of separate considerations, including the need to make the most efficient use of land and deliver much-needed housing. As such, the impact resulting from overshadowing needs to be considered in the wider context of the scheme as a whole. Although there will be some adverse impact from overshadowing due to the height of the buildings, this will be minimal, particularly given the character of the SINC is predominantly typified by denser woodland, for which overshadowing will have less of an impact.

18.31 Importantly, the scheme also delivers significant biodiversity enhancements that contribute positively to the local ecological network. As noted earlier in this section, measures such as significant tree planting and the introduction of green roofs throughout result in a substantial increase in biodiversity habitat units – all of which will strengthen ecological connectivity through and around the site by providing additional foraging and nesting opportunities. These features will complement the habitats present within the SINC, reinforcing its function rather than undermining it. The emerging local plan seeks to create a green nature corridor linking Kentish Town Road and Hampstead Heath as part of a wider Camden Green Network, the site has the potential to contribute to this through the measures already shown, but it is felt that further enhancements in the north-west corner could be delivered adjacent to the SINC and therefore a Biodiversity Enhancement Plan for the north-west corner is to be secured by S106.

18.32 Policy G6 of the London Plan states that, where harm to a SINC is unavoidable, proposals should ensure that damage is avoided to significant ecological features and that any potential impacts are minimised and mitigated against. This development does not propose any development that takes land from or in any way fragments the SINC and has been designed such that the impact on the SINC is minimised wherever possible,

through both construction and occupation phases. The proposal is therefore considered to be acceptable with respect to its impact on the SINC.

19. SAFETY AND SECURITY

Policy context

19.1 Policy D8 of the London Plan requires the public realm to be well-designed, safe, accessible, and inclusive, whilst Policy D6 states that means of security for housing should be provided through the principles of good urban design and inclusive design, rather than measures such as gated communities. Policy D11 requires schemes to work with Designing Out Crime Officers (DOCOs) to design and maintain a safe and secure environment that reduces fear of crime, as well as dealing more generally with safety, security, and resilience to emergency.

19.2 At the local level, Policy C5 of the Local Plan seeks to make the borough a safer place by working with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime, and antisocial behaviours. Proposed developments are required to demonstrate that they have incorporated design principles which contribute to community safety and security, with appropriate security and community safety measures and promotion of safer streets and public areas.

19.3 Fearing crime or the chances of being a victim of crime vary notably across age, gender, and race (protected characteristics under the Public Sector Equality Duty), and these discrepancies mean that if the environment is not perceived as a safe public space for all users, certain groups are likely to be excluded or suffer greater impact, contrary therefore not only to Policy C5 of the Local Plan, but also Policy C6, which aims to secure access for all.

19.4 The applicant has prepared a Crime Impact Assessment (CIA) to demonstrate how the proposed development will take steps to deter crime and improve public safety, showing how careful design has been utilised to reduce opportunities to commit crime and increase the feeling of safety for members of the public.

19.5 The Council's Designing Out Crime Officer (DOCO) was consulted on the application and provided comments, which are summarised below.

Crime, security, and building resilience

19.6 The DOCO comments note that the site is unusual in that it is quite isolated in character; due to the boundaries established by the railways to the north and west of the site, as well as the current lack of a north-south connection between Holmes Road and Regis Road, the only entrance point to much of the site area is from Kentish Town Road to the east (it is essentially a cul-de-sac). Whilst the proposal would alleviate this by introducing new connections to the south and future-proofing for connections to the west and

improved permeability to the east, the north will continue to be less accessible until the pedestrian bridge (that links to the Murphy site to the north) comes forward.

19.7 As a result of this, until a pedestrian bridge is brought forward, the area surrounding the Heathgate buildings could potentially be experienced as an isolated space that receives little through movement and thus natural surveillance. Additionally, although the blocks include concierge/lobby areas, and one community space at ground level, there will be little activation through commercial uses, for example. The DOCO has expressed the view that, although there may well be a sufficient level of legitimate activity in the daytime, the nighttime may potentially invite antisocial activity into the area. Whilst this comment is acknowledged, it is considered by officers that the separation of public and private spaces around the bases of the blocks will be sufficient to ensure that there are no 'leftover' spaces where the lack of delineation leads to unwanted activity; by clearly separating private residential areas (which will require fob access, for example), the public realm is clearly defined and can be ensured to be sufficiently activated and overlooked. Following minor design amendments to this part of the scheme, there are also clear lines of site in the surrounding public realm that will help to ensure a safer and more inclusive environment.

19.8 Additionally, a lighting strategy will be secured to ensure that all public areas are adequately lit and avoid spaces that may give the impression of being unsafe, whilst limiting the impact on the adjacent SINC.

19.9 Elsewhere across the site, the proposed development is considered to provide a strong public realm with good levels of natural surveillance, clear site lines, and appropriate delineation of public and private areas. The mix of uses throughout also help to ensure that good levels of activity will be present at the site throughout the daytime and evening, and it is likely that, although at much lower levels, there will be some appropriate level of activation at nighttime – for example, from late showings at the cinema in the School Building and Pavilion or late working at the Film Studios. The aforementioned lighting strategy will secure details across the entire site. Overall, this will help create a safer and more inclusive environment.

19.10 The DOCO comments did also request that the site achieve a design accreditation to silver award and that this standard should be maintained throughout the life of the development. This would be secured as part of a decision to approve , along with details of secured by design measures that would demonstrate the site's ability to achieve accreditation, which would be reviewed by officers and the DOCO.

19.11 In addition to comments received from the DOCO, the Metropolitan Police Service (MPS) did also request that a financial contribution is secured to mitigate the impact of the proposed development on the MPS infrastructure.

This contribution is based on the standard Section 106 calculator methodology used by police services within the UK and is intended to cover the costs of additional officers and police support staff, as well as the infrastructure require to equip and accommodate them. The total contribution is valued as £249,019.43 and would be secured as part of the Section 106 legal agreement .

19.12 As such, the development would result in a safe and inclusive environment in compliance with the development plan, subject to the above conditions.

20. FIRE SAFETY

20.1 Policy D12 of the London Plan requires all major development proposals to be submitted with a Fire Statement prepared by a suitably qualified third-party assessor, outlining how the proposal achieves the highest standards of fire safety. Policy D5 of the London Plan is also relevant to fire safety, as it seeks to ensure that development incorporates safe and dignified emergency evacuation for all building uses. Further guidance is provided in the draft LPG 'Fire Safety'.

20.2 The current fire safety regulatory framework includes three gateways for "relevant buildings". 'Relevant' buildings are defined as those that are 18 metres or more in height or seven or more storeys and containing two or more dwellings or educational accommodation. This applies to new buildings as well as changes of use of existing relevant buildings.

20.3 Gateway One relates to the planning stage of the process and considers fire safety matters as they relate to 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.

20.4 The proposal includes five 'relevant' buildings; these are Blocks A, B, and C of Inkerman Gardens and Blocks A and B of Heathgate. The other buildings that form the development are fully detached from the 'relevant' buildings and as such do not need to be reviewed as part of the Gateway One process.

20.5 Given the proposal involves the construction of 'relevant' buildings, the applicant has submitted fire statements to provide an outline of how the design has been informed by fire safety considerations and satisfy Building Regulations and the policies of the London Plan.

20.6 The proposed development includes a total of 513 new dwellings, 485 of which would be contained within five 'relevant' buildings forming Heathgate

and Inkerman Gardens. Figure X below shows the site layout to identify these buildings (outlined in blue), and their respective heights are as follows:

- Heathgate, Block A: 68.78m / 23 storeys
- Heathgate, Block B: 48.53m / 16 storeys
- Inkerman Gardens, Block A: 49.65m / 18 storeys
- Inkerman Gardens, Block B: 22.35m / 8 storeys
- Inkerman Gardens, Block C: 45.68m / 17 storeys

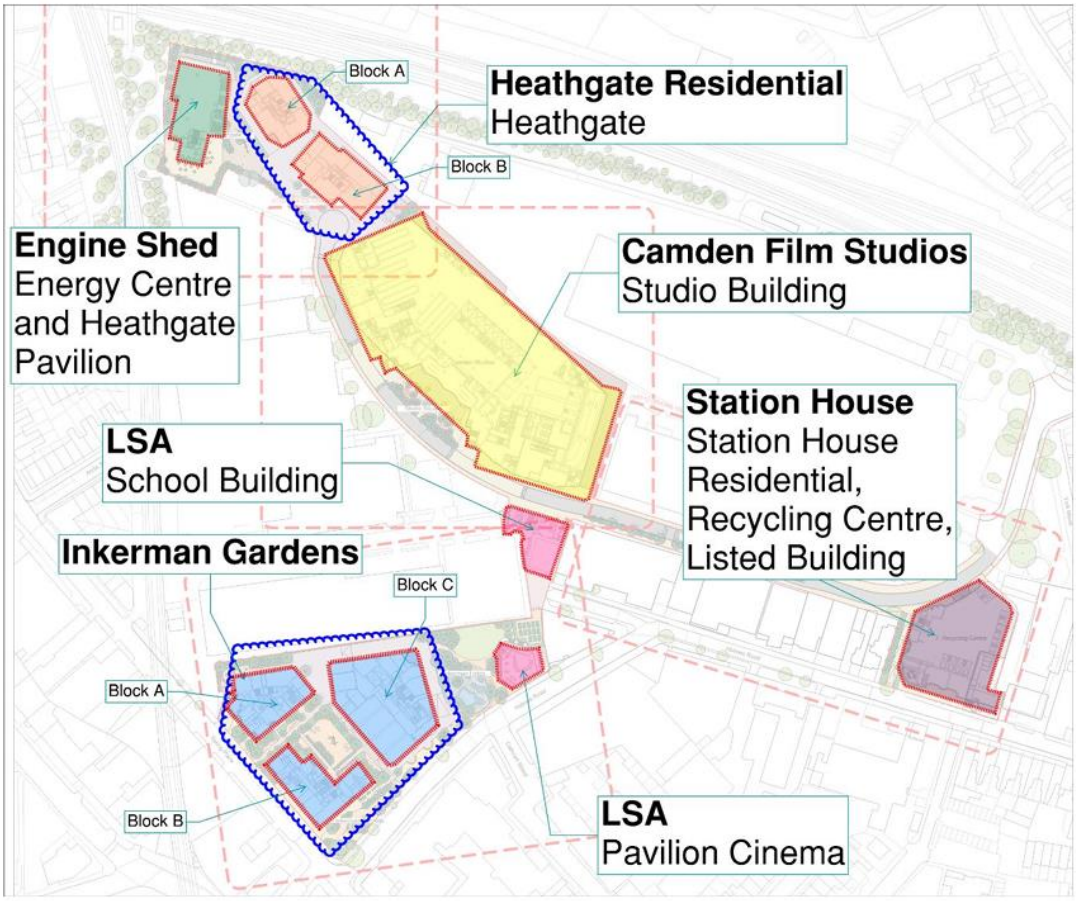


Figure X: Map showing building locations across development site with relevant buildings outlined in blue

20.7 The two submitted fire statements demonstrate how each building has been designed to incorporate fire safety principles and include mitigation against fire-associated risk. This includes construction details (such as methods, products, and materials), means of escape for all users, features to reduce the risk to life, access for fire service personnel and equipment, and siting of fire appliances. For clarity, every residential block will be serviced on all floors by two stair cores and be provided with at least one fire-fighting shaft, containing a firefighting stair with automatic opening vent, a firefighting lift, a smoke ventilated firefighting lobby, and a fire main outlet. The Inkerman Gardens blocks will be provided with dry rising mains, whilst the Heathgate blocks will be provided with wet rising mains.

20.8 Block A of Heathgate is a 22-storey building that includes a basement and plant to the roof of the building, whilst Block B is a 16-storey building with plant to the roof of the building. Both will operate with a 'stay put' evacuation strategy and will have a sprinkler system for all units, common areas, plant rooms, and ancillary spaces. The buildings would include wet risers and would utilise a mechanical smoke ventilation system for common corridors. The basement ancillary areas of Block A would also feature a mechanical smoke ventilation system. All residential areas of both buildings will be provided with sufficient exits and escape routes, with suitable travel distances from dwelling entrances to protected shafts.

20.9 Inkerman Gardens is split into three blocks, under which a basement is situated. The basement includes both commercial and residential parts; however, these are entirely separated from each other with no internal connections and unconnected means of escape. The residential and non-residential components will also be separated by 2-hour fire resisting construction.

20.10 Block A of Inkerman Gardens is the largest of the three blocks, with 18 storeys and two storeys of basement. Block B is the smallest block with 8 storeys, consisting of eight floors and a plant level, with no basement. Block C is sixteen storeys in total with a plant level and two storeys of basement. All three blocks would include smoke detection and alarm systems, with the basements featuring an aspirating smoke detection system; in the commercial parts of the basement, this would be able to be switched off in the event that filming is taking place that utilises pyrotechnics and/or smoke machines. Each block would include dry risers and mechanical smoke ventilation systems to common corridors and basement ancillary areas (where applicable). The three blocks would operate with 'stay put' evacuation strategies, though the basement would operate with a 'simultaneous' evacuation strategy.

20.11 The proposal and associated documents have been reviewed by the BSR which is part of HSE, who have confirmed that they are content with the fire safety design to the extent that it affects land use planning considerations. There were a number of matters identified that should be addressed in advance of later regulatory stages, however these are not specifically planning considerations and are noted in HSE's response to not be for the purposes of decision making by the LPA. However, for clarity these concerns relate to: lobby layouts for firefighting shaft access to Block A of Heathgate; smoke ventilation modelling; risk arising from green roofs; and cabling of PV panels.

20.12 Though the green roofs and PV cabling concerns noted by HSE are not planning considerations and would have no impact on land use planning considerations, the issues relating to firefighting shaft access and smoke

ventilation modelling could potentially affect land use planning considerations if a redesign becomes necessary. As such, conditions are secured to secure further details relating to this and alleviate any concerns relating to fire risk. Additionally, a condition secures compliance with the fire statements and any changes to be approved in writing.

21. AIR QUALITY

Policy context

21.1 Policy SI1 of the London Plan states that masterplans for large-scale development proposals subject to an EIA should consider how local air quality can be improved across the area of the proposals as part of an Air Quality Positive (AQP) approach. CPG 'Air Quality' (2021) recognises the AQP approach.

21.2 At the local level, the Camden Local Plan requires the submission of air quality assessments for proposed developments that may cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality. Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the borough. The Council will consider air quality impact through both exposure of occupants to air pollution and the effect of the development on air quality.

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

21.4 The whole of the London Borough of Camden was declared an Air Quality Management Area (AQMA) in 2002 due to concerns over the achievement of long-term NO2 AQS objective and short-term PM10 AQS objective.

Site context

21.5 The application site is part of the borough-wide AQMA, as well as located within the London Low Emission Zone (LEZ), London Ultra Low Emission Zone (ULEZ), and London's Low Emission Zone for Non-Road Mobile Machinery (NRMM), as designated by the GLA.

21.6 The site and proposed development is not located within an Air Quality Focus Area (AQFA), however there is an AQFA in reasonable proximity to the site; the 'Camden High Street' AQFA is located approximately 560m to the south of the site. Further to the northeast, the 'A1 Holloway Road' AQFA is located around 1.5km away.

21.7 The proposed development is subject to an EIA, and to this end, Chapter 9 of the submitted Environmental Statement covers all matters relating to air

quality and associated with the construction and operation of the proposed development. The relevant chapter of the ES is also supported by an Air Quality Neutral and Air Quality Positive Statement.

Impacts on local air quality (operational)

21.8 The development proposes all-electric heating, hot water, and power. It does not include any centralised combustion plant for hot water or heating provision due to the incorporation of air source heat pumps that help to minimise local emissions, but there will be life safety systems included in the design that include diesel generators.

21.9 An initial back-up power feasibility assessment has been undertaken, which suggests that a back-up system may not be needed and that the model of generator that would be used would not classify as 'medium combustion plant', given it would be emergency use only with less than 50 hours of use per annum. This would be considered acceptable as long as the system is for life safety functions which involve maintaining power for sprinkler pumps, emergency lighting, risers, and any other critical infrastructure in the event of an emergency such as a fire. The intention is that it should not extend to maintaining power for business continuity functions. The cumulative capacity of the generators should also not exceed 1MWh.

21.10 The flues for the generators would release exhaust emissions above the roofs of relevant buildings, where any emissions released would be able to be dispersed more effectively. In order to confirm that the generators are located appropriately and the flues are sufficiently high above roof level and distant from nearby buildings or inlets, a condition would secure further details of both generators and flues . This will also require that alternatives to diesel are considered for the generators and to secure their use as for emergency purposes only .

21.11 Given that the proposed development is entirely electrically provided, there are no building-related emissions produced, so it is air quality neutral in this sense. In terms of transport-related emissions, the proposed residential parts of the development would be entirely car-free apart from the required Blue Badge parking, though the commercial part of the development is not car-free. However, the use of cars and vehicles has been minimised as far as operational requirements allow, and the reduction of car dependency over the lifetime of development is also a key part of the parking operational management plan, as outlined in Section 17 of this report. The trip rates for the proposed development are also less than those of the existing baseline. Therefore, given the proposed development will generate fewer trips than the benchmark trip rate, the proposed development is air quality neutral in terms of transport related emissions.

21.12 In accordance with the requirements of the GLA Planning Data Standard, the air quality neutral assessment gives the details of the expected transport-related emissions from the development. This includes emissions of 578.46 kg/annum for nitric oxide (NOx) and 47.46 kg/annum for particulate matter ($PM_{2.5}$). It is hoped that this figure will be reduced over time as the proposal is able to deliver additional electric vehicle parking; 20% of parking spaces onsite are already secured as active provision electric charging, with the remaining 80% as passive provision, meaning there is a possibility that 100% of parking onsite can provide electric vehicle charging, helping to bring the transport-related emissions down further.

Impacts on occupants

21.13 The proposed development would be expected to reduce air pollution at the site through measures that reduce private vehicle use such as car-free development, travel plans, and improvements to the local pedestrian and cycle environment. Additionally, the existing industrial uses on site (which are typically associated with poorer air quality) would be replaced by development that has been designed to be fully electric. The buildings have also been designed to incorporate efficient building design to reduce exposure to pollutants for occupants and utilise non-toxic building materials. The landscape strategy also aims to provide green infrastructure that will help provide a barrier to railway air pollution and improve air quality. These measures are all detailed within the air quality positive statement that is included in the submitted Environmental Statement.

21.14 Outside of the construction phase, one of the main sources of air pollution that is noted to potentially impact future occupants is the proximity to the railway lines that run to the north and west of the site. This presents a possible impact to occupants of Heathgate in particular, which is closest to the National Rail lines that pass to the north. The submitted air quality assessment calculates expected emission rates from the railway lines based on NAEI data recorded from 1km x 1km grid cells, showing the air quality impact to be at an acceptable level for the nearby residential use. However, the Council considers that additional precautions would be required in order to ensure an acceptable level of air quality for future occupants. As such, real-time air quality monitoring sensors should be placed at the points of the site where the distance between the proposed residential units and existing railways is smallest in order to carry out a baseline monitoring period and establish the impact of rail on future occupants. If air pollution exceeds the National Air Quality Objective levels for the proposed uses then additional mitigation must be implemented, retained, and maintained. Such mitigation may include measures such as additional or more advanced filtration systems or, if required, design alterations such as non-openable windows or winter gardens (rather than balconies), in order to reduce exposure to air pollution. The additional

testing and subsequent mitigation (if required) would be secured by condition .

21.15 In addition to the above, it is worth noting that the proposed development is set to be constructed over several phases, taking at least six years in total. Air quality changes over time, so an updated Air Quality Assessment and Air Quality Positive Statement will be required at each phase of development, to ensure that up-to-date air quality data is taken into account and the proposed development is taking all appropriate measures to ensure acceptable air quality for occupants (see conditions below).. These updated AQAs will also take into account the impact from vehicle movements in proximity to the sites and would provide detailed modelling to determine the appropriate amount and type of mitigation to ensure satisfactory air quality, if necessary.

21.16 To provide sufficient internal air quality for future occupants of the proposed development, mechanical ventilation systems that incorporate NO_2 and particulate filtration will be integrated into all buildings with public exposure. These will be designed to achieve 51% reduction in NO_2 concentrations, a minimum 10% reduction in PM_{10} concentrations, and a minimum 44% reduction in $PM_{2.5}$ concentrations. Mechanical ventilation is accepted and all inlets should be located away from emission sources such as busy roads, railways, or flues – this will be secured by condition.

21.17 However, it is noted that it is yet to be determined whether the air quality exceeds limits in any parts of the site, or if there will be exceedance of limits across the entire site; as such, filtration may not be required for all units and should not be a substitute for air inlets located away from pollution sources (which do not have the same associated energy demand as filtration). To ensure that filtration is only proposed where required, a condition will secure details of any proposed NO_2 and particulate filtration with reference to the results of air quality testing across the site as justification.

21.18 Subject to the above conditions and further consideration of the railway emissions and requirement for further mitigation, the proposed uses are appropriate at the site in terms of air quality and comply with the relevant policies of the development plan.

Demolition and construction impact

21.19 The impacts of demolition and construction work with regards to dust and dust soiling have been assessed and classified as ‘high’. It is therefore extremely important that appropriate mitigation is implemented throughout the duration of the project, including at least four real time dust monitors. The construction impact on local air quality is also an important issue raised by many residents in their consultation responses, particularly as it tends to

have disproportionate impacts on the young, the elderly, and those with long term respiratory conditions, further underlining the importance of mitigation.

21.20 The mitigation measures to control construction-related air quality impacts will be secured within the Construction Management Plan, as previously detailed in Section 17 of this report. The applicant will be required to complete the standard CMP pro-forma and demonstrate that all mitigation measures relevant to the level of identified risk are being included. An informative will be added to the decision notice to remind the applicant of this.

21.21 It is noted that the dust emission impacts from earthworks are considered a medium risk, though this is considered to be an underestimate given the amount of excavation required for the basements, which are particularly deep and large. This excavation would likely generate moderately dusty soil and there are proposed to be up to 154 HGV per day, which is significantly more than what would be considered a high risk (less than 10 per day).

21.22 It is also important context that there are four large scale construction projects in the nearby area that are either due to take place or may come forward during the lifetime of this project, including the West Kentish Town Estate, Murphy site, Kentish Town Police Station, and Joseph Homes land. Although it will be expected that these cumulative schemes will adopt appropriate mitigation measures relating to air quality and earthworks, the impact from construction traffic and associated NRMM is likely to be significant.

21.23 In order to mitigate against the identified construction dust risk, it will be necessary to secure a revised dust risk assessment at each stage of development and implement dust monitoring across the whole site. Given that the proposed development is being delivered in phases, separate conditions for each phase will secure dust assessments, monitoring, and mitigation strategies (see conditions below). The dust monitors will need to be in place at least 3 months prior to commencement (to check baseline conditions) and remain in place throughout the demolition and construction process. Planning conditions will also be used to ensure that any NRMM utilised in the development is compliant with Low Emission Zone requirements .

22. WASTE AND RECYCLING

Construction waste

22.1 Policy SI 7 of the London Plan sets a target of 95% of construction, excavation, and demolition waste to be either reused or recycled, which will be secured at this development by condition . The applicant will be required to specifically prioritise targeting materials with the highest levels of embodied carbon.

22.2 The monitoring, reduction, and recycling of construction waste will also be included as a constituent part of the waste management strategy, which would be secured within the Construction Management Plan . Further information on construction waste and circular economy is set out in Section 16 of this report. The minimisation of construction waste will comply with Policy CC1 of the Local Plan, Policy SI 7 of the London Plan, and other relevant guidance.

Domestic and commercial waste and recycling

22.3 Policy CC5 of the Local Plan and CPG 'Design' set out the waste and recycling facilities that will be expected to be provided as part of proposed developments to ensure that there is an appropriate storage for all types of waste. To ensure that residents and businesses are able to properly store and sort their waste, sufficient facilities are expected to be provided onsite and should be provided to meet current waste and recycling targets as a minimum, with flexibility to meet more ambitious future targets.

22.4 The proposed residential buildings all incorporate communal bin stores at ground level, which consist of general waste bins and general recycles bins (both collected in 1,100L Eurobins), and glass bins and food waste bins (both collected in 140L bins wheeled bins). The bin stores have been located so that they are in close proximity to residential cores, ensuring that residents benefit from short and efficient journeys when taking refuse from their flats to the communal stores.

22.5 At Heathgate, the bin stores would both be serviced from the passage between the buildings, which leads directly to the western end of Regis Road. This would ensure that collection operatives will not have to travel further than 10m from either building's bin store to the collection vehicles. Similarly, the residential bin stores at Inkerman have been located such that they are easily accessible from Spring Place, Holmes Road, or the new road to the North, so that appropriate drag distances for collection operatives can be ensured. Also at Inkerman Gardens, Block B provides a bulky refuse store accessed from Spring Place and Block C provides a separate bin store for the studio use, which would collected from the road to the north. Conditions would secure full details and drawings of all residential and commercial bin storage to ensure that the provision is acceptable and fully in accordance with policy and guidance .

22.6 Unlike the residential waste, which would be collected by Camden Council, the commercial waste would be collected by a private waster contractor, who would service the entire site to minimise the amount of vehicle trips. Given the scale of the Film Studios building and the subsequent waste storage required, there is proposed to be a designated waste collection area at ground level, which will be accessed via the service road at the rear of the building. The details of this storage area would also be secured as part

of the aforementioned condition, and additional conditions would secure details of the compaction, consolidation, and on-site sorting of waste to allow transfer , given that compactors are proposed onsite.

22.7 It is noted that the Recycling and Reuse Centre (RRC) that is being reprovided within the Station House site has been developed in discussion with a working group, consisting of representatives from London Energy Limited (LEL), the North London Waste Authority (NLWA), the London Borough of Camden, and representatives from the applicant team. Details of the design and operation of the RRC are covered elsewhere in this report. The reprovided RRC is considered to be acceptable for the purposes of waste management, though it is noted that the NLWA have indicated concerns surrounding the booking system for visitors to the RRC. As such, full details of the operation of the RRC will be required to be provided as part of a Delivery and Operation Plan, which will be secured as part of the Section 106 legal agreement . This will include how the RRC will be managed (including dealing with fly tipping and a complaints line) and accessed by the public (including pedestrians and cyclists) will need to be agreed by the aforementioned stakeholders.

22.8 The applicant has submitted a Site Waste Management Plan that has been reviewed by the Council's Waste Management team. They have confirmed that they have no objections to the scheme, subject to conditions securing further details of the refuse stores across the entire development, as well as a final Site Waste Plan being provided prior to occupation, as the current version is relatively high level and requires more detail. Additionally, the final details for domestic and commercial waste collection should be secured through a Delivery and Servicing Management Plan. These would both be secured as part of the Section 106 legal agreement. The latter must cover in detail elements including swept path maps and how waste collection will safely take place in conjunction with cycle infrastructure and movements across the site.

22.9 On this basis and subject to the above, the proposals for waste and recycling storage are acceptable and in accordance with policy.

23. BASEMENT CONSIDERATIONS

Policy context

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

- neighbouring properties;
- the structural, ground, or water conditions of the area;
- the character and amenity of the area;

- the architectural character of the building; and
- the significance of heritage assets.

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

23.3 Other elements of the criteria set out in policy A5, such as (f) to (m), seek to control the siting, location, scale, and design of basements; these are not relevant in this case as this is a large comprehensively planned development site. Criteria (n) to (u) set out some of the factors which will be taken into account when considering whether a basement harms (a) to (e).

23.4 The proposed scheme includes significant basement development and a BIA has been submitted to assess compliance with the policy requirements outlined above. The section below details this BIA, its conclusions, and its review by the Council's independent auditor, Campbell Reith.

Basement Impact Assessment Audit

23.5 The submitted basement assesses the four basements proposed across the site, which range from 5.5m-26m in depth; these consist of two large basements beneath the Film Studios building and Inkerman Gardens (up to seven storeys), as well as two smaller basements beneath Heathgate and the Pavilion building (1-2 storeys). The uses of all four of the basements are predominantly studios and flexible creative spaces, alongside ancillary spaces such as cycle stores and plant rooms.

23.6 The application was accompanied by a BIA prepared by Thornton Tomasetti, which was reviewed by Campbell Reith. As part of their independent review, Campbell Reith requested additional information, which has been provided in the form of addendum documents and updated BIA revisions. The updated and version of the BIA (Revision 3) was provided in March 2026.

23.7 The BIA includes a screening and scoping assessment, which identifies the site as being located above the London Clay Formation. The BIA confirms that all basement foundation levels are within the London Clay Bed Formation; perched water located within the Made Ground (that sits above the London Clay Formation) can be managed via sump pumping during excavation. The screening does also identify that part of the subterranean River Fleet runs through the western portion of the site, though notes that the basement will not adversely affect the groundwater regime in the surrounding area. The reduction in impermeable hardstanding at the site would also ensure that there is no impact on groundwater flow, and the audit confirms that the proposed basements will not have any adverse impact on the hydrological environment.

23.8 The BIA considers the impact of the proposed excavation on the neighbouring buildings and surrounding infrastructure (including adjacent railways). It is considered that there would be no impact on the stability of nearby buildings, including when considering the removal of trees on site. Ground Movement Assessments (GMAs) have been prepared to confirm this, which review the construction sequence for the proposed basements and the expected movement resulting from this. The GMAs and building damage assessment conclude that the potential damage to neighbouring buildings will not be greater than Category 1 'Very Slight' of the Burland scale.

23.9 To ensure that the impact of ground movement is acceptable, a Basement Construction Plan will be secured. This will include final construction methodology and sequencing, alongside special precautions in terms of design details, monitoring strategy, action plans, and mitigation measures, to ensure the impacts align with the GMA predictions.

23.10 Separate GMAs are also being prepared to confirm that the impact of the basement construction to infrastructure and underground assets surrounding the site is acceptable, as set out in the BIA. These will also be secured and the relevant third-party asset protection teams will be consulted to assess the details (eg. Transport for London).

23.11 Campbell Reith has fully reviewed the revised BIA and concluded that it is adequate and in compliance with the requirements set out in Policy A5 of the Local Plan, CPG Basements, and the 'Principles for Audit' set out in the 'BIA Audit Service Terms of Reference & Audit Process'. This is also subject to the aforementioned conditions, as well as the requirement to appoint a suitably qualified engineer to oversee the works and the construction being carried out in accordance with the audited BIA . With these conditions and controls in place, officers are satisfied that the proposed development meets development plan policy requirements

24. CONTAMINATED LAND

24.1 Policy A1 seeks to protect the quality of life of future users, occupiers, and neighbours; one of the factors the Council considers in this assessment is contaminated land. This is particularly important where development is proposed on sites that are either known to be or have the potential to be contaminated.

24.2 The site currently comprises a variety of commercial uses including industrial and warehouse units and residential dwellings. The southern corner of the site comprises hardstanding used as vehicle parking and a grassy lawn associated with the council-owned depot to the west. The southeast corner of the site comprises a three-storey commercial annex interlinked with the Kentish Town Police Station. The centre of the site

comprises Camden Recycling and Car Pound, vehicle parking, and various industrial units. The northwest corner of the site comprises Reef dark kitchens and a builders' merchant (SIG Roofing Kentish Town), whilst the northeastern parts of the site comprises a single carriageway road (Regis Road).

24.3 There are a number of other land uses within close proximity to the site, including railway lines, a UPS depot, a construction company yard, office space, storage units, residential units, gyms, communal landscaped areas, student accommodation, schools, and commercial units.

24.4 Records suggest that artificial deposits are reportedly mapped on the western portion of the site and extend beyond the site boundary to the southwest and northwest.

24.5 Historic records indicate that the site comprised undeveloped fields in the 1740s but had been developed as an industrial area by the late 1800s, comprising a coal depot and railway tracks, along with residential houses. By the end of the century, the site contained tanks, stables, a carriage shed, and railway sidings and embankments, along with a police station. From 1952, the site was mapped to contain a number of industrial sites including Salvage Stores, Glazed Brick & Sanitary Ware Depot, Smelting Shed, a naphtha store, allotment gardens, and a small works. By the 1970s, the carriage shed was replaced by the British Road Services Depot, which later became the Council Depot. An unspecified works was on site by the 1980s, with a new tank (southeast) and foundry (central) and a warehouse to the west.

24.6 In terms of historic land uses in close proximity to the site, these included railway sidings, cow pens/sheds, and residential properties. Industrial uses such as colour works, road vehicle works, and timber yards were also mapped in the surrounding area and bomb damage was reported in the vicinity of the site by 1952 mapping. More recent uses identified by this mapping include a builder's yard, metal works, glass works, and engineering workshop. By the 1990s, nearby land uses included warehouses, garages, electrical substations, and unspecified commercial and industrial buildings.

24.7 There are numerous records for historic waste sites on the subject site, mostly associated with the Scrap Metal Depot and the Regis Road Recycling Centre, the latter of which is a licensed household waste amenity site with a recorded size of 25,000 tonnes. There are no records of landfill sites within 250m of the site.

24.8 Due to the aforementioned bomb damage and the very high level of bombing that the area was subject to during World War II, there is a potential risk posed by unexploded ordnance (UXO), the extent of which would need clarification in the form of a detailed UXO risk assessment. A preliminary

UXO risk assessment has been provided as part of the desk study, and a full detailed version would be secured by condition.

24.9 The applicant has provided a Phase 1 Desk Study that reviews the site's history and environmental setting to identify any potential land contamination or environmental constraints. The study considers historic site investigations, which includes reporting on ground conditions, which are noted to comprise of made ground to depths of 1.5-4.9m, overlying London Clay. The made ground reportedly contained brick, gravel, and gravelly clay, with visual and olfactory evidence of ash, coal, clinker, and fuel odour. Low concentrations of carbon dioxide were report, however methane was reported up to 14.7%. Chemical analysis of soils recorded elevated levels of nickel, lead, and benzo(a)pyrene.

24.10 The Desk Study considers that there are notable records of recent industrial land uses on and surrounding the site (as detailed above). Land uses such as retail units, offices, and general non-industrial commercial uses on site are not considered to be a potential source of substantial contamination. As the ground comprising relatively impermeable London Clay Formation, viable migration pathways would likely not be feasible for the former industrial uses, so former industrial land that is not of a significant size have not been identified as potential sources of off-site contamination. The study goes on to identify a number of potential sources of contamination both on-site and off-site, including:

- **Made Ground and Worked Ground** – potential of previous development and demolition to be a source of contaminants such as heavy metals, asbestos fibres, ground gas, etc.
- **On-site industrial uses** – Both current and former uses are potential sources of contaminants such as heavy metals, pH, hydrocarbons, etc.
- **Former miscellaneous uses** – previous uses on site including the coal depot, tanks, naphtha store, smelting shed, and foundry all could be potential sources of contaminants including heavy metals, asbestos fibres, cyanides, sulphates, coal tar, etc.

24.11 As the proposed development includes substantial basement development, Made Ground in these areas is anticipated to be excavated and disposed off-site. Ground gas that is generated on-site and contained within this Made Ground will therefore be removed at source, which reduces the potential risk in this area.

24.12 The Desk Study identifies potential pathways to relevant sources and receptors, assessing the risk presented by the development based on this, all of which is identified as either low or moderate risk. Potentially unacceptable risks to human health of future users, neighbouring off-site

users, construction workers, proposed buildings, flora, and fauna are identified. As such, the report recommends that a ground investigation is undertaken to assess these specifically identified unacceptable risks.

24.13 To this end, the Council's Contaminated Land Officer has reviewed the proposal and submission documents and recommended that a full Land Contamination Risk Assessment is secured by condition. This would be required to assess all potential risks identified by the Desk Study, including by providing a generic quantitative risk assessment and revised conceptual site model. Subsequent parts of this condition will require a remediation method statement and verification report for any mitigation that is recommend by the risk assessment.

24.14 Given the above and subject to the recommended conditions, the proposal would be acceptable and in compliance with the development plan in terms of contaminated land.

25. FLOOD RISK AND DRAINAGE

Policy and site context

25.1 Policy CC3 of the Local Plan requires development to avoid increasing flood risk and, where possible, reduce the risk of flooding. This includes assessing impacts in flood-prone areas, incorporating flood resilience measures and utilising Sustainable Urban Drainage Systems (SuDS) to achieve greenfield runoff rates, as well as not locating vulnerable development in flood prone areas. The policy sets out the expectation that major developments:

- Achieve greenfield run-off rates wherever feasible and, as a minimum, 50% reduction in run-off rates;
- Include SuDS, unless demonstrated to be inappropriate;
- Follow the drainage hierarchy in Policy 5.13 of the London Plan;
- Constrain run-off volumes to greenfield run-off volumes for the 1 in 100 year 6-hour event plus climate change.
-

25.2 The London Plan also seeks to reduce the risk of flooding including through Policy SI 13, which highlight's London's vulnerability to surface water flooding, calling for developments to manage runoff near its source and prioritise green infrastructure according to the drainage hierarchy. Additionally, Policy GG6 of the London Plan emphasises designing developments to improve efficiency and resilience, considering climate change and flood risks.

25.3 There are three flood zones for flooding by rivers and the sea, as defined by the Environment Agency: Flood Zones 1, 2, and 3. The higher the value of the flood zone, the greater the risk of flooding. This site is in Flood Zone 1 (like all Camden sites) and is therefore at low risk of flooding from rivers and

sea. Areas considered at risk of flooding include 14 Local Flood Risk Zones, previously flooded streets, areas at medium or high risk of surface water flooding, those in the vicinity of a historic watercourse, and areas with previous sewer surcharge incidents. Policy CC3 states that vulnerable development should not be located in flood prone areas.

25.4 Although much of the site is classified as having a low risk of surface water flooding, there are also areas of medium or high surface water risk, up to a depth of 0.3m. The extent and depth of surface water flood risk is expected to increase with climate change. The areas of greater risk are particularly concentrated in the area proposed to be occupied by the film studios and the service road that runs to the rear of this (currently utilised by UPS). It is also noted that there are areas of high surface water risk immediately adjacent to the site, just beyond the site boundary.

25.5 The site is also located within the Counters Creek catchment area and the subterranean River Fleet crosses through the site. It is also in the vicinity of a previously flooded street (Kentish Town Road), which flooded in 1975, 2002, and 2021. The site therefore has the potential for surface water flooding without mitigation.

Proposed development

25.6 To demonstrate and assess the impact of the proposed development on flooding, a Flood Risk Assessment and Sustainable Drainage Strategy have been submitted as part of the application. These detail the incorporation of a series of Sustainable Urban Drainage Systems (SuDS) across the scheme, including conveyance and attenuation features such as blue roofs, green roofs, basins, permeable paving, rain gardens, tree cells, and attenuation tanks.

25.7 The SuDS measures incorporate 1670 m^3 in 6,369m^2 of blue roofs, 111m^3 in 1893m^2 of permeable pavements, 144m^3 in 315m2 of basins and ponds, and 424m^3 of attenuation tank storage to achieve this reduction of surface water runoff. This results in a total runoff attenuation volume of 2349m^3. Conditions will be used to secure final SuDS details that achieve sufficient surface water reduction and to ensure implementation of these details.

25.8 These measures would help achieve a runoff rate of 71.2l/s across the whole site, which meets the greenfield runoff rate for a 1 in 100-year storm event. It is also a significant reduction on the existing runoff rate for the site, which is 963.1l/s. This means there is likely to be a notable improvement over the surface water runoff for the current site.

25.9 It is noted that the calculations used to determine the runoff rates do not use the latest rainfall data (FEH22), and only account for the impermeable area on site. Reassurance has been provided that a conservative approach has been taken, that the areas of soft landscaping (permeable) are small, that

additional SuDS capacity is provided to ensure adequate SuDS and attenuation are provided on site and that the scheme will be refined post planning. This is considered acceptable to allow for assessment of the application. To confirm the attenuation capacity is sufficient to achieve the greenfield run off rate updated calculations will be required prior to implementation of the proposed works which are secured by condition .

25.10 The National Standard for sustainable drainage systems by DEFRA states that “the surface water system shall be assessed for exceedance events in excess of the 1% AEP (1 in 100 year) event with expected exceedance routes identified across the development to confirm there is no adverse flood risk to the development or elsewhere”. A high level exceedance diagram has been provided showing the general direction of overland flows and there is reference to Finish Floor Levels proposed to be higher than existing ground levels. Further detail will be required prior to commencement to ensure compliance with the National standards for SuDS, and will need to indicate that flows of water are generally directed away from buildings and towards suitable low points. The final design of the scheme will need to ensure that as much as possible of exceedance flows are captured downstream and minimise the risk to buildings, infrastructure, and people. This will be covered by the aforementioned condition relating to SuDS.

25.11 As detailed when discussing site context earlier in this section, the areas of highest surface water flooding risk are located around the area to be occupied by the film studios building. As such, the finished floor level (FFL) will be higher than existing ground levels in these locations and the landscaping will be designed such that any surface water flows away from building thresholds (reducing the risk of flooding within the buildings). These details will form part of the SuDS information secured by condition.

25.12 Due to the risk of flooding onsite and the nature of the transient uses proposed, details of safe access and egress routes are required to ensure that the development can be made safe should flooding occur. To this end, the applicant has submitted a Flood Warning and Evacuation Plan (FWEP), which demonstrates that life safety can be ensured if a flood event were to occur. This covers actions for residents, visitors, and staff across the entire development and includes assessment of the level of risk, actions based on the hazard rating, triggers for evacuation, and advice for what do in the event of a flood and evacuation and recovery procedures. A final Flood Risk Emergency Plan (FREP) will be required to be submitted prior to occupation of the proposed development and will be secured by condition, in order to ensure the safety of all occupants. The condition will ensure that the measures set out in the FWEP, and also signage and emergency access arrangements, are included in the FREP and have been fully implemented prior to occupation.

25.13 Thames Water has been consulted and has confirmed that they have no objection subject to conditions and informatives to:

- Incorporate protections to prevent sewage flooding, including the installation of a positive pumped device ;
- Provide details of measures undertaken to minimise groundwater discharges into the public sewer ;
- Details to demonstrate that the development is able to ensure sufficient water supply capacity, as the existing water network infrastructure is not capable of accommodating the needs of the development ;
- Details of foundations and piling layout to indicate the locations of any and all foundations and piles to be installed at the development site, showing the relationship with Thames Water assets and including appropriate protections where piling is required ;
- Remind the applicant of build over agreements where development is within 3m of a public sewer;
- Remind the applicant that a minimum water pressure of 10m head and a flow rate of 9 litres/minute will need to be provided for occupants of the development;
- Remind the applicant that works near Thames Water mains will need to make sure that there is no reduction of capacity or limitation of repair or maintenance activities during and after construction;
- Remind the applicant of their responsibilities to take into account Thames Water's underground water assets.

25.14 In conclusion, the proposals would improve the surface water runoff over the existing site and, subject to the detailed conditions and planning obligations, would be acceptable and fully compliant with the development plan insofar as flooding and drainage matters are concerned.

26. HEALTH IMPACT

26.1 Policy C1 of the Local Plan and Policy GG3 of the London Plan both aim to promote strong, vibrant, and healthy communities and seek to tackle health inequalities. Healthy and inclusive communities are a key objective of the Council, supported through the development plan's commitment to improving health by a range of policies. These include to provide affordable housing and high-quality accommodation, promote active travel, and seek to reduce health inequality.

26.2 The applicant has provided a study of the human health impact and socio-economic impact of the proposed development as part of the Environmental Statement, submitted with the application. These chapters assess the potential health impact and consider the wider determinants of health, including the social, economic, and environmental factors that influence

people's wellbeing. The assessment also gives reference to the HUDU Rapid HIA Tool and HUDU benchmarks.

26.3 The scheme will bring significant health benefits in the first instance by delivering 488 additional homes; the proposed development provides 513 homes in total, of which 25 are reprovided. In total, this would contribute 3% to the borough's housing target for the 2016-2031 period. A substantial number of these are also provided as affordable homes. All new homes will meet or exceed accessibility and space standards, which directly addresses health inequalities – particularly for low-income households, older people, and those with disabilities (as well as families and carers).

26.4 The development will also provide new, high-quality open space and play areas. These include a public park area known as 'Western Gardens', a landscaped play and garden area adjacent to the Heathgate buildings, and a central courtyard within the Inkerman Gardens buildings. These improvements are expected to support physical activity, mental wellbeing, and social cohesion, and have been designed to be inclusive and accessible. It is noted that the proposed development would also increase the demand for open and play space in the local area. However, this should be seen in the context of future development coming forward within the wider site allocation that would help meet the demand for residents.

26.5 Active travel is promoted and prioritised through the development by the inclusion of new pedestrian and cycle links, traffic calming measures, and the car-free nature of the residential development. Measures have also been proposed and secured that would aim to reduce the dependence of the film studio on private car use over the lifetime of the development. These changes will encourage healthier lifestyles and improve access to local services.

26.6 The scheme has incorporated Secured by Design principles (as covered in the relevant section of this report) and would provide public spaces that are inclusive, well-lit, and address concerns surrounding anti-social behaviour and fear of crime. These concerns disproportionately impact women, older people, and ethnic minorities, so the proposed development would address these inequalities through incorporating safer public spaces.

26.7 Potential negative impacts of the proposed development would arise from the demolition and construction phases, specifically as a result of noise, vibration, and other disruption. These could have a disproportionate impact on those such as disabled people and older people, and potentially result in adverse effects to mental health. The demolition and construction works will be managed through a robust Construction Management Plan, as has been detailed elsewhere in this report. This will include liaison with local residents and measures to control impacts such as noise emission, air quality, and travel disruption. A Construction Working Group that is made up of

representatives from the local community will also be formed to ensure robust engagement and communication and should include representation from vulnerable groups.

26.8 Although the length of the demolition and construction period will likely increase the adverse impacts identified, the measures outlined above will ensure that the impact to vulnerable groups is reduced where possible. The CMP is also a live document that will be updated throughout the phases of delivery, so the applicant would be required to engage each time they update the plan.

26.9 The submitted document also assesses the potential impact of the proposed development on GP services and local schools to understand whether the capacity is sufficient to accommodate the new residents. It is calculated that the development would introduce 1,144 new residents who would require access to health and social care services. Using HUDU methodology, this constitutes a 2% increase in the patient to full-time equivalent GP ratio, from 2,002 to 2,039. Whilst this would exceed the HUDU benchmark of 1,800 patients per FTE GP, it would remain below the borough average of 2,073, as well as the regional (2,503) and national (2,272) averages. It is also noteworthy that the existing patient to FTE GP ratio already exceeds the HUDU benchmark, and that the increase is only very slight.

26.10 As such, it is considered that there would be sufficient capacity for local health and social services to accommodate the new residents, meaning that there would be a neutral impact on these services. The scheme would also deliver construction and end-use jobs, which would target employment and training opportunities for locals, including those from vulnerable groups. These measures are detailed in the relevant section of this report.

26.11 Equality considerations are detailed in the relevant chapters of the submitted Environmental Statement and have been central in the assessment of the proposed development. The scheme is expected to benefit groups experiencing health inequalities and, whilst there will be adverse impacts arising from the demolition and construction activities, these can be carefully managed and mitigated to some degree through the measures outlined above, as well as through separate highways and environmental legislation.

26.12 The NHS London Healthy Urban Development Unit (HUDU) were consulted on the application and responded to confirm that, using modelled patient population growth, the proposed development and its introduction of new residents would be expected to result in the region of 742 new patients. This additional patient demand cannot be met within the existing NHS clinical infrastructure without detriment to the healthcare outcomes of existing patients. As such, HUDU have requested that a financial contribution of £294,800 is secured to expand primary care capacity within the vicinity of

the site and accommodate the patient population growth created by the development. To this end, a planning obligation secured as part of the Section 106 legal agreement would secure the payment .

26.13 Therefore, the proposal is likely to have an overall positive impact on health and wellbeing, with clear benefits to be delivered for those that are most affected by health inequalities. As such, the proposed development complies with the policies of both the Local Plan and the London Plan.

27. PLANNING OBLIGATIONS

Obligations (Heads of Terms)

27.1 The following planning obligations (including financial contributions) are required to mitigate the impact of the development and ensure that the proposal is acceptable in planning terms. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area and will be secured through a Section 106 legal agreement.

27.2 The final wording of each obligation is not included at this stage and will be finalised prior to issuing a final decision, but the subject and requirement of each of the heads of terms is provided below:

<u>Infrastructure</u>

Area Wide Infrastructure Strategy

- Collaboration with Council and Landowners Forum.
- Arctic Street to York Mews east-west link.
- Bridge link.
- Future proof potential connection to the City Farm.
- Safeguard necessary part(s) of application site to facilitate Area Wide Infrastructure Works.

Camden Film Quarter Infrastructure Delivery Strategy (to set out how the following infrastructure will be delivered and to deliver them)

- Regis Road improvements, including:
  - Pedestrian and cycle infrastructure improvements along full length of Regis Road; and
  - Improvements to the ‘gateway’ at junction of Regis Road with Kentish Town Road.
- Service road.
- Browns Lane link between Spring Place and Regis Road. The Browns Lane link to be future proofed to allow for LSA (School Building and Pavilion) delivery.
- Holmes Road link (aka Holmes Road Walk).
- Energy Centre, including:

    - Route to the future bridge link to the north
    - Safeguarding provisions to receive the bridge at the appropriate time in the future; and
    - Design of Engine Shed and Bridge to be progressed in parallel to completion of RIBA3 stage, prior to implementation of works on Engine Shed or Heathgate (Camden will lead on bridge design and recover costs from the s106).
- Heath Line Bridge Link, including:
    - Commitment to collaborate with Council on Bridge Design Strategy through to its completed;
    - Phased delivery plan: a detailed programme for design and delivery (including measures to support the construction) of the bridge - demonstrating any interim/meanwhile proposals for incorporating landscaped play/open space on the roof of the Engine Shed prior to the implementation of the permanent Bridge Ramp function - including details of move-on space for any displaced interim play/landscaping uses;
    - Safeguarding of land for the bridge and landing, provision of access between Regis Road and the elevated bridge, via ramp, lift and steps, to be free, unobstructed and available to the public 24 hours per day 365 days a year;
    - Bridge width of 5m to allow for segregation of pedestrians and cyclists, although a 4m width may be considered as a minimum if that is not achievable and a generous staircase and lift is provided;
    - Bridge to have minimal oversailing of the SINC and create minimal obstruction of usable public realm, it should aim to be contained within the footprint of the Engine Shed roof;
    - £2.5 million contribution towards design, Network Rail & statutory approvals, delivery of bridge;
    - Commitment to maintain area of bridge within applicant land and contribute to the ongoing maintenance of the bridge;
    - Maintenance strategy setting out how costs to be shared between other interests and stakeholders; and
    - All reasonable measures to accommodate the Bridge construction including the transferring of ownership/rights over the necessary area of the safeguarding land to the council or a third party for the delivery of the bridge at a nominal fee.

<u>Reprovision of existing uses</u>

- Reprovision and fit out of replacement Holmes Road Housing and Recycling and Reuse Centre, including:
    - Reprovision of the existing housing at 76 & 78 Holmes Road at Station House and upon completion to Fit it Out or pay LBC to cover the fit out - before any works take place on existing site of 76 or 78 Holmes Road; and

    - Reprovide the Reuse & Recycling Centre and upon completion to either Fit it Out or pay the Council for the fit out - all before any works take place on the existing RRC site.
- Reprovision and fit out (or pay the Council for the fit out) of replacement car pound.
- Reprovision and fit out (or pay the Council for the fit out) of replacement Depot.
- Future use of Station House LB - submit applications PP/LBC and implement approved works.
- Relocation of police facilities to Section House.

Affordable Housing Delivery

- 120 social affordable rent homes at Heathgate.
- 123 affordable homes at Inkerman Gardens, including 105 social affordable rent and 18 intermediate rent.
- 28 reprovided social affordable rented homes at Station House.
- 18 Discount Market Sales homes, appropriately discounted so they are affordable to those on an income of less than £90,000.

Proposed Use Management

- Station House - Operational Management Plan, including:
    - Management of shared roof terrace and access to all residents.
- Recycling and Reuse Centre - Operational Management Plan to be prepared in consultation with LBC and NLWA and include:
    - Queue management and booking system;
    - Time for skip replacement;
    - Promotion and support for use by cyclists and pedestrians;
    - Measures to minimise risk of fly tipping and address issues that occur; and
    - Community Liaison for residents including a contact and a telephone line, consideration of 24 hours safety and working hours and amenity.
- Film Studio Building - Operational Management Plan to cover successful coexistence of all uses including studio, hotel, orchestra, and commercial units and clarity on functioning of public and private spaces.
- Inkerman Gardens (non-residential space) – Operational Management Plan to include ensuring the that the studio spaces operate for the benefit of the community.
- School Pavilion Building – Operational Management Plan including a plan for use and management of the roof terrace space to ensure it is of benefit to the community throughout the year.
- Culture and Community Use Plan
    - Cultural programme details;
    - Free-to-access programme;

    - Activation of public realm;
    - Support for Queen's Crescent activation projects and film placements;
    - 2 major public events with local cultural groups each year
    - Community use details;
    - Bookings system and management;
    - Free-to-access spaces/cinema for local charities and school groups; and
    - Annual updates to plan.
- Meanwhile use strategy.

Public realm and landscaping

- £2,304,702.00 POS contribution.
- Public realm strategy including details of delivery, management, maintenance and governance of the public open spaces (temporary and permanent) and public realm in accordance with the Public London Charter.

Employment and training

- Affordable Workspace Strategy and Provision, including:
    - Provision of a minimum of 10% of the space within the 'Beehive' to be affordable workspace, details to be agreed with Council, for local creative SMEs and artists.
    - Discount based on 20% of artist studio income.
    - Opportunities to increase quantum of affordable workspace across the site to be explored and co-working hub in Film Studio Building.
- Business Retention and Relocation Strategy
- Employment and Training Plan (Construction Phase), including:
    - 20% local employment target (220 jobs in total).
    - 20% local procurement.
    - 240 construction apprenticeships.
    - 284 construction work placements.
    - £408,000 construction apprenticeship support fee
    - School engagement programme (including minimum of 4 annual events)
    - PfP work experience and apprenticeships targeted at women, ethnic minority groups, disabled and engagement with schools.
- Employment and Training Plan (Occupation Phase), including:
    - Programme Manager for occupation phase obligations – 10 years.
    - 5 apprenticeships per year
    - 5 paid work experience / internship opportunities per year (ring-fenced for Camden Youth Mission priority cohorts)
    - 5 T-Level placements per year
    - Annual STEAM work-experience week reaching 100 students

    - 5 unpaid work experience placements for over 18-year olds per year
    - Bespoke STEAM pledge
    - Recruit locally through Good Work Camden (20%)
    - NFTS apprenticeship programme - ring-fenced opportunities for Camden residents
    - Film and TV careers hub - minimum offer for Camden – numbers of Camden schools, Camden partnerships locally.
    - Bursary scheme for local students to access post graduate creative education.
    - Outreach programme with 55 schools.
- Employment and Skills contribution of £1,108,463 to support initiatives creating and promoting employment and training opportunities in the borough.

Energy and sustainability

- Sustainability and energy plan (including)
    - Maximising energy efficiency and commitment to sustainable principles
    - Details of ambient loop system and how other landowners will be able to connect to energy centre
    - Total carbon reductions of minimum 63.2%: 'Be green' stage reductions of minimum 59.7%; 'Be lean' stage reductions of minimum 8.7% with reasonable endeavours to meet 10% for residential and 15% for non-residential; and requirement to 'Be seen'.
- £1,674,013 carbon offset contribution.
- Futureproof to district heat networks
- BREEAM targets:
    - Non-residential certification of 'excellent' as a minimum;
    - Residential certification of 3.5 stars as a minimum; and
    - Maximisation of BREEAM credits.

Transport

- Construction Management Plan – for each phase of development including £60,000 Implementation Support Contribution for each phase and £50,000 Impact Bond to be topped up (if drawn from) for each phase.
- Construction Working Group
- Travel Plan – for each development phase (Heathgate and Energy Centre treated as one – so 5 in total) including monitoring and measures fee of £11,348 for each plan.
- Delivery and Servicing Plan – for each development phase Heathgate and Energy Centre treated as one – so 5 in total) including monitoring fee of £15,000 for each plan.

- £6,482,386 to make improvements to public realm for pedestrian, cycling, and environmental improvements.
- £10,000,000 contribution to support step-free access for Thameslink services at Kentish Town Station.
- Kentish Town Station Transport Task Force.
- £600,000 for impact to repair works to highways from construction.
- Car-free development, with the exception of specified operational car parking.
- Film Studio Parking Operational Management Plan (to include):
    - continuous monitoring of parking demand, utilisation, and compliance, with the intention of reducing the level of car parking onsite over the long term;
    - the use cargo bikes for local trips, small equipment transfers and last-mile logistics;
    - car sharing aimed at specialist film crew and contractors whose operational responsibilities require them to travel with equipment or at atypical hours;
    - provision of travel information relating to public transport options, active travel routes, site parking restrictions, car sharing opportunities and the availability of cargo bike rentals for all crew and contractors prior to the start of filming to influence behavioural change.
- Blue badge parking: 7 spaces for Inkerman Gardens and 7 spaces for Heathgate.
- £40,000 for two electric vehicle charging points (Spring Place).
- £40,000 for car club space and electric vehicle charging point.
- £150,000 towards 'CA-L' and 'CA-M' CPZ reviews.
- £20,000 towards cycle/e-scooter improvements.
- £120,000 towards additional Santander cycle hire docking stations.
- Restriction on coach bookings.
- Legible London contribution (TBC).

<u>Other</u>

- Basement Construction Plan.
- Biodiversity enhancement plan for north-west corner.
- £294,800 Healthcare contribution to be used for increasing clinical infrastructure capacity within vicinity of the site.
- £249,019.43 Metropolitan Police Service (MPS) contribution to mitigate the additional impacts of the development on MPS infrastructure.

28. COMMUNITY INFRASTRUCTURE LEVY (CIL)

28.1 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.

28.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of **£2,236,993.94** .

28.3 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 **£8,896,069.46**.

28.4 Most of the Camden CIL (75%) is used for strategic purposes and is spent on borough-wide infrastructure to support growth. The remaining 25% of the Camden CIL collected is identified as 'Local' CIL and is allocated locally by ward councillors. In this case, this would equate to £2,224,017.36. The spending process for Local CIL is guided by a priority list for each ward. These have been developed by ward members and in consultation with their local communities.

29. CONCLUSION

29.1 The proposal set out in the application would act as a catalyst for the comprehensive redevelopment of the site, which is currently underdeveloped industrial land that makes inefficient use of land. Whilst the proposed development is only for part of the growth area which is contrary to policy, taking account of recent appeal decisions, this piecemeal approach is accepted on the basis that it has been shown that the development would not prejudice the development of adjoining sites. Significantly, supporting this scheme could have the effect of unlocking other developments sites in the Regis Road Growth Area, the land has been designated as a growth area for nearly 10 years but due to the fragmented land ownership has not come forward for development. The proposed development has been prepared in discussions with other landowners and has had regard to the masterplan in the Regis Road Area Guidance, which sets out, *inter alia*, necessary routes and connections and the location of public open space.

29.2 The proposed development would deliver an employment-led scheme that reprovides and significantly increases industrial floorspace, albeit in a different form of industrial provision, as well as providing 513 high quality new homes (485 of which are additional). The scheme is guided by the vision and aspirations of the Regis Road Area Guidance (and Kentish Town Planning Framework, more broadly) to deliver a landscaped and pedestrian friendly place to live in its own right, but will be able to integrate with future development that comes forward at adjacent sites.

29.3 The development would deliver 513 good quality homes in total, of which 28 would be reprovided to compensate for the loss of the only existing homes

at the site at Holmes Road. In total, 225 of the new homes would be affordable, and this would exceed the threshold of the required affordable housing quantum by habitable room. 60% of those homes will be social-affordable rent and 40% intermediate rent in line with policy. The provision of new housing across the site would help to improve the living conditions of existing residents, as well as reduce the Council's social housing waiting list and contribute significantly to the borough being able to meet its housing targets.

29.4 The current delivery housing delivery in the borough is low and that means that the presumption in favour of sustainable development in paragraph 11 of the NPPF is engaged, and significant weight should be given the provision of housing in decision making. The application should be granted unless the adverse impacts would significantly and demonstrably outweigh their benefits when assessed against the development plan as a whole.

29.5 In addition to providing new housing, the proposed development would substantially increase the amount of commercial floorspace at the site, specifically delivering industrial floorspace in the form of the film studios. The site is currently low-density and limited in how many jobs can be provided due to the nature of the businesses and buildings onsite. The proposed development would bring a significant uplift in employment density and capacity, supporting a growing and nationally important industry and bringing a large increase in jobs, training, and education opportunities for local people. The development would also deliver affordable space for growing businesses to support Camden's SMEs and creative startups.

29.6 The proposed development would integrate well into the surrounding context and the Regis Road area, allowing for the delivery of future parcels of land to achieve the aspirations of the Kentish Town Planning Framework and the Regis Road Area Guidance. However, the scheme in its own right creates an exemplary landscape with good quality open space, play space, and planting, and would substantially increase the level of greenery and usable public space at the site. It will also deliver and support the delivery of key infrastructure identified in guidance such as a pedestrian friendly Regis Road, a service road, the Heath Line Bridge Link and various other routes and connections.

29.7 The design is high quality and appropriate for the proposed uses and the site context, but it is acknowledged that as a result of the height and scale of certain buildings (in particularly the Film Studio, Heathgate and Inkerman Gardens) there would be less than substantial harm to a number of heritage assets, at various ends of the scale (from low to high). In particular, the proposal would result in less than substantial harm at a high level to the grade II listed Kentish Town Police Station as a result of loss of historic fabric and a medium level to the setting of listed buildings, including Kentish Town

Police Station and St Paul's Cathedral. The impact of that harm on St Paul's Cathedral, given its significance as a grade I listed building and iconic landmark in London, should be given more weight. There would also be harm to LVMF views from Parliament Hill and Kenwood to St Paul's Cathedral. This is contrary to policy and should be given considerable weight and importance in decision making. The level and nature of harm has been carefully considered, mitigated where it can, but must be viewed in the context of the wider development and the public benefits that it could bring (outlined below). Minimising harm further would likely necessitate a significant reduction in housing delivery and potentially jeopardise the ecosystem of the film quarter.

29.8 The scale of the scheme would also inevitably harm the amenity of some nearby homes through impacts to daylight, sunlight, and overshadowing – exceeding what is typically expected in urban contexts. These impacts have been assessed in detail, noting that the harm is mostly limited to a small number of properties and that the impact must be balanced with wider public benefits. It has also been considered how the design has been approached to minimise and mitigate light impacts wherever possible and, on this basis, the impact to light would be acceptable.

29.9 The development would be car-free, with the exception of the operational car parking for the Camden Film Studios and Blue Badge parking for the residential use; planning obligations would support the long-term reduction of car parking at the film studios site through monitoring and encouragement of sustainable transport. The scheme would provide good quality cycle parking within all buildings and significant financial contributions would secure improvements to the transport, pedestrian, and cycling environment in the local area, mitigating the impact of the development on transport infrastructure. The impact from demolition and construction works would also be carefully managed by way of management plans for each phase of works, as well as a Construction Working Group for the duration of the proposed works to ensure continuous engagement.

29.10 The scheme directly addresses local health inequalities, particularly for low-income households, older people, and disabled people (as well as their families and carers) by providing affordable and accessible homes. The economic benefits directed to local residents will have a positive impact on long-term health, along with public spaces and placemaking, which will support physical activity, mental wellbeing, and social cohesion.

29.11 As has been established, it has been identified that less than substantial harm would be caused to a number of heritage assets, including conservation areas and listed buildings. As well as this the LVMF view would be impacted and there would be some harm to the amenity of nearby homes as a result of light impact. Considerable weight and importance must be

given to the heritage harm, but it is considered that the substantial public benefits that would be delivered by the scheme would outweigh any harm and negatives identified with the scheme. These public benefits include the following:

- Significant additional housing to help address the borough's housing delivery targets;
- Policy compliant additional affordable housing at the most affordable tenure;
- Improved housing quality for reprovided homes at Holmes Road;
- Energy efficient new homes that will help reduce costs for residents;
- Substantial densification and increase in employment capacity and space for an industry that is important to the economies of the borough and the country more widely;
- High quality urban design and placemaking to transform an existing underutilised industrial site;
- Significant improvements and contributions to transport infrastructure, including active travel like walking and cycling;
- Significant improvements to connective infrastructure to improve the permeability of the surrounding area;
- Improved safety and security in the public realm and around the site;
- Improved open space provision and landscaped, inclusive, and accessible spaces for a wide range of residents and visitors;
- Improved greening and biodiversity through the delivery of new green spaces and biodiversity-supporting design measures;
- Improved accessibility, both internally and externally, including the delivery of wheelchair accessible homes;
- Economic and employment benefits, including local employment, training, and procurement;
- Positive health impact, particularly for low-income households, older people, and disabled people.

29.12 Whilst officers have identified conflict with some policies of the development plan, it is considered that the proposed development which considered against the development plan as a whole and taking account of material considerations is acceptable.

30. RECOMMENDATION

30.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the heads of terms as listed in section 28 of this report following referral to the Mayor

30.2 Grant conditional listed building consent s

31. LEGAL COMMENTS

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

32. 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:

Drawings:

2112-SPP-ZZ-ZZ-DR-A-02-0002-PL (Master Plan - Existing Location Plan); 2112-SPP-SH-0R-DR-A-00-1001-PL (Station House - Location Plan); 2112-SPP-ZZ-ZZ-DR-A-02-0001-PL P01 (Masterplan – Existing Site Plan); 2112-SPP-ZZ-0G-DR-A-02-1001-PL P01 (Masterplan – Existing Level 0G Floor Plan); 2112-SPP-ZZ-01-DR-A-02-1002-PL P01 (Masterplan – Existing Level 01 Floor Plan); 2112-SPP-ZZ-0R-DR-A-02-1003-PL P01 (Masterplan – Existing Roof Plan); 2112-SPP-ZZ-ZZ-DR-A-02-3001-PL P01 (Masterplan – Existing Elevations); 2112-SPP-ZZ-0G-DR-A-95-1001-PL P01 (Masterplan – Demolition Level 0G Floor Plan); 2112-SPP-ZZ-01-DR-A-95-1002-PL P01 (Masterplan – Demolition Level 01 Floor Plan); 2112-SPP-ZZ-0R-DR-A-95-1003-PL P01 (Masterplan – Demolition Roof Plan); 2112-SPP-ZZ-ZZ-DR-A-95-3001-PL P01 (Masterplan – Demolition Elevations); 2112-SPP-ZZ-ZZ-DR-A-00-0001-PL P05 (Masterplan – Proposed Site Plan); 2112-SPP-ZZ-0G-DR-A-20-1000-PL P05 (Masterplan – Proposed Level 0G Floor Plan - Boundary); 2112-SPP-ZZ-0G-DR-A-20-1006-PL P05 (Masterplan – Proposed Level 0G Floor Plan); 2112-SPP-ZZ-0G-DR-A-20-1130-PL P05 (Masterplan – Proposed Level 0G Open Spaces); 2112-SPP-ZZ-0R-DR-A-20-1120-PL P05 (Masterplan – Proposed Phase 1A); 2112-SPP-ZZ-0G-DR-A-20-1220-PL P05 (Masterplan – Proposed Phase 1B); 2112-SPP-ZZ-0G-DR-A-20-1320-PL P05 (Masterplan – Proposed Phase 2A); 2112-SPP-ZZ-0G-DR-A-20-1420-PL P05 (Masterplan – Proposed Phase 2B); 2112-SPP-ZZ-01-DR-A-20-1007-PL P05 (Masterplan – Proposed High-Line Level Floor Plan); 2112-SPP-ZZ-01-DR-A-20-1230-PL P05 (Masterplan – Proposed High-Line Open Spaces); 2112-SPP-ZZ-0R-DR-A-20-1020-PL P06 (Masterplan – Proposed Roof Plan); 2112-SPP-ZZ-0R-DR-A-20-1330-PL P05 (Masterplan – Proposed Roof Open Spaces); 2112-SPP-ZZ-ZZ-DR-A-25-3001-PL P04 (Masterplan – Proposed Elevations); 2112-SPP-ZZ-ZZ-DR-A-00-0002-PL P01 (Masterplan – Proposed Site Plan – Regis Road Kinetic Views); 2112-SPP-CS-0G-DR-A-02-1001-PL P01 (Camden Film Studios – Existing Level 0G Floor Plan); 2112-SPP-CS-01-DR-A-02-1002-PL P01 (Camden Film Studios – Existing Level 01 Floor Plan); 2112-SPP-CS-01-DR-A-02-1003-PL P01 (Camden Film Studios – Existing Level 02 Floor Plan); 2112-SPP-CS-0R-DR-A-02-1004-PL P01 (Camden Film Studios – Existing Roof Plan); 2112-SPP-CS-ZZ-DR-A-02-2001-PL P01 (Camden Film Studios – Existing Sections); 2112-SPP-CS-ZZ-DR-A-02-3001-PL P01 (Camden Film Studios – Existing Elevations); 2112-SPP-CS-0G-DR-A-95-1001-PL P01 (Camden Film Studios – Demolition Level 0G Floor Plan); 2112-SPP-CS-0G-DR-A-20-1000-PL P05 (Camden Film Studios – Proposed Ground Floor Plan – Boundary); 2112-SPP-CS-B5-DR-A-20-1001-PL P02 (Camden Film Studios – Proposed Level B5 Floor Plan); 2112-SPP-CS-B4-

DR-A-20-1002-PL P02 (Camden Film Studios – Proposed Level B4 Floor Plan); 2112-SPP-CS-B3-DR-A-20-1003-PL P02 (Camden Film Studios – Proposed Level B3 Floor Plan); 2112-SPP-CS-B2-DR-A-20-1004-PL P02 (Camden Film Studios – Proposed Level B2 Floor Plan); 2112-SPP-CS-B1-DR-A-20-1005-PL P03 (Camden Film Studios – Proposed Level B1 Floor Plan); 2112-SPP-CS-0G-DR-A-20-1006-PL P05 (Camden Film Studios – Proposed Ground Floor Plan); 2112-SPP-CS-GM-DR-A-20-1007-PL P05 (Camden Film Studios – Proposed Ground Mezzanine Floor Plan); 2112-SPP-CS-01-DR-A-20-1008-PL P05 (Camden Film Studios – Proposed Level 01 Floor Plan); 2112-SPP-CS-02-DR-A-20-1009-PL P04 (Camden Film Studios – Proposed Level 02 Floor Plan); 2112-SPP-CS-2M-DR-A-20-1010-PL P04 (Camden Film Studios – Proposed Level 02M Floor Plan); 2112-SPP-CS-03-DR-A-20-1011-PL P04 (Camden Film Studios – Proposed Level 03 Floor Plan); 2112-SPP-CS-3M-DR-A-20-1012-PL P04 (Camden Film Studios – Proposed Level 03M Floor Plan); 2112-SPP-CS-04-DR-A-20-1013-PL P04 (Camden Film Studios – Proposed Level 04 Floor Plan); 2112-SPP-CS-05-DR-A-20-1014-PL P04 (Camden Film Studios – Proposed Level 05 Floor Plan); 2112-SPP-CS-5M-DR-A-20-1015-PL P04 (Camden Film Studios – Proposed Level 05M Floor Plan); 2112-SPP-CS-06-DR-A-20-1016-PL P04 (Camden Film Studios – Proposed Level 06 Floor Plan); 2112-SPP-CS-6M-DR-A-20-1017-PL P04 (Camden Film Studios – Proposed Level 06M Floor Plan); 2112-SPP-CS-07-DR-A-20-1018-PL P04 (Camden Film Studios – Proposed Level 07 Floor Plan); 2112-SPP-CS-08-DR-A-20-1019-PL P04 (Camden Film Studios – Proposed Level 08 Floor Plan); 2112-SPP-CS-8M-DR-A-20-1020-PL P04 (Camden Film Studios – Proposed Level 08M Floor Plan); 2112-SPP-CS-09-DR-A-20-1021-PL P04 (Camden Film Studios – Proposed Level 09 Floor Plan); 2112-SPP-CS-9M-DR-A-20-1022-PL P04 (Camden Film Studios – Proposed Level 09M Floor Plan); 2112-SPP-CS-10-DR-A-20-1023-PL P04 (Camden Film Studios – Proposed Level 10 Floor Plan); 2112-SPP-CS-11-DR-A-20-1024-PL P04 (Camden Film Studios – Proposed Level 11 Floor Plan); 2112-SPP-CS-12-DR-A-20-1025-PL P04 (Camden Film Studios – Proposed Level 12 Floor Plan); 2112-SPP-CS-RF-DR-A-20-1026-PL P04 (Camden Film Studios – Proposed Roof Plan); 2112-SPP-CS-ZZ-DR-A-26-2002-PL P03 (Camden Film Studios – Proposed Section 2); 2112-SPP-CS-ZZ-DR-A-26-2003-PL P02 (Camden Film Studios – Proposed Section 3); 2112-SPP-CS-ZZ-DR-A-26-2004-PL P02 (Camden Film Studios – Proposed Section 4); 2112-SPP-CS-ZZ-DR-A-25-3001-PL P03 (Camden Film Studios – Proposed Elevation – South West); 2112-SPP-CS-ZZ-DR-A-25-3002-PL P02 (Camden Film Studios – Proposed Elevation – North East); 2112-SPP-CS-ZZ-DR-A-25-3003-PL P03 (Camden Film Studios – Proposed Elevation – East); 2112-SPP-CS-ZZ-DR-A-25-3004-PL P03 (Camden Film Studios – Proposed Elevation – North West); 2112-SPP-CS-ZZ-DR-A-21-4004-PL P02 (Camden Film Studios – Bay Study 01); 2112-SPP-CS-ZZ-DR-A-21-4005-PL P01 (Camden Film Studios – Bay Study 02); 2112-SPP-CS-ZZ-DR-A-21-4006-PL P01 (Camden Film Studios – Bay Study 03; 2112-BM-IG-0R-DR-A-02-1001-PL (Inkerman Gardens – Site Plan); 2112-BM-IG-0R-DR-A-02-1004-PL (Inkerman Gardens – Existing Roof Plan); 2112-BM-IG-ZZ-DR-A-02-3001-PL (Inkerman Gardens – Existing Elevations – Sheet 01); 2112-BM-IG-ZZ-DR-A-02-3002-PL (Inkerman Gardens – Existing Elevations – Sheet 02); 2112-BM-IG-0R-DR-A-95-1004-PL (Inkerman Gardens – Demolition Roof Plan); 2112-BM-IG-ZZ-DR-A-95-3001-PL (Inkerman Gardens – Demolition Elevations – Sheet 01); 2112-BM-IG-ZZ-DR-A-95-3002-PL (Inkerman Gardens – Demolition Elevations – Sheet 02); 2112-SPP-IG-0G-DR-A-20-1000-PL P01 (Inkerman Gardens – Proposed Level 0G Floor Plan – Boundary); 2112-SPP-IG-B5-DR-A-20-1001-PL P01 (Inkerman Gardens – Proposed Level B5 Floor Plan – Commercial); 2112-SPP-IG-B4-DR-A-20-1002-PL P01 (Inkerman Gardens – Proposed Level B4 Floor Plan – Commercial); 2112-SPP-IG-B3-DR-A-20-1003-PL P01 (Inkerman Gardens – Proposed Level B3 Floor Plan – Commercial); 2112-

SPP-IG-B2-DR-A-20-1004-PL P01 (Inkerman Gardens – Proposed Level B2 Floor Plan – Commercial); 2112-BM-IG-B2-DR-A-20-1004-PL (Inkerman Gardens – Proposed Level B2 Floor Plan – Residential); 2112-SPP-IG-B1-DR-A-20-1005-PL P01 (Inkerman Gardens – Proposed Level B1 Floor Plan – Commercial); 2112-BM-IG-B1-DR-A-20-1005-PL (Inkerman Gardens – Proposed Level B1 Floor Plan – Residential); 2112-SPP-IG-0G-DR-A-20-1006-PL P01 (Inkerman Gardens – Proposed Level 0G Floor Plan – Commercial); 2112-BM-IG-01-DR-A-20-1007-PL (Inkerman Gardens – Proposed Level 01 Floor Plan – Residential); 2112-BM-IG-02-DR-A-20-1008-PL (Inkerman Gardens – Proposed Level 02 Floor Plan); 2112-BM-IG-03-DR-A-20-1009-PL (Inkerman Gardens – Proposed Level 03 Floor Plan); 2112-BM-IG-04-DR-A-20-1010-PL (Inkerman Gardens – Proposed Level 04 Floor Plan); 2112-BM-IG-05-DR-A-20-1011-PL (Inkerman Gardens – Proposed Level 05 Floor Plan); 2112-BM-IG-06-DR-A-20-1012-PL (Inkerman Gardens – Proposed Level 06 Floor Plan); 2112-BM-IG-07-DR-A-20-1013-PL (Inkerman Gardens – Proposed Level 07 Floor Plan); 2112-BM-IG-08-DR-A-20-1014-PL (Inkerman Gardens – Proposed Level 08 Floor Plan); 2112-BM-IG-09-DR-A-20-1015-PL (Inkerman Gardens – Proposed Level 09 Floor Plan); 2112-BM-IG-10-DR-A-20-1016-PL (Inkerman Gardens – Proposed Level 10 Floor Plan); 2112-BM-IG-11-DR-A-20-1017-PL (Inkerman Gardens – Proposed Level 11 Floor Plan); 2112-BM-IG-12-DR-A-20-1018-PL (Inkerman Gardens – Proposed Level 12 Floor Plan); 2112-BM-IG-13-DR-A-20-1019-PL (Inkerman Gardens – Proposed Level 13 Floor Plan); 2112-BM-IG-14-DR-A-20-1020-PL (Inkerman Gardens – Proposed Level 14 Floor Plan); 2112-BM-IG-15-DR-A-20-1021-PL (Inkerman Gardens – Proposed Level 15 Floor Plan); 2112-BM-IG-0R-DR-A-20-1022-PL (Inkerman Gardens – Proposed Roof Plan); 2112-SPP-IG-ZZ-DR-A-26-2001-PL P02 (Inkerman Gardens – Proposed Sections – Sheet 01 – Commercial); 2112-SPP-IG-ZZ-DR-A-26-2101-PL P02 (Inkerman Gardens – Proposed Sections – Sheet 01 – Coordination); 2112-SPP-IG-ZZ-DR-A-25-3001-PL P02 (Inkerman Gardens – Proposed South and East Elevations – Commercial); 2112-SPP-IG-ZZ-DR-A-25-3002-PL P01 (Inkerman Gardens – Proposed North and West Elevations – Commercial); 2112-BM-IG-ZZ-DR-A-25-3010-PL 01 (Inkerman Gardens – Proposed South Elevation Block A); 2112-BM-IG-ZZ-DR-A-25-3011-PL 01 (Inkerman Gardens – Proposed West Elevation Block A); 2112-BM-IG-ZZ-DR-A-25-3012-PL 01 (Inkerman Gardens – Proposed North Elevation Block A); 2112-BM-IG-ZZ-DR-A-25-3013-PL 01 (Inkerman Gardens – Proposed East Elevation Block A); 2112-BM-IG-ZZ-DR-A-25-3014-PL 01 (Inkerman Gardens – Proposed South Elevation Block B); 2112-BM-IG-ZZ-DR-A-25-3015-PL 01 (Inkerman Gardens – Proposed West Elevation Block B); 2112-BM-IG-ZZ-DR-A-25-3016-PL 01 (Inkerman Gardens – Proposed North Elevation Block B); 2112-BM-IG-ZZ-DR-A-25-3017-PL 01 (Inkerman Gardens – Proposed East Elevation Block B); 2112-BM-IG-ZZ-DR-A-25-3018-PL 01 (Inkerman Gardens – Proposed South Elevation Block C); 2112-BM-IG-ZZ-DR-A-25-3019-PL 01 (Inkerman Gardens – Proposed West Elevation Block C); 2112-BM-IG-ZZ-DR-A-25-3020-PL 01 (Inkerman Gardens – Proposed North Elevation Block C); 2112-BM-IG-ZZ-DR-A-25-3021-PL 01 (Inkerman Gardens – Proposed East Elevation Block C); 2112-BM-IG-ZZ-DR-A-26-2002-PL 02 (Inkerman Gardens – Proposed Site Sections – Section 02); 2112-BM-IG-ZZ-DR-A-26-2003-PL 01 (Inkerman Gardens – Proposed Site Sections – Section 01 – Coordination); 2112-BM-IG-ZZ-DR-A-26-2004-PL 01 (Inkerman Gardens – Proposed Site Sections – Section 02 – Coordination); 2112-SPH-IG-ZZ-DR-L-90-2005 P01 (Inkerman Gardens – Landscape Sections Courtyard); 2112-BM-IG-ZZ-DR-A-25-3001-PL (Inkerman Gardens – Proposed Street Elevation South-East); 2112-BM-IG-ZZ-DR-A-25-3002-PL (Inkerman Gardens – Proposed Street Elevation South-West); 2112-BM-IG-ZZ-DR-A-25-3003-PL (Inkerman Gardens – Proposed Street Elevation North-West); 2112-BM-IG-ZZ-DR-A-25-3004-PL (Inkerman Gardens – Proposed Street Elevation North-

East); 2112-BM-IG-ZZ-DR-A-25-3010-PL (Inkerman Gardens – Proposed South Elevation Block A); 2112-BM-IG-ZZ-DR-A-25-3025-PL 01 (Inkerman Gardens – Proposed Bay Study – Block A); 2112-BM-IG-ZZ-DR-A-25-3026-PL 01 (Inkerman Gardens – Proposed Bay Study – Block B); 2112-BM-IG-ZZ-DR-A-25-3027-PL (Inkerman Gardens – Proposed Bay Study – Block C); 2112-BM-IG-ZZ-DR-A-25-3028-PL (Inkerman Gardens – Proposed Bay Study – Block A – Ground Floor); 2112-BM-IG-ZZ-DR-A-25-3029-PL (Inkerman Gardens – Proposed Bay Study – Block B – Ground Floor); 2112-BM-IG-ZZ-DR-A-25-3030-PL (Inkerman Gardens – Proposed Bay Study – Block B – Ground Floor); 2112-SPP-IG-ZZ-DR-A-21-4001-PL P01 (Inkerman Gardens – Proposed External Wall 01 – Commercial); 2112-SPP-IG-ZZ-DR-A-21-4002-PL P02 (Inkerman Gardens – Proposed Bay Study 01 – Commercial); 2112-SPP-IG-ZZ-DR-A-21-4003-PL P01 (Inkerman Gardens – Proposed Bay Study 02 – Commercial); 2112-BM-IG-0G-DR-A-29-4001-PL 01 (Inkerman Gardens Block A – Apartment Layouts Level 00); 2112-BM-IG-01-DR-A-29-4002-PL 01 (Inkerman Gardens Block A – Apartment Layouts Level 01); 2112-BM-IG-ZZ-DR-A-29-4003-PL 01 (Inkerman Gardens Block A – Apartment Layouts Level 02-14); 2112-BM-IG-15-DR-A-29-4004-PL 01 (Inkerman Gardens Block A – Apartment Layouts Level 15); 2112-BM-IG-0G-DR-A-29-4005-PL (Inkerman Gardens Block B – Apartment Layouts Level 00); 2112-BM-IG-01-DR-A-29-4006-PL 01 (Inkerman Gardens Block B – Apartment Layouts Level 01); 2112-BM-IG-ZZ-DR-A-29-4007-PL 01 (Inkerman Gardens Block B – Apartment Layouts Level 02-04); 2112-BM-IG-ZZ-DR-A-29-4008-PL (Inkerman Gardens Block B – Apartment Layouts Level 05-07); 2112-BM-IG-02-DR-A-29-4009-PL 01 (Inkerman Gardens Block C – Apartment Layouts Level 02); 2112-BM-IG-ZZ-DR-A-29-4010-PL 01 (Inkerman Gardens Block C – Apartment Layouts Level 03-07); 2112-BM-IG-ZZ-DR-A-29-4011-PL (Inkerman Gardens Block C – Apartment Layouts Level 08-14); 2112-BM-HR-B1-DR-A-20-1001-PL 03 (Heathgate Residential – Proposed Level B1 Floor Plan); 2112-BM-HR-0G-DR-A-20-1002-PL 06 (Heathgate Residential – Proposed Level 0G Floor Plan); 2112-BM-HR-MZ-DR-A-20-1025-PL 01 (Heathgate Residential – Proposed Mezzanine Level Floor Plan); 2112-BM-HR-01-DR-A-20-1003-PL 04 (Heathgate Residential – Proposed Level 01 Floor Plan); 2112-BM-HR-02-DR-A-20-1004-PL 04 (Heathgate Residential – Proposed Level 02 Floor Plan); 2112-BM-HR-03-DR-A-20-1005-PL 04 (Heathgate Residential – Proposed Level 03 Floor Plan); 2112-BM-HR-04-DR-A-20-1006-PL 04 (Heathgate Residential – Proposed Level 04 Floor Plan); 2112-BM-HR-05-DR-A-20-1007-PL 04 (Heathgate Residential – Proposed Level 05 Floor Plan); 2112-BM-HR-06-DR-A-20-1008-PL 04 (Heathgate Residential – Proposed Level 06 Floor Plan); 2112-BM-HR-07-DR-A-20-1009-PL 04 (Heathgate Residential – Proposed Level 07 Floor Plan); 112-BM-HR-08-DR-A-20-1010-PL 04 (Heathgate Residential – Proposed Level 08 Floor Plan); 2112-BM-HR-09-DR-A-20-1011-PL 04 (Heathgate Residential – Proposed Level 09 Floor Plan); 2112-BM-HR-10-DR-A-20-1012-PL 04 (Heathgate Residential – Proposed Level 10 Floor Plan); 2112-BM-HR-11-DR-A-20-1013-PL 04 (Heathgate Residential – Proposed Level 11 Floor Plan); 2112-BM-HR-12-DR-A-20-1014-PL 04 (Heathgate Residential – Proposed Level 12 Floor Plan); 2112-BM-HR-13-DR-A-20-1015-PL 04 (Heathgate Residential – Proposed Level 13 Floor Plan); 2112-BM-HR-14-DR-A-20-1016-PL 04 (Heathgate Residential – Proposed Level 14 Floor Plan); 2112-BM-HR-15-DR-A-20-1017-PL 04 (Heathgate Residential – Proposed Level 15 Floor Plan); 2112-BM-HR-16-DR-A-20-1018-PL 04 (Heathgate Residential – Proposed Level 16 Floor Plan); 2112-BM-HR-17-DR-A-20-1019-PL 04 (Heathgate Residential – Proposed Level 17 Floor Plan); 2112-BM-HR-18-DR-A-20-1020-PL 04 (Heathgate Residential – Proposed Level 18 Floor Plan); 2112-BM-HR-19-DR-A-20-1021-PL 04 (Heathgate Residential – Proposed Level 19 Floor Plan); 2112-BM-HR-20-DR-A-20-1022-PL 04 (Heathgate Residential – Proposed Level 20 Floor Plan); 2112-BM-HR-21-DR-A-20-1023-PL 04 (Heathgate Residential –

Proposed Level 21 Floor Plan); 2112-BM-HR-RF-DR-A-20-1024-PL 04 (Heathgate Residential – Proposed Roof Plan); 2112-BM-HR-ZZ-DR-A-26-2001-PL 02 (Heathgate Residential – Proposed Site Section AA); 2112-BM-HR-ZZ-DR-A-26-2002-PL 02 (Heathgate Residential – Proposed Site Section BB); 2112-BM-HR-ZZ-DR-A-25-3001-PL 03 (Heathgate Residential – Proposed South West Elevation); 2112-BM-HR-ZZ-DR-A-25-3002-PL 03 (Heathgate Residential – Proposed North West Elevation); 2112-BM-HR-ZZ-DR-A-25-3005-PL 03 (Heathgate Residential – Block A – Proposed Elevations North East & South West); 2112-BM-HR-ZZ-DR-A-25-3006-PL 03 (Heathgate Residential – Block A – Proposed Elevations South West & North West); 2112-BM-HR-ZZ-DR-A-25-3007-PL 02 (Heathgate Residential – Block B – Proposed Elevations North East & South East); 2112-BM-HR-ZZ-DR-A-25-3008-PL 02 (Heathgate Residential – Block B – Proposed Elevations South West & North West); 2112-BM-HR-ZZ-DR-A-25-3011-PL 02 (Heathgate Residential – Block A – Proposed Elevation North); 2112-BM-HR-ZZ-DR-A-25-3012-PL 02 (Heathgate Residential – Block A – Proposed Elevation East); 2112-BM-HR-ZZ-DR-A-25-3013-PL 01 (Heathgate Residential – Block A – Proposed Elevation South); 2112-BM-HR-ZZ-DR-A-25-3014-PL 02 (Heathgate Residential – Block A – Proposed Elevation West); 2112-BM-HR-ZZ-DR-A-25-3015-PL 01 (Heathgate Residential – Block B – Proposed Elevation North); 2112-BM-HR-ZZ-DR-A-25-3016-PL 01 (Heathgate Residential – Block B – Proposed Elevation East); 2112-BM-HR-ZZ-DR-A-25-3017-PL 01 (Heathgate Residential – Block B – Proposed Elevation South); 2112-BM-HR-ZZ-DR-A-25-3018-PL 01 (Heathgate Residential – Block B – Proposed Elevation West); 112-BM-HR-ZZ-DR-A-25-3009-PL 02 (Heathgate Residential – Proposed Bay Study – Block A); 2112-BM-HR-ZZ-DR-A-25-3010-PL 02 (Heathgate Residential – Proposed Bay Study – Block B); 2112-BM-HR-ZZ-DR-A-25-3019-PL 01 (Heathgate Residential – Proposed Bay Study – Block A – Ground Floor); 2112-BM-HR-ZZ-DR-A-25-3020-PL 01 (Heathgate Residential – Proposed Bay Study – Block B – Ground Floor); 2112-BM-HR-ZZ-DR-A-25-3021-PL 01 (Heathgate Residential – Proposed Bay Study – Block B); 2112-BM-HR-ZZ-DR-A-29-1001-PL 02 (Heathgate Residential – Block A – Apartment Layouts Levels 01-16); 2112-BM-HR-ZZ-DR-A-29-1002-PL 01 (Heathgate Residential – Block A – Apartment Layouts Levels 17-20); 2112-BM-HR-ZZ-DR-A-29-1003-PL 01 (Heathgate Residential – Block A – Apartment Layouts Level 21); 2112-BM-HR-ZZ-DR-A-29-1004-PL 02 (Heathgate Residential – Block B – Apartment Layouts Levels 01-08); 2112-BM-HR-ZZ-DR-A-29-1005-PL 01 (Heathgate Residential – Block B – Apartment Layouts Levels 09-15); 2112-SPP-SH-B1-DR-A-02-1000-PL P01 (Station House – Existing Level B1 Floor Plan); 2112-SPP-SH-0G-DR-A-02-1001-PL P01 (Station House – Existing Level 0G Floor Plan); 2112-SPP-SH-01-DR-A-02-1002-PL P01 (Station House – Existing Level 01 Floor Plan); 2112-SPP-SH-02-DR-A-02-1003-PL P01 (Station House – Existing Level 02 Floor Plan); 2112-SPP-SH-0R-DR-A-02-1004-PL P01 (Station House – Existing Roof Plan); 2112-SPP-SH-ZZ-DR-A-02-2001-PL P01 (Station House – Existing Sections); 2112-SPP-SH-ZZ-DR-A-02-3001-PL P01 (Station House – Existing Elevations); 2112-SPP-SH-0G-DR-A-95-1001-PL P02 (Station House – Demolition Level 0G Floor Plan); 2112-SPP-SH-01-DR-A-95-1002-PL P02 (Station House – Demolition Level 01 Floor Plan); 112-SPP-SH-02-DR-A-95-1003-PL P02 (Station House – Demolition Level 02 Floor Plan); 2112-SPP-SH-ZZ-DR-A-95-2001-PL P02 (Station House – Demolition Sections); 2112-SPP-SH-ZZ-DR-A-95-3001-PL P02 (Station House – Demolition Elevations); 2112-SPP-SH-0G-DR-A-20-1000-PL P04 (Station House – Proposed Level 0G Boundary); 2112-SPP-SH-0G-DR-A-20-1001-PL P03 (Station House – Proposed Level 0G); 2112-SPP-SH-0G-DR-A-20-1001M-PL P03 (Station House – Proposed Level 0G Mezzanine); 2112-SPP-SH-01-DR-A-20-1002-PL P03 (Station House – Proposed Level 01); 2112-SPP-SH-02-DR-A-20-1003-PL P03 (Station House – Proposed Level 02); 2112-SPP-SH-

03-DR-A-20-1004-PL P03 (Station House – Proposed Level 03); 2112-SPP-SH-04-DR-A-20-1005-PL P03 (Station House – Proposed Level 04); 2112-SPP-SH-05-DR-A-20-1006-PL P04 (Station House – Proposed Roof Level); 2112-SPP-SH-ZZ-DR-A-26-2001-PL P03 (Station House – Proposed Sections); 2112-SPP-SH-ZZ-DR-A-25-3001-PL P03 (Station House – Proposed Elevations); 2112-SPP-SH-ZZ-DR-A-25-3002-PL P02 (Station House – Proposed South Elevation); 2112-SPP-SH-ZZ-DR-A-25-3003-PL P02 (Station House – Proposed West Elevation); 2112-SPP-SH-ZZ-DR-A-25-3004-PL P02 (Station House – Proposed North Elevation); 2112-SPP-SH-ZZ-DR-A-25-3005-PL P02 (Station House – Proposed East Elevation); 2112-SPP-01-ZZ-DR-A-21-4002-PL P01 (Station House – Proposed Bay Study 01); 2112-SPP-ES-0G-DR-A-02-1001-PL P01 (Energy Centre – Existing Level 0G Floor Plan); 2112-SPP-ES-01-DR-A-02-1002-PL P01 (Energy Centre – Existing Level 01 Floor Plan); 2112-SPP-ES-0R-DR-A-02-1003-PL P01 (Energy Centre – Existing Roof Plan); 2112-SPP-ES-ZZ-DR-A-02-2001-PL P01 (Energy Centre – Existing Sections); 2112-SPP-ES-ZZ-DR-A-02-3001-PL P01 (Energy Centre – Existing Elevations); 2112-SPP-ES-0G-DR-A-95-1001-PL P01 (Energy Centre – Demolition Level 0G Floor Plan); 2112-SPP-ES-01-DR-A-95-1002-PL P01 (Energy Centre – Demolition Level 01 Floor Plan); 2112-SPP-ES-0R-DR-A-95-1003-PL P01 (Energy Centre – Demolition Roof Plan); 2112-SPP-ES-ZZ-DR-A-95-2001-PL P01 (Energy Centre – Demolition Sections); 2112-SPP-ES-ZZ-DR-A-95-3001-PL P01 (Energy Centre – Demolition Elevations); 2112-SPP-HT-0G-DR-A-20-1000-PL P04 (Energy Centre - Proposed Level 0G Floor Plan – Boundary); 2112-SPP-HT-0G-DR-A-20-1001-PL P04 (Energy Centre – Proposed Level 0G Floor Plan); 2112-SPP-HT-0G-DR-A-20-1004-PL P04 (Energy Centre – Proposed Roof Plan); 2112-SPP-HT-0G-DR-A-26-2001-PL P02 (Energy Centre – Proposed Sections); 2112-SPP-HT-0G-DR-A-25-3001-PL P02 (Energy Centre – Proposed Elevations); 2112-SPP-HT-0G-DR-A-25-3002-PL P02 (Energy Centre – Proposed North Elevation); 2112-SPP-HT-0G-DR-A-25-3003-PL P02 (Energy Centre – Proposed East Elevation); 2112-SPP-HT-0G-DR-A-25-3004-PL P02 (Energy Centre – Proposed South Elevation); 2112-SPP-HT-0G-DR-A-25-3005-PL P02 (Energy Centre – Proposed West Elevation); 2112-SPP-ES-ZZ-DR-A-21-4003-PL P02 (Energy Centre – Proposed Bay Study 01); 2112-SPP-ES-ZZ-DR-A-21-4002-PL P02 (Energy Centre – Proposed External Wall Details – Sheet 02); 2112-SPP-SA-0G-DR-A-02-1001-PL P01 (School Building & Pavilion (LSA) – Existing Level 0G Floor Plan); 2112-SPP-SA-0R-DR-A-02-1002-PL P01 (School Building & Pavilion (LSA) – Existing Roof Plan); 2112-SPP-SA-0G-DR-A-95-1001-PL P01 (School Building & Pavilion (LSA) – Demolition Level 0G Floor Plan); 2112-SPP-SA-0R-DR-A-95-1002-PL P01 (School Building & Pavilion (LSA) – Demolition Roof Plan); 2112-SPP-SA-0G-DR-A-20-1000-PL P02 (School Building & Pavilion (LSA) – Proposed Level 0G Boundary); 2112-SPP-SA-0G-DR-A-20-1003-PL P02 (School Building & Pavilion (LSA) – Proposed Level 0G Floor Plan); 2112-SPP-SA-01-DR-A-20-1004-PL P02 (School Building & Pavilion (LSA) – Proposed Level 01 Floor Plan); 2112-SPP-SA-02-DR-A-20-1005-PL P02 (School Building & Pavilion (LSA) – Proposed Level 02 Floor Plan); 2112-SPP-SA-03-DR-A-20-1006-PL P02 (School Building & Pavilion (LSA) – Proposed Level 03 Floor Plan); 2112-SPP-SA-04-DR-A-20-1007-PL P02 (School Building & Pavilion (LSA) – Proposed Level 04 Floor Plan); 2112-SPP-SA-05-DR-A-20-1008-PL P02 (School Building & Pavilion (LSA) – Proposed Level 05 Floor Plan); 2112-SPP-SA-06-DR-A-20-1009-PL P02 (School Building & Pavilion (LSA) – Proposed Level 06 Floor Plan); 2112-SPP-SA-07-DR-A-20-1010-PL P02 (School Building & Pavilion (LSA) – Proposed Level 07 Floor Plan); 2112-SPP-SA-0R-DR-A-20-1011-PL P03 (School Building & Pavilion (LSA) – Proposed Roof Plan); 2112-SPP-SA-01-DR-A-26-2001-PL P02 (School Building & Pavilion (LSA) – Proposed Sections – Sheet 01); 2112-SPP-SA-01-DR-A-26-2002-PL P02 (School Building & Pavilion (LSA) – Proposed Sections – Sheet 02); 2112-SPP-SA-01-DR-A-25-3001-PL P02

(School Building & Pavilion (LSA) – Proposed Western Elevation); 2112-SPP-SA-01-DR-A-25-3003-PL P02 (School Building & Pavilion (LSA) – Proposed Northern Elevation); 2112-SPP-SA-01-DR-A-25-3004-PL P02 (School Building & Pavilion (LSA) – Proposed Southern Elevation); 2112-SPP-SA-01-DR-A-25-3102-PL P01 (School Building & Pavilion (LSA) – Proposed Eastern Elevation); 2112-SPP-SA-01-DR-A-25-3103-PL P01 (School Building & Pavilion (LSA) – Proposed Northern Elevation); 2112-SPP-SA-01-DR-A-25-3104-PL P01 (School Building & Pavilion (LSA) – Proposed Southern Elevation); 2112-SPP-SA-01-DR-A-25-3101-PL P01 (School Building & Pavilion (LSA) – Proposed Western Elevation); 2112-SPP-SA-ZZ-DR-A-21-4003-PL P01 (School Building & Pavilion (LSA) – Proposed Western Bay Study 01); 230001528-TT-00-ZZ-DR-C-20400 P04 (Site Wide – Proposed Drainage Strategy Exceedance Flow Path Layout); CFQ-MTC-YC-RC-00-XX-D-H-000003 P05 (Recycling Centre – General Arrangement Option 3); CFQ-MTC-YC-RC-00-XX-D-H-000151 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 1 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000152 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 2 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000153 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 3 of 12); FQ-MTC-YC-RC-00-XX-D-H-000154 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 4 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000155 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 5 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000156 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 6 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000157 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 7 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000158 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 8 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000159 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 9 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000160 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 10 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000161 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 11 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000161 P04 (Recycling Centre – Skip Replacement Operation Swept Paths 12 of 12); CFQ-MTC-YC-RC-00-XX-D-H-000170 P04 (Recycling Centre Egress – Skip Replacement Operation Swept Paths 1 of 2); FQ-MTC-YC-RC-00-XX-D-H-000171 P04 (Recycling Centre Egress – Skip Replacement Operation Swept Paths 2 of 2); CFQ-MTC-YC-RC-00-XX-D-H-000163 P04 (Recycling Centre – Sprinter Van Swept Path Analysis 1 of 2); CFQ-MTC-YC-RC-00-XX-D-H-000164 P04 (Recycling Centre – Sprinter Van Swept Path Analysis 2 of 2); CFQ-MTC-YC-RC-00-XX-D-H-000165 P04 (Recycling Centre – Refuse Vehicle and 12.8m Oil Tanker Swept Path Analysis); CFQ-MTC-YC-RC-00-XX-D-H-000166 P04 (Recycling Centre – Large Car Two-Way Gate Access Swept Path Analysis); CFQ-MTC-YOO-RR-00-D-H-000013 A (Regis Road – General Arrangement); CFQ-MTC-YOO-RR-00-D-H-000014 A (Regis Road – Visibility Splay); 2112-SPP-SH-0G-DR-A-20-1001-COO P03 (Station House – Proposed Level 0G); 2112-SPP-SH-0G-DR-A-22-1000-COO P02 (Station House – Proposed Level 0G Dimensions); 2112-SPP-SH-0G-DR-A-20-1001M-COO P02 (Station House – Proposed Level 0G Mezzanine); 6409-CS-SK-005 (Indicative Sitewide Ambient Loop); 2112-SPH-CS-0G-DR-L-90-1004 P01 (Detailed Areas -Camden Studios Ground Level); 2112-SPH-CS-01-DR-L-90-1005 P01 (Detailed Areas – Camden Studios Podium Level); 2112-SPH-CS-10-DR-L-90-1006 P01 (Detailed Areas – Camden Studios Terrace Level); 2112-SPH-CS-Rf-DR-L-90-1007 P01 (Detailed Areas – Camden Studios Roof Level); 2112-SPH-HP-0G-DR-L-90-1001 P01 (Detailed Areas – Heathgate Ground Level); 2112-SPH-HP-02-DR-L-90-1002 P01 (Detailed Areas – Heathgate Podium Level); 2112-SPH-HP-RF-DR-L-90-1003 P01 (Detailed Areas – Heathgate Roof Level); 2112-SPH-IG-0G-DR-L-90-1011 P01 (Detailed Areas – Inkerman Gardens Ground Level); 2112-SPH-IG-02-DR-L-90-1012 P01 (Detailed Areas – Inkerman

Gardens Podium Level); 2112-SPH-IG-Rf-DR-L-90-1013 P01 (Detailed Areas – Inkerman Gardens Roof Level); 2112-SPH-RR-0G-DR-L-90-1008 P01 (Detailed Areas – Regis Road Ground Level); 2112-SPH-RR-02-DR-L-90-1009 P01 (Detailed Areas – Regis Road Podium Level); 2112-SPH-RR-Rf-DR-L-90-1010 P01 (Detailed Areas – Regis Road Roof Level); 2112-SPH-ZZ-0G-DR-L-90-0001 P02 (General Arrangements – Ground Level Landscape Masterplan); 2112-SPH-ZZ-0G-DR-L-90-0002 P01 (General Arrangements – Podium Level Landscape Masterplan); 2112-SPH-ZZ-0G-DR-L-90-0003 P01 (General Arrangements – Roof Level Landscape Masterplan); 2112-SPH-ZZ-0G-DR-L-90-0004 P02 (General Arrangements – Urban Greening Factor); 2112-SPH-ZZ-0G-DR-L-90-0005 P03 (General Arrangements – Play).

Documents

Affordable Housing Statement – Inkerman Gardens & Heathgate (prepared by Places for People, dated October 2025); Arboricultural Impact Assessment 240638-TMA-XX-RP-AP-2700-P01 (prepared by TMA, dated 30/10/2025); Archaeological Desk-Based Assessment Rev 3 (prepared by MOLA, dated 27/10/2025); Basement Construction Plan 230001528-TT-00-ZZ-RP-S-00008 Rev 1 (prepared by Thornton Tomasetti, dated 20/01/2026); Basement Impact Assessment 230001528-TT-00-ZZ-RP-S-00007 Rev 03 (prepared by Thornton Tomasetti, dated 12/03/2026); Basement Impact Assessment Addendum 230001528-TT-00-ZZ-RP-S-00010 Rev P01 (prepared by Thornton Tomasetti, dated 29/01/2026); Basement Impact Assessment Audit F1 (prepared by Campbell Reith, dated 18/03/2026); Business Retention and Relocation Strategy (prepared by Volterra, dated October 2025); Camden Film Quarter Brief 2112-CFQ-YC-ZZ-ZZ-RP-K-ZZ-0000-PL (prepared by Oxygen Studios, dated 27/10/2025); Camden Film Studios – Proposed Area Schedule 2112-SPP-CS-ZZ-SH-A-83-0001-PL-S4-P03 (prepared by SPPARC, dated 13/03/2026); Circular Economy Statement P02 (prepared by Atelier Ten, dated 05/11/2025); Crime Impact Assessment QCIC - 05503 – 01001a (prepared by QCIC); Design and Access Statement 2112-SPP-ZZ-ZZ-DS-A-ZZ-0000-PL (prepared by SPPARC, undated); Design and Access Statement Amendment – Building Proposal: Heathgate East 11.0 Design and Access Statement Appendix 2112-SPP-ZZ-ZZ-DS-A-ZZ-0001-PL (prepared by SPPARC, undated); Drainage Strategy 230001528-TT-00-ZZ-RP-S-00005 Rev P03 (prepared by Thornton Tomasetti, dated 08/12/2025); Ecological Appraisal (prepared by Trium, dated October 2025); Economic Statement (prepared by Volterra, dated October 2025); Equalities Impact Assessment (prepared by Volterra, dated February 2026); Employment and Training Strategy (prepared by Volterra, dated October 2025); Environmental Impact Assessment (prepared by Trium, dated October 2025); Environmental Impact Assessment – Applicant Response (prepared by Trium, dated 29/01/2026); Environmental Impact Assessment – Statement of Conformity (prepared by Trium, dated 25/02/2026); Flood Risk Assessment 230001528-TT-00-ZZ-RP-S-00004 P04 (prepared by Thornton Tomasetti, dated 27/10/2025); Flood Warning and Evacuation Plan 230001528-TT-00-ZZ-RP-S-00006 P01 (prepared by Thornton Tomasetti, dated 16/01/2026); Gateway One Fire Statement LO25163 R00 (prepared by OFR, dated 24/10/2025); Heathgate Amendments Summary 8494-SKB-025 (prepared by Spacehub, dated February 2026); Heathgate – Accommodation Area Schedule (dated 19/01/2026); Inkerman Gardens – Accommodation Area Schedule (dated 09/12/2025); Internal Daylight, Sunlight, and Overshadowing Report V1 (prepared by Point2 Surveyors, dated January 2026); Landscape and Public Realm Strategy 2112-SPH-ZZ-ZZ-DS-L-90-6001-P02 (prepared by Spacehub, dated 19/03/2026); Lighting Assessment Rev 01 (prepared by Atelier Ten, dated 27/10/2025); London Plan Fire Statement

LO25163 Rev R02 (prepared by OFR, dated 21/01/2025); Noise Impact Assessment Rev 03 (prepared by Atelier Ten, dated 24/10/2025); Open Space Calculations (prepared by Spacehub, undated); Phase 1 Desk Study 230001528-TT-00-ZZ-RP-S-00001 Rev 03 (prepared by Thornton Tomasetti, dated 27/10/2025); Planning Statement (prepared by Montagu Evans, undated); Pre-planning enquiry letter – Confirmation of sufficient capacity (prepared by Thames Water, dated 17/12/2025); Regis Road Design Technical Note (prepared by Momentum, dated 11/12/2025); Regis Road Overlays (prepared by SPPARC, dated 27/04/2026); Review of the Environmental Statement for Regis Road (prepared by LUC, dated 26/01/2026); RRC Operational Management Strategy Rev 1.0 (prepared by Momentum, dated 24/10/2025); RRC Operational Statement (prepared by Momentum, dated 04/03/2026); Site Waste Management Plan Rev 2.0 (prepared by Momentum, dated 27/10/2025); Social Value and Community Benefits Delivery Plan (prepared by CFQ, undated); Statement of Community Involvement (prepared by CFQ, dated October 2025); Station House – Daylight and Sunlight Letter (prepared by Point2 Surveyors, dated January 2026); Station House – Proposed Area Schedule 2112-SPP-SH-ZZ-SH-A-83-0001-PL-S4-P02 (prepared by SPPARC, dated 27/01/2026); Station House – Supplementary Information (prepared by SPPARC, dated 17/12/2025); Structural Statement 230001528-TT-00-ZZ-RP-S-00002 Rev P2 (prepared by Thornton Tomasetti, dated 27/10/2025); Summary Fan Data Sheet (MVHR Selections); Sustainable Drainage Proforma; Sustainability and Energy Statement Rev P02 (prepared by Atelier Ten, dated 05/11/2025); Transport Assessment M001313-3 Rev 2.0 (prepared by Momentum, dated 27/10/2025); Transport Supporting Information Technical Note (prepared by Momentum, dated 11/12/2025); Urban Greening Factor (prepared by Spacehub, undated); Utilities Statement Rev 01 (prepared by Atelier Ten, dated 24/10/2025); Ventilation and Extraction Statement Rev P01 (prepared by Atelier Ten, dated 24/10/2025); VSC Façade Assessment – Joseph Homes Impact (prepared by Point2, undated); Whole Life Carbon Assessment Rev 02 (prepared by Atelier Ten, dated 03/11/2025).

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

Pre-start conditions (any works)

3 Air Quality Monitoring

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

a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
b) A confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and
c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

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

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

4 Land Contamination Risk Assessment

Part A:

No development shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority. 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:

No development shall commence until a remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.

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.

5 UXO Risk Assessment

No development shall commence until a detailed Unexploded Ordnance (UXO) Risk Assessment has been submitted to and approved in writing by the Local Planning Authority, which shall consist of the following:

a) A desk-based UXO risk assessment identifying the likelihood of unexploded ordnance being present at the site, having regard to the historical use of the site and the surrounding area, as well as the scale of proposed excavation;

b) Details of any mitigation measures required to address any risk identified by the desk-based risk assessment, including safe systems of work, watching briefs, exclusion zones, and emergency procedures.

The development shall be carried out in full accordance with the approved details and by a competent person.

Reason: To ensure the risks presented by potential unexploded ordnance to construction workers and future users of the land are minimised and the proposed works can be carried out safely without unacceptable risk 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.

6 London Underground Infrastructure

No development shall commence until the detailed design on the use of any tall plant, crane, or lifting equipment has been submitted to and approved in writing by the local planning authority, in consultation with Tfl Infrastructure Protection, who should also be consulted on the preparation of these details.

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

Reason: To ensure that the development does not impact on existing London Underground/DLR transport infrastructure, in accordance with policy T3 of the London Plan 2021 and London Plan Supplementary Planning Guidance.

7 Active cooling

Prior to commencement, evidence shall be submitted and approved in writing by the Local Planning Authority, demonstrating that measures to adapt to climate change have been incorporated into the design where appropriate and that overheating risk has been managed. The evidence shall demonstrate that the development will not overheat and has reduced cooling demand as far as is reasonably feasible and deliverable and that the cooling hierarchy has been followed and should minimise the impact on the environment. The proposals should include natural ventilation where there are no evidenced restrictions due to noise or air quality or other justified reasons.

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 2017.

8 SuDS Details

Prior to commencement of development, full details of the sustainable drainage system including [111m3 permeable paving/ 1670m3 blue roofs / detention basin 144m3 / 424m3 attenuation tanks], shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to

accommodate all storms up to and including a 1:100-year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate the greenfield run off rates approved by the Local Planning Authority. Revised supporting evidence should include:

- Updated calculations demonstrating the use of FEH22 rainfall data;
- Detailed exceedance diagram for each building required in line with National standards for sustainable drainage systems (SuDS) guidance;
- Thames Water confirmation of sufficient capacity of the proposed sewers for each outfall;

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

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.

9 Flood Risk Emergency Plan

Prior to commencement of development, a Flood Risk Emergency Plan (FREP) incorporating the details of the Flood Warning and Evacuation Plan and ensuring that safe evacuation and recovery would be guaranteed, shall be submitted to and approved in writing by the Local Planning Authority. The FREP shall include:

- Details of flood risk to the site and level of risk;
- Actions based on hazard rating;
- Triggers for evacuation;
- Advice for what to do in a flood (e.g. stay put or evacuate);
- Evacuation and recovery procedures;
- Details of safe access and egress routes (including signage) with voluntary and free movement of people if a flooding event were to occur;
- Location of safe refuge areas.

The development shall be carried out in accordance with approved plan which shall be strictly adhered to thereafter.

Reason: To ensure that the development can be occupied safety and to mitigate risk in the event of a flood event, in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.

10 Updated Air Quality Assessments

At least 3 months prior to commencement of each phase, a revised air quality assessment report, written in accordance with the relevant current guidance, for the existing site and proposed development shall be submitted to and approved in writing by the Local Planning Authority.

The development shall be at least “Air Quality Neutral” and an air quality neutral assessment for both buildings and transport shall be included in the report.

The assessment shall provide detailed modelling of air quality for the development. The report shall include all assumptions, calculations, and baseline data, and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations.

An assessment should be made of the construction dust risk and appropriate mitigation proposed and implemented.

If required, a scheme for air pollution design solutions or mitigation measures based on the findings of the report shall be submitted to and approved by the Local Planning Authority prior to commencement of development. This shall include mitigation for when air quality neutral transport and building assessments do not meet the benchmarks or if mitigation is not adequate then an air quality neutral offset payment may be agreed.

The approved design or mitigation scheme shall be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with policy CC4 of the London Borough of Camden Local Plan 2017 and policy SI 1 of the London Plan 2021.

11 Dust Risk Assessment

At least 3 months prior to commencement of each phase, a revised dust risk assessment report, written in accordance with the relevant current guidance, for the proposed development shall be submitted to and approved by the Local Planning Authority.

If required, mitigation measures based on the findings of the report shall be submitted to and approved in writing by the Local Planning Authority prior to development.

The approved mitigation scheme shall be implemented in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with policy CC4 of the London Borough of Camden Local Plan 2017 and policy SI 1 of the London Plan 2021.

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

12 Detailed design drawings and samples – Camden Film Studios

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Camden Film Studios site, 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 of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;
b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and

c) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.

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 London Borough of Camden Local Plan 2017.

13 Ground level treatment – Camden Film Studios

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Camden Film Studios site, detailed drawings, and samples of materials where appropriate, of the ground level elevations, shopfronts, and entrances shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These shall include plans, colour elevations, and section drawings at a scale of 1:20.

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 London Borough of Camden Local Plan 2017.

14 Boundary thresholds, materials, and locations – Camden Film Studios

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Camden Film Studios site, detailed drawings of the boundary thresholds surrounding the building, including details of materiality and boundary locations shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These details shall include plans, elevations, and section drawings at a scale of 1:20 and should clearly show areas of public and private access.

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 London Borough of Camden Local Plan 2017.

15 Detailed design drawings and samples – Heathgate

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Heathgate site, 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 of all windows (including jambs, head and cill), external doors, screening, balconies,

balustrades, parapets, planters and associated elements at a scale of 1:20;
b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and
c) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.

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 London Borough of Camden Local Plan 2017.

16 Ground level treatment – Heathgate

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Heathgate site, detailed drawings, and samples of materials where appropriate, of the ground level elevations and entrances shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These shall include plans, colour elevations, and section drawings at a scale of 1:20.

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 London Borough of Camden Local Plan 2017.

17 Boundary thresholds, materials, and locations – Heathgate

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Heathgate site, detailed drawings of the boundary thresholds surrounding the building, including details of materiality and boundary locations shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These details shall include plans, elevations, and section drawings at a scale of 1:20 and should clearly show areas of public and private access.

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 London Borough of Camden Local Plan 2017.

18 Detailed design drawings and samples – Inkerman Gardens

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Inkerman Gardens site, 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 of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;
b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and
c) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.

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 London Borough of Camden Local Plan 2017.

19 Ground level treatment – Inkerman Gardens

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Inkerman Gardens site, detailed drawings, and samples of materials where appropriate, of the ground level elevations, shopfronts, and entrances shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These shall include plans, colour elevations, and section drawings at a scale of 1:20.

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 London Borough of Camden Local Plan 2017.

20 Boundary thresholds, materials, and locations – Inkerman Gardens

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Inkerman Gardens site, detailed drawings of the boundary thresholds surrounding the building, including details of materiality and boundary locations shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These details shall include plans, elevations, and section drawings at a scale of 1:20 and should clearly show areas of public and private access.

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 London Borough of Camden Local Plan 2017.

21 Detailed design drawings and samples – Station House

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Station House site, 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 of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;
b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and
c) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.

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 London Borough of Camden Local Plan 2017.

22 Ground level treatment – Station House

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Station House site, detailed drawings, and samples of materials where appropriate, of the ground level elevations and entrances shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These shall include plans, colour elevations, and section drawings at a scale of 1:20.

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 London Borough of Camden Local Plan 2017.

23 Boundary thresholds, materials, and locations – Station House

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the Station House site, detailed drawings of the boundary thresholds surrounding the building, including details of materiality and boundary locations shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These details shall include plans, elevations, and section drawings at a scale of 1:20 and should clearly show areas of public and private access.

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 London Borough of Camden Local Plan 2017.

24 Detailed design drawings and samples – School Building & Pavilion

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the School Building & Pavilion site, 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 of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;
b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and
c) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.

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 London Borough of Camden Local Plan 2017.

25 Ground level treatment – School Building & Pavilion

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the School Building & Pavilion site, detailed drawings, and samples of materials where appropriate, of the ground level elevations and entrances shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These shall include plans, colour elevations, and section drawings at a scale of 1:20.

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 London Borough of Camden Local Plan 2017.

26 Boundary thresholds, materials, and locations – School Building & Pavilion

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance) at the School Building &

Pavilion site, detailed drawings of the boundary thresholds surrounding the building, including details of materiality and boundary locations shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These details shall include plans, elevations, and section drawings at a scale of 1:20 and should clearly show areas of public and private access.

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 London Borough of Camden Local Plan 2017.

27 Adaptability of School Building & Pavilion building

Prior to commencement of works (other than demolition and site clearance) at the School Building & Pavilion site, details to demonstrate that the building can be suitably adapted or repurposed for future alternative uses that require typical levels of daylight shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun. These details shall include illustrative plans and elevations to show potential building alterations that would ensure a sufficient quality of adaptable space with minimal building works.

Reason: To ensure that the building is resilient and can be repurposed for future alternative uses and to safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the London Borough of Camden Local Plan 2017.

28 Secure by design measures

Prior to the commencement of above ground works of each site (excluding demolition and site preparation works), details of secure by design measures that would demonstrate that demonstrate that the design can achieve secured by design accreditation shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Designing Out Crime Officer. Details shall be submitted for each of the following sites:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

Once approved, the measures shall be implemented in full and retained for perpetuity, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development minimises the opportunities for crime and anti-social behaviour and ensures community safety, in accordance with policies D1 and C5 of the London Borough of Camden Local Plan 2017 and policy D11 of the London Plan 2021.

29 Basement engineer

No development shall commence (excluding demolition and site clearance) until such a time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed and their appointment details and responsibilities have been submitted to and approved in writing by the Local Planning Authority. The appointed engineer shall inspect, check for compliance with the design (as approved by the Local Planning Authority and building control body), and monitor the critical elements of both permanent and temporary basement construction works throughout their duration. The basement works shall not proceed at any time unless such monitoring is in place and any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

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

30 Rainwater harvesting

Prior to commencement of development (excluding demolition and site clearance), details of rainwater recycling proposals shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be constructed in accordance with the approved details.

Reason: To ensure that the development contributes to minimising the need for further water infrastructure in an area of water stress, in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017,

31 Whole Life-Cycle Carbon Assessment Updates

Prior to the stages outlined below, an updated version of the Whole Life Carbon Assessment must be submitted to and approved in writing by the Local Planning Authority:

(a) Prior to commencement of any work on site including all works of deconstruction and demolition.

(b) Prior to commencement of any construction works.

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 carbon emissions (A1-A5) above 1,146kgCO2e/m2 and/or total Whole Life Carbon (A1-C4) above 1,550kgCO2e/m2 for the whole site; and carbon emissions (A1-A5) above 850kgCO2e/m2 and/or total Whole Life Carbon (A1-C4) above 1,200kgCO2e/m2 for the residential areas; and carbon emissions (A1-A5) above 750kgCO2e/m2 and/or total Whole Life Carbon (A1-C4) above 1,000kgCO2e/m2 for the educational buildings 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 of the London Plan 2021 and Policy CC1 of the London Borough of Camden Local Plan 2017.

Prior to above ground works

32 Landscaping – Heathgate & Energy Centre

No development shall take place above ground until full details of hard and soft landscaping at the Heathgate site and the adjacent Energy Centre, including all un-built open areas and terraces, have been submitted to and approved in writing by the local planning authority. Such details shall include the following:

- Details of any proposed earthworks including grading, mounding, and other changes in ground levels;

- Sectional drawings of tree pits that are connected by soft cells (where possible);

- Details of tree species and sizes, alongside other planting, with a statement regarding how inner London's predicted future climate has influenced tree species selection;

- Details of play space equipment, furniture, and pavers;

- Details of landscape management and maintenance, including a comprehensive landscape management plan with irrigation details to ensure all planting successfully establishes. This shall cover at least 3 full years post-planting, with sufficient time periods relative to the size of the trees at the time of planting.

The relevant part of the works shall not be carried out other than in accordance with the details thus approved.

Reason: In the interests of ecological value and visual amenity, in accordance with policies A2, A3, A5, and D1 of the London Borough of Camden Local Plan 2017.

33 Landscaping – Camden Film Studios

No development shall take place above ground until full details of hard and soft landscaping at the Camden Films Studios site, including all un-built open areas and terraces, have been submitted to and approved in writing by the local planning authority. Such details shall include the following:

- Details of any proposed earthworks including grading, mounding, and other changes in ground levels;

- Sectional drawings of tree pits that are connected by soft cells (where possible);

- Details of tree species and sizes, alongside other planting, with a statement regarding how inner London's predicted future climate has influenced tree species selection;

- Details of play space equipment, furniture, and pavers;

- Details of landscape management and maintenance, including a comprehensive landscape management plan with irrigation details to ensure all planting successfully establishes. This shall cover at least 3 full years post-planting, with sufficient time periods relative to the size of the trees at the time of planting.

The relevant part of the works shall not be carried out other than in accordance with the details thus approved.

Reason: In the interests of ecological value and visual amenity, in accordance with policies A2, A3, A5, and D1 of the London Borough of Camden Local Plan 2017.

34 Landscaping – Inkerman Gardens

No development shall take place above ground until full details of hard and soft landscaping at the Inkerman Gardens site, including all un-built open areas and terraces, have been submitted to and approved in writing by the local planning authority. Such details shall include the following:

- Details of any proposed earthworks including grading, mounding, and other changes in ground levels;

- Sectional drawings of tree pits that are connected by soft cells (where possible);

- Details of tree species and sizes, alongside other planting, with a statement regarding how inner London's predicted future climate has influenced tree species selection;

- Details of play space equipment, furniture, and pavers;

- Details of landscape management and maintenance, including a comprehensive landscape management plan with irrigation details to ensure all planting successfully establishes. This shall cover at least 3 full years post-planting, with sufficient time periods relative to the size of the trees at the time of planting.

The relevant part of the works shall not be carried out other than in accordance with the details thus approved.

Reason: In the interests of ecological value and visual amenity, in accordance with policies A2, A3, A5, and D1 of the London Borough of Camden Local Plan 2017.

35 Landscaping – Station House

No development shall take place above ground until full details of hard and soft landscaping at the Station House site, including all un-built open areas and terraces, have been submitted to and approved in writing by the local planning authority. Such details shall include the following:

- Details of any proposed earthworks including grading, mounding, and other changes in ground levels;

- Sectional drawings of tree pits that are connected by soft cells (where possible);

- Details of tree species and sizes, alongside other planting, with a statement regarding how inner London's predicted future climate has influenced tree species selection;

- Details of play space equipment, furniture, and pavers;

- Details of landscape management and maintenance, including a comprehensive landscape management plan with irrigation details to ensure all planting successfully establishes. This shall cover at least 3 full years post-planting, with sufficient time periods relative to the size of the trees at the time of planting.

The relevant part of the works shall not be carried out other than in accordance with the details thus approved.

Reason: In the interests of ecological value and visual amenity, in accordance with policies A2, A3, A5, and D1 of the London Borough of Camden Local Plan 2017.

36 Landscaping – School Building & Pavilion

No development shall take place above ground until full details of hard and soft landscaping at the School Building & Pavilion site and the adjacent 'Western Gardens' open space, including all un-built open areas and terraces, have been submitted to and approved in writing by the local planning authority. Such details shall include the following:

- Details of any proposed earthworks including grading, mounding, and other changes in ground levels;

- Sectional drawings of tree pits that are connected by soft cells (where possible);

- Details of tree species and sizes, alongside other planting, with a statement regarding how inner London's predicted future climate has influenced tree species selection;

- Details of play space equipment, furniture, and pavers;

- Details of landscape management and maintenance, including a comprehensive landscape management plan with irrigation details to ensure all planting successfully establishes. This shall cover at least 3 full years post-planting, with sufficient time periods relative to the size of the trees at the time of planting.

The relevant part of the works shall not be carried out other than in accordance with the details thus approved.

Reason: In the interests of ecological value and visual amenity, in accordance with policies A2, A3, A5, and D1 of the London Borough of Camden Local Plan 2017.

37 Details of green and living roofs

Prior to commencement of above ground works at each site, full details of green and living roofs in the areas indicated on the approved roof plans shall be submitted to and approved in writing by the local planning authority for each of the following sites:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

The details shall include:

- a detailed scheme of maintenance;
- sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used, and demonstrating that adequate depth is available in terms of the construction and long-term viability of the green roof;
- full details of planting species, density, and substrate.

The green and living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

38 Cycle parking

Prior to commencement of above ground works (excluding demolition and site preparation works) details of long and short stay bicycle parking including details of electric bike parking, shall be submitted to and approved in writing by the Local Planning Authority for each site of the proposed development sites:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

Thereafter the development should be completed in accordance with the approved detailed and maintained and retained as such.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policies T1 and T2 of the London Borough of Camden Local Plan 2017, policy T5 of the London Plan 2021, CPG Transport, and the Mayoral Design Guidance in force at the time of the condition discharge.

39 Noise controls for railway noise

Prior to commencement of above-ground works (excluding demolition and site preparation works) details shall be submitted to and approved in writing by the Local Planning Authority to provide that all habitable rooms exposed to external railway noise in excess of 55 dBA Leq 16 hour (free field) during the day (07.00 to 23.00 hours) or 45 dBA Leq 8 hour (free field) at night (23.00 to 07.00 hours) shall be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night and, in bedrooms, 30 dBA Leq 8 hour at night.

The submitted scheme shall ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated while maintaining sound insulation performance without opening windows.

No dwelling shall be occupied until the approved sound insulation and ventilation measures have been installed to that property in accordance with the approved details. The approved measures shall be retained thereafter in perpetuity.

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

40 Lighting strategy

Prior to the commencement of above ground works (excluding demolition and site preparation works) for each phase, a lighting strategy, including lux plans, shall be submitted to and approved in writing by the local planning authority. The lighting strategy must consider the impact to the adjacent SINC, where relevant.

A lighting strategy will be required for each of the following phases of development:

a) Phase 1a: Station House, Heathgate, and Energy Centre

b) Phase 1b: Camden Film Studios

c) Phase 2a: Inkerman Gardens

d) Phase 2b: School Building and Pavilion

Once agreed any measures shall be implemented on site in full prior to first occupation of the development as necessary. The lighting strategy shall be followed thereafter for the development in perpetuity.

Reason: To protect residential amenity, ensure a safe and secure environment and to protect biodiversity in accordance with policy A1, A3, D1, and C5 of the London Borough of Camden Local Plan 2017.

41 Solar glare

Prior to the commencement of above-ground works (excluding demolition and site preparation works), details of the reflectivity and the orientation of reflective surfaces such as glazing or non-matt metal and materials to be used for the external surfaces of the building shall be submitted to and approved in writing by the Local Planning Authority in consultation with Network Rail in order to ensure there are no excessive solar glare impacts on the road and rail network. Once approved the development shall be implemented in accordance with the approved details and maintained as such thereafter.

Reason: To protect local transport infrastructure in accordance with policy T3 of the London Borough of Camden Local Plan 2017.

42 Biodiversity enhancements

Prior to the commencement of above ground works of each site (excluding demolition and site preparation works), details of biodiversity enhancements incorporating the recommendations from the Ecological Appraisal (and including

specific details of locations of bird/bat boxes and insect hotels) shall be submitted to and approved in writing by the Local Planning Authority. Details shall be submitted for each of the following sites:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

The measures 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 policy A3 of the London Borough of Camden Local Plan 2017.

43 Mechanical ventilation

Prior to commencement of above ground works, full details of the mechanical ventilation system, including air inlet locations, shall be submitted to and approved in writing by the Local Planning Authority. Air inlet locations should be located away from busy roads and the emergency generator stacks or any other emission sources, as well as being as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with policy CC4 of the London Borough of Camden Local Plan 2017 and policy SI 1 of the London Plan 2021.

44 Back-up generators

Prior to the commencement of above ground works, details of the proposed Emergency Diesel Generator Plant and any associated abatement technologies including make, model, and emission details shall have been submitted to and approved by the Local Planning Authority in writing.

Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered, and testing minimised. 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 policies A1 and CC4 of the London Borough of Camden Local Plan 2017 and policies GG3 and SI 1 of the London Plan 2017.

45 Railway emissions monitoring

Prior to commencement of above ground works (excluding demolition and site preparation), automatic real time NO2 and PM air quality monitoring at the closest points to the railway lines (specifically at the Heathgate site) should be undertaken

for a baseline monitoring period to establish the impact of railways on the future occupants.

If air pollution exceeds the National Air Quality Objective levels for the proposed uses, no above ground works shall take place until details of additional mitigation have been submitted to and approved in writing by the Local Planning Authority. The approved additional mitigation must then be implemented prior to occupation, retained, and maintained thereafter.

Reason: To protect the amenity of future occupants of the development in accordance with policies A1 and CC4 of the London Borough of Camden Local Plan 2017 and policy SI 1 of the London Plan 2021.

46 Waste storage – Heathgate

Prior to the commencement of above ground works at the Heathgate site, details of the location, design, and method of waste storage and removal (including recycled materials) shall be submitted to and approved in writing by the Local Planning Authority. The facilities as approved shall be provided prior to first occupation of the site 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 policies A1 and CC5 of the London Borough of Camden Local Plan 2017.

47 Waste storage – Inkerman Gardens

Prior to the commencement of above ground works at the Inkerman Gardens site, details of the location, design, and method of waste storage and removal (including recycled materials) shall be submitted to and approved in writing by the Local Planning Authority. The facilities as approved shall be provided prior to first occupation of the site 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 policies A1 and CC5 of the London Borough of Camden Local Plan 2017.

48 Waste storage – Station House

Prior to the commencement of above ground works at the Station House site, details of the location, design, and method of waste storage and removal (including recycled materials) shall be submitted to and approved in writing by the Local Planning Authority. The facilities as approved shall be provided prior to first occupation of the site 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 policies A1 and CC5 of the London Borough of Camden Local Plan 2017.

49 Waste storage – School Building and Pavilion

Prior to the commencement of above ground works at the School Building and Pavilion site, details of the location, design, and method of waste storage and removal (including recycled materials) shall be submitted to and approved in writing by the Local Planning Authority. The facilities as approved shall be provided prior to first occupation of the site 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 policies A1 and CC5 of the London Borough of Camden Local Plan 2017.

50 Waste storage – Camden Film Studios

Prior to the commencement of above ground works at the Camden Film Studios site, details of the location, design, and method of waste storage and removal (including recycled materials) shall be submitted to and approved in writing by the Local Planning Authority. The facilities as approved shall be provided prior to first occupation of the site 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 policies A1 and CC5 of the London Borough of Camden Local Plan 2017.

51 Wind mitigation measures – ground level

Prior to the commencement of above ground works at each of the following phases of development, full details of wind mitigation measures for the ground floor and public realm shall be submitted to and approved in writing by the local planning authority:

a) Phase 1a: Station House, Heathgate, and Energy Centre
b) Phase 1b: Camden Film Studios
c) Phase 2a: Inkerman Gardens
d) Phase 2b: School Building and Pavilion

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

Reason: To ensure that the development is carried out in accordance with the assessment and conclusions of the Environmental Statement and achieves suitable wind conditions throughout the development, in accordance with Policy A1 of the London Borough of Camden Local Plan 2017.

52 Wind mitigation measures – above ground level

Prior to the commencement of above ground works at each of the following phases of development, full details of wind mitigation measures for the above ground elements (including balconies, roofs, and terraces) shall be submitted to and approved in writing by the local planning authority:

a) Phase 1a: Station House, Heathgate, and Energy Centre
b) Phase 1b: Camden Film Studios
c) Phase 2a: Inkerman Gardens
d) Phase 2b: School Building and Pavilion

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

Reason: To ensure that the development is carried out in accordance with the assessment and conclusions of the Environmental Statement and achieves suitable wind conditions throughout the development, in accordance with Policy A1 of the London Borough of Camden Local Plan 2017.

53 Revised 'Be Lean' Modelling

Prior to commencement of above-ground works the development hereby approved shall submit revised Be Lean assessment with supporting modelling and robust justification that further fabric measures have been considered with the aim of at improving the energy efficiency to not increase carbon emissions over the baseline for the non-residential areas of Inkerman and where possible achieve the the target 10%/15% reduction in carbon dioxide emissions beyond Part L 2021 Building Regulations in line with the energy hierarchy to the Local Planning Authority to be approved in writing. Prior to occupation, evidence demonstrating that the approved measures have been implemented shall be submitted and approved in writing by the Local Planning Authority.

Reason: To ensure the development contributes to minimising the effects of, and can adapt to, a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017 and policy SI 2 of the London Plan 2021.

54 Solar PV

Prior to commencement of above ground works, drawings and data sheets showing the location, extent (1,817 panels) and predicted energy generation of photovoltaic cells (at least 818kWp) and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. This includes:

a) Central Studios 1,048 panels and 472kWp
b) Inkerman Studios and Garden 384 panels and 173kWp
c) LSA 75 panels and 34kWp
d) Heathgate 185 panels and 83kWp
e) Holmes Road 125 panels and 56kWp

The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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

Prior to occupation or use

55 Internal noise standards – Heathgate (Residential)

Prior to occupation of the residential units at the Heathgate site, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value DnT,w and L'nT,w of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

56 Internal noise standards – Inkerman Gardens (Residential)

Prior to occupation of the residential units at the Inkerman Gardens site, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value DnT,w and L'nT,w of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

57 Internal noise standards – Station House (Residential)

Prior to occupation of the residential units at the Station House site, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value DnT,w and L'nT,w of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

58 Internal noise standards – Heathgate Residential (Community Space)

Prior to occupation of the community space at the Heathgate site, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ceiling/walls separating the non-residential part(s) of the premises from any noise sensitive premises, including residential dwellings. Details shall demonstrate that the sound insulation value DnT,w and L'nT,w is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the 'Good' criteria of BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings' within the noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and adjacent noise sensitive premises is not adversely affected by noise, in accordance with the requirements of polices A1 and A4 of the London Borough of Camden Local Plan 2017.

59 Internal noise standards – Inkerman Gardens (Commercial)

Prior to occupation of the commercial units at the Inkerman Gardens site, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ceiling/walls separating the commercial part(s) of the premises from any noise sensitive premises, including residential dwellings. Details shall demonstrate that the sound insulation value DnT,w and L'nT,w is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the 'Good' criteria of BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings' within the noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and adjacent noise sensitive premises is not adversely affected by noise, in accordance with the requirements of polices A1 and A4 of the London Borough of Camden Local Plan 2017.

60 Internal noise standards – Station House (Non-residential)

Prior to occupation of the non-residential space at the Station House site, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ceiling/walls separating the non-residential part(s) of the premises from any noise sensitive premises, including residential dwellings. Details shall demonstrate that the sound insulation value DnT,w and L'nT,w is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the 'Good' criteria of BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings' within the noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and adjacent noise sensitive premises is not adversely affected by noise, in accordance with the requirements of polices A1 and A4 of the London Borough of Camden Local Plan 2017.

61 Internal noise standards – Camden Film Studios (Non-residential)

Prior to occupation of the Camden Film Studios site, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ceiling/walls of the building(s). Details shall demonstrate that the sound insulation value DnT,w and L'nT,w is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the 'Good' criteria of BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings' within the noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and adjacent noise sensitive premises is not adversely affected by noise, in accordance with the requirements of polices A1 and A4 of the London Borough of Camden Local Plan 2017.

62 Internal noise standards – Station House (Non-residential)

Prior to occupation of the School Building and Pavilion site, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ceiling/walls of the building(s). Details shall demonstrate that the sound insulation value DnT,w and L'nT,w is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the 'Good' criteria of BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings' within the noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and adjacent noise sensitive premises is not adversely affected by noise, in accordance with the

requirements of polices A1 and A4 of the London Borough of Camden Local Plan 2017.

63 Hours of use

Prior to occupation of the non-residential buildings, a schedule of opening hours for the proposed activities shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter operate only within the approved hours unless otherwise agreed in writing by the local planning authority.

Reason: To safeguard the amenity of the adjoining premises and the area generally in accordance with policies A1 and A4 of the London Borough of Camden Local Plan 2017.

64 Urban greening factor

Prior to the first occupation of each of the relevant sites of development, full details of the urban greening factor shall be submitted to and approved in writing by the Local Planning Authority. The details should demonstrate that steps have been taken to maximise the greening factor achievable at the relevant site and meet the minimum scores given below:

a) The Camden Film Studios – 0.39
b) Heathgate Residential – 0.42
c) Inkerman Gardens, School Building, and Pavilion – 0.41
d) Station House – 0.36

The details should also demonstrate that every effort has been made to maximise the urban greening factor at each site to increase the score to as close to 0.4 as possible.

Reason: In accordance with the urban greening objectives of policy G5 of the London Plan 2021.

65 Completion of biodiversity enhancements

Prior to first occupation of each site, the habitat creation and enhancement works as set out in the approved Habitat Management and Monitoring Plan must be completed and a completion report, evidencing the completed habitat enhancements, shall be submitted to and approved in writing by the Local Planning Authority. A report must be provided for each of the following sites:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

Reason: In order to protect and enhance biodiversity and ensure that biodiversity net gain is achieved, in accordance with policy A3 of the London Borough of Camden Local Plan 2017.

66 Waste and refuse storage

The recycling and refuse facility as approved shall be provided prior to the first occupation of any of the new homes 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.

67 Secure by design accreditation

Prior to first occupation of each site, evidence that the buildings will achieve or have achieved secured by design accreditation to 'Silver' award shall be submitted to and approved in writing by the Local Planning Authority. Evidence shall be submitted for each of the following sites:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

Reason: To ensure that the development minimises the opportunities for crime and anti-social behaviour and ensures community safety, in accordance with policies D1 and C5 of the London Borough of Camden Local Plan 2017 and policy D11 of the London Plan 2021.

68 Fire vehicle access arrangements - occupation

Prior to the occupation of each development site, an updated version of the Fire Appliances Access Arrangements for occupied buildings on or around the relevant site shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall demonstrate how provision will be made within and around each of the following sites to enable fire appliances to gain access to any occupied buildings once development is completed:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

Reason: To ensure the development provides appropriate access for fire appliances once completed and to ensure the safety of all building users and the highest standards of fire safety, in accordance with policies D5 and D12 of the London Plan 2021.

69 SuDS – evidence of installation

Prior to occupation of each development site, evidence that the SuDS measures have been implemented in accordance with previously approved details shall be submitted to and approved in writing by the Local Planning Authority, for each of the following sites:

a) The Camden Film Studios
b) Heathgate Residential
c) Inkerman Gardens
d) Station House
e) The School Building and Pavilion

The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water runoff 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.

70 Thames Water Infrastructure

The development shall not be occupied until confirmation has been submitted to and approved in writing 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: To ensure the adequate provision of water infrastructure to meet the needs of the development and to protect the water environment from harm in accordance with policies CC3 and A1 of the London Borough of Camden Local Plan 2017 and policies D2 and SI 5 of the London Plan 2021.

71 NO2 Filtration

Prior to first occupation and if required, evidence that an appropriate NO2 filtration system on the mechanical ventilation intake has been installed and a detailed mechanism to secure maintenance of this system should be submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the amenity of occupants, adjoining premises, and the area generally, in accordance with policies A1 and CC4 of the London Borough of Camden Local Plan 2017 and policies GG3 and SI 1 of the London Plan 2021.

72 Waste compaction – Camden Film Studios

Prior to first occupation of the Camden Film Studios site, details of waste compaction, consolidation, and on-site sorting facilities shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the location and specification of all equipment, details of the sorting process, the capacity and operation of any equipment, and measures to control noise, odour, vibration, and other harmful impacts.

The facilities shall be installed in accordance with the approved details prior to first occupation and retained and maintained thereafter.

Reason: To ensure waste is appropriately managed and stored, in accordance with the requirements of policies A1 and CC5 of the London Borough of Camden Local Plan 2017.

73 Whole Life Carbon – post construction assessment

Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to ZeroCarbonPlanning@london.gov.uk and

SustainabilityPlanning@camden.gov.uk, along with any supporting evidence as per the guidance.

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

Compliance conditions

74 Landscaping compliance

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 relevant phase of development. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

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, and of the London Borough of Camden Local Plan 2017.

75 Internal noise standards – residential

Noise levels in all habitable rooms exposed to external noise in excess of 55 dBA Leq 16 hour (free field) during the day (07.00 to 23.00 hours) or 45 dBA Leq 8 hour (free field) at night (23.00 to 07.00 hours) shall be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night. The submitted scheme shall ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated without opening windows. No dwelling shall be occupied until the approved sound insulation and ventilation measures have been installed to that property in accordance with the approved details. The approved measures shall be retained thereafter in perpetuity.

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

76 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.

77 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.

78 Vibration protection

The development shall be designed and constructed so as to ensure that vibration dose values do not exceed $0.4m/s^{1.75}$ between 07.00 and 23.00 hours, and $0.26m/s^{1.75}$ between 23.00 and 07.00 hours, as calculated in accordance with BS 6472-1:2008, entitled "Guide to Evaluation of Human Exposure to Vibration in Buildings", [1Hz to 80Hz]. The developments shall be constructed in accordance with the approved scheme.

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

79 External lighting

External artificial lighting at the development shall not exceed lux levels of vertical illumination at neighbouring premises that are recommended by the CIE guidance 2003 & 2017 and the ILP Guidance Notes for the Reduction of Obtrusive Light (2021). Lighting should be minimized and glare and sky glow should be prevented by correctly using, locating, aiming and shielding luminaires, in accordance with the Guidance Notes.

Reason: To ensure that the amenity of occupiers of surrounding premises is not adversely affected by lighting, in accordance with the requirements of policy A1 of the London Borough of Camden Local Plan 2017.

80 Accessible homes

The development hereby approved shall include 53 (10%) accessible homes. These shall be designed to meet the requirements of Part M4(3)(2)(b) of the Building Regulations. All remaining residential units hereby permitted shall be constructed to comply with Part M4(2) or Part M4(3)(2)(a) 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 London Borough of Camden Local Plan 2017.

81 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 the London Borough of Camden Local Plan 2017.

82 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.

83 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.

84 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.

85 Basement impact

The development shall not be carried out other than in strict accordance with the methodologies, recommendations, and requirements of the Basement Impact Assessment Revision 03 dated 12/03/2026 (as reviewed by BIA Audit by Campbell Reith Rev F1 dated 18/03/2026) hereby approved, which confirm that at the detailed design stage, the damage impact assessment would be limited 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 polices D1 and A5 of the London Borough of Camden Local Plan 2017.

86 Fire safety

The development shall be implemented in accordance with the provisions of the Fire Statement (Revision R02) dated 21/01/2026, produced by OFR Consultants,

or any subsequent and updated versions of this document that are approved by other relevant regulatory regimes thereafter.

Reason: To ensure that the development provides for the safety of all building users and achieves the highest standards of fire safety, in accordance with policy D12 of the London Plan 2021.

87 Circular Economy delivery

The development shall be carried out in accordance with the approved Circular Economy Statement prepared by Atelier Ten (Rev P02, dated 05/11/2025) in order to achieve at least 95% reuse/recycling/recovery of construction and demolition waste and 95% beneficial use of excavation waste (45% on site). A minimum of 20% of the total value of materials should derive from recycle and reused content.

Reason: To ensure all development optimises resource efficiency, reduces waste, and supports the circular economy in accordance with policy CC1 of the London Borough of Camden Local Plan 2017 and policy SI 7 of the London Plan 2021.

Listed Building Consent Conditions

88 Demolition Method Statement

Prior to the commencement of the relevant part of the works, a Demolition Method Statement works shall be provided to and approved by in writing by the Council.

The relevant part of the works shall be carried out in accordance with the details thus approved.

Reason: To safeguard the special historic and architectural interest of the retained part of the listed building in accordance with Policy D1 and D2 of the London Borough of Camden Local Plan 2017.

89 Structural Stabilisation of Retained Fabric

Prior to the commencement of the relevant part of the works, drawings (plans, sections, and elevations) showing the proposed means of structural stabilisation of the retained fabric shall be provided to and approved in writing by the Council.

The relevant part of the works shall be carried out in accordance with the details thus approved.

Reason: To safeguard the special historic and architectural interest of the retained part of the listed building in accordance with Policy D1 and D2 of the London Borough of Camden Local Plan 2017.

90 Structural Method Statement

Prior to the commencement of the relevant part of the works, a Structural Method Statement with regard to the retained part of the listed building shall be provided to and approved in writing by the Council.

The relevant part of the works shall be carried out in accordance with the details thus approved.

Reason: To safeguard the special historic and architectural interest of the retained part of the listed building in accordance with Policy D1 and D2 of the London Borough of Camden Local Plan 2017.

91 Material Details

Prior to the commencement of the relevant part of the works, all new materials required for the making good of the part-demolished listed building including: all new brickwork, all new roof coverings, any new window frames and glazing, interior plaster to walls and ceilings, interior joinery, interior floor structures and any other such material deemed relevant by the Council shall be provided, for inspection on site by means of samples, for approval in writing by the Council.

The relevant part of the works shall be carried out in accordance with the details thus approved.

Reason: To safeguard the special historic and architectural interest of the retained part of the listed building in accordance with Policy D1 and D2 of the London Borough of Camden Local Plan 2017.

92 Method Statement - Brickwork

Prior to first occupation of the listed building following the demolition works, a method statement in relation to brickwork cleaning, repointing and the general restoration and repair of existing fabric, shall be provided to and approved in writing by the Council.

The relevant part of the works shall be carried out in accordance with the details thus approved.

Reason: To safeguard the special historic and architectural interest of the retained part of the listed building in accordance with Policy D1 and D2 of the London Borough of Camden Local Plan 2017.

93 Internal Works

Prior to the commencement of the relevant part of the works detailed drawings including sections, plans and internal elevations of any approved alterations to the interior of the listed building shall be provided to and approved in writing by the Council.

The relevant part of the works shall be carried out in accordance with the details thus approved.

Reason: To safeguard the special historic and architectural interest of the retained part of the listed building in accordance with Policy D1 and D2 of the London Borough of Camden Local Plan 2017.

94 No further works permitted

Notwithstanding the plans hereby approved, no consent is hereby given for alteration to the interior of the listed building beyond the proposed demolition drawings. Any further alterations not covered under this consent shall be subject to a new application or applications for Listed Building Consent.

Reason: To safeguard the special historic and architectural interest of the retained part of the listed building in accordance with Policy D1 and D2 of the London Borough of Camden Local Plan 2017.

Building regulations (imposed optional requirements)

95 Water use (building control optional requirements)

The development hereby approved shall achieve a maximum internal water use of 105 litres/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.

33. INFORMATIVES

1	**Cadent Gas** Cadent Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist. If buildings or structures are proposed directly above the apparatus, the development may only take place following diversion of the apparatus. The applicant should apply online to have operators diverted in advance of any works by visiting cadentgas.com/our-services/gas-diversions. 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.
2	**Environmental Permit** The development may require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12. In circumstances where an activity/operation meets certain criteria, an exemption from permitting may apply. More information on exempt activities can be found here: https://www.gov.uk/guidance/register-your-waste-exemptions-environmental-permits The applicant is advised to find out more information about the permit application process online and to send a pre-application enquiry form via the gov.uk website: https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form

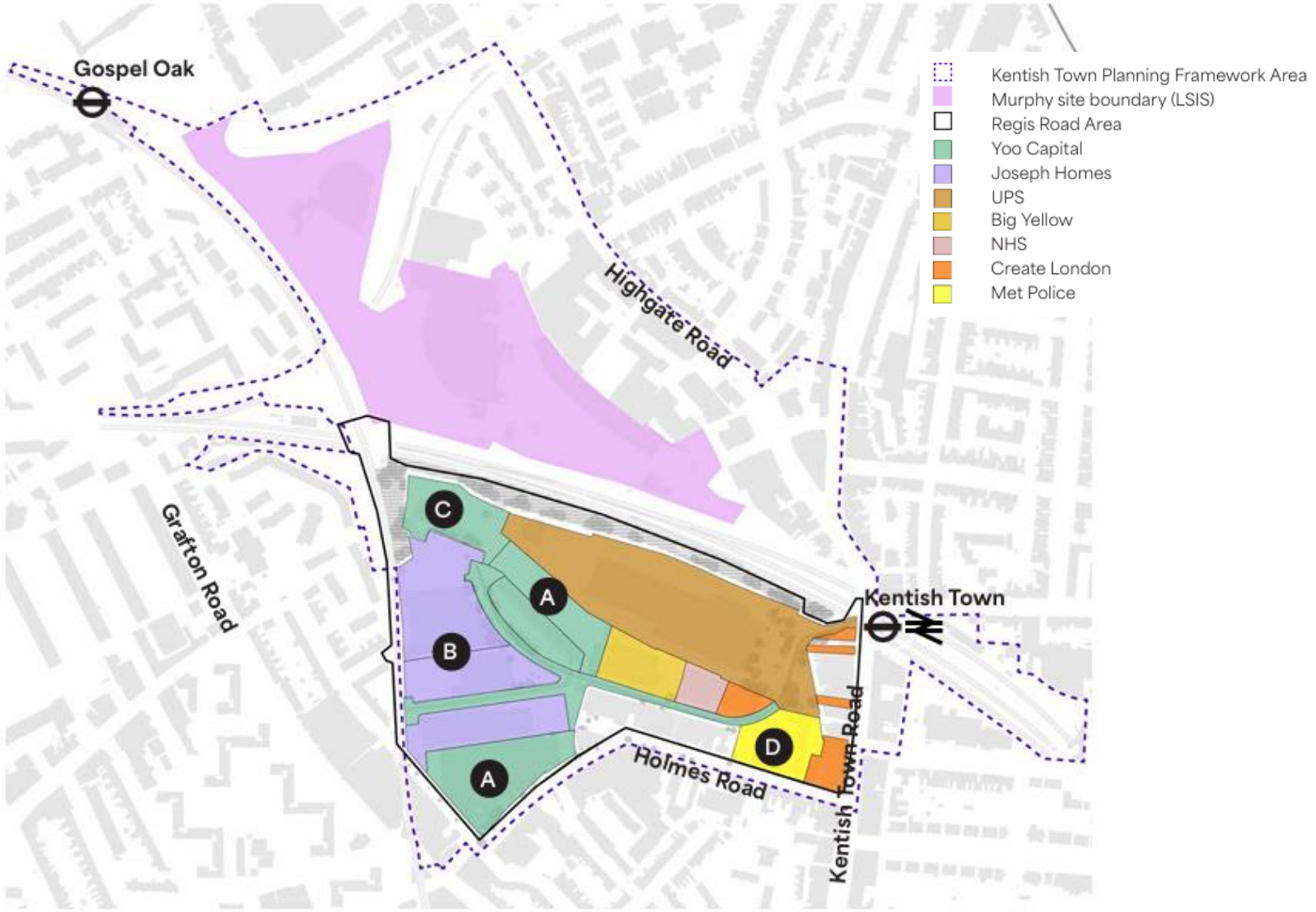
Planning Committee

15th June 2026

2025/4861/P & 2025/5082/L

Land at Regis Road
London
NW5 3EW

Regis Road Area
TUFNELL PARK
Gordon House Road
GOSPEL OAK
Kentish Town Planning Framework Area
Highgate Road
Fortess Road
Mansfield Road
Regis Road Area
Regis Road
Leighton Road
KENTISH TOWN
Queen's Crescent
Grafton Road
Malden Road
Kentish Town Road
KENTISH TOWN WEST
Prince of Wales Road



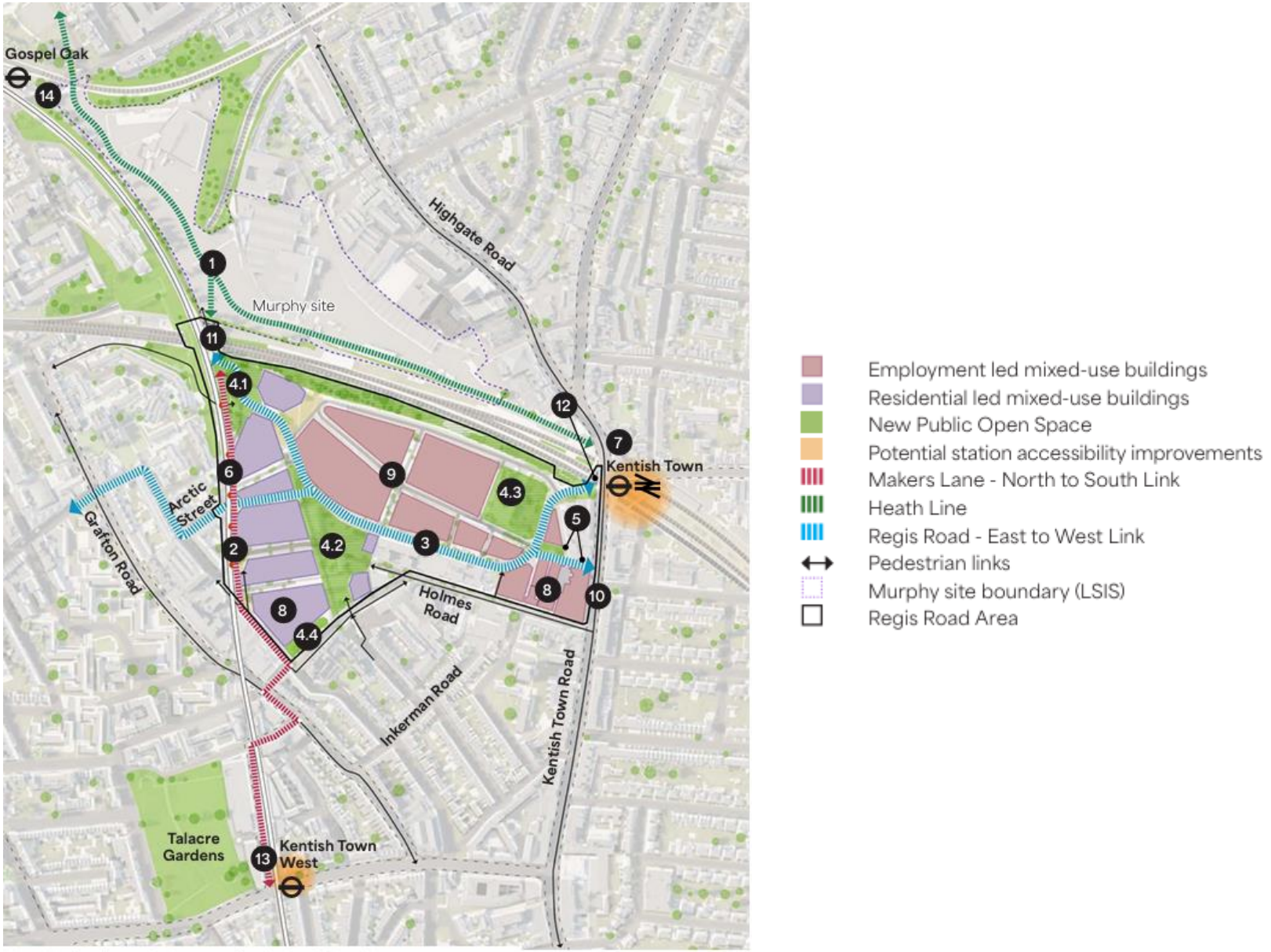
Map 2. Current approximate landownership parcels within the Kentish Town Planning Framework area (as of March 2025)

Map 14. Parcels and connectivity infrastructure in the Regis Road Area

- Parcel A1 (Predominantly Joseph Homes land)
- Parcel A2 (Predominantly Yoo Capital land)
- Parcel B (Big Yellow, NHS, Create London, Met Police land)
- Parcel C (Predominantly UPS land)
- Parcel D (Create London & other landowners)
- Parcel E
- Murphy site boundary (LSIS)
- Regis Road Area

Connectivity infrastructure:

1. Regis Road
2. Arctic Street link
3. York Mews link
4. Makers Lane
5. Servicing route
6. Holmes Road link
7. Pedestrian & Cycle Bridge - Makers Lane
8. Heath Line route
9. Enhanced Kentish Town gateway



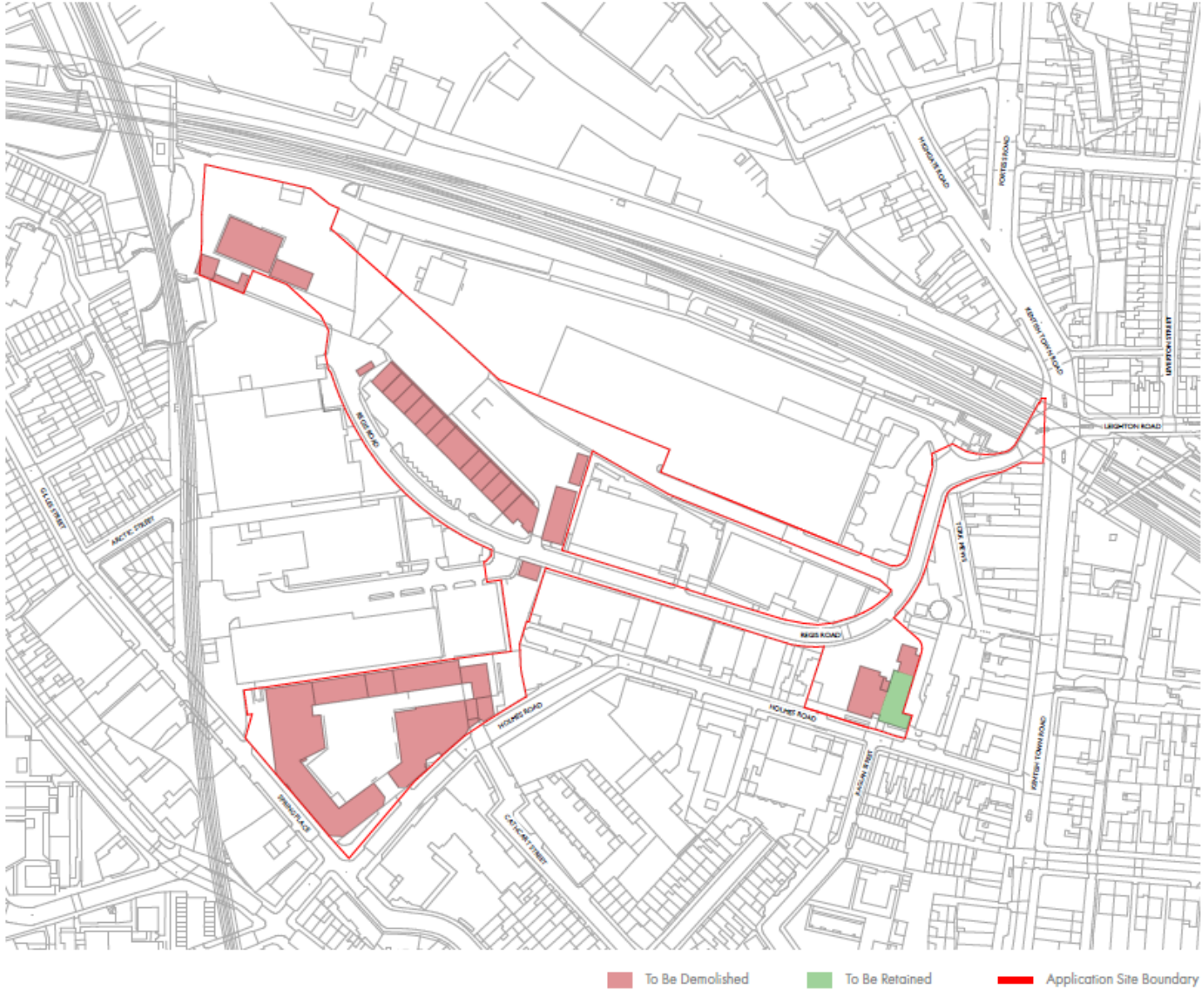
Map 4. Indicative spatial strategy for the Regis Road Area

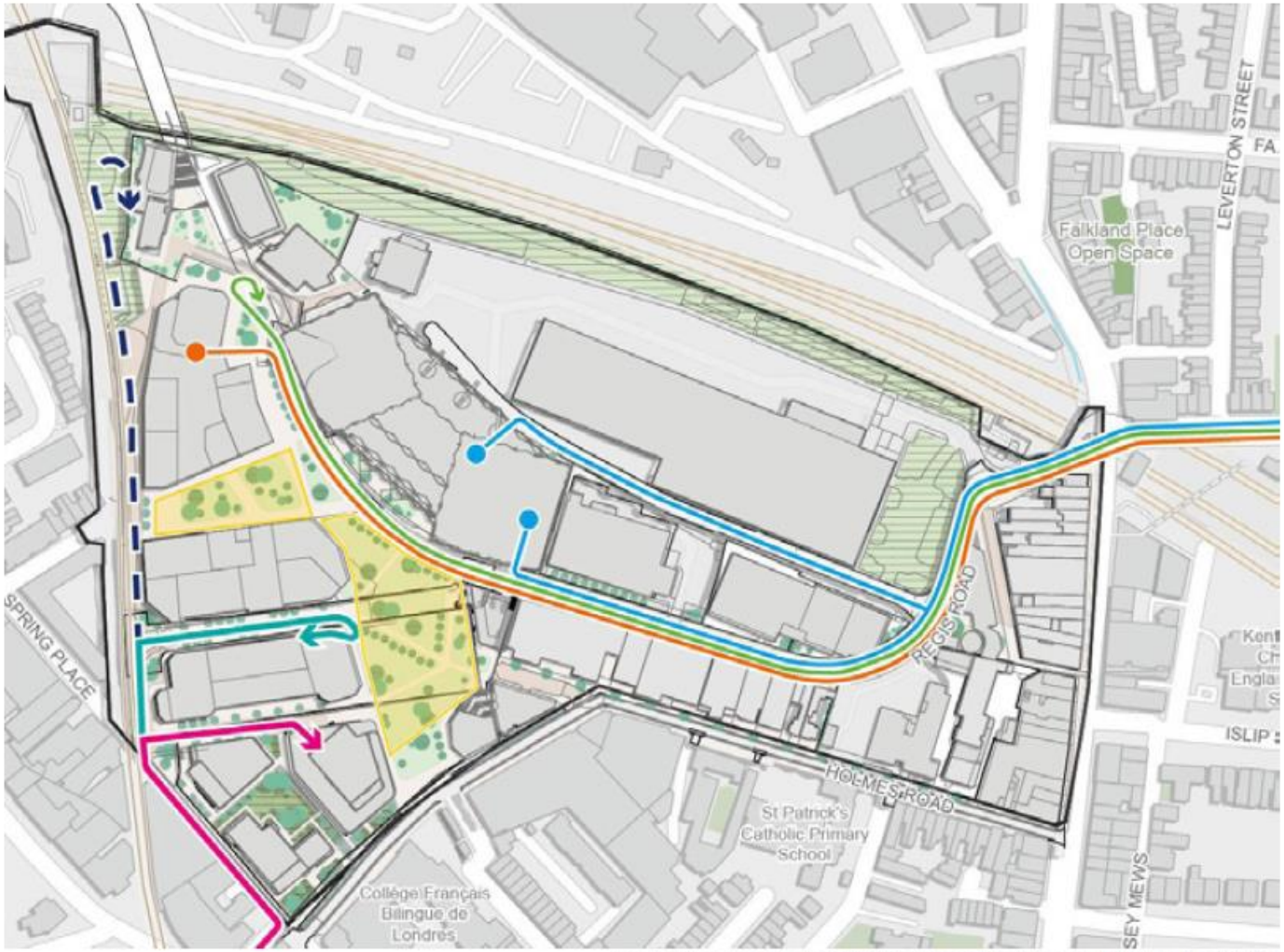
Map 7. Routes and connections required to support redevelopment of Yoo Capital and Joseph Homes parcels

Map 9. Indicative landscape masterplan.
This map illustrates a future vision for the redevelopment of the Regis Road Area, including the UPS site. Please note that UPS currently has no plans to redevelop its site.

02 The Application Scheme shown within the wider masterplan vision. Elements shown outside of the application buildings represent the wider masterplan vision and are indicative.

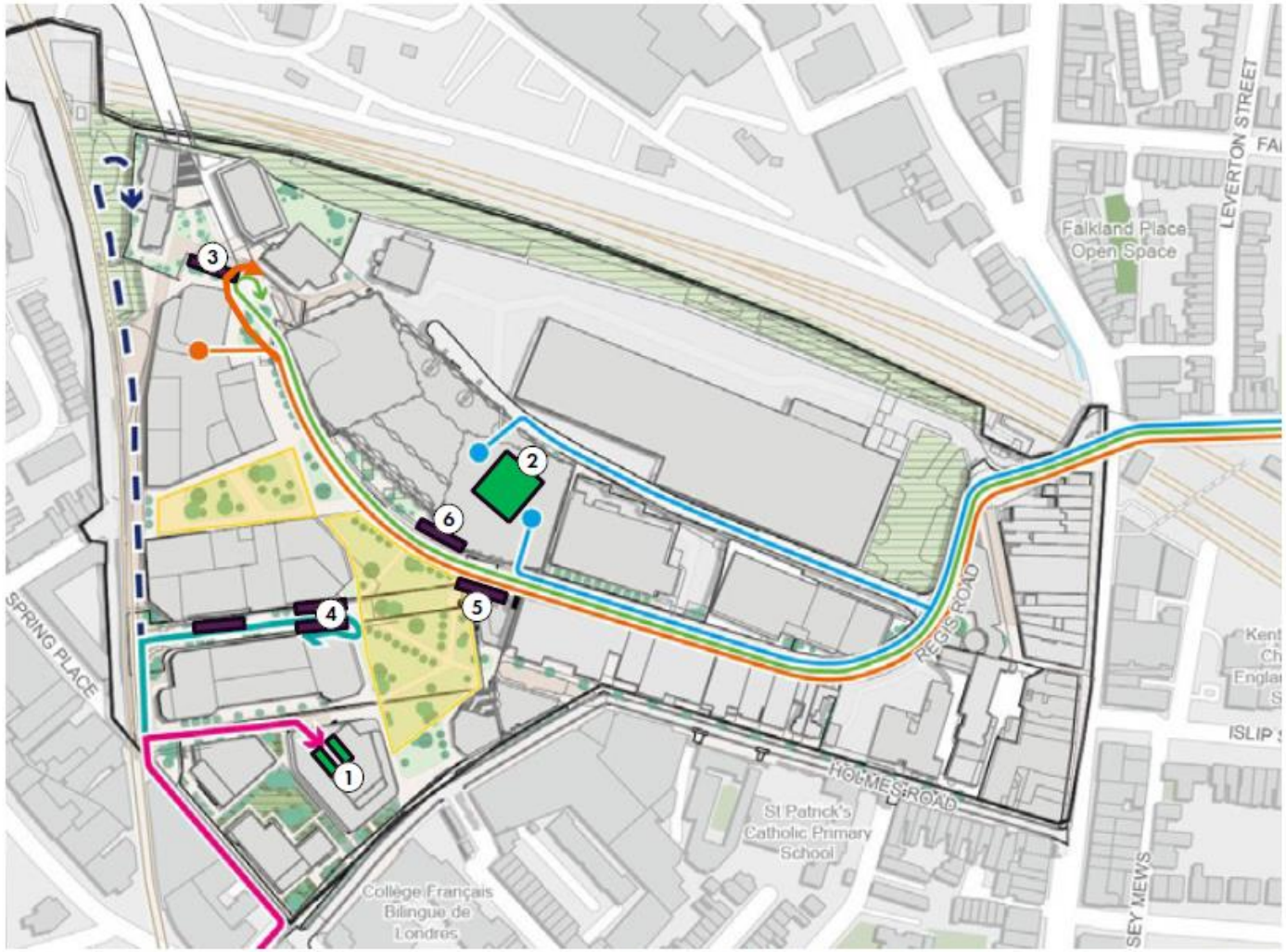
Heathgate
150m²
400m²
Holmes Road Residential
250m²
Inkerman Gardens
450m²
100m²
300m²
150m²
0
25
50m
Doorstep Play (0-5 years)
Local Play (5-11 years)
Youth Play (12+)


To Be Demolished
To Be Retained
Application Site Boundary



Elements shown outside of the application buildings represent the wider masterplan vision and are indicative.

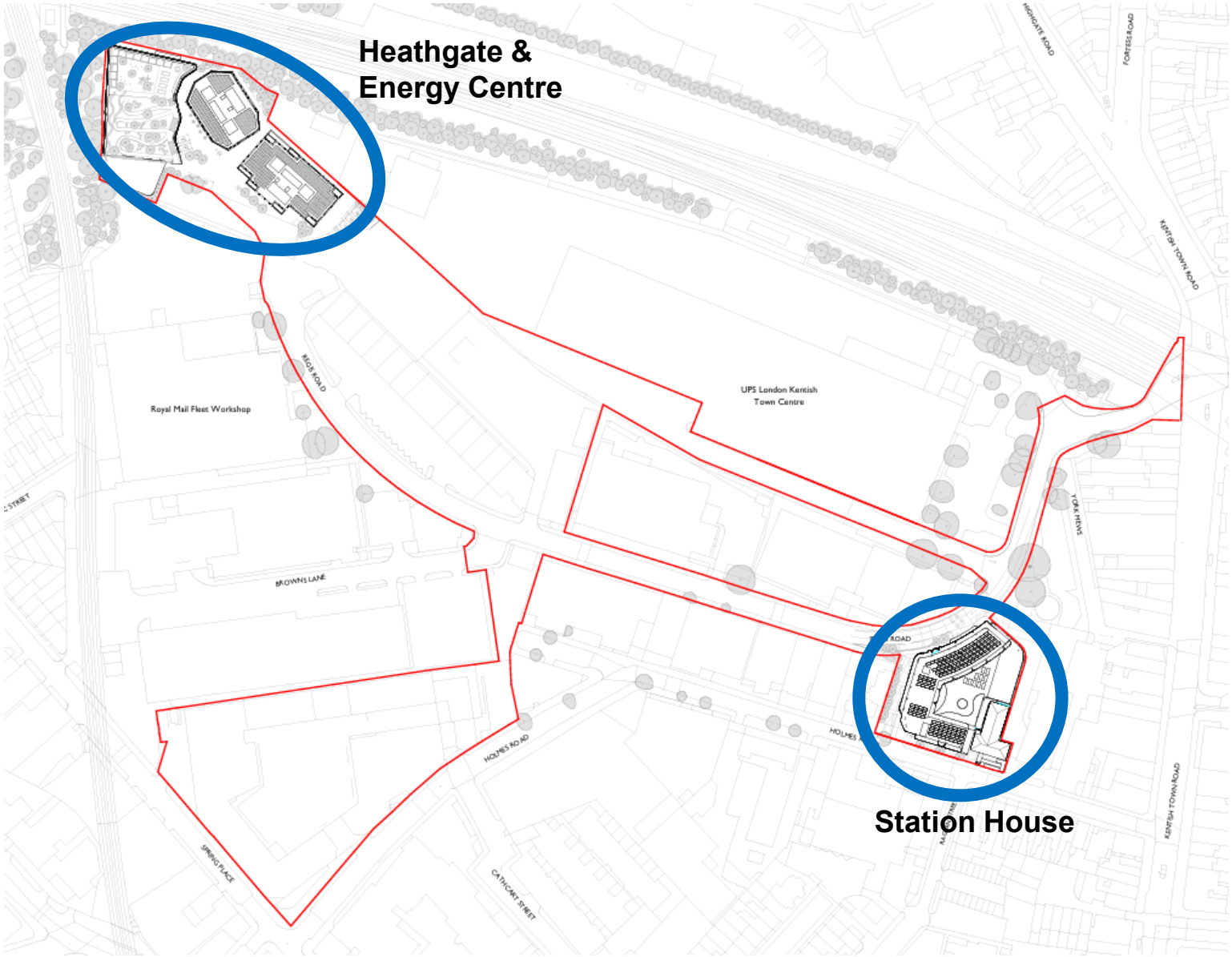
- Servicing Route for Royal Mail
- Servicing Route to Heathgate and Royal Mail
- Restricted Servicing Route for Energy Centre and the Arches
- Servicing Route for Inkerman Gardens
- Basement Parking for Royal Mail
- Film Studio Servicing Access
- Fairfax Meadow and Browns Lane Servicing
- Pedestrian and Cycle Access Only



Elements shown outside of the application buildings represent the wider masterplan vision and are indicative.

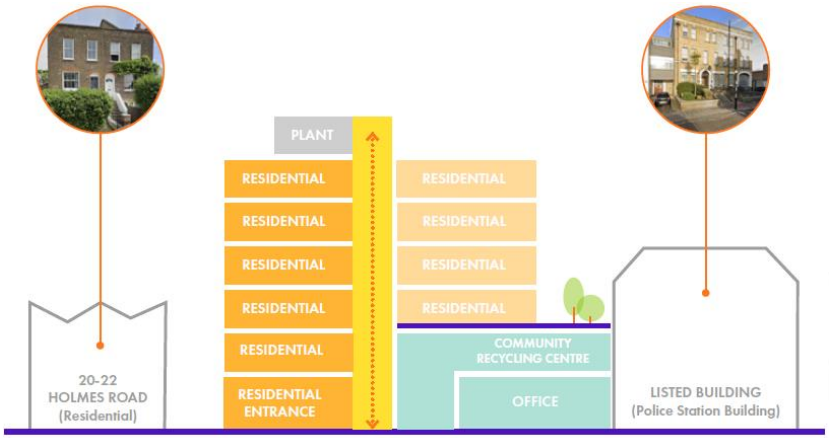
- Off-street loading
- On-street loading
- Servicing Route for Royal Mail
- Basement Parking for Royal Mail
- Servicing Route to Heathgate and Royal Mail
- Film Studio Servicing Access
- Restricted Servicing Route for Energy Centre and the Arches
- Fairfax Meadow and Browns Lane Servicing
- Servicing Route for Inkerman Gardens
- Pedestrian and Cycle Access Only

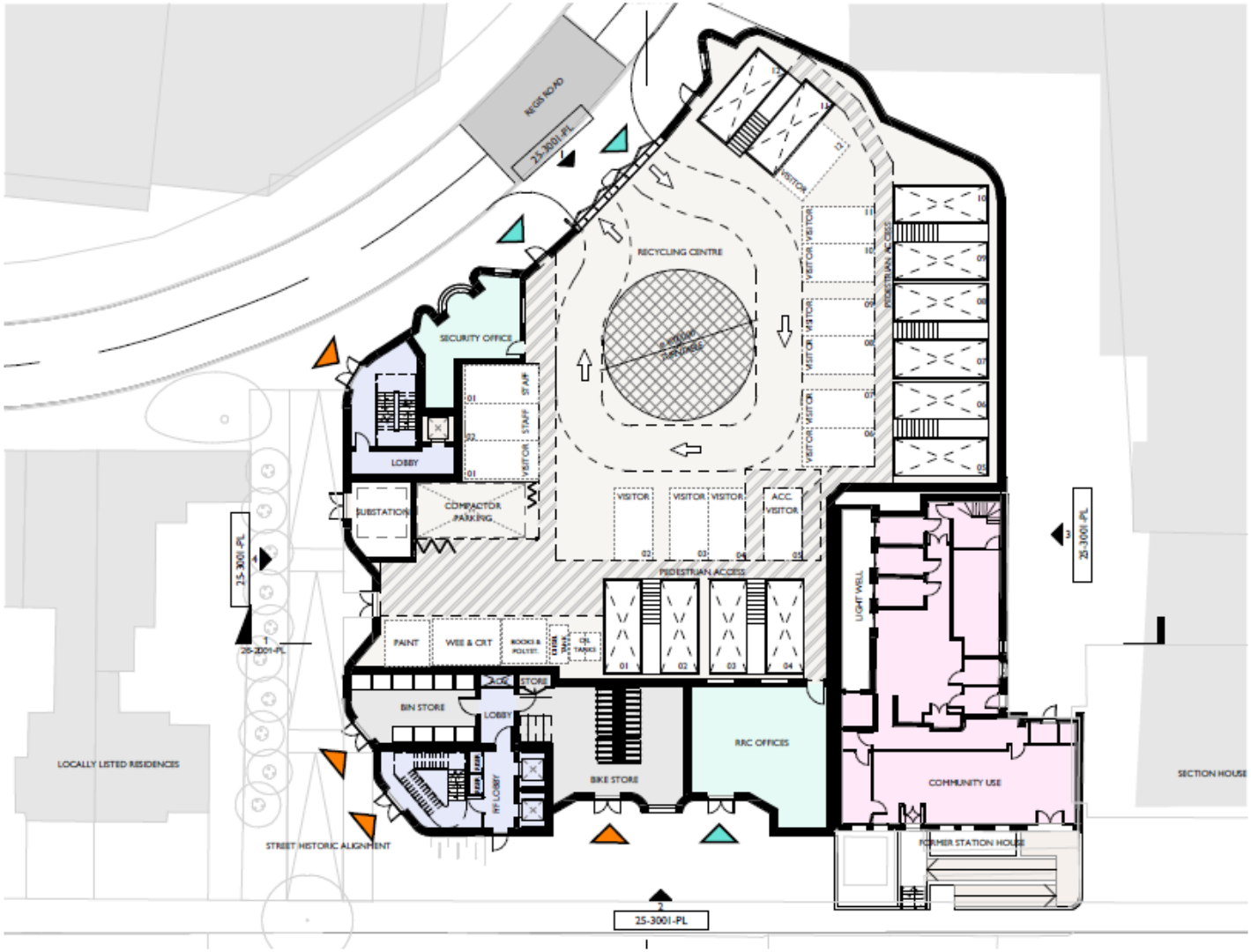
HIGHGATE ROAD
FORTESS ROAD
KENTISH TOWN ROAD
LEVERTON STREET
LEIGHTON ROAD
REGIS ROAD
TORK MEWS
HOLMES ROAD
MAGLAN STREET
KENTISH TOWN ROAD
SENEKA PLACE
CAPLIGAT STREET
Phase 1A
Phase 1B
Phase 2A
Phase 2B
Application Site Boundary


Heathgate &
Energy Centre
Royal Mail Fleet Workshop
UPS London Kentish
Town Centre
BROWNS LANE
HOLMES ROAD
CATHCART STREET
SPRAGG PLACE
KENTISH TOWN ROAD
YORK RISE
Station House

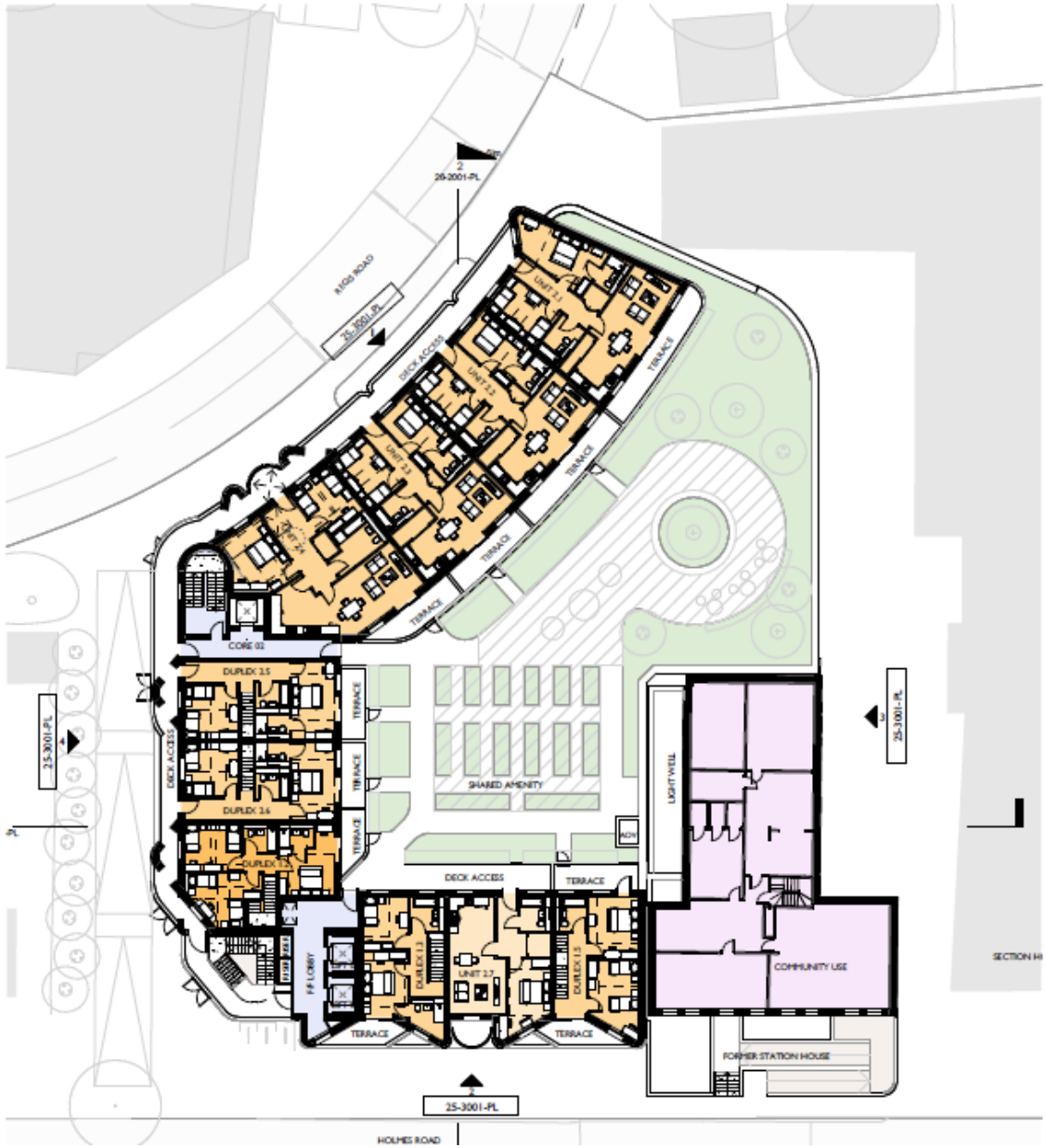
KENTISH TOWN

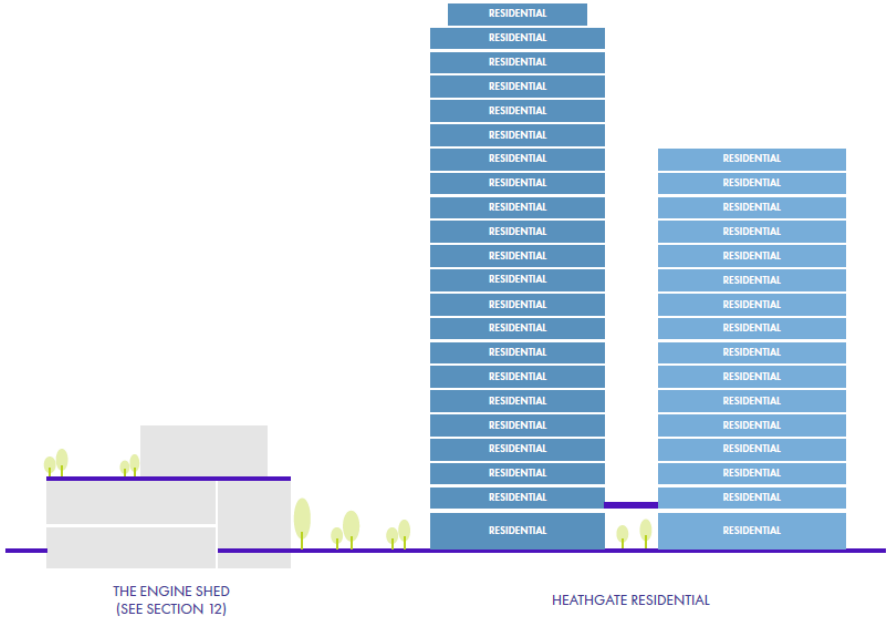
RECYCLING
KENTISH TOWN


PLANT
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL ENTRANCE
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
COMMUNITY RECYCLING CENTRE
OFFICE
20-22 HOLMES ROAD (Residential)
LISTED BUILDING (Police Station Building)



Ground Level

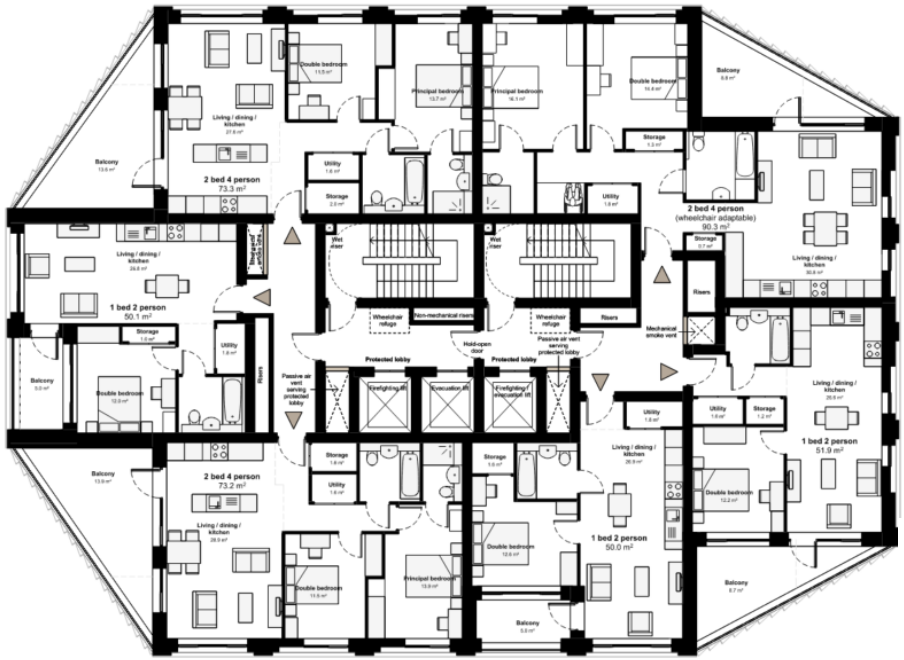

KINGS ROAD
HOLMES ROAD
UNIT 1.1
UNIT 2.1
UNIT 2.2
UNIT 2.4
CORE 01
DUPLEX 2.5
DUPLEX 2.6
DUPLEX 1.5
DECK ACCESS
TERRACE
SHARED AMENITY
LIGHT WELL
COMMUNITY USE
FORMER STATION HOUSE
F/F LOBBY
DUPLEX 1.3
UNIT 2.3
DUPLEX 1.5
25-3001-PL
25-2001-PL
25-3101-PL


RESIDENTIAL
THE ENGINE SHED
(SEE SECTION 12)
HEATHGATE RESIDENTIAL

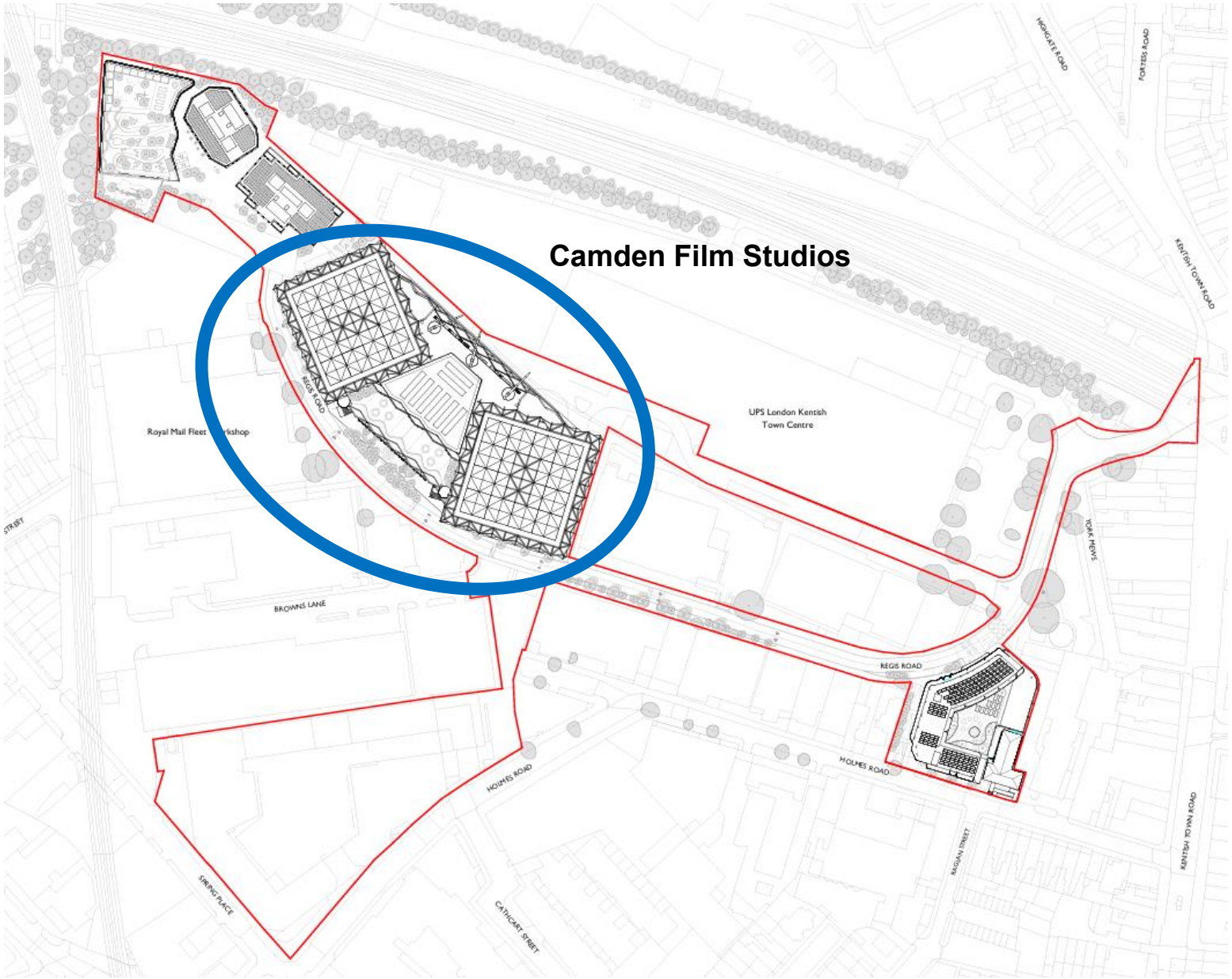
BLOCK A
BLOCK B
Tenure distribution plan
Private
Affordable

Block A
BLOCK A
(Private tenure)
Block B
BLOCK B
(Affordable tenure)

Block A



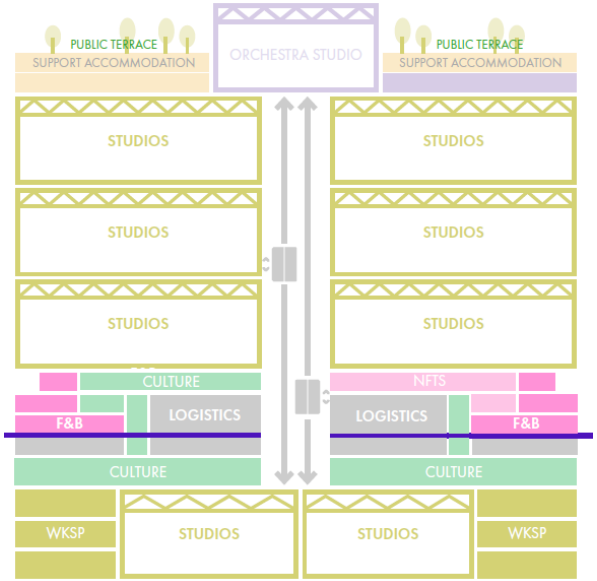
Block B

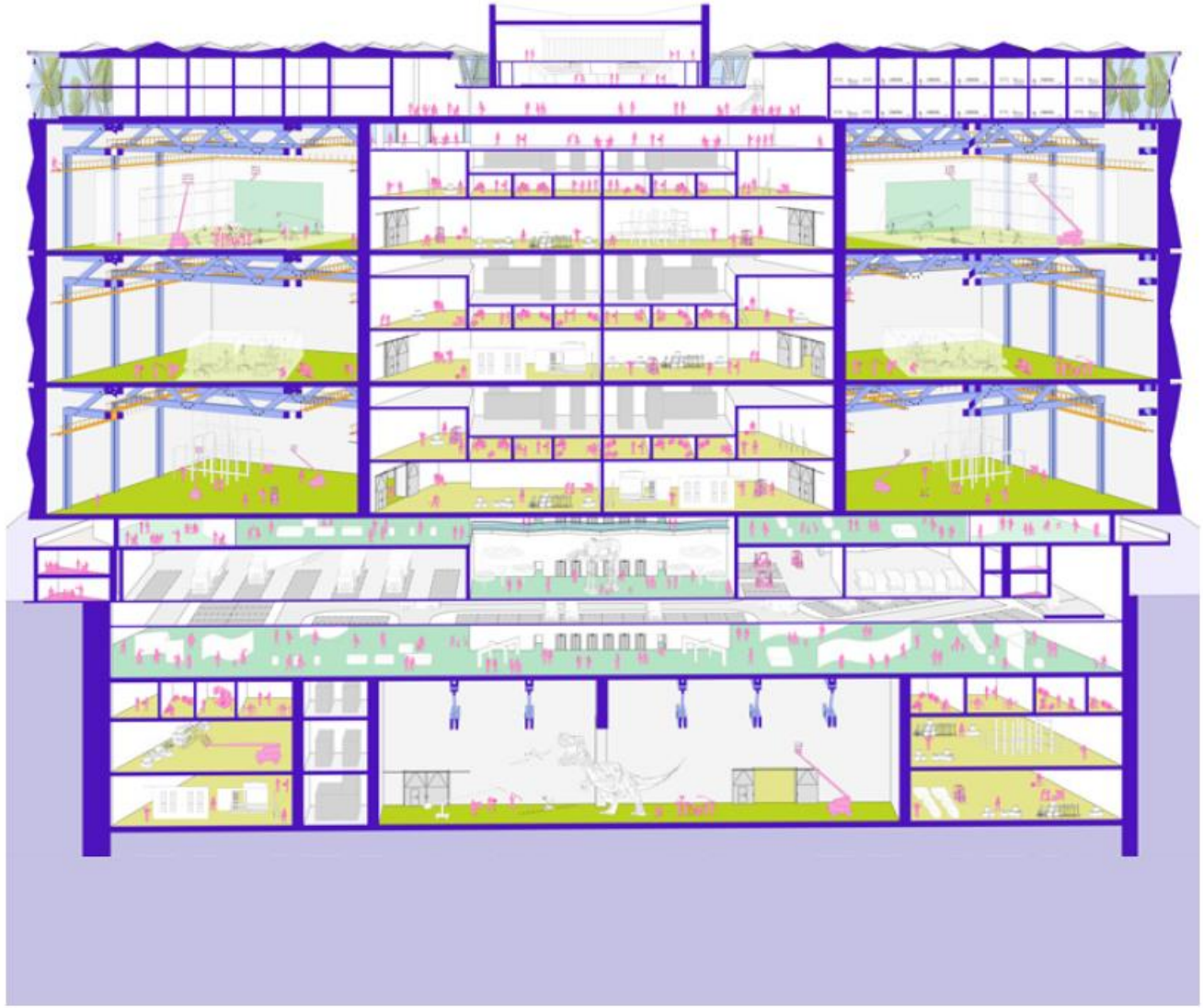

Camden Film Studios
Royal Mail Fleet
UPS London Kentish Town Centre
BROWNS LANE
KEGS ROAD
HOLMES ROAD
SPRING PLACE
CATHCART STREET
RAGIAN STREET
YORK MEWS
KENTISH TOWN ROAD
HIGHGATE ROAD
FORTESS ROAD

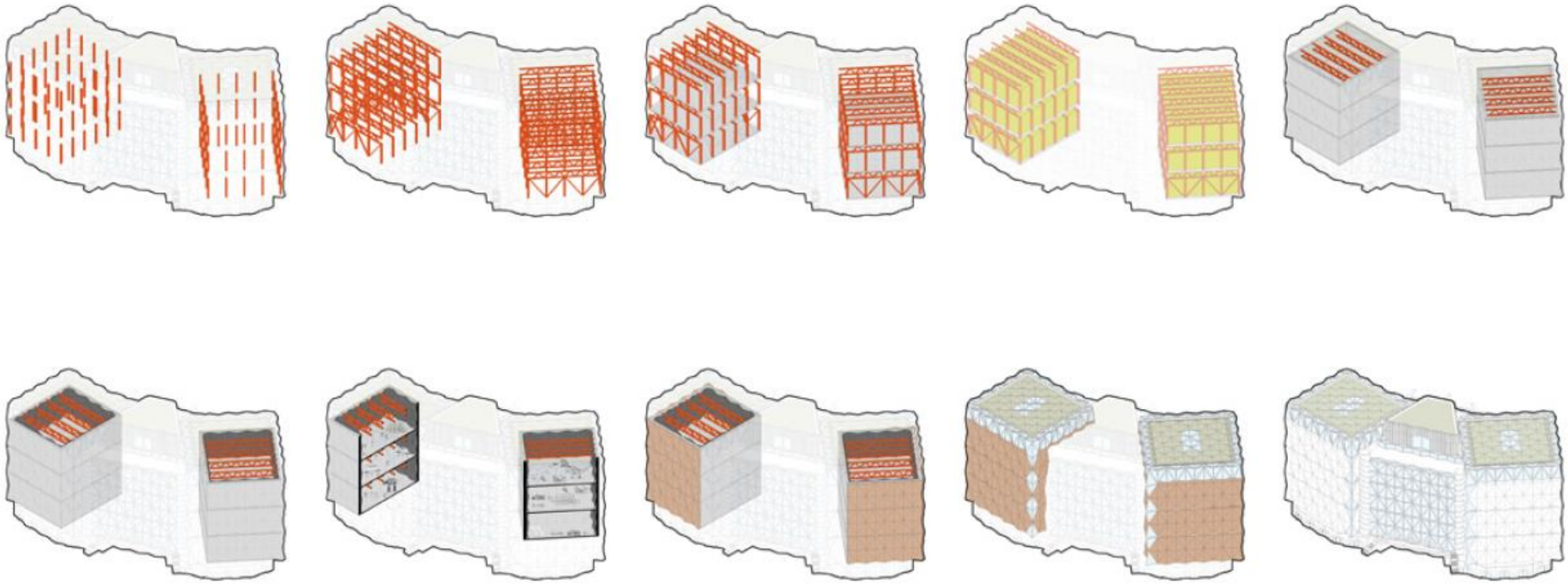
CAMDEN FILM QUARTER

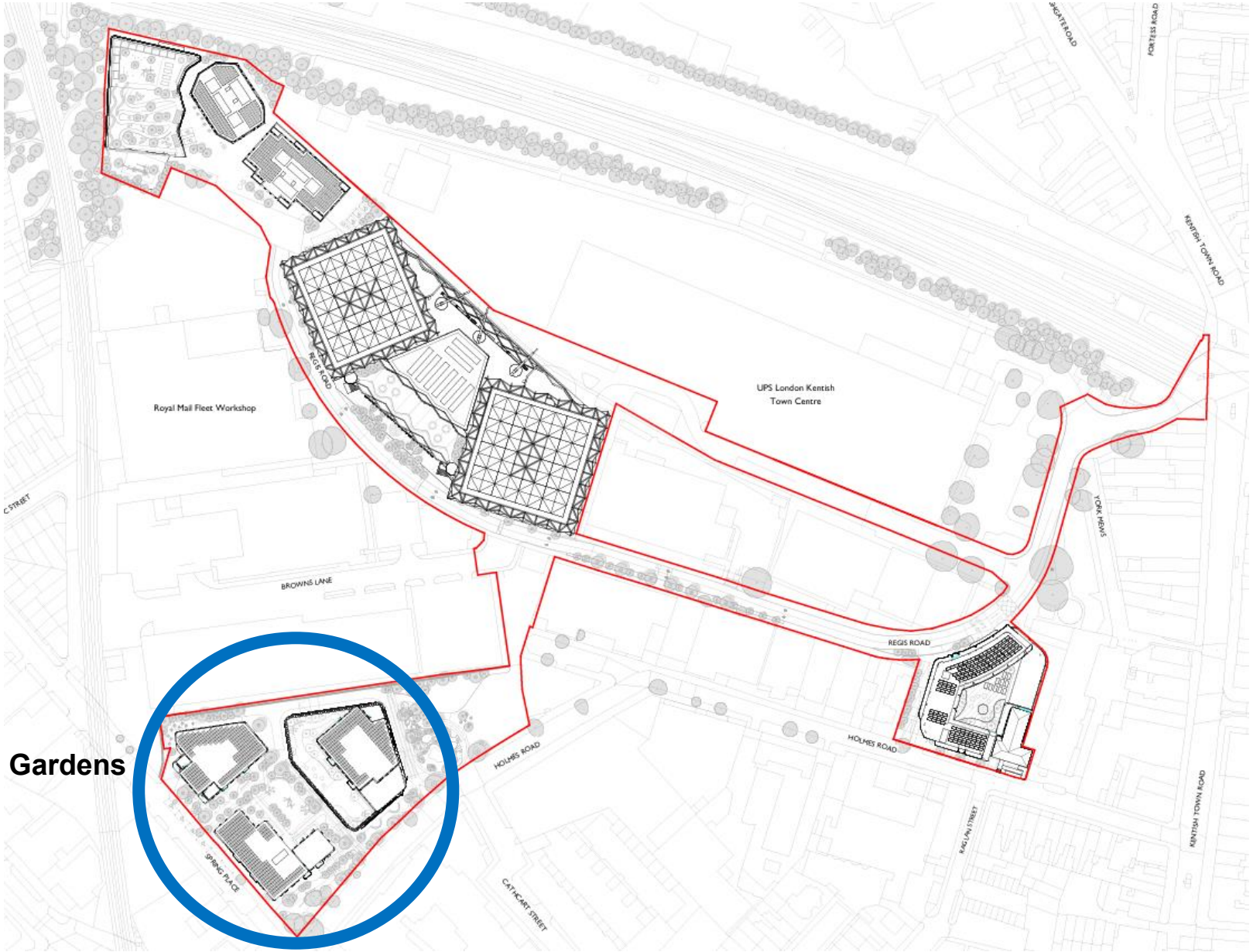
CPG.
L
S
A

CAMDEN FILM QUARTER

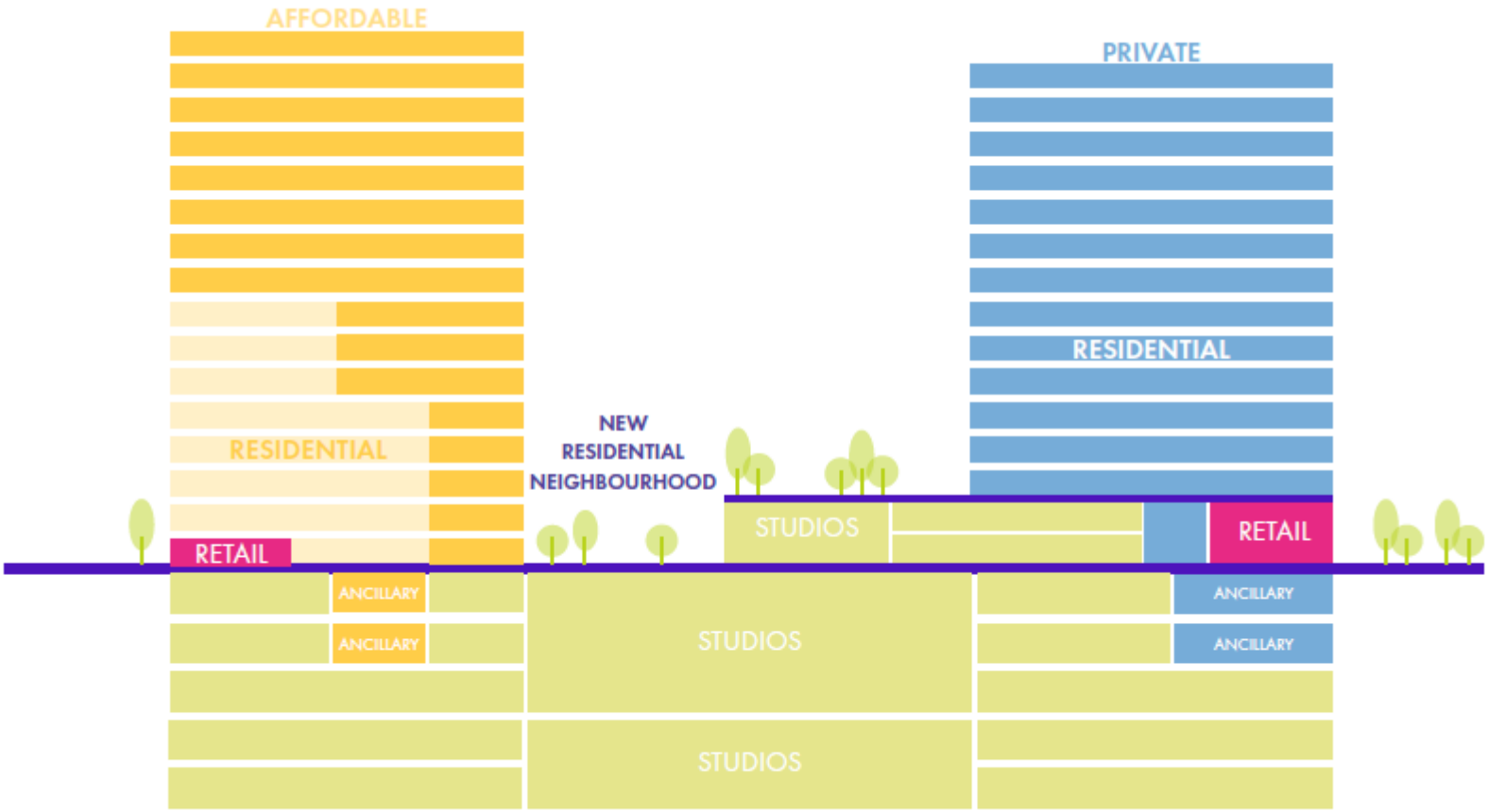

PUBLIC TERRACE
SUPPORT ACCOMMODATION
ORCHESTRA STUDIO
PUBLIC TERRACE
SUPPORT ACCOMMODATION
STUDIOS
STUDIOS
STUDIOS
STUDIOS
STUDIOS
STUDIOS
CULTURE
F&B
LOGISTICS
NFTS
LOGISTICS
F&B
CULTURE
CULTURE
WKSP
STUDIOS
STUDIOS
WKSP



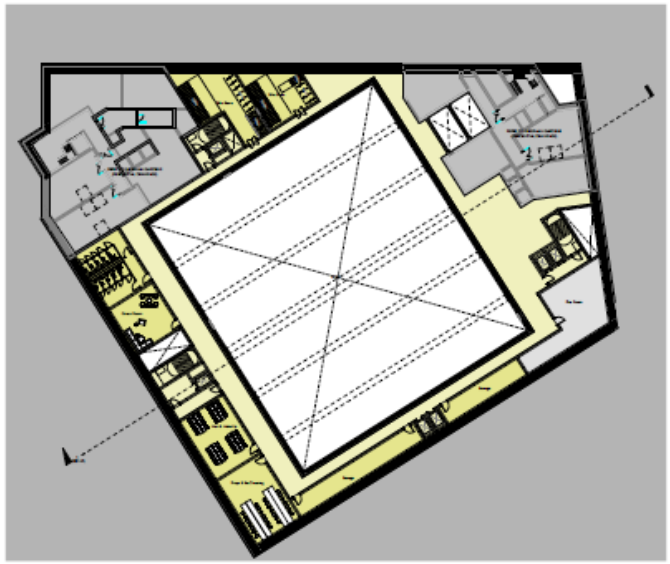




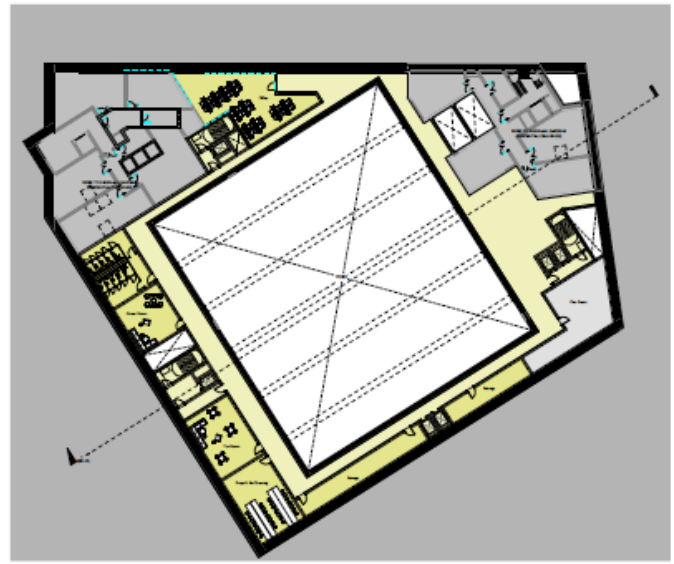
Inkerman Gardens


AFFORDABLE
PRIVATE
RESIDENTIAL
NEW
RESIDENTIAL
NEIGHBOURHOOD
RESIDENTIAL
STUDIOS
RETAIL
RETAIL
ANCILLARY
ANCILLARY
ANCILLARY
ANCILLARY
STUDIOS
STUDIOS

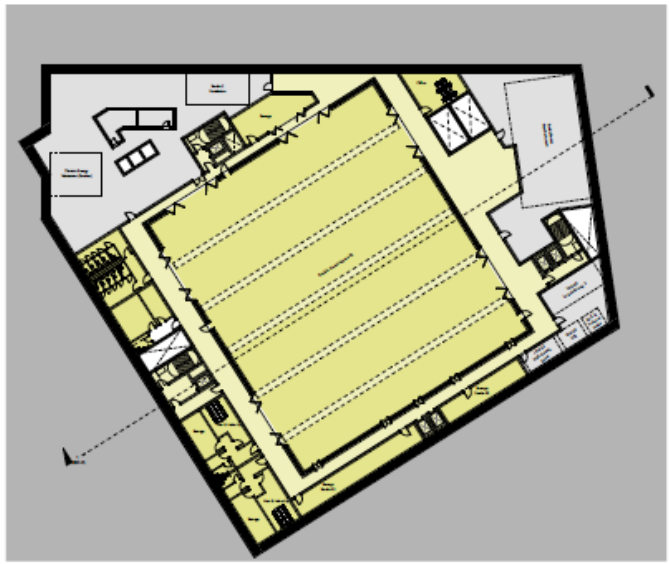
Ground Floor Plan



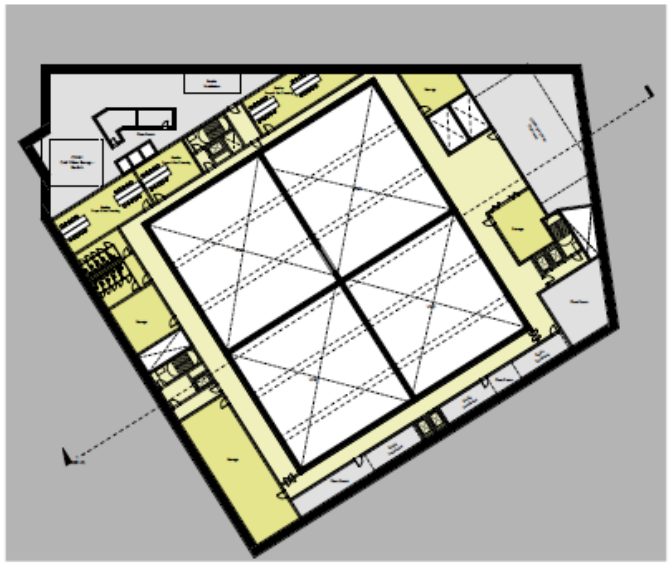
Basement Level -01



Basement Level -02



Basement Level -03



Basement Level -04

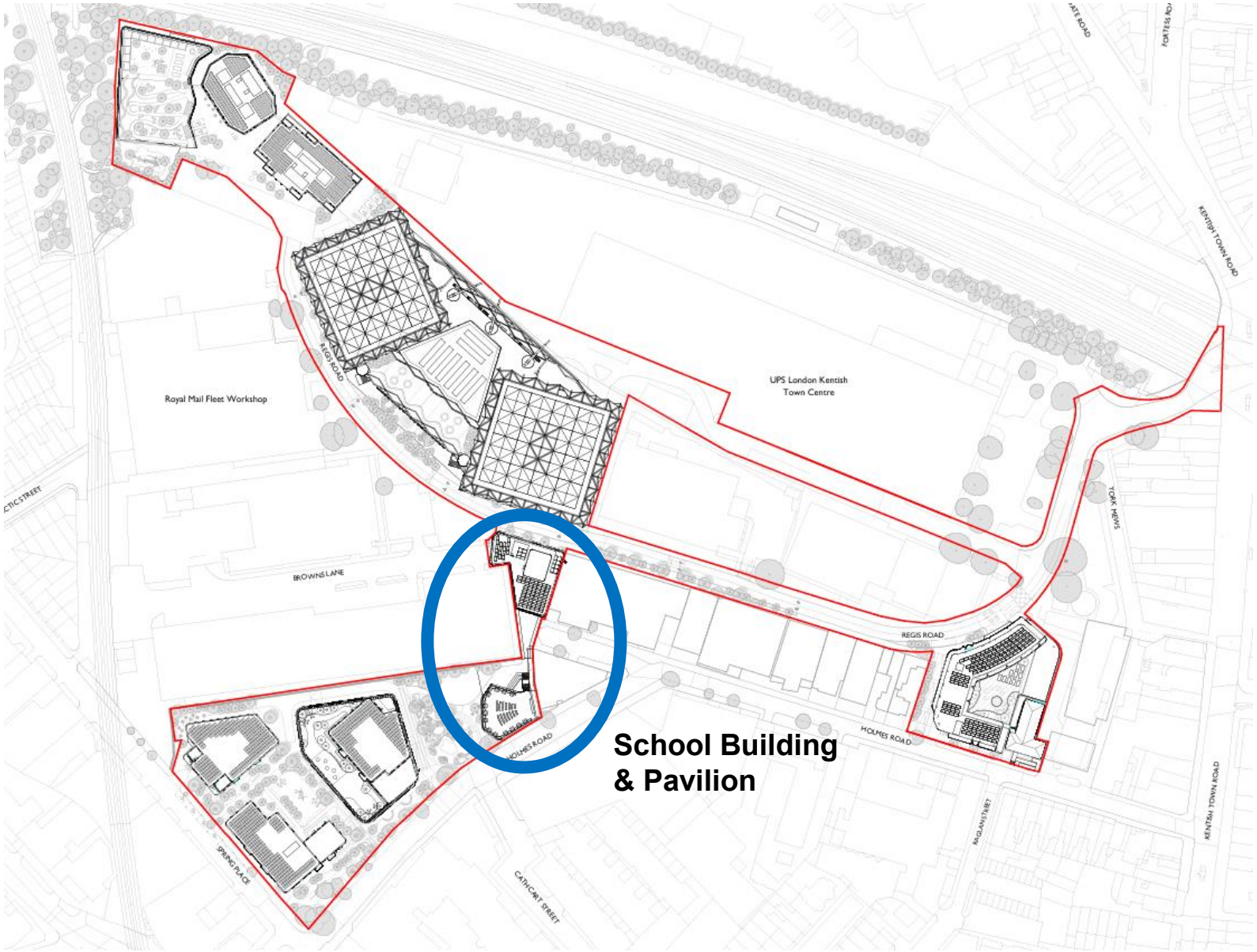
Basement Level -04

First floor plan

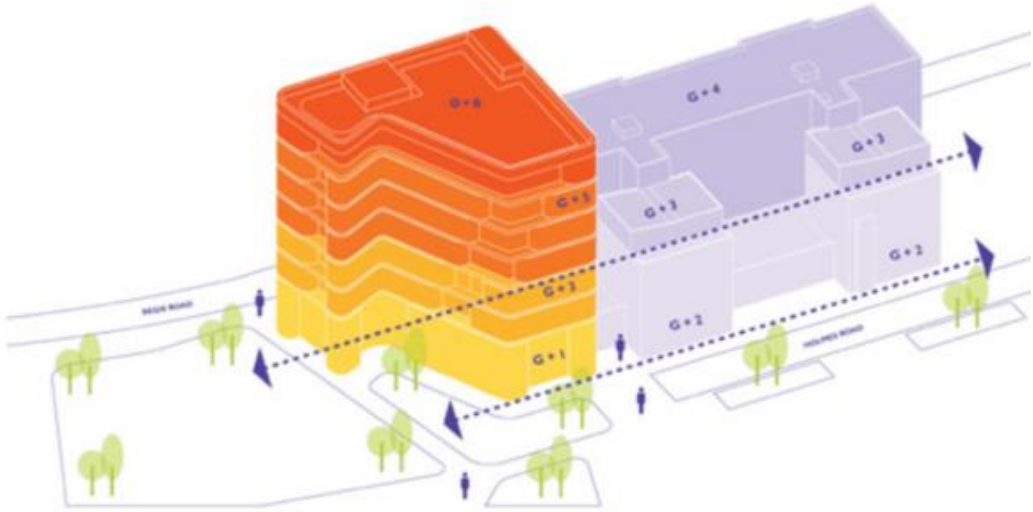
Second floor plan

Third to fourth floor plan

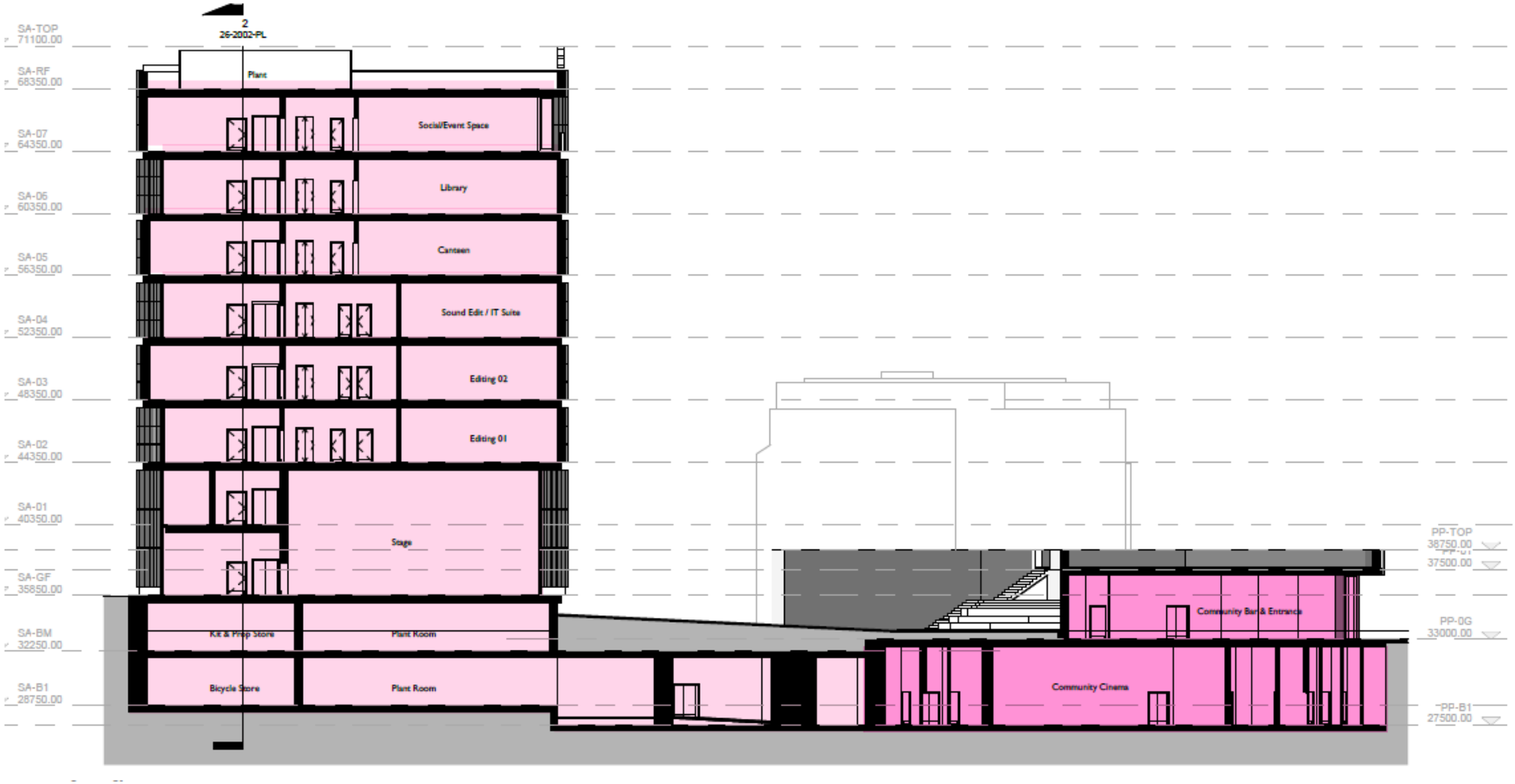
Fifth to seventh floor plan


Royal Mail Fleet Workshop
UPS London Kentish Town Centre
REGIS ROAD
BROWNS LANE
HOLMES ROAD
KENTISH TOWN ROAD
YORK MEWS
CATHCART STREET
SPRING PLACE
School Building & Pavilion

NDON SCREEN
LSA
ONDON SCREEN
ACADEMY



01 Main Education Building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SA-B1
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Plant
Social/Event Space
Library
Canteen
Sound Edit / IT Suite
Editing 02
Editing 01
Stage
Kit & Prop Store
Plant Room
Bicycle Store
Plant Room
Community Bar & Entrance
Community Cinema
PP-TOP
38750.00
37500.00
PP-0G
33000.00
PP-B1
27500.00

KENTISH
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