Address:	33 - 35 Jamestown Road London NW1 7DB		**2**
Application Number(s):	2024/4953/P	**Officer:** Josh Lawlor	
Ward:	Camden Town		
Date Received:	11/11/2024		
Proposal:	Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus five storeys and sixth-floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys plus a sixth floor plant room. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works.		

Background Papers, Supporting Documents and Drawing Numbers:

Existing Drawings:
23054 MCO XX ZZ DR A 05001 EXISTING SITE LOCATION PLAN October 2024 P01, 23054 MCO XX ZZ DR A 05002 EXISTING SITE PLAN October 2024 P01, 23054 MCO XX B1 DR A 05109 EXISTING PLAN LEVEL B1 October 2024 P01, 23054 MCO XX 00 DR A 05110 EXISTING PLAN LEVEL 00 October 2024 P01, 23054 MCO XX 01 DR A 05111 EXISTING PLAN LEVEL 01 October 2024 P01, 23054 MCO XX R1 DR A 05112 EXISTING PLAN LEVEL R1 October 2024 P01, 23054 MCO XX ZZ DR A 05201 EXISTING ELEVATION NORTH + EAST October 2024 P01, 23054 MCO XX ZZ DR A 05202 EXISTING ELEVATION SOUTH + WEST October 2024 P01, 23054 MCO XX ZZ DR A 05301 EXISTING SECTION AA October 2024 P01

Proposed Drawings:
23054 MCO XX ZZ DR A 06001 PROPOSED SITE LOCATION PLAN March 2025 P02, 23054 MCO XX ZZ DR A 06002 PROPOSED SITE PLAN March 2025 P02, 23054 MCO XX B1 DR A 06109 PROPOSED PLAN LEVEL B1 March 2025 P02, 23054 MCO XX 00 DR A 06110 PROPOSED PLAN LEVEL 00 April 2025 P03, 23054 MCO XX 01 DR A 06111 PROPOSED PLAN LEVEL 01 April 2025 P04, 23054 MCO XX 02 DR A 06112 PROPOSED PLAN LEVEL 02-04 April 2025 P04, 23054 MCO XX 05 DR A 06115 PROPOSED PLAN LEVEL 05 April 2025 P04, 23054 MCO XX 06 DR A 06116 PROPOSED PLAN LEVEL 06 March 2025 P02, 23054 MCO XX 07 DR A 06120 PROPOSED PLAN LEVEL R1 March 2025 P02, 23054 MCO XX ZZ DR A 06201 PROPOSED ELEVATION NORTH March 2025 P02, 23054 MCO XX ZZ DR A 06202 PROPOSED ELEVATIONS PBSA COURTYARD March 2025 P02, 23054 MCO XX ZZ DR A 06203 PROPOSED ELEVATIONS PBSA GABLES + SOUTH WEST March 2025 P02, 23054 MCO XX ZZ DR A 06204 PROPOSED ELEVATIONS C3 EAST + SOUTH GABLE March 2025 P02, 23054 MCO XX ZZ DR A 06205 PROPOSED ELEVATIONS C3 COURTYARD March 2025 P02, 23054 MCO XX ZZ DR A 06301 PROPOSED SECTION AA March 2025 P02, 23054 MCO XX ZZ DR A 06302 PROPOSED SECTION BB March 2025 P02, 23054 MCO XX ZZ DR A 06303 PROPOSED SECTION CC March 2025 P02

Documents:
Design and Access Statement, prepared by Morris + Company, including; Landscape Statement, by New Practice and Context Office and Crime Impact Assessment, by Morris + Company;; Townscape Visual Impact Assessment (including Accurate Visual Representations), prepared by Turley and AVR London; Affordable Housing Statement Rev A, prepared by Regal; Financial Viability Assessment, prepared by BNP Paribas; Student Housing Management Plan, prepared by Homes for Students; Preliminary Ecology Appraisal, prepared by Greengage; Arboricultural Impact Assessment, prepared by TMA; Biodiversity Net Gain Assessment, prepared by Greengage; Detailed Health Impact Assessment, prepared by Volterra; Air Quality Assessment, prepared by AQC; Acoustic Report, prepared by RBA; Land Contamination Report/Geotechnical Assessments, prepared by HDR; Basement Impact Assessment, prepared by HDR; Statement of Community Involvement, prepared by Meeting Place; Draft Construction Management Plan, prepared by Regal London; Healthy Streets Transport Assessment, prepared by Iceni; Framework Travel Plan, prepared by Iceni; Delivery and Servicing Management Plan, prepared by Iceni; Flood Risk/SUDS Strategy/Drainage Report, prepared by HDR; Revised Energy Statement and Overheating Assessment, prepared by Wallace Whittle; Revised Sustainability Statement (incl BREEAM Pre-Assessment, Whole Life Carbon and Circular Economy), prepared by Wallace Whittle; Daylight and Sunlight Assessment, prepared by GIA; and, Economic Regeneration and Employment and Skills Strategy (Including Student Housing Needs Assessment), prepared by Volterra.

Design and Access Statement Addendum Morris + Company, Townscape Visual Impact Assessment Addendum Turley, Financial Viability Assessment Addendum BNP Paribas, Health Impact Assessment Addendum Volterra, Transport Assessment Addendum Iceni, Fire Statement Addendum Jenson Hughes, Daylight and Sunlight Assessment Addendum GIA, Economic Regeneration Addendum Volterra.

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	**Agent:**
Regal on behalf of 4C Jamestown Road Ltd 4-5 Coleridge Gardens, London NW6 3QH	DP9 Ltd. 100 Pall Mall London SW1Y 5NQ

ANALYSIS INFORMATION

Land use - floorspace figures

Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Sui Generis	Purpose Built Student Accommodation	0	5,946 (178 PBSA studio beds)	+ 5,946
C3	Dwellings (flats)	0	2,905	+ 2,905
Sui Generis	Offices and depot (including Basement car park 737 sqm)	2,173 sqm	0	-2,173
Class E	Flexible commercial space	0	339	+339
Total	All uses	2,173	9,520	7,017

Proposed C3 housing mix and tenure						
Tenure	Studio	1 bed	2 bed	3 bed	4 bed	**Total**
Market	0	0	0	0	0	0
Social-affordable rent	0	0	**8**	**8**	0	**16**
Intermediate rent	0	**5**	**6**	0	0	**11**
Total homes	**0**	**5**	**14**	**8**	**0**	**27**

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	70	0	-70
Car - Disabled accessible	0	1 (on street)	+1
Total reduction			**-69**
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle –student (PBSA) long stay	0	136	+136
Cycle – residential long stay		54	+ 54
Cycle – commercial long stay	0	6	+ 6
Cycle – short stay (all uses)	0	8	+8
Total uplift			**+ 204**

EXECUTIVE SUMMARY

i) The proposed redevelopment of 33–35 Jamestown Road and 211 Arlington Road, seeks to deliver a high-quality mixed-use scheme comprising a Purpose Built Student Accommodation (PBSA) block, affordable residential homes, and flexible commercial space. The scheme will transform a vacant and underused brownfield site, previously occupied by low-grade office and depot buildings, into a sustainable development aligned with Camden's and London's strategic planning objectives.

ii) The key benefits of the scheme are the delivery 178 high-quality student accommodation bedspaces and 27 affordable homes, helping meet Camden's need for housing, in the form of student and affordable housing. This contributes positively to Camden's housing targets under the Housing Delivery Test, where the borough's delivery performance remains below target, and should be given significant weight. The proposal provides a 33% on-site affordable housing provision by floorspace, with a further financial contribution to address the shortfall against the 50% policy target, which has been viability tested. The £3,600,000 PiL represents 47.4% of the full top-up PiL of £7,600,750.

iii) The scheme supports economic development by introducing flexible Class E commercial space (339 sqm GIA) and investing in local employment initiatives, including a Section 106 financial contribution of £103,870 to promote training and employment opportunities for Camden residents.

iv) The development complies with local and regional climate and sustainability policies. The demolition of the existing buildings is accepted in this case to allow optimisation of the site, and it is expected that refurbishment is not a viable option to deliver the same public benefits. It incorporates sustainable design measures, including green roofs, high energy efficiency standards, air-source heat pumps (ensuring the development is air quality neutral). The site-wide total carbon reduction is 60.7% over the baseline, with the 39.3% shortfall met through a carbon offset contribution of £49,961. There is a commitment to biodiversity through carefully designed courtyard landscaping and extensive green roofs.

v) Whilst the site is not in a conservation area, it is next to the Primrose Hill, Regents Canal and Camden Town Conservation Areas, and close to statutorily and locally listed buildings, notably Arlington House, terraced properties on Gloucester Road and the Piano Factory. Some harm to the setting of nearby locally listed heritage assets is identified, primarily due to the scale and massing of new buildings exceeding existing terraces. However, this harm is less than substantial. It has been mitigated through a sensitive design approach: varied rooflines, articulation of façades, and careful material selection to respond to the local townscape character. Officers are satisfied that, in line with the NPPF, the identified heritage harm is outweighed by the significant public benefits of the proposal, particularly in addressing housing needs and regenerating a brownfield site, making effective use of the land.

vi) Some concerns were raised during consultation, particularly regarding the height, massing, daylight/sunlight impacts, and potential noise associated with the new uses. However, these impacts have been carefully considered and mitigated

through design amendments (including reduction in height) and robust management strategies secured via planning conditions and obligations.

vii) Considering the overall planning balance, the scheme complies with the development plan as a whole. It delivers substantial housing and economic benefits, promotes sustainability, regenerates an underused site, and appropriately addresses heritage, amenity, and environmental considerations. Accordingly, it is recommended that planning permission be granted subject to conditions and the completion of a Section 106 Agreement.

viii) 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 (Clause 3(i))

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Town Centre (TC)	Adjacent to Camden Town Centre
Conservation Area	Adjacent to Regents Canal, Primrose Hill and Camden Town.
PTAL (Public transport accessibility)	6a Highly accessible
Underground development constraints and considerations	- Slope stability - Subterranean flow

Table 1 - Site designations and constraints

Description

1.2 The site comprises three buildings at 33-35 Jamestown Road, London NW1 7DB and 211 Arlington Road, London NW1 7HD. The site lies between Jamestown Road to the immediate north and Arlington Road to the east. Camden High Street is parallel to Arlington Road, further to the east of the site. The site location is shown in the image below.

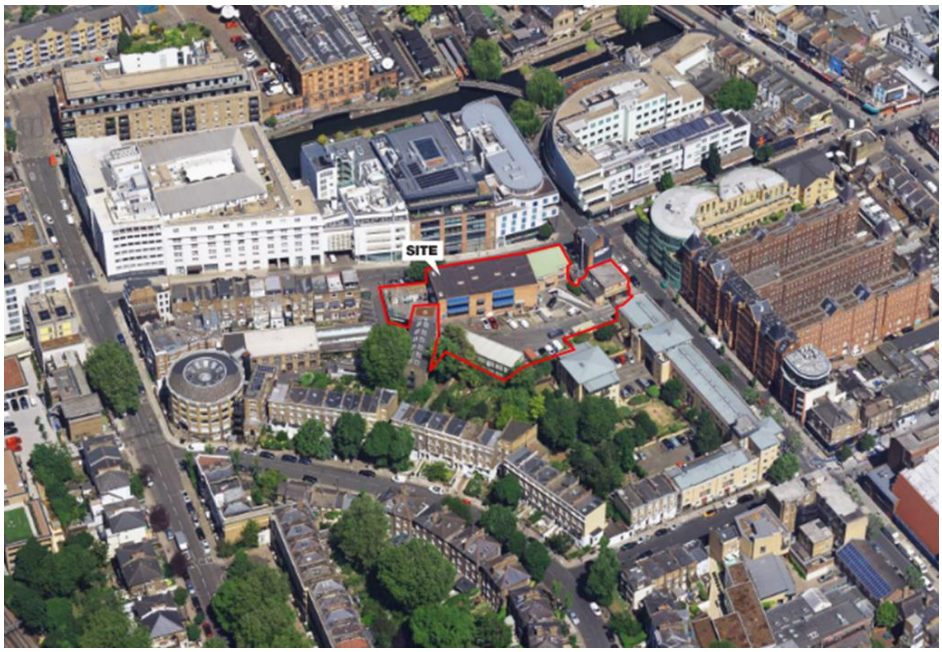


Figure 1 – The existing site

1.3 The existing buildings on site include 2,173 sqm of floorspace, which were last used as offices and a depot, and a 737 sqm basement car park. The "office" elements of the use total 1,436 sqm over three different buildings. Both the basement and the three buildings are of low value and performance and have been vacant for some time. The site also formerly had three temporary container buildings to the west of it which were subject to a temporary permission. Camden's Cleaning Services team last used the buildings as a mix of offices and a waste depot. The existing land use is Sui Generis. Vehicles access the site via a ramp into the basement car park accessed off Jamestown Road.

1.4 The site is proposed to be allocated for employment and residential uses as part of the Submission Draft Camden Local Plan. The Draft Camden Local Plan (DCLP) identifies the site under allocation C19 – "Alington Road former depot site". The allocation outlines its preferred use as employment and permanent self-contained homes, acknowledging potential for PBSA, and suggests an indicative capacity of 63 additional homes.

1.5 The site is located just outside the designated Camden Town Centre, and Jamestown Road leads directly into Camden High Street, a hub of busy commercial activity.

1.6 The site wraps around an existing corner building at 31 Jamestown Road, a late 19th-century locally listed public house that does not form part of the site. Jamestown Road curves and slopes westward, with the site levels sloping across the site and on the street, varying by approximately 2.5m.

1.7 Although the site is not in a conservation area it is close to several designated and non-designated heritage assets. It is near the Primrose Hill Conservation Area (to the southwest), the Regents Canal Conservation Area (to the north), and Camden Town Conservation Area (to the south). In terms of statutory listings, Arlington House to the east is Grade II listed and several properties on Gloucester Cresent to the south, namely the Piano Factory Building and 36-41 Gloucester Cresent, are also Grade II listed.

1.8 The site is also close to locally listed buildings, with the pub on the corner (31 Jamestown Road) and the buildings to the west, at 57A-D and 61-85 Jamestown Road, being the most significant.

1.9 These heritage assets in the immediate area are shown in the map below, with the site boundary shown in red.

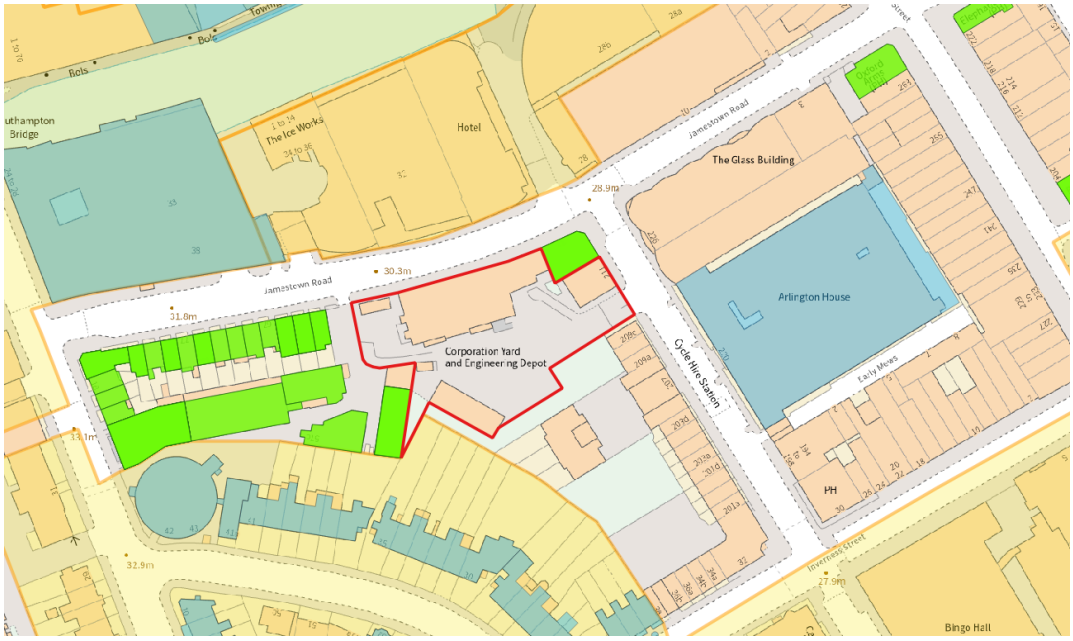


Figure 2. Primrose Hill (bottom-left), Camden Town (bottom-right), Regents Canal (top) Conservation Areas in beige, Listed Buildings in blue, and Locally Listed buildings in green

1.10 The site is less than 100m south of the Regents Canal. However, it is in Flood Zone 1 and has the lowest probability of land or sea flooding.

1.11 The site's immediate context has a range of land uses, including residential properties to the immediate west on Jamestown Road, and south, where the site abuts the rear gardens of residential properties on Gloucester Crescent. There are commercial uses to the north, and restaurant uses to the east, along Jamestown Road. The buildings surrounding the site typically span from two to six storeys. The adjacent buildings, including the Cushla public house and opposite Holiday Inn Hotel, comprise materially taller buildings than the existing height of the site.

2. THE PROPOSAL

2.1 The proposal is to demolish existing buildings and structures to facilitate redevelopment of the whole plot. It comprises a Purpose-Built Student Accommodation (PBSA) (Sui Generis) block over the basement and ground, plus five storeys (and a sixth-floor plant room) with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys (with a setback plant enclosure on the Jamestown Road block). Each block has a private courtyard with hard and soft landscaping, cycle parking, and associated works.

2.2 During the course of the application, the applicant decided to reduce the building by a storey so that the development is no longer categorised as a "high risk building" for the purposes of the Building Safety Act.

2.3 The areas for the proposed development are shown at Table 2 below.

Land Use	Proposed (GIA)	Proposed (GEA)
Purpose Built Student Accommodation (PBSA) (Sui Generis)	5,946 sqm	6,495 sqm
Residential (Class C3)	2,905 sqm	3,401 sqm
Flexible Commercial (Class E)	339 sqm	385 sqm
Total	**9,190 sqm**	**10,281 sqm**

Table 2 – Proposed gross internal areas (GIA) and external areas (GEA)

2.4 The student accommodation building would include ground plus five storeys, plus plant, and the residential building would also rise to ground plus five storeys with a plant room. The existing basement level is proposed to be extended laterally and vertically.

2.5 The layout of the buildings provides back-to-back land uses centred around courtyards to locate the student accommodation and affordable housing across an awkwardly shaped site, creating two "C"-shaped land uses with access to their own amenity spaces. The axonometric diagram below shows the basic layout with the courtyards behind.

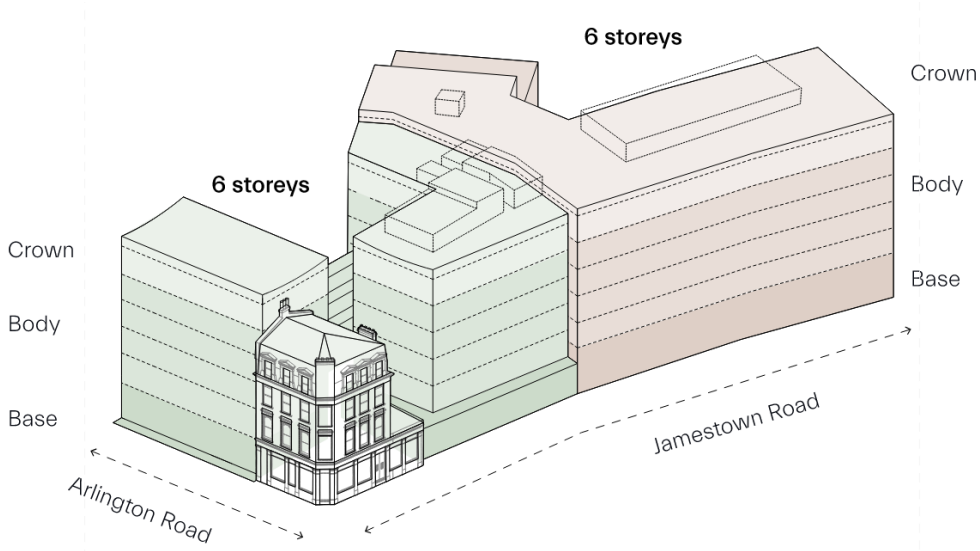


Figure 3. Diagram showing affordable C3 homes in green and PBSA in brown

2.6 The proposed material palette draws on local context and character. A mix of brick, metal, and pre-cast stone.

2.7 The architectural treatment has been broken up into a base, a body with a horizontal emphasis, and a differentiated crown on the student accommodation building and the residential block. Different brick colours and metalwork would be used. Some sculpted precast textures relate to various stone elements found in Arlington House.

2.8 The proposed student rooms are all self-contained studios, with no cluster rooms or shared flats. There are 178 student rooms proposed, with supporting communal amenity spaces internally and in the dedicated courtyard space.

2.9 The proposals also provide 339 sqm of flexible commercial space (Use Class E). The commercial space is envisaged to be provided as a workspace, on the ground and basement levels, with a lightwell to allow natural light to the basement level. However, it could be used as a range of Class E commercial activities.

2.10 The 27 affordable dwellings are a mix of 11 intermediate rent and 16 social-affordable rented (Low Cost) homes. This split is 62.4% social-affordable and 37.6% intermediate based on NIA. Most are provided as flats, accessed by deck from a communal entrance on Jamestown Road, with three maisonettes accessed directly from Arlington Road and flats located above. The proposals represent 33% affordable housing by the total gross internal floorspace, and 35% by habitable room. The measure by floorspace represents a proportionally lower percentage than by habitable room due to the common parts being almost entirely external in the form of deck access and corridors. If these areas were to count towards the total affordable provision to provide a percentage, it would be equal to 35% by floorspace.

2.11 All permanent residential accommodation would have private external amenity spaces. The housing is centred around a private shared courtyard that provides play space for younger children.

2.12 In terms of highway works, the current vehicular crossover on Arlington Road is proposed to be removed and reinstated as a footway, alongside remedial works to the footway to enable integration of the new building lines and entrances on both Arlington Road and Jamestown Road.

2.13 The proposed development is car-free, removing all existing parking from the site, with one disabled bay to be provided outside the red line boundary to be secured by s106 agreement. The proposed development includes a total of 196 long-stay cycle parking spaces to provide:

- 136 student spaces,
- 54 residential spaces, and
- 6 commercial spaces.

2.14 These spaces are provided in a mix of Camden stands, two-tier racks and larger/accessible spaces within dedicated internal cycle stores at ground and basement levels, which will be secure.

2.15 Eight short-stay spaces (five for student accommodation, 2 for residential, and 1 for flexible commercial space) are proposed in four Camden stands to

be provided on the street and secured by S106 agreement with a payment of £300 per stand.

2.16 Deliveries and servicing would occur on an on-street loading bay on Jamestown Road.

2.17 The residential garden is a south-facing space for relaxation, socialising, and play. It balances several amenity uses while improving biodiversity.

3. RELEVANT HISTORY

The site

3.1 **2024/3371/P EIA** screening opinion (before submitting this application). LBC confirmed that the application does not require an EIA **(September 2024).**

3.2 **2013/2773/P** – Installation of steel modular Portacabin for a temporary period of seven years. **Granted on July 2013**.

The area

100 and 100a Chalk Farm Road

3.3 **2024/0479/P** Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works. **Granted 27/11/2024**

4. CONSULTATION

Statutory consultees

Health and Safety Executive (HSE)

4.1 Advice was given before re-consultation with revised proposal, which reduced the building by a storey so that the development is no longer categorised as a “high risk building” for the purposes of the Building Safety Act.

4.2 Advice to the local planning authority from the HSE as a statutory consultee for developments that include a relevant building.

4.3 HSE issued a substantive response (concern) dated 28/11/2024, under the reference pgo-6191 in relation to a consultation received on 11/11/2024.

4.4 The LPA emailed the applicant on 24/01/2025 requesting further consultation. The applicant had provided comments in response to HSE’s concern and a revised fire statement. The comments were on the means of

escape, open plan apartments / cooking facilities, smoke ventilation systems / extended travel distances, hydrants, photovoltaic panels.

4.5 Following a review of the applicant's comments and the revised fire statement, HSE is content with the fire safety design in the project description to the extent that it affects land use planning considerations.

Non-statutory consultees

HUDU, on behalf of the North Central London Integrated Care Board

4.6 The HUDU Planning Contributions Model has been run on the proposed development in accordance with paragraph 11.1.37 of the London Plan to calculate capital costs for increased demand arising from the proposed development. A contribution of £77,900 towards mitigating the adverse impacts of the proposed development on health infrastructure.

Thames Water

4.7 Several conditions and informatives have been requested, which are added to the decision notice (9 Foul water capacity, 10 Water network upgrade, Piling method statement). These conditions relate to the protection of Thames Water infrastructure, with details the applicant must submit to the Council in consultation with Thames Water relating to how the development would not impact this infrastructure. Specifically, the proposed works will be near underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Following initial investigations, Thames Water has identified a potential inability of the existing water network infrastructure to accommodate the development needs. The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

4.8 Design Review Panel

4.9 The Proposed Development has been subject to scrutiny by two Design Review Panels in May and July 2024. The Panel’s written feedback is summarised below:-

4.10 First Review (10th May 2024)

4.11 The panel supports the principle of development and much positive work has been undertaken, with a suggestion that the overall density of the site should be slightly reduced. It was welcomed that the proposals could be reviewed at such an early stage.

4.12 The panel considers that the layout is successful with student and residential arranged around courtyards.

4.13 The panel considered that the height along Jamestown Road and Arlington Road should be reduced, with a revision to the overall composition of the rear.

4.14 The design should futureproof the adaptation of student accommodation to housing and make this clear as part of any planning application.

4.15 The architecture should have greater overall coherence, and respond to its prominent neighbours;

4.16 Second Review (26th July 2024)

4.17 The panel confirmed that the proposals have developed positively since the first review and have resulted in a much improved scheme, particularly the reductions in height and rationalisation of the overall massing;

4.18 The panel suggested that further architectural changes could be made to make the architecture more joyful, overall it is moving in a positive direction.

4.19 The balconies facing Jamestown Road should ensure that occupants benefit from privacy when using them;

4.20 The revised elevation to Jamestown Road featuring a crank is a positive alteration, giving relief to the street and creating a more sympathetic relationship to the street.

4.21 The courtyard amenity spaces have developed positively, particularly the removal of the sunken courtyard for the student communal space.

4.22 There are opportunities to make the entrance sequence to the student accommodation and the residential flats more legible and simpler.

Local groups

Primrose Hill CAAC

4.23 Objection covering the building heights, massing, and impact on designated and non-designated heritage assets. These comments were made before revisions, and some of the concerns raised, to a degree, have been addressed:

- The site abuts the Primrose Hill Conservation Area.
- It is next to a group of Listed Buildings in the PHCA.
- It is next to the Regent's Canal Conservation Area.
- Buildings on Jamestown Road are included on the Local List.
- 31 Jamestown Road, the former pub (ref 454), and 61-85 Jamestown Road (ref 453) are important in the townscape. As the local list (ref 454) states of the pub: 'in long views it can be seen together with the

historic 61-85 Jamestown Street which reinforces the underlying historic framework of the streetscape'

4.24 The varied heritage assets in the area offer an opportunity to provide new homes which allow residents to feel at home in a well-established neighbourhood rather than being alienated by living in imposed and intrusive structures.

4.25 We welcome the mixed uses proposed in principle. While we welcome affordable housing provided on site, especially social rent housing, we seek reassurance that such affordable housing on site has been maximised within the site's constraints.

4.26 Note that providing student housing can free up other existing housing for families. Still, we seek certainty through a condition or legal agreement that the student housing will not be diverted to Airbnb or other similar tourist accommodation. We know the recent, incremental, uncontrolled loss of affordable housing, specifically key-worker housing, to tourist accommodation in the PHCA.

4.27 It is critical that the buildings on Arlington Road and Jamestown Road be integrated with the existing streets. The junction of Arlington Road and Jamestown Road is formed by the former pub, 31 Jamestown Road, now 'Cushla', which is Locally Listed (ref 454) and a key building in the streetscape.

4.28 The proposed block on Arlington Road south of the former pub is overly dominant in massing and detail. The former pub should retain its landmark quality in the local streetscape, particularly in the views of its spectacular, playful roof.

4.29 The proposed western building on Jamestown Road is over-dominant in massing – 7 storeys + plant at roof level – and design regarding the historic existing terraced houses at 61-65 Jamestown Road (Locally Listed ref 453). These houses, at 4-storeys, are a survival of the earlier development of the area and form a coherent block. The entry to the rear of the site, to the east of the terrace, should offer an opportunity for a more appropriate scale and design.

4.30 The buildings on Jamestown Road to the north of the application site, commercial buildings on a scale suited to the working of the Canal, are 6 storeys. The housing on the application site at 7 storeys + plant at roof level is inappropriate and excessive.

4.31 Welcome the provision of green courtyards within the site. Their planting and maintenance should be subject to condition to ensure ecologically appropriate vegetation and long-term sustainability.

Officer response:

- *The applicant has undertaken a Heritage, Townscape and Visual Impact Assessment, which has informed the scheme's massing, materials, and architectural articulation. The proximity to the PHCA and Regent's Canal Conservation Area, as well as the visibility of the site in key local views, has necessitated a contextual approach.*
- *The proposed development notes the importance of 31 Jamestown Road (Locally Listed, Ref 454) as a key townscape building, particularly at the junction of Arlington and Jamestown Roads.*
- *Similarly, the group of terraced houses at 61–85 Jamestown Road (Locally Listed, Ref 453) has been considered in the design evolution. While the proposed height is greater than the existing 4-storey terraces, officers are satisfied that the design responds sensitively in both scale and detailing, and that there is sufficient separation and articulation to preserve the character and setting of the locally listed buildings.*
- *While the proposal includes buildings of up to 6 storeys with plant enclosures above, this is considered appropriate in the wider context of Jamestown Road, where several commercial and canal-side buildings rise to comparable heights. The massing has been broken into distinct elements to reflect the historic grain of the area and to mitigate the perception of bulk. The scheme incorporates varied rooflines, and articulated façades to reduce visual impact and create a more sympathetic relationship with adjoining buildings.*
- *Officers welcome the inclusion of affordable housing within the scheme, including provision at social rent levels. Officers are satisfied that the current proposal represents the best achievable outcome regarding on-site affordable provision.*
- *Regarding the student accommodation, officers acknowledge concerns about potential conversion to short-term lets. A legal agreement will be secured to restrict student accommodation to bona fide students only, with robust management measures in place and prohibitions on short-term holiday letting platforms such as Airbnb in term time. Short-term accommodation is allowed, subject to a management plan outside of term time. The CPG sets out that the Council will use a Non-student Management Plan planning obligation to secure the nature of alternative use, ensure that it does not disrupt occupation by students who wish to let their place for the entire academic year; and that the duration of non-student lettings should be for no more than 14 weeks in any academic year. This safeguards against the loss of residential capacity and supports wider housing objectives.*

- *The scheme has been designed to integrate with the existing street patterns of Arlington Road and Jamestown Road, with active frontages and entrances that relate to the existing urban form. The green courtyards*

are welcomed as part of the site's open space strategy, and planning conditions will secure appropriate planting schemes and long-term management to ensure ecological and visual benefits are maintained over time.

- *On balance, officers consider the proposal to represent a high-quality and contextually responsive scheme. The development provides much-needed housing, including affordable and student accommodation, while respecting the character and appearance of the adjacent conservation areas and heritage assets.*

Adjoining occupiers

4.32 Eight site notices were displayed, in the following locations:

- 1 outside 33-35 Jamestown Road.
- 1 outside 32 Jamestown Road.
- 1 outside 211 Arlington Road.
- 1 outside 207 Arlington Road.
- 1 outside 220 Arlington Road.
- 1 outside 35 Gloucester Crescent.
- 1 outside 51 Gloucester Crescent.
- 1 outside 14-16 Oval Road.

4.33 The notices were displayed on 15/11/2024 until 09/12/2024 and the application was advertised in the local paper on 21/11/2024 (expiring 15/12/2024).

4.34 At least 23 local households objected. The objections received by the Council are published in full on the Council's website. The key issues raised are below.

4.35 The application was reconsulted, incorporating the revisions including reducing a storey from the PBSA block fronting Jamestown Road.

4.36 Eight site notices were displayed in the locations listed above locations from 16/04/2025 to 10/05/2024. The site was also re-publicised in the local paper from 17/04/2025 to 11/05/2025.

4.37 **Objections to re-consultation:**

4.38 Nine objections to the re-consultation were made, one from a new address; the other eight objections were re-statements of objections to the revised scheme.

4.39 Nine objections to the re-consultation were made, one from a new address; the other eight objections were re-statements of objections to the revised scheme.

Height, Scale, and Massing (8 of the objectors raised this)

- Development remains out of scale with neighbouring properties, particularly the locally listed terraces on Jamestown Road.
- Incongruous bulk and flat brick frontages harm the streetscape and residential character.
- Requests for further height reduction and building setbacks on Arlington and Jamestown Roads.
- Development overshadows locally listed buildings, such as the pub at 31 Jamestown Road.
- Fails to respect the varied heritage and architectural character of the area (Georgian and Victorian).
- Flat, solid designs criticised as unsympathetic and monotonous.

Officer response:

- The height of the PBSA block was reduced by one storey post-submission. Officers consider this revision, along with articulation, material differentiation, and setbacks, to provide sufficient mitigation. The scheme maintains a contextually appropriate massing in a setting that includes a wide range of building scales (see Section 12 Heritage and Section 13 Design). The design takes account of the prominence of 31 Jamestown Road and locally listed terraces at 61–85 Jamestown Road, as discussed in paragraph 12.42 of the committee report

Loss of Light and Overshadowing (6 objectors raised this)

- Significant overshadowing of adjacent homes and gardens, especially at 61–65 Jamestown Road.
- Insufficient reduction in height to address light loss.
- Concerns not properly addressed in revised plans.

Officer *response*:

- *A revised Daylight and Sunlight Addendum (March 2025) was submitted in response to the design revisions. While the effects on certain properties remain over BRE targets, the reduction in height leads to slight improvements in some cases, and overall impacts remain consistent with the earlier scheme. These are addressed and justified in Section 11 (Impact on Amenity) of the committee report, and are not considered to result in unacceptable harm.*

Noise and Disturbance (6 mentions)

- Noise from mechanical equipment like heat pumps, particularly affecting summer nights.

- Potential noise amplification due to building shape (C-shaped rear façade).
- Commercial units and community events may generate late-night or early-morning disruption.

Officer response:

- *These concerns were addressed in the original Noise Impact Assessment and will be further managed through conditions and planning obligations, including Construction and Student Management Plans. Commercial uses are low-intensity offices not bars or nightclubs. Policy-compliant restrictions on hours and plant noise emissions ensure compliance with BS4142, and the development will meet Camden's noise limits.*

Impact on Residential Amenity (5 mentions)

- Concerns over privacy loss from proposed overlooking balconies and rear-facing windows.
- Transient student population may undermine community cohesion and increase anti-social behaviour.
- Reduction in quality of life from the extended construction period.

Officer response:

- *Privacy impacts have been assessed and are considered acceptable due to window orientation, separation distances, and boundary treatments. The Student Management Plan secures operational measures to minimise anti-social behaviour and maintain residential amenity (Section 11 and 22 of the committee report). No evidence indicates the student use would cause harmful disruption*

Need and Mix of Housing (4 mentions)

- Questioning of demand for student accommodation amid falling higher education numbers.
- Greater need for social and affordable housing in Camden.
- Fears over future conversion of student units to short-term lets (e.g. Airbnb).

Officer response:

- *There is demand for student accommodation. The student units will be secured via a legal agreement to be used solely for bona fide students, with short-term lets (e.g. Airbnb) prohibited. The scheme enables delivery of 27 affordable homes alongside the PBSA, maximising site capacity (Section 8 and 9 of the report)*

Traffic, Access and Road Safety (3 mentions)

- Lorry routing appears erroneous (reference to Chalk Farm Road).
- Congestion and safety concerns around Arlington Road and local schools.
- Construction traffic impact on existing residential and school zones.

Officer response

- *Construction will be managed via a Construction Management Plan and Logistics Plan, including a construction working group. No construction routes pass through school zones. Final logistics will be conditioned and agreed in consultation with Camden Highways (Section 16 and 20 of the report)*

Commercial Uses (4 mentions)

- Doubts over viability of new commercial units due to low footfall in Jamestown Road.
- Risk of disruption from deliveries and inappropriate uses like bars or nightclubs.
- Suggestion to restrict commercial use to the eastern end near existing pub.

Officer response:

- *The Class E unit is likely to be used for office/workspace. The unit is located near existing commercial activity and frontages, where any adverse effects are unlikely.*

Environmental and Sustainability Issues (3 mentions)

- Inadequate exploration of sustainable energy options (e.g. ground source heat pumps).
- Concerns over air pollution, drainage, and noise from rooftop plant.
- Lack of meaningful environmental impact reassessment in revised plans.

Officer response:

- *The revised scheme remains policy-compliant and has been reviewed against Camden and London Plan sustainability requirements. Plant noise and emissions are mitigated, and the Energy Statement confirms 60.7% on-site carbon reduction. Green roofs, biodiversity measures and air quality neutrality are all secured by condition (see Sections 13, 14 and 15)*

Construction Impacts (4 mentions)

- Long construction period expected to cause sustained disturbance.
- Unclear mitigation of noise, access, congestion, and air quality impacts.
- Requests for asset protection for properties adjacent to excavation zones.

Officer response:

- *All construction impacts will be controlled via the CMP, with real-time dust and noise monitoring required. Camden's standard protections will apply, and basement construction has been assessed through a Basement Impact Assessment. Neighbouring structures will be safeguarded under building regulations and party wall procedures (Section 20 of the report)*

4.40 **Objections to original consultation:**

Height of the building (23 of the objections raised this)

- The proposed height (6-8 storeys) is significantly higher than the surrounding buildings, especially out of character with the existing residential structures along Jamestown Road and Arlington Road. The massing diagrams show a significant increase in built development within the urban block. The application proposes a new build development with a significantly different character from the existing site.
- Concerns about overshadowing, loss of light, and detrimental visual impact on the local architecture and nearby listed buildings.
- The Heritage, Townscape and Visual Statement identified several townscape character areas, but the identification was incorrect and based on conservation areas rather than the actual townscape. The Jamestown Road Townscape Character Area should be split into separate areas, "A" and "B", with different characters. The area "A" has a Victorian character with a fine grain of residential development, while area "B" is of a larger scale with modern buildings.
- The HVIS did not correctly assess the heritage baseline, including the significance of a grade II listed former Piano Factory.
- The scoping of heritage assets was not robust, and the Zone of Theoretical Visibility (ZTV) was not used to identify potential impacts.
- The proposals would differ greatly from the surrounding area, which has a fine grain of development. The developments identified in the DAS as part of the local emerging context are to the north of the site and on the opposite side of the Regents Canal.

Officer response:

- *Since the November 2024 submission, the applicant team have decided to reduce the height of the proposed student accommodation building by one full storey. Still, the proposal involves a significant change to the site, but that level of change is considered appropriate for the townscape context. Given the broader townscape context and capacity, the scale of change does not automatically result in an adverse impact. The extent of the proposal's visibility does not translate to a harmful effect. Change that is 'noticeable' to the setting does not necessarily imply harm. To illustrate that special attention has been given to the relevant statutory duties, the proposal has undergone extensive and iterative pre-application consultation and engagement. This included testing various massing options for the site, which was informed by an understanding of built heritage, townscape, and visual considerations.*
- *The potential for some overshadowing of heritage assets is not considered harmful to their significance.*
- *There is no prescribed methodology for identifying townscape character areas. Conservation areas are, by definition, special areas of townscape and/or landscape character, and it is appropriate that they can form discrete townscape character areas.*
- *The ZTV shows intervisibility with the proposal outside of the 250m study area. Given the extensive separating distances and the established urban context, the degree of change experienced within these views will be limited. The viewpoints were chosen to be representative, reflecting the areas of greatest likely change within the townscape. They agreed with officers through the pre-application process, reflecting the proportionate approach recommended by guidance.*
- *Some adverse visual effects were identified within a wider context of mainly none or neutral visual impacts. The proposed development can have some slight adverse visual impacts whilst overall positively affecting townscape character. A complete analysis of impact on heritage assets is made within Section 12 Heritage of this report.*

<u>Design and Character (Objections: 18)</u>

- The design, featuring solid vertical flat facades, is criticized for not being in line with the mixed architectural character of the area, failing to complement the existing historical context.
- The proposed development is seen as creating an oppressive environment, with a disconnect from the local aesthetic.

Officer response:

- *Many objections relate to the overall bulk and height of the proposal. However, the proposal successfully optimises a vacant, brownfield site through a design-led approach to providing high-quality, purpose-built*

student accommodation, affordable housing, and flexible commercial space.

- *The proposal is not considered to create an oppressive environment at street level, and officers believe the ground floor has been activated as far as possible to provide visual interest*

Loss of Light and Privacy (Objections: 14)

- Objections point out that the new buildings will significantly reduce natural light for existing homes, transforming the area into a "non-sunlit chasm."
- Two objections highlight that the proposal's environmental assessment does not adequately consider how the new development will affect natural light in the surrounding area.
- Residents express concerns that the proposed buildings' height and bulk will not only overshadow their properties but could fundamentally change the light quality in the neighbourhood, impacting the health and well-being of current residents.
- Concerns about diminished privacy for adjacent residential properties due to the heights and proximity of the new development

Officer response:

- *The submitted Daylight and Sunlight Assessment assess the impacts to 22 properties. The assessment acknowledges some impacts to neighbouring properties that are over the BRE Guidelines, and these impacts are discussed in more detail and justified in Section 11 of this report, Impact on Neighbouring Amenity.*
- *The Daylight and Sunlight Report is prepared separately from the environmental impact scoping report.*
- *Since the November 2024 submission, the applicant team have decided to reduce the height of the proposed student accommodation building. As set out in the Daylight and Sunlight Addendum letter (dated 19 March 2025), the proposed changes are unlikely to have a material difference in impact, with some properties to the south, southeast and southwest likely to see an improvement to the daylight and sunlight impact on neighbouring properties. Overall, the daylight/sunlight impacts are not considered to be materially different to the original scheme.*

Impact on Student Accommodation (Objections: 11)

- Questions were raised about the necessity of the proposed student accommodations given the declining student numbers.
- Concerns regarding the balance of housing types, emphasizing a need for more affordable social housing instead of purpose-built student accommodation.

Officer response:

- *Local and regional planning policy acknowledges that there is a need for student housing and it is supported by policy.*
- *The proposed student accommodation has an important economic relationship to the delivery of traditional affordable homes on site.*

Traffic, Road Safety and Construction impact (Objections: 10)

- Potential for increased traffic congestion due to construction and after, as new residents move in, which could hinder the area's emergency access and general traffic flow. Lack of parking provisions leading to competition for already limited street parking spaces.
- Four residents mention that the assessment does not fully address how the influx of residents (particularly students) would strain existing local traffic systems, potentially leading to congestion and safety risks.

Officer response:

- *The impacts of construction are recognised. The applicant is committed to preparing a demolition management plan and construction management plan, including a construction working group to liaise with neighbours. The draft Construction Logistics Plan submitted with the application sets out how the applicant intends to construct the development and manage construction during the process. Ultimately, the final measures would be expected to be controlled by a section 106 legal agreement. All matters relating to construction impacts can be appropriately controlled via these mechanisms.*
- *The proposal will be car-free, with any disabled parking needs to be secured by a commuted sum for Camden to deliver on-street in case a need arises from users of the development. There are no direct transport impacts from the proposal that are not mitigated by way of the proposed measures, nor are any of the financial contributions sought by Camden in line with the Transport CPG. There is nothing to suggest that there would be more visitors driving to and parking at the site over and above any other car users outside the Controlled Parking Zone hours.*

Noise and Disturbance (Objections: 10)

- Anticipation of significant disturbance during construction and noise pollution from plant equipment and increased resident activity that may affect current residents' quality of life. Three objections state that the documentation lacks a comprehensive analysis of noise pollution during the construction and post-construction phases.
- Concerns about the suitability of ground-floor commercial units contributing to late-night noise.

Officer response:

- *In line with Policy A1 (Managing the impact of development) of the Camden Local Plan, the applicant has submitted a Noise Impact Assessment that addresses both the construction and operational phases. A Construction Management Plan (CMP) will be secured by planning obligation to minimise disruption, including controls on hours of work, vehicle routing, and noise mitigation measures during construction. Plant noise will be required to comply with Camden's strict noise limits, and condition 33 (Noise levels) will ensure compliance with BS4142 standards to protect neighbouring amenity. The student accommodation will require Studenent Management Plans to manage resident activity and servicing.*
- *The commercial unit is likely to be used as an office and is unlikely to cause noise and disturbance issues. However, the flexible commercial space could be used as a restaurant or other commercial use but this would be acceptable in terms of amenity, given its ground floor location.*

Air quality

- Some objections indicate that the environmental impact assessment overlooks potential air quality issues that may arise from increased vehicular traffic associated with the development. Residents are concerned that more vehicles will lead to higher emissions and air pollution, further degrading local air quality.

Officer response:

- *Development uses air source heat pumps, so they have no combustion for heating and are car-free. Therefore, they are considered air quality neutral. The air quality in the area is considered suitable for the proposed uses of the site. The air quality monitoring on the road and near the site indicates that NO2 levels were 21.1µg/m3 in 2023, well below the 38µg/m3 at which further mitigation should be considered. The construction dust risk is assessed as Medium without mitigation. Therefore, real-time dust monitoring with two monitors is required, and the system is secured under condition 3, and appropriate mitigation measures should be secured through the CMP.*

Inaccurate Drawings (Objections: 6)

- Claims that the existing site drawings omit critical features such as the entrance to nearby buildings (e.g., the Glass Building), complicating construction logistics and access.

Officer response:

- *The drawings show the development and neighbouring context with sufficient accuracy and quality. The drawings meet the Council's Local Area requirements.*

Access for People with Disabilities (Objections: 4)

- Criticises the absence of parking provisions for people with disabilities in student accommodation and social housing.

Officer response:

- *A S106 obligation secures an off-site contribution of £4,000 for a disabled parking space.*

Learning from the Grenfell Inquiry (Objections: 5)

- Serious concerns regarding building safety in line with lessons learned from past fire tragedies, notably regarding emergency access and evacuation procedures.

Officer response:

- *Since the application was submitted, the applicant has taken the decision to reduce the height of the building to change it being categorised as a "high risk building" for the Building Safety Act. To avoid doubt, the submitted proposals did not cause a fire safety risk, and this decision has been taken entirely at the applicant's discretion. The original application was reviewed by the Health and Safety Executive who concluded that fire safety had been sufficiently considered in the submission. The revised development proposals have been designed to the highest standards of fire safety, as outlined in the revised submitted documents including the Design and Access Statement Addendum, and Fire Statement Addendum.*

Absence of Community Engagement:

- Some residents feel the environmental consultation process lacks transparency, asserting that residents' voices and concerns were not considered adequately in the environmental assessments. They believe a more collaborative approach would have yielded a more thorough evaluation of potential environmental impacts.

Officer response:

- *See paragraph 4.21 Developer Consultation below. While pre-application consultation is encouraged rather than mandatory, officers note that the applicant undertook community engagement as outlined in the Statement*

of Community Involvement, which is consistent with Camden Local Plan Policy A1 (Managing the impact of development). The planning application process provides a formal opportunity for community input, and all representations received have been considered in the application assessment. Officers and relevant statutory consultees have reviewed the environmental assessments to ensure they meet required standards.

Concerns Regarding Infrastructure Resilience:

- Objections mention the need for further examination of how the area's infrastructure (roads, drainage systems, etc.) will cope with the increased population density once the new development is in place. Residents raise concerns that existing systems may not handle the additional load, leading to potential flooding or service disruptions.

Officer response:

- *Infrastructure capacity, including drainage, transport, and services, has been considered. The development includes a Drainage Strategy to manage surface water in accordance with Sustainable Drainage Systems (SuDS) principles. Camden's Highways and Flooding teams, along with external consultees where relevant, have reviewed the proposals and raised no objections, subject to appropriate conditions and monitoring. Contributions secured through the Community Infrastructure Levy (CIL) will also help support local infrastructure improvements.*

Questions About Sustainability Practices:

- Comments emphasize a lack of sustainable practices integrated into the development plans. Residents express disappointment that the proposal does not robustly address sustainability principles, including renewable energy utilization, green space provisions, or waste management strategies, which could effectively mitigate environmental impacts.

Officer response:

- *The scheme incorporates high energy efficiency standards, green roofs, low-carbon technologies, and biodiversity measures. A Sustainability and Energy Statement has been submitted and reviewed, and conditions and planning obligations will secure the delivery of key measures including carbon reduction savings, renewable energy use (Be Green savings), and energy monitoring. Officers are satisfied that the proposal aligns with the Camden Local Plan's environmental and climate polices. See Section 13, Sustainability and Energy, for a full response.*

Developer-led consultation

4.41 The developer has submitted a Statement of Community Involvement with the application that sets out the engagement they have undertaken throughout the planning process.

4.42 The developer and their Design Team have engaged on the proposals since March 2024 with the London Borough of Camden and the Metropolitan Police Designing Out Crime Officer. The proposals were scrutinised twice: on 10 May 2024 and 26 July 2024 at the Camden Design Review Panel.

4.43 The proposals were subject to public consultation in May and July 2024. Camden held a Development Management Forum on 17 July 2024.

5. POLICY

National and regional policy and guidance

National Planning Policy Framework 2024 (NPPF)
National Planning Practice Guidance (NPPG)

London Plan 2021 (LP)

GG1 Building strong and inclusive communities
GG2 Making the best use of land
GG3 Creating a healthy city
GG4 Delivering the homes Londoners need
GG5 Growing a good economy
GG6 Increasing efficiency and resilience
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
D10 Basement development
D11 Safety, security and resilience to emergency
D12 Fire safety
D13 Agent of Change
D14 Noise
H1 Increasing housing supply
H4 Delivering affordable housing
H5 Threshold approach to applications
H6 Affordable housing tenure
H7 Monitoring of affordable housing
H10 Housing size mix
H15 Purpose-built student accommodation
H16 Large-scale purpose-built shared living
S1 Developing London's social infrastructure
S4 Play and informal recreation

E1 Offices
E2 Providing suitable business space
E3 Affordable workspace
E11 Skills and opportunities for all
HC1 Heritage conservation and growth
HC3 Strategic and Local Views
HC4 London View Management Framework
HC7 Protecting public houses
G4 Open space
G5 Urban greening
G6 Biodiversity and access to nature
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 5 Water infrastructure
SI 7 Reducing waste and supporting the circular economy
SI 8 Waste capacity and net waste self-sufficiency
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
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
Small Site Design Codes LPG
Housing Design Standards LPG
Large-scale purpose-built shared living LPG
Affordable Housing and Viability SPG
Housing SPG
Play and Informal Recreation SPG
London View Management Framework 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

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth
Policy H1 Maximising housing supply
Policy H4 Maximising the supply of affordable housing
Policy H6 Housing choice and mix
Policy H7 Large and small homes
Policy H9 Student housing
Policy C1 Health and wellbeing
Policy C4 Public houses
Policy C5 Safety and security
Policy C6 Access for all
Policy E1 Economic development
Policy E2 Employment premises and sites
Policy A1 Managing the impact of development
Policy A2 Open space
Policy A3 Biodiversity
Policy A4 Noise and vibration
Policy A5 Basements
Policy D1 Design
Policy D2 Heritage
Policy 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 TC3 Shops outside of centres
Policy TC4 Town centre uses
Policy T1 Prioritising walking, cycling and public transport
Policy T2 Parking and car-free development
Policy T3 Transport infrastructure
Policy T4 Sustainable movement of goods and materials
Policy DM1 Delivery and monitoring

Camden Site Allocations 2013

The adopted Site Allocations (2013) does not allocate the site.

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
Design - January 2021
Developer Contribution CPG - March 2019
Employment sites and business premises - January 2021
Energy efficiency and adaptation - January 2021
Housing - January 2021
Planning for health and wellbeing - January 2021
Public open space - January 2021
Student housing CPG - March 2019
Transport - January 2021
Trees CPG - March 2019
Water and flooding CPG - March 2019

Other guidance:

Planning Statement - Intermediate Housing Strategy and First Homes (2022)
Regent's Canal, adopted September 2008
Primrose Hill, adopted 2000
Camden Town, adopted October 2007

Draft Camden Local Plan

The council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). The Camden Local Plan Proposed Submission Draft is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026). The consultation on the Proposed Submission DCLP closes on the 27 June 2025.

DCLP Draft Site Allocation – C19 - Arlington Road former depot site

The DCLP identifies the site as a draft site allocation. It is allocated for the employment and self-contained homes. The indicative capacity in the draft allocation is 63 additional homes. It says any purpose-built student accommodation on the site should be in compliance with DCLP policy H9.

6. ASSESSMENT

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

7	**Land use**
8	**Affordable Housing and Viability**
9	**Housing mix**

10	**Quality of housing**
11	**Impact on amenity**
12	**Heritage**
13	**Design**
14	**Sustainability and Energy**
15	**Air Quality**
16	**Transport**
17	**Public Open Space**
18	**Trees, Greening and Biodiversity**
19	**Health**
20	**Basement**
21	**Contaminated Land**
22	**Employment and Training Opportunities**
23	**Fire**
24	**Community Infrastructure Levy**
25	**Conclusion**

7. LAND USE

Loss of office and depot use

7.1 CLP policy E1 aims to safeguard employment sites and maintain a stock of premises suitable for various business activities. CLP Policy E2 is clear the council will resist loss of a business use to a non-business use unless it has been explored whether there is possibility for that use to continue. The council considers the suitability of the location for business use, whether the premises are in a reasonable condition to allow the use to continue, the range of unit sizes, and whether the business use is well related to nearby land uses (supporting text para. 5.37). Where a change of use to a non-business use is proposed, the applicant needs to demonstrate there is no realistic prospect of demand to use the site for an employment use by submitting evidence of a marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, including a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third-party providers (supporting text para. 5.39).

7.2 The previous uses on site were bespoke for a specific Council function and used as a waste vehicle depot. It is noted that the use is more akin to a

storage or light industrial use than conventional commercial or office Class E(g)(i). Paragraph 5.5 of the Local Plan states that 'business' and 'employment' are used refer to the following uses:

- offices, research and development and light industry (formally Use Class B1, now Class E);
- general industrial uses (Use Class B2);
- storage and distribution (warehousing) (Use Class B8); and
- other unclassified uses of similar nature to those above, such as depots or building merchants (classed as Sui Generis).

7.3 In this case, Camden's Environmental Services team last used the site as a depot for waste vehicles and office space, which were relocated to Regis Road in 2021. As the specific depot function has been relocated elsewhere in the borough and the site is now vacant, the use does not need specific protection.

7.4 The site was acquired by the owners in 2022 when the Council disposed of the asset following re-provision in another part of the borough. The council marketed it for 6 months before the current owner acquired it. Since then, it has not been actively marketed for employment use. It has been vacant for over 18 months and was never formally part of the active office market, given its continued use for Council services as a Council's own asset. It has not ever been marketed for new commercial purposes on the open market.

7.5 The buildings are of poor quality and unsuitable for modern office working practices. The site is not within a town centre, the Central Activities Zone, or a Growth Area where significant business/office growth is targeted. It has been vacant since early 2022 and the former uses re-provided elsewhere.

7.6 Only one of the existing buildings has an Energy Performance Certificate ("EPC") with a rating of E, which expires in 2027. The building at 211 Arlington Road does not have an EPC rating. From 2030, new Minimum Energy Efficiency Standards are expected to require all commercial lettings to have a rating of EPC B or higher. The current standard is an "E" rating or better. While building C could be re-let based on its current EPC, this would likely only be for a very short period before significant investment and upgrading to make it lettable by 2030.

7.7 The building is not lettable at present. The office space is unmarketable in its present condition and would need a significant investment to market it and let it continue as a commercial space. These works would come at a significant cost and result in a non-commensurate investment return, and therefore, they would likely be unviable.

7.8 The applicant discounted the potential for new or re-provided employment floorspace as part of a wider site redevelopment. Initial headline values

indicate that commercial office rents for new-build employment floorspace in this location would not generate viable development.

7.9 The substantial retrofit exercise that would need to take place to bring the building up to standard (leaving aside questions of viability or effective use of land) is discussed in more detail in the Energy & Sustainability section of the report. The Design and Access Statement sets out the rationale for a design-led approach for an office-led redevelopment proposal. This exercise found that shallow floor plate depths would be proposed at around 8-15m, and the irregular footprint layout responds to the site's irregular shape. It is considered that this would create highly inefficient floor plates for commercial use.

7.10 Notwithstanding the loss of floorspace, the proposal includes flexible commercial (Class E) floor space at ground and basement level, totalling 339 sqm GIA. This space is envisaged to serve a function related to the students using the accommodation—potentially in partnership with a university. As such, whilst there would be a reduction in employment floorspace on the site, there would be some reprovision in the new development.

7.11 As per paragraph 54 of the Employment Sites and Business Premises CPG, in these circumstances, where the loss of employment use can be expected to result in a reduction of potential job opportunities for Camden residents, the Council will seek a contribution from developers towards measures which create or promote opportunities for employment or training of local people. A contribution will only be sought in cases where the net loss of employment space is 500 sqm (GIA) or more. These monies will be held by the Council and used to support activities that create or promote opportunities for employment or training, which could include providing affordable employment space in the borough.

7.12 The calculation of the appropriate contribution will take account of the proposed alternative use of the floorspace and whether this use can be expected to create employment or training opportunities for Camden residents.

7.13 Space of 15sqm per worker is considered appropriate given the previous depot use on the site. Net full-time jobs lost (in this case, the no. of full-time jobs expected if use continues): 1,834 sqm / 15 sqm = - 122 FT jobs lost (floorspace / average space per worker).

7.14 No. of jobs lost, which would be expected to be filled by Camden residents: - 122 x 21% = 26 Camden jobs (FT jobs lost x 21%)

7.15 Cost of retraining and supporting a number of Camden residents who would be expected to be employed in the former use: 26 x £3,995 = £103,870 (Number of jobs lost which would be expected to be filled by Camden

residents multiplied by retraining costs). This **£103,870 payment for loss of employment space would be secured by s106 agreement**.

7.16 The reduction in employment floorspace on site is justified in accordance with policy E2 of the Local Plan. As well as retaining an element of employment floorspace, the student accommodation will also provide employment opportunities. Reprovision of the council depot uses off-site, together with re-provision of employment uses on-site with a payment to mitigate shortfall, accords with the objectives of the policy and the development plan.

Draft site allocation uses – C19

7.17 The Draft Site Allocation C19 – Arlington Road former depot site proposes the following land uses: Employment and permanent self-contained homes. There is an indicative capacity of 63 additional homes.

7.18 Whilst the draft allocation has limited weight at this stage, the proposal would offer a mix of uses, including self-contained affordable C3 homes and commercial floorspace, aligning with this site's proposed ambitions in emerging policy.

7.19 The proposal would provide 27 self-contained Class C3 homes, and 178 student studios, significantly contributing to the area's housing provision. The student provision allows for a greater proportion of affordable housing to be delivered because of the improved viability.

7.20 As a result, the proposal performs very well against the draft allocation's indicative capacity of 63 homes, exceeding expectations and making an efficient use of the land.

7.21 However, the draft allocation also expects the re-provision of the employment floorspace, reflected in the lower indicative housing capacity. Although some commercial floorspace is re-provided, along with the employment associated with the student housing, it falls short of full re-provision. The trade-off to achieve the high level of housing on the site is less re-provision of the commercial employment (formerly office and depot use) floorspace. The loss of employment office use is covered in detail above.

7.22 Overall, the proposal reflects the emerging policies in the DCLP's site allocation, albeit with a shift in emphasis from employment to housing. This helps with increased housing provision for the borough and its performance in terms of meeting housing targets.

Proposed PBSA (Sui generis)

7.23 The proposal's predominant residential use is Purpose-Built Student Accommodation (PBSA), which consists of 178 private studio rooms and

communal ancillary student facilities. The London Plan defines PBSA as housing dedicated, at least in term time, to full-time students.

7.24 London Plan Policy H15 requires boroughs to ensure that local and strategic needs for purpose-built student accommodation are addressed and that they contribute to a mixed and inclusive neighbourhood. It shows an established need for 3,500 bed spaces annually over the London Plan period (2021-2031) (equating to 35,000 bed spaces over the plan period). It encourages boroughs to develop student accommodation in locations well-connected to local services through walking, cycling, and public transport as part of mixed-use regeneration schemes.

7.25 The London Plan recognises that London's higher education providers make a significant contribution to London's economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, whether in Purpose Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not separate or in addition to this need. In recognition of the housing need met by student accommodation, its development contributes towards the Borough's Housing Delivery Test.

7.26 At a local level, policy H9 of the CLP seeks a supply of student housing to meet or exceed Camden's target of 160 additional places per year and will support the development of student housing subject to several criteria, provided below together with a brief assessment of how the proposal performs:

a. will not involve the net loss of 2 or more self-contained homes;

There is no loss of self-contained homes.

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

As set out above, the proposal would contribute homes to LB Camden's housing targets, allows it to do so at a higher density due to the smaller units sizes, and will be provided alongside 27 affordable self-contained homes.

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

There is no current planning permission for self-contained housing on the site. The draft site allocation is not yet an adopted development plan

document and has limited weight. That said, the draft allocation has an aspiration for 63 additional homes. While 27 C3 homes are provided on site, which falls short of this objective, officers note that a higher proportion of affordable housing is provided as it is cross-subsidised by the more viable student housing. Furthermore, the draft allocation acknowledges the potential for PBSA to deliver housing on the site and references the requirements of policy H9 (student housing).

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

The proposals meet the appropriate standards.

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

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

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

The proposal only provides private and larger private studios incorporating the DDA Accessible rooms. This is considered acceptable given the spatial constraints of the site. Larger clusters were proposed as part of an earlier iteration of the scheme but contributed to the building appearing as too bulky and dominant within local views.

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

The application offers a hybrid model in meeting affordable housing, as on-site housing is provided in the form of on-site residential and a top-up payment to the Council's affordable housing fund. As such the student bedrooms do not require a nomination agreement to be secured as affordable housing.

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

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

i. contributes to creating a mixed, inclusive and sustainable community; and

j. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity

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

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

7.27 Policy H9 of the DCLP reaffirms the current Local Plan policy and recognises that purpose-built student accommodation can help to limit additional pressure on the wider private rented market, releasing it for more general needs housing. It notes that the interest in developing student accommodation in the borough appears to have diminished since the adoption of the previous Camden Local Plan, as indicated by several planning consents failing to progress on site.

7.28 The supporting text of CLP policy H9 (para 3.262) recognises there are often concerns around student housing by the established local community, such as noise disturbance and community cohesion. CPG Student Housing requires a draft Student Management Plan (SMP) to be submitted with any proposal for student housing. This is to ensure the health and wellbeing of students but also to mitigate the potential impact of the development on neighbours and the local area.

7.29 A draft plan has been prepared by Homes for Students, an established student management company. The plan covers the proposed approach to travel and deliveries, the safety and security of students, and day-to-day management processes, including pastoral care and welfare, anti-social behaviour, operations and maintenance. Regarding security, the plan sets out that students would be educated on safety and security matters at the move-in stage. The scheme would include comprehensive CCTV installation and a security presence on site. A controlled electronic entry system will operate to individual blocks and communal areas.

7.30 Once the accommodation provider is on board, the s106 agreement will secure a full, more detailed, and bespoke Student Management Plan. To align with Agent of Change principles, it will include provision for prospective students' contracts to include the adjacent Public House as a noise-generating use and fully use the building's soundproofing measures. The

submitted acoustic report assesses noise from the adjacent licensed premises and subsequent Agent of Change implications.

7.31 The applicant intends that the accommodation will be used outside of term time. This accords with *CPG Student Housing* and *LPG Purpose-built Student Accommodation*, which recognises how temporary use of otherwise empty accommodation ensures blocks remain active throughout the year and helps to keep costs down for students. The CPG sets out that the Council will use a Non-student Management Plan planning obligation to secure the nature of alternative use, ensure that it does not disrupt occupation by students who wish to let their place for the entire academic year; and that the duration of non-student lettings should be for no more than 14 weeks in any academic year.

Proposed self-contained residential (Use Class C3)

7.32 The proposed 27 homes with a floorspace of 2,905 sqm is strongly supported under CLP policy H1. All homes would be affordable, split across social-affordable rent (62.4%) and intermediate rent tenures (37.6%) based of NIA. Given the hybrid approach, affordable housing will be assessed together with the affordable student accommodation in the 'Affordable housing' section of the report. Standard of accommodation, housing mix and accessibility are discussed in the relevant sections of the report.

7.33 London Plan Policy H1 and Table 4.1, set a 10-year housing target for Camden of 10,380 additional homes from 2019/20 to 2028/29 or 1,038 per year for the 10 years.

7.34 The Housing Delivery Test (HDT) is an annual measurement of housing completions introduced by the government. It measures whether development plan requirements (or, in some cases, local housing need calculated by the government's standard method) have been met over the last 3 years. The government's most recently published figure is for 2023, when the government's measurement for Camden was 53% - which means that Camden's development plan policies are treated as being out-of-date in relation to housing provision.

7.35 The presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and great weight should be given to the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.

7.36 The proposed 27 new affordable homes and 178 student studios, within a sustainable location, would contribute towards the strategic objectives of the development plan and contribute to the borough's housing supply. This housing provision complies with the development plan and the NPPF in land-use terms, and has been given significant weight.

Proposed Commercial (Use Class E)

7.37 Commercial (Class E) floor space is provided at ground and basement level, totalling 339 sqm GIA. Use Class E is a diverse and flexible use class encompassing a range of commercial, high street, and employment uses. It is envisaged that this would serve a function related to the students using the accommodation—potentially in partnership with a university. The space is dual aspect with views to the street and rear courtyard. It has access to the central shared student courtyard with a dedicated outdoor amenity. Internally, it is designed to operate independently from the student accommodation building; however, it is connected to the PBSA entrance space via a double door at ground level. This allows flexibility to be used independently of, or in association with, the student accommodation.

7.38 An atrium space and lightwell provide natural light from the south glazed façade into the basement. A stair and lift connect both levels providing accessible floorspace. Space is identified for WCs, 6 cycle spaces, and an accessible shower room at the basement level.

7.39 The commercial use would also re-provide an element of the previous employment use on site, which is welcomed.

Figure 4. Ground floor plan with workspace in brown to the left of the floorplate

Agent of change and impact of uses

7.40 The development plan and NPPF all highlight the importance of the Agent of Change principle, ensuring that new uses introduced in the area do not result in unreasonable restrictions on existing uses. The most notable potential impact in this case is on the Cushla public house at 31 Jamestown Road.

7.41 The London Plan categorises Camden Town (directly adjacent to the site) as a Major Town Centre with an NT1 night-time economy classification (Ref 23 in Table A1,1 of the London Plan). This means it is of international or national

significance. Local Plan policy C4 (Public Houses) seeks to protect public houses that are of community, heritage, or townscape value. The policy focuses on the change of use or redevelopment of public houses; however, the strategic objective of retaining public houses is relevant to this development.

7.42 The proposed residential uses—both the affordable housing and the PBSA—will be a new noise-sensitive development right next to the Cushla public house and other Camden Town Centre uses, which include night-time uses.

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

Land use conclusion

7.44 The proposal would provide much-needed affordable housing and student accommodation, for which there is an identified need. The proposed new homes and student accommodation, within a sustainable location on brownfield land, would contribute to the strategic objectives of the development plan and the borough's housing supply. This housing provision complies with the development plan and the NPPF in land-use terms and has been given significant weight.

7.45 The impact on employment capacity in the area resulting from the loss of office and depot is further mitigated by the provision of a reduced quantum of high-quality commercial space within the proposal, and a financial contribution of £103,870 towards measures which create or promote opportunities for employment or training of local people. The scheme would carefully manage the relationship with surrounding night-time uses, and so the land uses are supported and in line with the development plan as a whole.

8. AFFORDABLE HOUSING AND VIABILITY

Affordable housing requirements

8.1 London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. Similarly, Policy H4 of the Camden Local Plan aims to maximise affordable housing in developments to meet the needs of households unable to access market housing.

8.2 Policy H5 of the London Plan then sets out the threshold approach for major development proposals, which is 35% and 50% for public sector land (as is

the case here). These thresholds determine whether an application can follow the “fast track route”. Policy H15 of the London Plan says to provide greater certainty, speed up the planning process, and increase the delivery of affordable student accommodation, the 35% threshold, or 50% where the development is on public land (as in this case) threshold, applies for PBSA schemes to take advantage of the Fast Track Route.

8.3 The London Plan indicates that the percentage of affordable housing should be measured based on habitable rooms, unless the average size of habitable rooms is not comparable for market and affordable elements. For developments in Camden, the Council will continue to assess the percentage of affordable housing and the mix of affordable housing types based on floorspace. It will only consider assessments based on habitable rooms in relation to strategic developments that must be referred to the Mayor prior to decision-making under the provisions of the Town and Country Planning (Mayor of London) Order 2008 (as amended). This application is not referable to the Mayor prior to decision-making. Still, the London Plan threshold approach of 50% affordable housing on public land is the same as the Local Plan H4 50% target.

8.4 The Council considers that additional designated student housing can help limit pressure on the wider private rented market. Still, the rooms must be available at a competitive rate with the wider market. Policy H9 aims to ensure that student housing is available at a cost that meets the needs of students from various backgrounds.

Affordable student accommodation

8.5 Criteria (g) of Policy H9 states that student housing developments should have an undertaking in place to provide housing for students at one or more specific education institutions or otherwise provide a range of accommodation that is affordable to the student body.

8.6 Where a proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body in accordance with criterion (g), the Council will expect the development to provide an appropriate amount of affordable housing for general needs, having regard to Policy H4, Maximising the supply of affordable housing.

8.7 The applicant is not providing any of the student bedrooms as Affordable Student Accommodation. The student accommodation would not have an undertaking to provide housing for students at one or more specific educational institutions. Still, the s106 would ensure that all occupants of the PBSA must attend a higher education institution within Camden or adjoining boroughs.

8.8 The applicant's approach is to provide on-site affordable self-contained residential housing (Class C3) and a top-up payment in lieu of affordable

housing for general needs under policy H4. The Mayor's PBSA LPG sets out under para 2.5.3 that while PBSA need should be addressed in line with policy H15, the inclusion of conventional (Class C3) housing on larger sites, may nonetheless be acceptable and even desirable as part of pursuing mixed and inclusive neighbourhood objectives and may be particularly relevant where C3 housing delivery is relatively poor.

8.9 Given the Borough's need for self-contained housing, and particularly affordable housing, officers welcome the proposed approach which provides on-site affordable self-contained homes with an additional viability-tested PiL to meet the affordable housing floorspace target. This is based on the maximum viable amount with the policy target of 50% per Local Plan Policy H4 (equivalent to London Plan policies H15 and H5).

Affordable self-contained homes

8.10 The 27 affordable homes include 16 homes (59.26%) for social-affordable rent and 11 homes (40.74%) for intermediate rent, based on NIA. Three wheelchair-accessible homes are provided in the social-affordable rent tenure. This closely aligns to the preferred tenure split for affordable homes in the development plan of 60% social-affordable and 40% intermediate rent.

8.11 The NPPF stipulates that a Registered Provider (RP) should manage affordable housing for rent and remain affordable for future eligible households. The Council has agreed an Approved Strategic Partner List and requires affordable housing to be transferred to a partner on the list. CPG Housing recommends that developers involve a provider from the earliest stages of housing design to ensure the homes meet the requirements. A s106 agreement will be used to ensure that the developer will select a housing provider from the approved list (and will be subject to the Council's written approval) and that occupation of market homes (in this case, the student housing) will not take place until the affordable homes have been transferred to the provider.

8.12 The developer has not yet selected an affordable housing partner but have had interest from three RPs, only one of which (Sovereign Network Group) is currently on the Council's approved list of housing providers. The s106 will stipulate the need for the Registered Provider to be on the Council's approved list.

Assessment of capacity and the top up PiL

8.13 Officers have used the assessment of capacity and the sliding scale to determine the affordable housing percentage target. The proposed 27 homes have a floorspace of 2,905 sqm and the PBSA has a floor area of 5,945.70 sqm, resulting in a total GIA of 9,130.50 sqm.

8.14 The on-site 50% target floor space is 4,565 sqm. The proposal provides 33% (2,905.40 sqm) of the 50% on-site requirement. Therefore, there is a 17% floorspace shortfall (1,520 sqm) in the 50% policy target. This is equivalent to a payment in lieu of £7,600,750.

Additional residential floorspace (GIA sqm)	Affordable housing floorspace target	Shortfall in floorspace target	Payment in lieu required
8,851.10	4,425 sqm (50% of total housing)	4,425 sqm - 2,905 sqm (on-site provision) = 1,520 sqm	1,520 sqm x £5,000 = £7,600,750

Table 3. Affordable housing target and target PiL

8.15 The applicant pointed out that including deck access and ground floor entrance for affordable residential as part of the GIA would result in a higher percentage of on-site affordable provision and lower top-up payment. These parts are not in the building envelope in the GIA, and using GIA for the floorspace target is a defined methodology. The difference with the deck access and common parts at ground level, included as part of the affordable GIA is only provided for comparison with the above calculation. The deck access (shown below under Figures 4-6) totals 279.4 sqm.

- Total housing (PBSA + C3) GIA - 9,130.5 sqm
- Of which C3 is 3,184.8 sqm inc deck = 35%
- 50% affordable target = 4,565.25 sqm
- Affordable housing shortfall = 1,380.45 sqm (15%)
- Top-up PiL with £5,000 psm = £6,902,250

Figure 4. Ground floor 64.7 sqm (under croft entrance area)

Figure 5. 1st floor 19.9 sqm (Deck access)

Figure 6. 2nd to 5th floors 48.7 sqm (Deck access)

Viability and top up payment in lieu of affordable housing

8.16 The following summarises the viability position, as advised by BPS, the Council's independent viability consultants. BPS and BNP Paribas (the applicant's viability consultant) still disagree on several points, but there is consensus on the overall outcome that the scheme is in deficit.

8.17 In their most recent high-level appraisal, BPS partly adopted the applicant's figures (costs) to generate a deficit of £6,951,233 million (including an upfront PiL of 3.6M). Without the PiL included, BNP Paribas reported a deficit of £7,097,155. Therefore, both sides agree that the scheme would still result in a deficit of several million, meaning it cannot be expected to contribute to affordable housing provision.

8.18 There are differences in opinion regarding the Gross Development Value—£77,88,836 for BNP Paribas compared to £79,704,071 for BPS. The BNP Paribas Benchmark Land Value (BLV) is £11.7M, and the BPS figure is £8.3M. The profit target is 15% for BNP Paribas in PBSA, compared to 12.5% for BPS. These differences lead to BNP Paribas viewing the deficit as greater than the BPS assessment.

Viability summary	**BPS Values**
On-site affordable housing floorspace (%)	33% (2,905.40 sqm)
Top-up payment in lieu of affordable housing	£3.6m
Benchmark Land Value (BLV)	£8.3m
Gross development value (GDV)	£77,538,111
Construction Costs	£45,073,730
Developer profit – (% of GDV)	12.5%
Surplus or deficit for affordable housing	Deficit of £6,951,233

Table 4. Viability summary

8.19 Despite disagreements on many inputs and values, BPS has acknowledged that the scheme is clearly in deficit and cannot include a higher proportion of affordable housing. Despite the agreement that the scheme is in deficit and cannot include a higher proportion of affordable housing, the applicant has nonetheless agreed to provide a £3.6m payment in lieu of affordable housing, reducing profit further. When expressed as a percentage, this amount represents 8% additional affordable floorspace, bringing the total percentage floorspace to 41% of the total. The £3,600,000 represents 47.4% of the full top-up PiL of £7,600,750.

8.20 When affordable housing provision is not viable, as in this case, the council would typically require a late-stage review mechanism to see if the council can secure a Deferred Affordable Housing Contribution (DAHC) once the actual values and costs of the scheme are known. However, in this case, the applicant is offering on-site housing and an up-front payment in lieu, despite the viability position.

8.21 Late-stage review mechanisms typically use the BPS or agreed figures for key inputs like the BLV and profit target. In this case notable differences remain as discussed above. The DAHC is not certain, and the ability to secure it would depend on viability improving, for example, because construction costs fall, or development values increase. For the viability to improve, the real inputs (like the actual costs and values of the scheme) would need to improve. Should a surplus then be identified, 60% of that surplus will be paid to the council, with 40% retained by the developer as an incentive to improve the viability, in line with the Housing CPG. The applicant's upfront offer of PiL and on-site delivery would allow fast delivery of affordable homes at the most affordable rents. The developer is willing to take a chance on the profit levels and provide the £3.6m top up payment in order to secure certainty for funding which late-stage review mechanisms can undermine. For these reasons, officers believe that a late-stage viability review is not justified and given the overall provision of affordable housing compared to the policy target. As such, the affordable housing provision is considered a good offer and a notable public benefit of the scheme, contributing directly to the affordable housing supply, and to the Affordable Housing Fund through a financial contribution. The proposal would therefore comply with the development plan as a whole.

9. HOUSING MIX

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

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

Table 5 - Dwelling Size Priorities (Local Plan Table 1)

9.2 The CLP priorities table above shows that the higher priorities for Socially Affordable Rented homes are for 2—and 3-bedroom homes, with medium demand for 4-bedroom or more.

9.3 Nine of the 16 Socially Affordable Rented homes proposed in the scheme are 3-bedroom homes. There are 2 x 2-bedroom 4-person homes, which can still accommodate families and 3 x 2 bedroom 3-person homes. **Together, 2—and 3-bedroom homes make up 100% of the social rent homes.**

9.4 The priorities for Intermediate Affordable homes are for 1-bed homes, with medium demand for 2-bed homes. **All (100%) the Intermediate Rent**

homes are 1-bed and 2-bed homes. The table below shows a balanced mix that contributes to the LP priorities.

Home size	Number proposed	Proportion of homes
1-bed	5	45%
2-bed	6	54%
3-bed	0	0%
Total	**11**	**100%**

Table 6 - Dwelling mix summary for Intermediate Rented homes

Home size	Number proposed	Proportion of homes
1-bed	5	18.52%
2-bed	14	51.85%
3-bed	8	29.62%
Total	**27**	**100%**

Table 7 - Dwelling mix summary for all homes

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

10. QUALITY OF PROPOSED HOUSING

10.1 CLP policy H6 is about housing choice and mix, and it aims to minimise social polarisation and create mixed, inclusive, and sustainable communities, by seeking high quality accessible homes and a variety of housing suitable for Camden's existing and future households.

10.2 In line with LP policy D6 and CLP policies H6 and D1, housing should be high quality and provide adequately sized homes and rooms, and maximise the provision of dual-aspect dwellings. CLP policy A2 encourages opportunities to provide private amenity space which is reflected in a requirement to provide amenity space in LP policy D6. CLP policy A1 seeks to protect the amenity of occupiers in relation to several factors, including privacy, outlook, light, and noise. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise-sensitive development.

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

Design and layout

10.4 Social Rent and Intermediate tenure units are included in the Affordable Housing Provision. 17 Social Rent units are located from the Ground Floor to level 03. The remaining 10 Intermediate units are located on the upper floors, levels 04 and 05. The 27 new homes are a mix of 1 bedroom, 2 bedroom and 3 bedroom homes with five homes on a typical floor. 3 Maisonettes are located on the ground floor over 2-storeys with private access from Arlington Road.

10.5 Part of the design-led approach to delivering effective high-density housing is about ensuring the development does not compromise the size and layouts of units, ensuring high-quality homes across the scheme. CLP policy H6 confirms that new residential development should conform to the Nationally Described Space Standards, which is reflected in LP policy D6, which sets the same minimum space standards in Table 3.1 of the London Plan 2021. The relevant excerpt from the table is reproduced below.

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

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

10.6 All the residential units in the detailed scheme meet or exceed the minimum standards. The new units would have good ceiling floor to heights (around 2.5 metres) and good room sizes. They are well laid out with a simple and rational plan form. All flats have a balcony and access to private communal amenity space.

10.7 CLP policy A2 states that developments should seek opportunities to provide private amenity space. LP policy D6 says that 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm for each additional occupant. All units meet the LP policy requirements.

10.8 The units all have their own secure front door. Due to its height of less than 18m, the building has a single core, including one stair and two lifts. Most units on the upper floor are accessed via an external gallery 1.6 m wide with

views over the courtyard, providing space to meet and connect, helping to promote a sense of community.

10.9 The maisonettes are located on the ground floor of Arlington Road. Defensible space is provided, with the entrance set back from the street. An open space kitchen/living/dining room is proposed, with the living room to the rear for direct access to the communal courtyard. At upper levels, the bedrooms are generously sized, with varying aspects.

10.10 On typical levels, 2b3P and 3B4P homes face Arlington Road. The unit is accessed from the external gallery, sheltered by the floor above. The layout follows principles similar to those of the maisonettes below. On typical levels, an 2B4P and 1B2P homes face Jamestown Road.

10.11 A wheelchair unit M4(3) is proposed at each of levels 02 to 04. Both bedrooms and the living rooms enjoy views over the courtyard.

10.12 The affordable housing communal entrance is from Jamestown Road and provides access from the street and the courtyard. Cycle storage, the post room, and refuse storage are accessible on this route.

10.13 The upper floors of the residential block to Jamestown Road are set back from the pub.

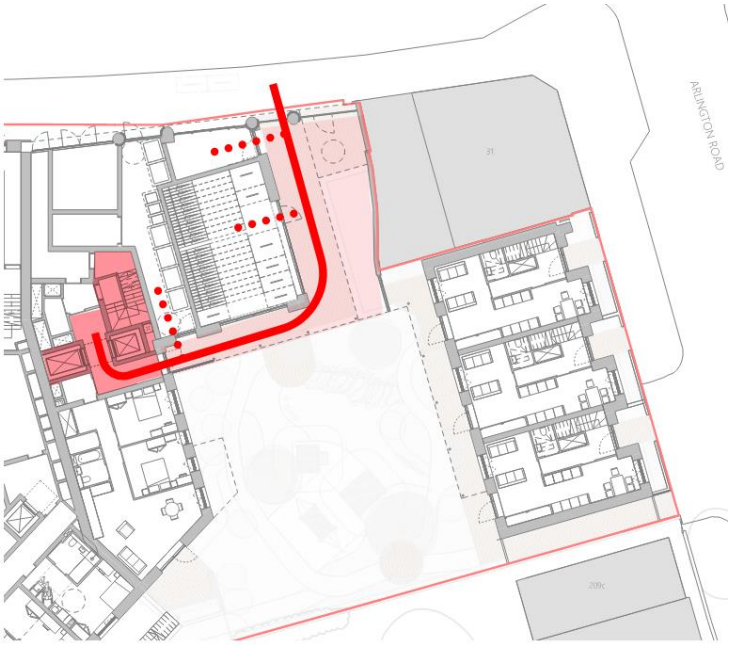


Figure 7. Residential entrance route form Jamestown Road

10.14 Overall, the proposed homes and amenity space comply with policy, resulting in high-quality development and provision for future occupiers.

Noise and vibration

10.15 The new homes are in a London location near the busy Camden Town Centre, so there would be an expected level of noise and disturbance. The neighbouring public house also as the potential to be a potential source of noise. However, the council's environmental health officer has recommended adequate noise insulation to comply with CLP policies A1 and A4, subject to conditions.

10.16 Noise from plant within and on top of buildings would be conditioned (condition 32) in terms of noise levels, and anti-vibration mounts would be required (condition 33). The dwellings will be constructed to a high standard that would ensure that the occupiers are not unduly impacted by noise from inside the block, or outside the building, following the aims of the development plan. Condition 16 sets maximum internal noise levels within the habitable rooms. This would ensure an additional layer of protection for the new occupiers in order to minimise the chance of noise and disturbance from established noise generating uses, like the pub next door, in line with the Agent of Change principle.

Dual aspect units

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

10.18 All of the homes (100%) would have dual aspects, with some having triple aspects, which is significant positive. This is achieved by use of the deck access arrangement.

Daylight and sunlight

<u>Methodology</u>

10.19 The internal daylight/sunlight report applies the relevant BRE guidelines to the proposed units. The Building Research Establishment publishes the leading industry guidelines on daylight and sunlight in BR209, 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes; however, it should not be applied rigidly and should be used to make a balanced judgement.

10.20 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit

making efficient use of a site if the resulting scheme would provide acceptable living standards.

10.21 The BRE guidance uses Climate-Based Daylight Modelling (CBDM) to assess the light for proposed development. This methodology is a complex simulation of actual daylight levels but has targets that are generally more difficult to achieve in an urban context than older BRE guidelines.

10.22 The recommended CBDM methodology is based on the British Standard 'Daylight in Buildings' (BS EN17037). The British Standard contains guidance on interior daylighting for buildings across Europe but also has a UK National Annex with alternative Median Daylight Illuminance (MDI) targets for dwellings in the UK. The council supports the use of these simpler alternative illuminance targets to take account of our denser context.

10.23 The submitted report uses the following metrics in its assessment of proposed accommodation in line with BRE guidance and British Standard:

- **Spatial Daylight Autonomy (sDA)** – A prediction of median illuminance levels (lux) in the room.
- *The UK National Annex recommends the following median (average) illuminances should be exceeded for at least 50% of the room for at least half the daylight hours: 100 lux in bedrooms, 150 lux in living rooms, and 200 lux in kitchens. Between 150 lux and 200 lux can be used for combined living/kitchen/dining room.*
- **Sunlight Exposure (SE)** – A prediction of how many hours of sunlight the centre of a window receives on 21 March (spring equinox).
- *The guidance says a habitable room in the home (preferably the main living space) should receive at least 1.5 hours of sunlight.*
- **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
- *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.*

<u>Assessment</u>

10.24 Within the entire development, 66% of all habitable rooms achieve a minimum level of median daylight illuminance. When holding LKD's and studios to the target of 150 lux, this figure would be 75%.

PBSA

10.25 The results show that 126 of the 178 habitable rooms (71%) will satisfy the 200-lux target. Additionally, 23 PBSA studios, while technically falling short of the 200-lux target, meet or exceed the 150-lux suggested for living areas and are therefore considered adequately daylit in an urban context. Thus, a

higher proportion (84%) of the proposed habitable rooms within the PBSA are considered well lit.

10.26 Of the 29 PBSA studios falling short, 20 meet at least the minimum recommendation for bedrooms (100 lux). The remaining nine all achieve between 72 and 99 lux. These studios are all located on the lowest floors where the view of the sky is inevitably more restricted. These are not all the accessible studios as they are provided three per floor. Overall, this is considered acceptable.

Residential

10.27 Again, the proposed residential homes generally provide an acceptable level of light in this urban context. Of the 29 bedrooms falling short of the 100 lux target, 16 achieve at least 70 lux, and seven rooms achieve at least 50 lux. The remaining six bedrooms achieve between 25 and 47 lux. They are located either on the northern elevation behind a balcony or facing the courtyard, and the deck access also obstructs them. For such rooms, there is a balance between achieving good lighting, and providing amenity space. This trade-off is generally targeted at bedrooms which the BRE guidance notes have lesser daylighting needs.

10.28 Four of the nine underperforming LKDs meet at least the minimum recommendation for bedrooms (100 lux). While achieving between 38 and 82 lux, the remaining five are either dual-aspect rooms being obstructed by both a balcony and the deck access, or a single-aspect one located behind an inset balcony. This private amenity feature inherently limits the daylight and sunlight ingress into the rooms. The shading, whilst providing more limited light, will also help to limit overheating risk.

10.29 The two dining rooms that fall short of the recommendation (150 lux MDI) fail to meet the target only marginally since both achieve 139 and 147 lux MDI, respectively.

10.30 Overall, 82% of the dwellings in the residential block have at least one room that meets or exceeds the higher BRE targets. While some LKDs, dining areas or bedrooms fall short, in the vast majority, at least one room sees good daylight levels. The provision of balconies and deck access arrangements means that there is some shading, but this in turn limits overheating while providing private amenity and outdoor circulation space.

Sunlight

10.31 The sunlight results are similar, with 60% of all units across the development meeting the 1.5 hours of sunlight criteria. Furthermore, 61% of the assessed units have at least one window facing due south.

10.32 When looking at the residential block in isolation, all units (100%) meet the orientation criteria (at least one window facing due south).

Overshadowing

10.33 The BRE guidance recommends that for an area to be adequately sunlit throughout the year, at least 50% of its space should receive two or more hours of sunlight on the 21st March. Overshadowing demonstrates that more than half the outdoor spaces will receive at least 120 mins of direct sunlight on 21 March (the spring equinox).

10.34 The areas tested are the Residential Garden and the Student Courtyard. On March 21st, both spaces exceeded the minimum recommended sunlight quantum. When considered as a whole, 87% of the tested areas within the site achieved this BRE target. This is considered an excellent result, helping to provide a high quality amenity space that can support a wide range of planning and biodiversity.

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

Outlook and privacy

10.36 There are adequate separation distances to neighbouring windows within the development and existing properties. The proposal provides for a variation of views. The design has offset the windows at the rear of the PBSA block, so none directly face one another.

10.37 The established separation distances would be maintained on Jamestown Road and across Arlington Road. The balustrades for the balconies are designed to maximise privacy from oblique views. The PBSA and affordable housing uses are arranged to maximise south-facing courtyards for both uses while removing potential for overlooking between them. These design measures provide a reasonable sense of privacy, and an outlook is provided for future development occupants, even in this dense environment.

10.38 The PBSA block's rear element (the block separating the two courtyards) is set at an angle to reduce direct surveillance of properties on Arlington Road (particularly number 205, closest to the site) and Gloucester Crescent. The overlooking subsection discusses the privacy of existing occupants in Section 11, Impact on Neighbouring Amenity.

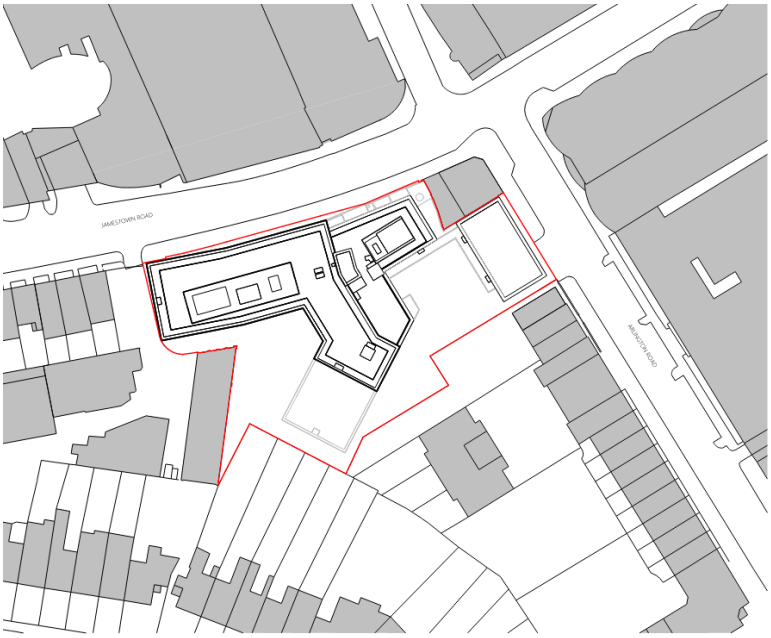


Figure 8. Proposed site Plan with neighbouring buildings

External amenity space

10.39 CLP policy A2 states developments should seek opportunities for providing private amenity space, and LP policy D6 says that 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. It must achieve a minimum depth and width of 1.5m.

10.40 The balconies range from 5 to 8 sqm, depending on the unit size. They ensure a good depth and width of 1.5m or more, and all units meet the LP policy requirements. They have been located off the living spaces to be functional and usable for all occupants. The communal courtyards provide a high-quality outdoor space for occupants with good lighting.

10.41 Overall, the provision of amenity space complies with policy and would result in a high-quality development and provision for future occupiers.

Quality of student accommodation

10.42 The ground floor of the student accommodation is a reception lounge, which provides student amenity and connects to the student courtyard. The student amenity wraps the courtyard. Separate street access is provided to the cycle store lobby, with a lift providing access to the cycle store located at the basement level.

10.43 The student accommodation will have amenity spaces with a GIA of 330 sqm and a ratio of 1.85 sqm per bedspace. These spaces will include a gym, cinema room, private study room, games room, lounge areas, laundry rooms, private study rooms and WC's.

10.44 The PBSA would comprise 178 rooms. The plan is arranged as two main wings of accommodation, with cores located in the inner corners of the plan. Two cores serve the PBSA block: a primary core with two lifts and a stair core and a secondary core with one lift and one stair core. A core serves 35 student rooms on the typical floor.

10.45 Each room contains a ensuite bathroom and kitchenette. Cluster rooms with shared living/kitchen/dining spaces are not proposed. Three different types of rooms are provided: standard studios (134 or 75%), premium studios (26 or 15%, and wheelchair-accessible and adaptable studios (18 or 10%), the latter of which are located close to the cores.

10.46 The regular student room is a studio bedroom with a GIA of 17-18 sqm, providing a bed space, study, storage, kitchenette and ensuite. With 134 regular studios proposed, these form the majority of rooms. Each room is ventilated by MVHR system and has an openable window. Bathroom pods have been included. All regular studios are Part M4(2) compliant.

10.47 The 26 premium rooms will be provided, which are larger in floor plan and range from 23-25 sqm. The 18 wheelchair-accessible units are located close to the cores. They are 25-27 sqm to accommodate the additional requirements of a wheelchair-accessible bedroom.

Accessible homes

10.48 The flats have been designed to a high standard of accessible and inclusive design, and CLP policy H6 requires 90% of new-build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair units). There is level access in the development and lifts within each. There is level access to the communal and outdoor courtyard space.

10.49 The proposed homes have been designed to accommodate 10% as M4(3) of the Building Regulations, with the remaining 90% meeting M4(2). The M4(3) standard refers collectively to "Wheelchair User Dwellings". This includes Wheelchair Adaptable Dwellings under M4(3)(2)(a) (ones which can be easily adapted for a wheelchair user), and Wheelchair Accessible Dwellings under M4(3)(2)(b) (ones which are fully adapted for a wheelchair user when constructed. The Wheelchair Accessible Dwellings are only required on the social-affordable rented homes where the council will have nominations.

10.50 Out of the 27 homes, 3 would be M4(3) accessible apartments which is 11%. All three are 2 bedroom 4 person dwellings with one on each level from L02 to L04. The three are social-affordable homes

10.51 The amount of accessible housing delivered by the scheme has a notable positive impact on disabled residents (disability being a protected

characteristic – see note at the front of the committee pack on the Public Sector Equality Duty).

10.52 A condition would be attached to secure the provision of the accessible and adaptable wheelchair dwellings (condition 41).

Conclusion

10.53 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.

11. IMPACT ON NEIGHBOURING AMENITY

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

Daylight and sunlight

11.2 A Daylight, Sunlight, and Overshadowing Report detailing any impacts upon 22 properties. The assessment acknowledges some impacts on neighbouring properties that are in excess of the BRE Guidelines.

11.3 Since the November 2024 submission, the applicant team has decided to reduce the height of the proposed student accommodation building. The Daylight and Sunlight Addendum letter (dated 19 March 2025) states that the proposed changes are unlikely to have a material difference on impact, but some properties to the southeast, south, and west of the site may see an improvement in the daylight and sunlight impact. These properties are 205-209 Arlington Road and the properties along Gloucester Crescent.

11.4 However, given the existing baseline is low and the low density of the site, the reduction in massing and subsequent improvement in daylight and sunlight to neighbours are not likely to result in materially different results to the original scheme. As a result, the assessments were not re-run as part of the Addendum Report and the below results are therefore a worst-case scenario.

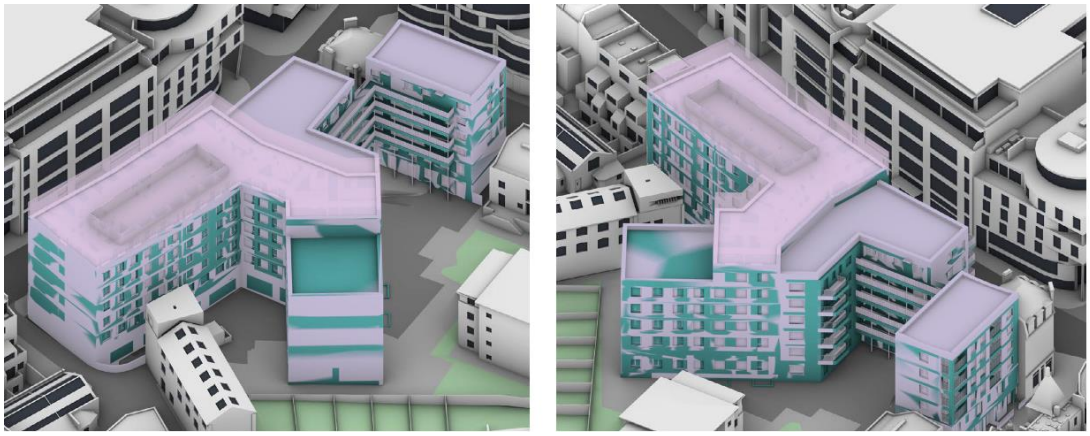


Figure 9. Scheme overlay (November 2024 in purple and Addendum scheme in Teal

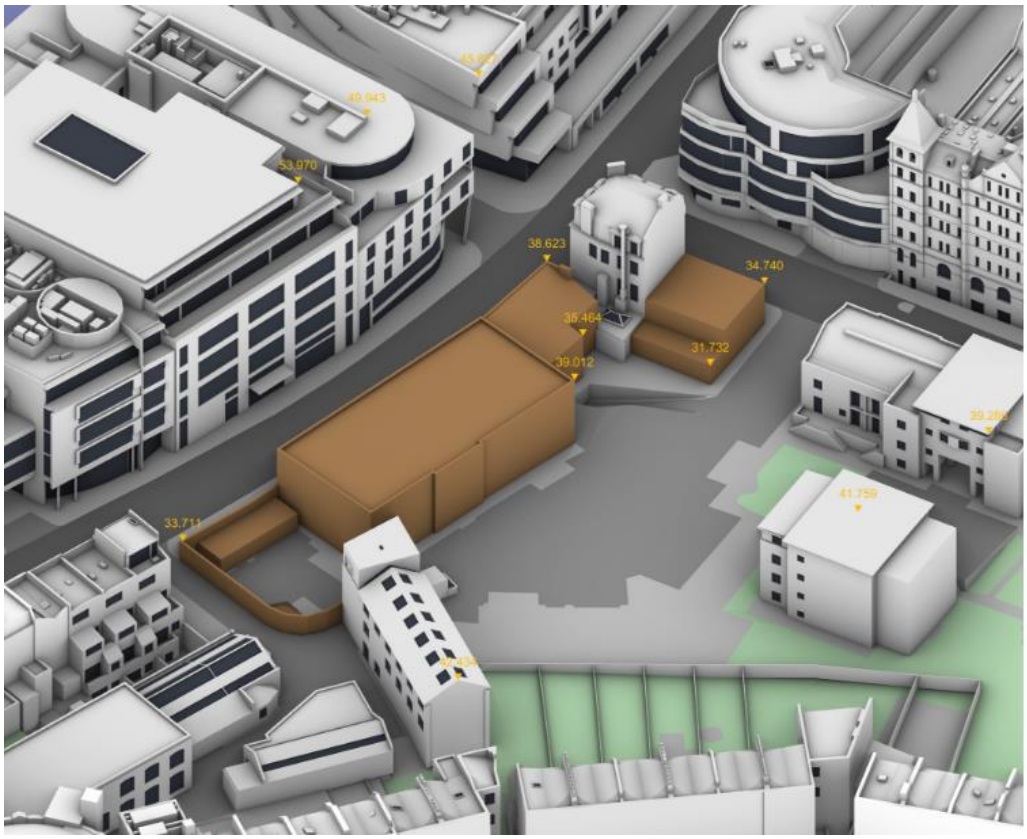


Figure 10. Existing site and context

11.5 The Building Research Establishment publishes the leading industry guidelines on daylight and sunlight in BR209, 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes; however, it should not be applied rigidly and should be used to quantify and understand the impact when making a balanced judgement.

11.6 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

11.7 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 Skyline (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

11.8 The assessment has set significance criteria, which is the approach recommended by BRE guidance.

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

Table 9 - Impact criteria

11.9 The BRE guidance targets are based on a model meant to be applied broadly across the country, so they do not tend to account for much denser urban settings like London or growth areas. As a result, they recommend setting alternative targets that take account of relevant local context.

Alternative targets

11.10 Table F1 of the BRE guidance indicates suggested alternative VSC targets based on street width to building height ratios. For example, in inner urban areas, a VSC in excess of 20% can be regarded as reasonably good. Retained VSC levels of around 15% to 20% are common in London.

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

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

11.12 The daylight/sunlight report used a Contextual Site Analysis to consider similar, recently built and consented schemes in London (called 'contextual sites'). The analysis concluded that a retained VSC value of in the mid-teens, with balconies off, can be considered an acceptable level of retained daylight for the surrounding properties, which aligns with the BRE guidelines described above. The alternative target proposed was for 15% for VSC.

11.13 Officers have interrogated the alternative target of 15% VSC. We have looked at five measurements of building height and street width (distance between buildings) on Arlington Road and Jamestown Road to produce spatial ratios. These five ratios were produced to present an accurate average reflecting the area's varying building heights and street widths. This has then been used to find the equivalent VSC score relative to that particular ratio, using BRE Table F1 -Equivalent VSCs, spacing to height ratios to identify the corresponding VSC.

11.14 The highest ratio was 1.90 (street width of 16m and height of 10m), producing an expected VSC of 26% for the lowest buildings. The lowest ratio was 0.56 (16m street width and 30m) for the larger buildings in the area, which would produce a VSC of well below 13%. The average ratio based on the street width and buildings presented was 0.86, which gives an equivalent VSC of around 13%. As such, officers consider the 15% alternative target an appropriate indicator when considering impacts.

11.15 Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where balconies 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 overhanding walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light.

11.16 The majority of the properties which experience daylight losses above the BRE Guidelines will meet the alternate baseline target of retained VSC values in the mid-teens. Two properties experience some reductions beyond the alternate baseline. These are:

- 205 Arlington Road; and
- 31 Jamestown Road.

Assessment

11.17 14 of the 22 (64%) properties assessed will meet the national numerical values identified in the BRE Guidance for daylight and sunlight. Within the 22 assessed properties;

- 433 windows have been analysed for VSC, of which 354 (82%) demonstrate BRE compliance.

- Of the 135 rooms relevant for the No Sky Line (NSL) assessment, 131 (97%) meet BRE's targets.

- Of the 280 windows relevant for Annual Probable Sunlight Hours (APSH) when considering sunlight to rooms, all 94 rooms will meet the APSH criteria.

11.18 The eight properties which do not meet the numerical recommendations set out within the BRE Guidelines or experience greater than a minor loss in VSC, NSL or APSH are considered in further detail. These properties are:

- 226 Arlington Road
- 34 Gloucester Crescent
- 209 A, B & C Arlington Road (three properties)
- 207 Arlington Road
- 205 Arlington Road (also fails alternative target)
- 31 Jamestown Road (also fails alternative target)

Figure 11. Daylight and Sunlight Sensitive Receptors 1-9

226 Arlington Road

11.19 Daylight (VSC & NSL)

11.20 226 Arlington Road is a five-storey mixed-use building, with commercial and retail on the ground floor and six residential apartments on the first and second floors. It is located to the northeast and is directly adjacent to the site.

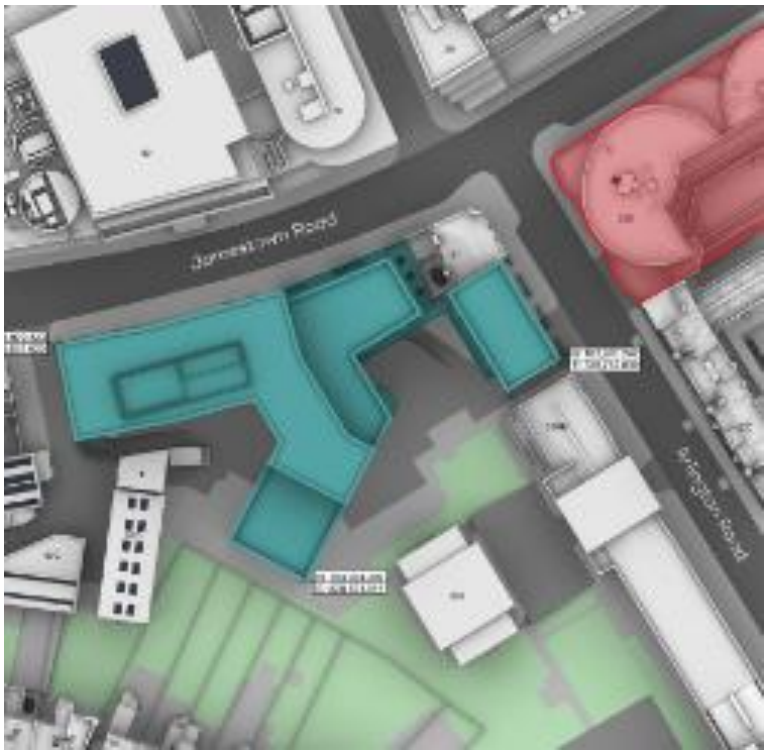


Figure 13. 226 Arlington Road is shown in red

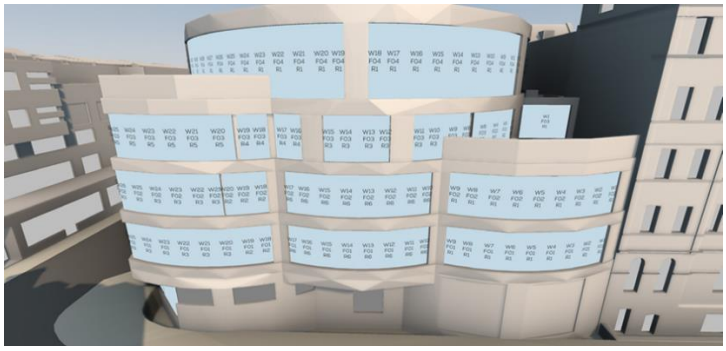


Figure 14. 226 Arlington Road window locations

11.21 The Daylight and Sunlight Report says the site-facing windows predominantly serve living and kitchen-dining rooms (LKDs). Nine apartments appear to face the site.

11.22 Of the 137 windows assessed for VSC, 90 (65.7%) will follow the numerical figures of the BRE Guidelines for VSC.

11.23 21 of the remaining 47 windows will experience transgressions between 20.4% and 29.4% which are considered minor. The remaining 26 windows will experience alterations between 30.8% and 39.3%, which is considered moderate.

11.24 When considering the retained VSC levels, all 47 windows that experience an impact will retain VSC levels above 16.4% which is considered acceptable in the context. Furthermore, 32 of the 47 windows will retain VSC levels of more than 20.2% which is good in an urban context.

11.25 Regarding NSL, 12 of the 15 (80%) rooms will meet the BRE criteria for NSL. Two of the remaining three rooms (R6/F01 & R6/F02) will experience transgressions of 20.9%-29.2%, which are considered minor; both rooms are understood to serve LKDs. The remaining room (R2/F01) experienced a loss of 41.8%, however, this room is understood to serve a bedroom which guidance notes are less dependent on daylighting.

11.26 When considering the retained sky visibility, all three impacted rooms will retain between 55.6%-79.1% NSL which is good. All windows and rooms will meet the BRE criteria for sunlight APSH targets.

34 Gloucester Crescent

11.27 34 Gloucester Crescent is a five-storey residential dwelling southwest of the site. It is understood that there are four residential apartments in this building.

11.28 The rear-facing windows face the site and primarily serve circulation spaces and bedrooms on the upper levels. The main habitable spaces (living rooms) face Gloucester Crescent.

11.29 All of the five windows assessed for VSC comply with BRE guidelines.

11.30 Three of the four (75%) rooms will meet the BRE criteria for NSL. The one impacted room (R1/F00) will experience a transgression of 44.5% which could be considered noticeable reduction in NSL. However, when considering the retained sky visibility, the kitchen will retain 54.7% NSL. As such, more than half the room will have a view of the sky at the working plane.

209 A, B & C Arlington Road

11.31 209 A, B & C Arlington Road are three three-storey residential dwellings to the east of the site. The internal configurations of this property are unknown.

Figure 16. 209 A, B & C Arlington Road shown in red (C is shown in red on the end of terrace with B and A adjacent)

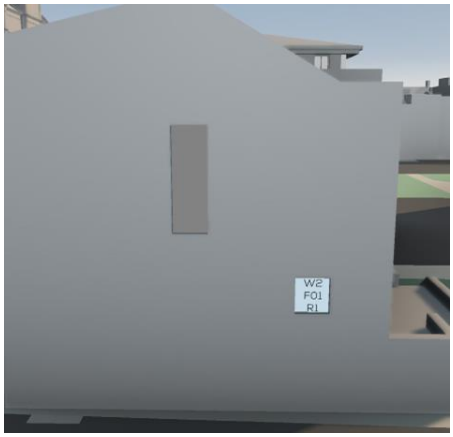


Figure 17. 209 C Arlington Road window locations top and 209 A bottom

11.32 Nine windows are relevant for daylight analysis in accordance with the BRE Guide; none of the windows will meet the BRE Guidelines for VSC.

11.33 For VSC, eight of the nine assessed windows will experience transgressions of 20.9% and 29.7%, which are considered minor. The remaining window (W2/ F01) which is on the side wall of 209C, will experience an alteration of 85.4% which is considered major.

11.34 When considering the retained VSC levels, seven of the eight minor windows will retain VSC levels in excess of 17.7%. The remaining window (W2/F01 in 209A) will retain 14.9% (this is a modest window at ground floor level. The window W2/F01 on the side elevation of 209C, will retain 3.9%. This window faces directly over the development land in very close proximity (circa 1m) to the boundary. An aperture on this facade is therefore considered to impose an unfair burden on the development.

11.35 The window is close to the corner of 209C Arlington Road. Based on site observation, officers believe it is likely that this window is a secondary window to a room, which is also served by the rear-facing window W1/F01.

11.36 The applicant has considered the VSC impact on the room. The retained room VSC is calculated by adding all the retained VSC scores for the windows. There would still be a large percentage alteration of 41.4%; however, the retained VSC to the room is 17.7%. These properties meet the alternative targets of 15% retained VSC. This is used as an indication of the impacts.

11.37 For NSL, the rooms have not been assessed because their layouts and uses are unknown. Nonetheless, the general levels of light are proportionate to the built form in the area, retaining levels in the mid-teens. Only the window directly facing the development site on the boundary suffers a more severe

impact. Adhering strictly to the BRE guide for this window would effectively sterilise the site.

11.38 Regarding sunlight, six of the eight windows meet the APSH criteria. The two remaining windows are located in 209A Arlington Road. Each will experience losses. W1/F01, the ground-floor opening, will retain 22% annual APSH against a 25% BRE target, which is acceptable given the urban location.

11.39 For W2/F01, the window to upper floor window of 209A will retain 15% annual APSH against a 25% BRE target, which could be noticeable

11.40 Both windows do not meet the winter target of 5% in the existing; therefore, cannot meet this target with the proposed.

207 Arlington Road

11.41 207 Arlington Road is a four-storey residential dwelling to the east of the site.

11.42 The internal configurations for this property are unknown; therefore, in accordance with the BRE Guidelines, NSL has not been assessed in the absence of floor plans. Council Tax records indicate that there are 9 flats at 207 Arlington Road.

Figure 18. 207 Arlington Road shown in red

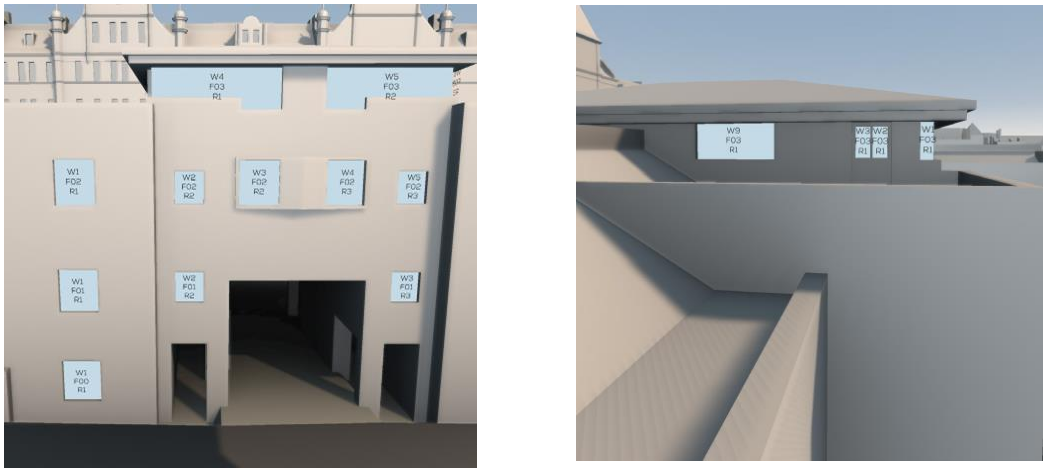


Figure 19. 207 Arlington Road window map

11.43 Of the 18 windows assessed for VSC, 13 (72.2%) will comply with the numerical figures outlined in the BRE Guidelines.

11.44 For VSC, one of the five remaining windows (W1/F00) will experience minor transgressions of 21.6%. The remaining four windows (W1, W2, W3, and W9/F03) will experience alterations between 31.7% and 33%, which are considered moderate.

11.45 When considering the retained VSC levels, W1/ F00 will retain a VSC level of 20.7% which is good.

11.46 The remaining four windows will retain lower values between 12.5% and 13.6% VSC, which are below the alternative target. These windows are all located on the top floor. Each is located under an overhanging roof, which limits access to daylight from the apex of the sky (Figure 20 gives a view from the centre of the window).

Figure 20. Waldram showing an overhanging roof of flats at 207 Arlington Road window map

11.47 These four windows are likely serving the same room (albeit not confirmed as floor plans were unavailable). The impact comes from the overhang as shown in the diagram, and multiple windows likely serve the space.

205 Arlington Road

11.48 205 Arlington Road is a four-storey residential apartment building located south of the site.

11.49 The internal configurations for this property are unknown, therefore following the BRE Guidelines, NSL has not been assessed without floor plans. Council tax records indicate that 12 flats are within 205 Arlington Road

11.50 The site-facing windows are on the north elevation and all face directly over the site on a vacant area of massing, which is uncharacteristically low for this area of Camden.

11.51 In addition, as seen in Figure 22 of the north elevation, the central windows serve rooms with balconies, which limit access to daylight from the zenith of the sky. A property without a balcony assessment has also been provided.

Figure 21. 205 Arlington Road shown in red

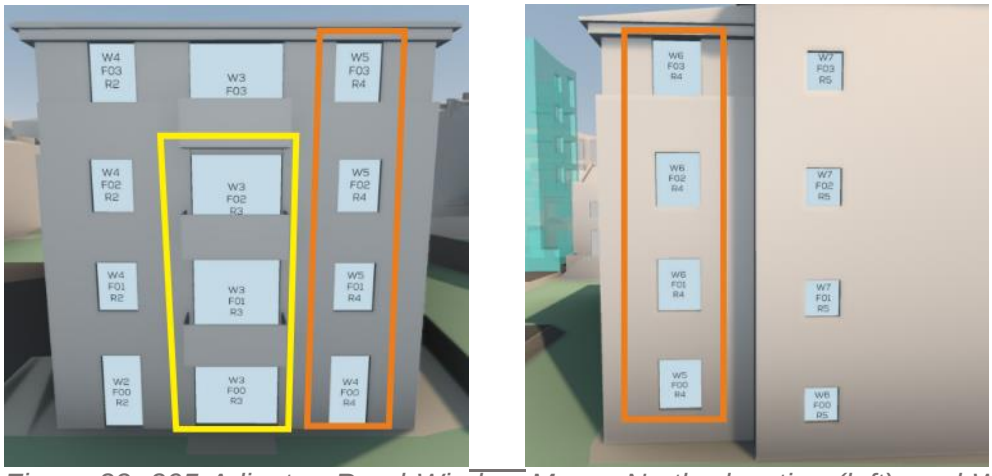


Figure 22. 205 Arlington Road Window Map – North elevation (left), and Window Map – West elevation (right)

11.52 Of the 27 windows assessed for VSC, 12 (44.4%) will comply with the BRE Guidelines for VSC. Two of the 15 remaining windows (W5/F00 and W6/F01) will experience minor transgressions of 23.7% and 21.8% respectively. A further window (W1/F00) will experience an alteration of 30.7% which is considered moderate.

11.53 The remaining 12 windows face directly north over the site's vacant car park. These windows will experience losses between 41.5% and 81%, which are considered major impacts.

11.54 When considering the retained VSC levels, out of the 15 remaining windows, 12 face directly north over the site, and six windows will retain more than 15.1%. A further two windows (W4/ F01 and W5/F02) retain 14.5% and 14.8%, which is only marginally below a mid-teens level (alternative VSC target).

11.55 The remaining seven windows will retain VSC levels between 3.7% and 12.2% which would be noticeable and are considered low. Four impacted windows (highlighted in amber in Figure 22) are located on the northwest corner of the building. These four windows are likely serving the same room (albeit not confirmed as floor plans were unavailable) as those to the rear (highlighted in amber in figure 22), facing the development. This means the rooms themselves could still be capable of reasonable daylighting.

11.56 Considering the VSC impact on the room, the rooms would experience percentage losses between 50.4% and 33.9%. However, the retained VSC would be much improved to between 14.1% and 20.1%.

11.57 As shown in Figure 22, the windows (highlighted in yellow) are restricted above by overhanging balconies on the first to the third floor. This obstruction limits access to daylight at the highest window point, one of the most important areas for daylight.

11.58 In this assessment, against the VSC criteria, the results are predominantly the same as the windows in 205 Arlington Road, except for the three windows under the balconies. With the balconies in place, these three windows will experience losses between 69.1% and 81% and retain VSC levels between 3.7% and 7.2%.

11.59 When assessed with the obstructions removed, the windows will still experience large alterations, however these are improved to between 49.7% and 60.3%. When considering the retained VSC, they will retain much improved levels of 11.8% to 16.3%. This demonstrates the impact is significantly exacerbated by the building's own balconies.

11.60 The building is close to the boundary and takes its daylight from the open adjacent site. Mirror massing is an analysis that looks at a comparative impact if the neighbouring building was mirrored on the development site. Mirror massing would also have significant impacts, but the proposed development is pulled away from the boundary in any event.

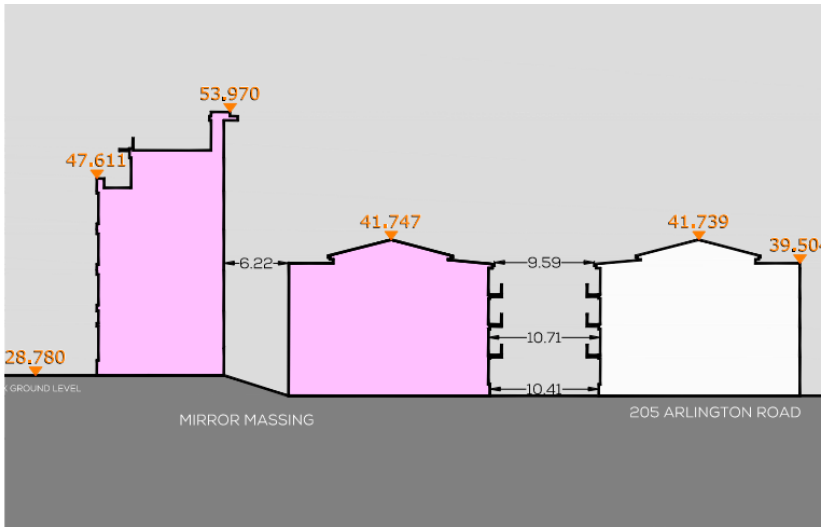


Figure 23. Mirror massing diagram

11.61 Whilst there would be significant impacts in daylighting here, the windows affected are all north facing so there would be no impact on sunlighting. All windows will meet the BRE criteria for sunlight APSH targets.

11.62 Overall, this property will experience breaches of BRE Guidelines in terms of VSC, which would be noticeable and significant. However, the site's existing low-rise and partly vacant form, and existing architecture of 205 Arlington Road, and its siting close to the boundary with windows taking their light from the adjacent site, has contributed to the significant daylight losses. Given additional assessments this has proved that the site is burdened. However, this does not remove that there will be some large losses. But these are likely inevitable for any meaningful massing coming forward on the site, given the burden on the site. Making an effective use of the land will likely have such

impacts or otherwise prejudice the site's development potential – a site in a sustainable location with a draft site allocation for housing.

31 Jamestown Road

11.63 31 Jamestown Road is a four-storey mixed-use property. A commercial pub occupies the ground and first floors, and residential workers' accommodation is on the second and third floors.

11.64 There are site facing windows serving the stair core and bathrooms which have been discounted from the assessment as non-habitable spaces. There are also windows serving a kitchen, secondary window to a living room and bedroom windows on the top floor.

11.65 The site facing windows all face directly over the site on an area that is two storeys in height.

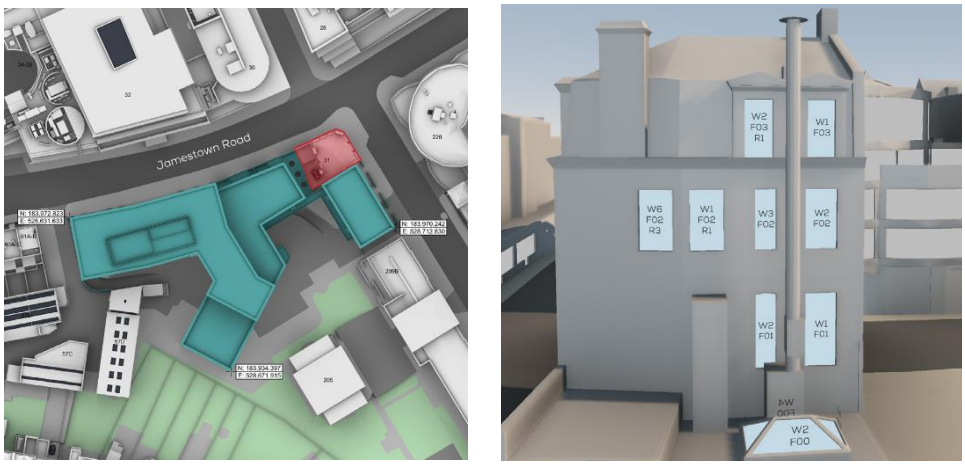


Figure 24. 31 Jamestown Road shown in red and window map

11.66 Daylight (VSC and NLS)

11.67 Of the five windows assessed for VSC, two (40%) will comply BRE guidelines.

11.68 Regarding NSL, one of the three (33.3%) rooms will meet the BRE criteria for NSL.

11.69 For VSC, the three site-facing windows will experience losses between 54.9% and 66.6%, which are considered major.

11.70 When considering the retained VSC levels, W6/F02, which serves the living room, will retain a VSC level of 15.1%. This window is also one of three that serves the living room. When considering the room's VSC, it will experience a negligible loss of 19.5% and retain a VSC of 24.5%.

11.71 The remaining two windows (W1/F02 and W2/F03) serve a small kitchen and a bedroom. These windows will retain VSC levels of 11.4% and 13.5% respectively, which are marginally below a mid-teens VSC.

11.72 For NSL, one of the two remaining rooms (R1/F02) will experience a transgression of 37.1%, which is considered moderate. This room is understood to serve a small kitchen. The remaining room (R1/ F03) experiences a loss of 64.6%, which is major. However, this room is understood to serve a bedroom, which is considered to have a lower expectation for daylight given its primary use.

11.73 When considering the retained sky visibility, the kitchen will retain 62.2% NSL; as such, over half the rooms will have a view of the sky at the working plane. The top-floor bedroom will retain less than half at 35%, albeit the bedroom has a lesser daylighting requirement.

11.74 The three site-facing rooms in this property are relevant for sunlight analysis in accordance with the BRE Guidelines; none will meet the APSH criteria.

11.75 All rooms will fall short of the BRE target for annual sunlight of 25%, with retained levels between 8% and 18% APSH. For winter sunlight, each will retain between 0% and 1%. These losses would be noticeable to the occupants with the development wrapping round the rear of the building.

11.76 This property will see changes in daylight (VSC and NSL) and sunlight which will be noticeable to the rear facing rooms. However, the combination of the low-rise and partly vacant nature (given the town centre urban context) in the existing condition contributes to high daylight losses.

11.77 Whilst not confirmed, it is likely that the main habitable spaces do not face the site, with the majority of windows in the property facing over Arlington Road and Jamestown Road, and these would be unaffected by the development.

Sunlight for amenity areas

11.78 All of the amenity areas assessed would meet the BRE Guidelines and achieve two hours of direct sunlight to over 50% of the area on March 21st.

11.79 The neighbour amenity spaces to the southeast at Arlington Road will achieve BRE compliance by retaining more than two hours of sunlight to over 50% of their area on March 21st and experiencing reductions of less than 0.8 times their former value.

11.80 The areas to the east of the Jamestown Road properties are already below the BRE target criteria; the development will not alter the sunlight amenity of these gardens.

11.81 The overshadowing effects on neighbouring back gardens will therefore be negligible and fully BRE compliant.

Conclusion

11.82 The overall results indicate high levels of retained daylight for neighbouring properties, with most non-compliant windows maintaining VSC values in the high teens to low twenties. Where losses are greater, or retained daylight levels lower, these are to three rooms in 31 Jamestown Road and four rooms in 205 Arlington Road. The impacts on these are major adverse impacts and in conflict with policy A1. However, the properties take their daylighting from the currently open application site. This means any reasonable density scheme is also likely to have major adverse impacts and the ability to deliver development on a draft allocated site would be prevented. The wider benefits of development should be weighed in the planning balance with compliance with the policy considered in the context of the development plan as a whole.

Noise

11.83 The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building. Noise from plant within and on top of buildings would be conditioned in terms of noise levels, and anti-vibration mounts would be required (conditions 32 and 33). The dwellings will be constructed to a high standard that would ensure that the neighbours are not unduly impacted by noise from inside the block, or outside the building. Condition 16 relates to internal noise levels.

Overlooking

11.84 The PBSA block's rear element (the block separating the two courtyards) is set at an angle to reduce direct surveillance of properties on Arlington Road (particularly number 205, closest to the site) and Gloucester Crescent.

11.85 The below show, a separation distance of 13.3 and 14.4m from the studio bedrooms to the nearest window of 205 Arlington Road. The angle of the building again reduces the impact of this relationship and affords more privacy deeper in the plan of both buildings. At the ground floor, the landscaping / boundary treatment is a further mitigation measure. Overall, the increase in overlooking is considered acceptable.

Figure 25. Arlington Road looks over the application site and is shown with the red marker

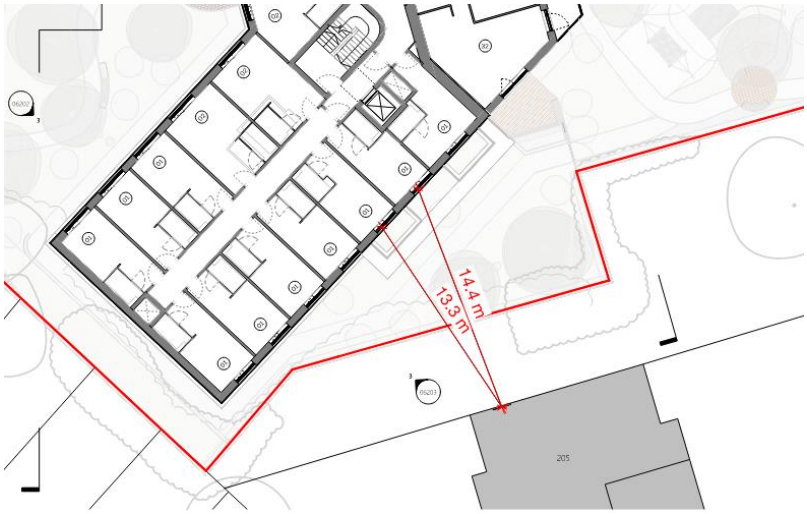


Figure 26. Separation distance of 13.3m to 205 Arlington Road

12. HERITAGE

Designated and non-designated heritage assets

12.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. The NPPF and the development plan make clear special regard is to be given to preserving or enhancing the character and appearance of a conservation area.

Historic Development

12.2 The development of the area from a fringe to a central London location was a result of the opening of the Regent's Canal in 1816-1820, followed by the extension of Railway in 1837, which encouraged an influx of people to move to Camden.

12.3 The site's urban block was defined during the mid-18th century, when a long residential terrace was built from Oval Road to Arlington Road. The site sits

on the northeastern corner of this terrace block next to an old carriage entrance to the yards at the rear, where various industries were present, including pianoforte manufacture, soap works, print works and a timber yard.

12.4 Between 1870 and 1914, Camden was the centre of the world's manufacture of pianos sent across the globe, which was favoured by the ease of transporting timber by canal, rail and road. The site was partly occupied by the Collard and Collard Pianoforte Factory buildings. The Piano Factory Building on Oval Road is now used as offices.

12.5 While the site sustained little damage during WWII, Collard's factory withdrew from it, and other industrial uses, workshops, and storage were introduced. Two new buildings were erected within the site boundary: one along the southwest boundary and another backing the rear properties on Jamestown Road. Further to the west, another building was erected backing onto gardens to the residential properties on Gloucester Crescent.

12.6 By the late 1960s, terraced houses to the north and east of the site had been cleared, and new workshops had been built in their place. Gaps left along Jamestown Road and Arlington Road provided new access to the site. The site itself changed very little between 1999 and 2020, though new residential blocks were constructed along Arlington Road and Inverness Street to the south.

12.7 The buildings on site were last used by Camden's Cleaning Services for a mix of offices and waste depot; they have been vacant since early 2022 when the site was sold.

Surrounding townscape

12.8 Development at different time periods has resulted in a mix of architectural forms and styles, with an eclectic mix of buildings present both in the immediate context, and across Camden Town. The site sits amongst a range of land uses including residential properties to the west and south; hotel and commercial uses to the north; restaurant uses to the east along Jamestown Road.

12.9 The character of the two conservation areas immediately adjacent to the site Primrose Hill and Regents Canal are very different, ranging in character, setting, architectural language and building heights. Camden Town Conservation Area also has its own distinct character.

Regent's Canal Conservation Area– no harm

12.10 The conservation area's character and appearance largely come from the canal itself and the industrial buildings that developed alongside it. It is an example of early eighteenth- and nineteenth-century industrial development that provided transportation links for goods going to and from the King's Cross.

12.11 The area's special character is largely derived from the canal's almost hidden nature and the surviving industrial heritage. The surrounding townscape largely turns its back on the canal, creating a tranquil space distinct from the city's business.

12.12 While glimpses of the proposed development will be possible from Regent's Canal and Camden Market, with linear views along Jamestown Road, these show the site in conjunction with predominantly large, modern buildings, or large former industrial buildings. In this context the setting of the conservation area would be unchanged.

Primrose Hill Conservation Area and 24-41 Gloucester Crescent (Grade II Listed) – no harm

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

12.14 This sub-area has abundant trees and vegetation and a lower density of development in comparison with the main body of the Conservation Area. Most buildings are set back from the highway with large front garden spaces containing mature trees. Rear gardens are also visible through gaps between building groups

12.15 The listed 24-41 Gloucester Crescent's special interest comes partly from their architectural design and elevational hierarchy and their group value as a cohesive and planned formal piece of townscape. They are typical of Victorian townhouse development from this time, when the urbanisation and growing wealth of London required the construction of housing to accommodate the expanding middle classes.

12.16 24-29 Gloucester Crescent form a wider group with 30-35 and 36-41 as the buildings are largely identical. They share many features including building heights, materials, plot widths and fenestration which create a strongly defined unifying character. There is a strong parapet line terminating the façade, above which other buildings are not visible.

12.17 Regarding the impact from Primrose Hill Conservation Area and the setting of 24-41 Gloucester Crescent, the development site can be viewed from Gloucester Crescent. The height of the development is largely hidden from view, and does not rise above the parapet level of the Gloucester Crescent buildings. While glimpses of the development through the gap between 44 Inverness Street and 24 Gloucester Crescent are possible, this view is only possible in a limited number of places. The development would be seen at a distance with vegetation in the foreground and in the context of mixed

modern development behind, so will not have a harmful impact on Gloucester Crescent, or the Conservation Area.

24,26,28 Oval Road (Grade II Listed) – no harm

12.18 The listed building was constructed in 1894-96 as a factory, store, and offices. It was later extended and altered in the 1930s. Its architectural and historic interest comes from it being a good example of a purpose-built industrial building and representative of the growth and importance of Gilbey's business, which became a major employer in the area and was associated with the Camden Goods Depot for over a century.

12.19 The building incorporated technical innovations, such as cork insulation in the foundations to protect the wine from the vibration of nearby trains.

12.20 This building was designed as a one-off in a mixed industrial setting. It was not intended to be a landmark. The proposed six-story building would be visible within its setting, but it would be comparable in size to much of the surrounding townscape on the north side of Jamestown Road and, therefore, preserve the building's setting.

Arlington House – no harm

12.21 Formerly the Camden Town Rowton House, this buildings dates from 1905. The list description outlines both its special architectural and historic interest. Its architectural interest comes from its imposing landmark design, using red brick, terracotta dressing and a distinctive roofscape.

12.22 Its historical interest comes from its being the last and largest of London's well-known Rowton Houses, built to provide accommodation for single men in the late nineteenth and early twentieth centuries. They illustrate a phase of history when philanthropists started to provide purpose-built facilities to accommodate workers due to concern over the squalid housing of the time.

12.23 The development will be visible near Arlington House in both directions along Arlington Road. However, this will be the lower-scale corner section, which will be subservient in scale and will not block any significant views of this building.

Piano Factory Oval Road – no harm

12.24 This Grade II listed piano factory was built in 1852 by Thomas and William Piper, for piano manufacturers Messrs Collard and Collard. It is of both architectural and historic interest. The architectural interest comes from its unusual circular form, elevation design and internal plan form and structure designed to facilitate the piano manufacturing process. Its historic interest comes from its association with the piano-making industry, which has strong connections with the area.

12.25 The proposed development is not visible in views from Oval Road, will not impede views of the building from the surrounding area or alter its relationship with neighbouring industrial buildings. Whilst the proposed development would be visible from within the Piano Building, this is an industrial building, where their view out of the building was not a consideration in the design, nor something which contributes to the building's special interest.

31 Jamestown Road (locally listed) – less than substantial harm

12.26 The building is a late 19th century public house, on a corner site, in fine red brickwork with prominent slated roofscape, chimneys and dormer windows. It is now an isolated historic building in a primarily redeveloped context. Still, in long views, it can be seen together with the historic 61-85 Jamestown Street, which reinforces the underlying historic framework of the streetscape. It is noted for its architectural, townscape and social significance.

12.27 This building not a designated heritage asset, but is included on the Local List for its architectural, townscape, and social significance. Historically, it was flanked by terraced house development of a similar height, which has since been demolished. As a public house, it has been designed to be a prominent local landmark. However, the replacement low-rise development has somewhat exaggerated this prominence on either side of it.

12.28 The proposal to split the development on either side into separate blocks is appropriate as it should better highlight the pub in views from the east along Jamestown Road.

12.29 There is some harm caused by the proposed massing of the five-storey block to the south, which is overbearing to the setting of the pub in views from the south and east. This has a harmful impact on both the architectural and townscape significance of the building and the corner landmark. However, because of the other taller buildings in the immediate vicinity, this sets the level of harm at a low level. This is a matter of planning balance as the building is a non-designated asset.

57A/B/CD Jamestown Road (locally listed) – no harm

12.30 This is a group of late 19th and early 20th-century light industrial buildings in a yard accessed from Jamestown Road. As a group, the buildings are of architectural, historical, and townscape significance. They are a rare example of a group of buildings that serve as a reminder of Camden's piano-making heritage.

12.31 These are a collection of four low industrial buildings arranged in an informal layout in historically a backland site between terrace houses on Jamestown Road and Gloucester Crescent. Their relatively plain form and appearance

respond to their function and the constraints of their immediate context at the time of construction.

12.32 There would still be a townscape gap in Jamestown Road, allowing views through to the locally listed buildings. Immediately adjacent to these buildings, the proposed development is lower, at five storeys, which fits in with the lower scale of the backhand site, and is of a similar height to 57d Jamestown Road, which is closest to the development.

61 -85 Jamestown Road (locally listed) – no harm

12.33 These are a terrace of 13 houses dating to the mid 18th century with a taller house which form an important consistent western end to Jamestown Road. They are of both architectural and townscape significance.

12.34 This terrace terminates the western end of Jamestown Road. Whilst the proposed development would be significantly taller, it is noted that the surrounding townscape to the west and north is already significantly taller. The ability to read the architecture and terrace as a group of buildings will be unaltered.

Conclusion

12.35 The proposal would preserve the significance of designated heritage assets. If the committee considers there to be harm to a designated heritage asset, considerable weight and importance should be given to that harm, and it should be outweighed in the balance by considerable public benefits.

12.36 Paragraph 215 of the NPPF states:

> *215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

12.37 Harm at the lower end of the scale has been identified to the locally listed pub at 31 Jamestown Road. The building itself is a non-designated heritage asset, and the works will cause some harm as identified – this is a matter of planning balance as set out in paragraph 216 of the NPPF:

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

13. DESIGN

13.1 The Council's design policies aim to achieve the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality to improve the function, appearance, and character of the area.

Site Layout and Ground Floor

13.2 The proposal reinstates the Victorian linear urban block and makes clever moves to occupy an oddly shaped site. The PBSA and affordable housing uses are arranged to maximise south-facing courtyards for both uses, whilst removing potential for overlooking between them. The proposals achieve a successful plan diagram with an independent student block with commercial use, and a courtyard housing building with gallery access, revolving around a generous residential garden.

13.3 This distribution of uses means that there are three proposed entrances on Jamestown Road – one for the commercial space; a generous student entrance setback from the main elevation that provides a covered arrival space; and a sensitive but architecturally rich residential communal entrance responding to the scale of the public house. The latter connects the street to the courtyard via a passage accessing the cycle store, post room and refuse store. The residential entrance introduces permeability into the site by offering glimpses into the biodiverse residential garden, replacing a defensive existing ground floor. Together, these entrances, varying from more to less private, will provide a much more animated, active ground floor, improving the pedestrian experience and safety.

13.4 On Arlington Road, the proposal introduces front gardens, separated from the street by a low brick wall with a balustrade, and private, covered entrances to two storey maisonettes. The vehicle crossover has been removed, continuing the pavement materiality to ensure pedestrian priority.

Scale and massing

13.5 The development responds sensitively by placing the predominant height where taller buildings are located in the immediate context.

13.6 The proposed PBSA block is 6 storeys on Jamestown Road and at the rear. After discussions with officers and feedback from the DRP panel, the proposed height has been reduced to be more contextual and respond to the local townscape: this was previously proposed as 9 storeys along Jamestown Road with part 6 and part 7 storeys at the rear.

13.7 Where visual impact and amenity are most sensitive around the residential properties at 205 Arlington Road and Camden Works, the massing is set back from the rear boundary line.

13.8 The massing has also been reduced to minimise impact on certain key views, particularly from the group of Gloucester Crescent terraces where the upper parts of the building will be glimpsed behind or above the roofscape of the listed buildings, which is considered acceptable.

13.9 It is acknowledged that the western gable of the PBSA block will be visible when looking east along Jamestown Road. However, this is a common condition in a dense urban environment, which can be found across Camden Town, creating dynamic and interesting streetscapes.

13.10 For example, the Grade II Georgian terraces at 82-90 Pratt Street sit adjacent to a locally listed 6-storey late 19th-century building; while the building and its gable are visible in long views, their relationship with the row of terraces feels comfortable.

Figure 27. The Grade II Georgian terraces at 82-90 Pratt Street sit adjacent to a locally listed 6-storey late 19th-century building

13.11 The condition is not uncommon in this context, and careful attention has been given to the articulation of this western gable to minimise impact, such as the introduction of blind windows inspired by Victorian brick gables.

13.12 A subtle but important kink in the massing for the student block following the natural curve of Jamestown Road has been introduced to achieve both a more generous public realm at ground floor, and a break in the long elevation. The resulting building line helps the proposal read more as part of the context when experienced along Jamestown Road.

13.13 The affordable housing building is proposed at 6 storeys on both Jamestown Road and Arlington Road. The Jamestown Road facade of the affordable housing block has been set back, to break up the frontage and provide relief from the otherwise long elevation of the student block.

13.14 The height of the housing block of 6 storeys, which the DRP considered should be reduced by one storey, is acceptable in this location across from

Arlington House, which stands at 7 storeys. The block is taller than the corner public house however the massing provides an acceptable backdrop, including setbacks, curved roof lines disappearing behind the corner massing. As such, it is considered that the proposal is successful in becoming a contextual neighbour to the public house.

Appearance and Detailing

13.15 The proposal is relatively simple in composition; its richness is derived from the careful detailing, where texture is added to both blocks via soldier course bandings, rusticated and hit-and-miss brickwork and other detailing, such as balconies, recessed and scalloped entrances.

13.16 The PBSA and affordable housing block have two distinct characters responding to their use; they are both composed of three main parts: a strong plinth expressing the most intricate detailing to enhance the pedestrian experience, a middle, and a top. The composition has a horizontal emphasis to embrace the curve of Jamestown Road and negotiate the datum relationship between the two buildings and the corner public house.

13.17 The student block has horizontal emphasis with woven brickwork along horizontal ribbons at the upper levels and punched, landscape windows of varying widths; the base has vertical piers and brick detailing.

13.18 The double-height student entrance steps back to create an outdoor covered arrival zone. The large openings show glimpses into both the amenity space and courtyard. The dual-aspect entrance to the commercial space has direct access to the central shared student courtyard with dedicated outdoor amenity and leads to an independently operated workspace.

13.19 The affordable block's balustrades are designed to maximise privacy from oblique views from the street through carefully aligned vertical fins. The balustrades are also set out to match the soldier course banding. The base on Jamestown Road celebrates the communal entrance via a sculptural plinth with round columns and fluted lintel linking with the pub's datum. This is an integral part of the design which relies on elements such as these to add visual interest and enhance the character of the street.

13.20 The ground floor expression on Arlington Road is different to respond to the residential context, with a rusticated base tying to the pub's datum. Hit and miss brickwork detail for the bathrooms to allow natural light and privacy, featuring again on the gable end, adds depth to the elevations.

13.21 The gallery deck wraps around the affordable housing courtyard, creating opportunities for interaction. Gable ends, particularly the western end of Jamestown Road, where woven brickwork wraps around the corner. Blind windows and hit and miss brick create a neutral backdrop to neighbouring buildings.

Materials

13.22 Brick is the proposed primary facing material, with metalwork to windows and balconies and precast features.

13.23 Warm brick tones are proposed for the affordable housing block, in direct response to Arlington House, and differentiate it from the student block which has a lighter palette responding to the buildings across on Jamestown Road. The calm brick palette is contrasted through the terracotta-coloured metalwork found in the windows, balconies and gallery at the rear. The precast features forming the plinth of the affordable housing block relate to the terracotta elements found in Arlington House. Condition 13 secures final details of materials.

Public realm/Landscape

13.24 The designs for the two courtyards maximise biodiversity within a largely hardscaped existing site that has no tree canopy.

13.25 The residential garden provides a shared, lush, south-facing green space creating opportunities for socialising and play, balancing environmental benefits with visual amenity. The entrance sequence, a covered walkway connects into the shared garden

13.26 Spill-out spaces will be created through outdoor paved areas which will encourage socialising. A green buffer to the southern boundary which abuts the residential gardens of properties along Gloucester Crescent, is designed to maximise biodiversity, tree and species-rich planting.

13.27 The pavement width along Jamestown Road will be increased due to the setback building line.

Design conclusion

13.28 Overall, the proposal is a well-planned scheme that effectively uses land. It is a contextual but contemporary scheme with high-quality detailing. An S106 clause requires the retention of a scheme architect to ensure the quality of the scheme. The high-quality design accords with the development plan, particularly CLP policy D1.

14. SUSTAINABILITY AND ENERGY

14.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

14.2 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

14.3 The GLA's Circular Economy Statement LPG sets out a design approach for existing buildings and includes a decision tree to inform the design process from the outset. The stages are: retain and retrofit; partial retention and refurbishment' disassemble and reuse; and demolish and recycle. Policy CC1 of the Camden Local Plan requires all development proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building (part e) and optimise resource efficiency (part f).

14.4 Feasibility studies were undertaken early in the pre-application process to explore whether retention of the existing buildings in full or in part was feasible and could deliver the development objectives. The Design and Access Statement section 3.0 looked at the potential for reuse of the existing buildings, their opportunities and limitations, and their condition. The study included an appraisal of the three existing buildings on site. It examined their condition, capacity, and architectural features to inform whether and to what extent they could or should be used in any future site redevelopment to optimise site capacity and public benefits.

14.5 Three development options were explored: Option 1 – retention and retrofit; Option 2 – retention and retrofit with extension and new build; and Option 3 – new build (i.e. the current application). Regarding land use, all three scenarios explore providing PBSA and C3 affordable housing. An alternative scenario for an office-led development has been considered.

14.6 Three options were considered for reusing the buildings or parts of their structure. This highlighted that attempting to retain part of the structure would compromise its efficiency and result in much of the existing fabric needing to be demolished to allow for new massing to be delivered above it.

14.7 The current buildings on site were established in the mid-late 20th Century. They offer limited opening and activation to the street and public realm. The existing building fabric is primarily uninsulated brickwork with a mix of double and single-glazed windows across three buildings. The only pedestrian entrance to the address door onto the street beside is situated centrally on Building C.

14.8 Surveys of the three buildings show distinct basement, ground and first-floor levels across the three buildings. This presents an accessibility challenge in a retrofit or reuse scenario.

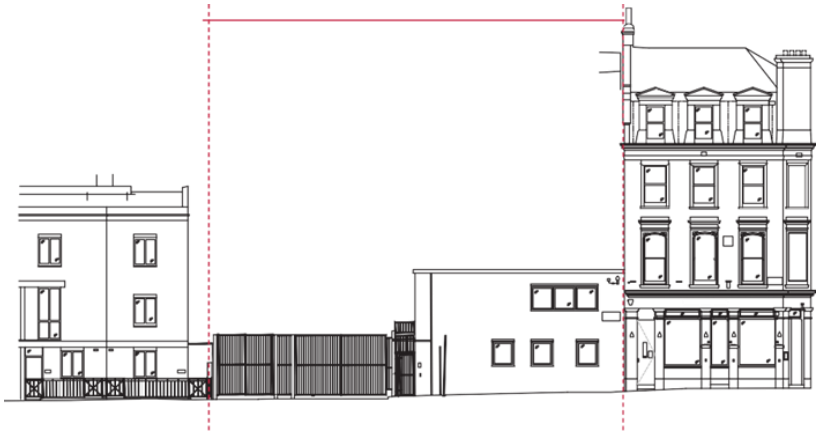


Figure 28. Arlington Road building A – Existing site elevation

Figure 29. 33 Jamestown Road, Building B and Jamestown Road Building C

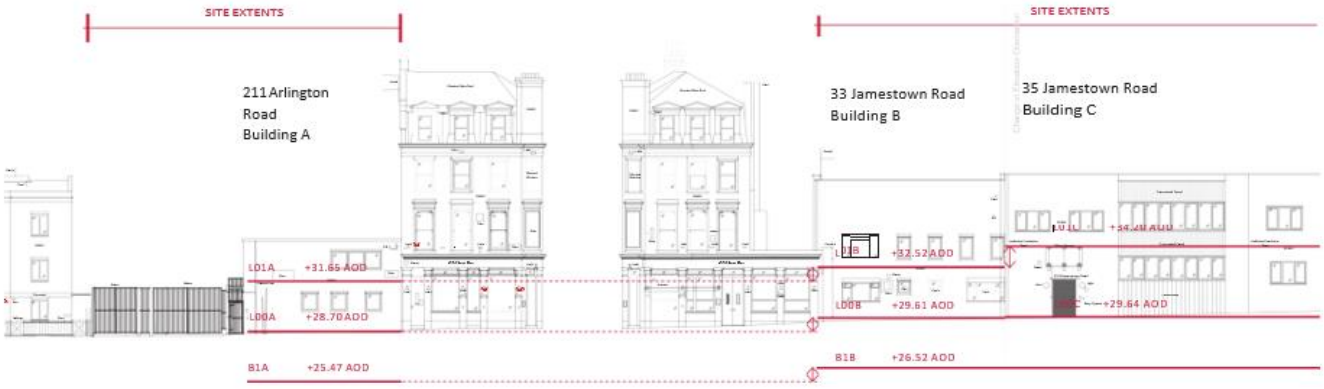


Figure 30. Arlington Road and Jamestown Road site elevation showing misaligned floor levels, which creates an accessibility challenge

14.9 A detailed analysis of 33-35 Jamestown Road and 211 Arlington Road has been undertaken based on the quality of the structure of the existing building and their potential for retrofit and/or reuse. The key challenges associated with each floor are highlighted below:

- Basement Plan – 2.88 ceiling height is restrictive on appropriate uses and efficient plant arrangement
- Beams step down from the ceilings which can disrupt services Eccentric beam arrangement limits layout possibilities
- Ground Floor Plan – basement limits capacity of this area

- Primary entrance from Jamestown Road is of a small scale
- First Floor Plan – full-width steel trusses support the existing roof have no further structural capacity
- Density of columns limits spatial planning
- 35 Jamestown Road is formed with a Woodwall slab, which is a deleterious material

14.10 Any meaningful retention of any part of the buildings would significantly compromise the ability to optimise the site and result in a building with hindered operational energy performance, accessibility issues, complications and risks involved in partial deconstruction tying new-build elements into existing buildings, basement adaptation presenting flooding/ waterproofing risk, and issues with acoustics and fire routes.

14.11 The proposal seeks transformative development to significantly increase site capacity, provide sought-after land uses, and improve the public realm environment. Retaining the existing building would not allow the site to realise its full potential, and making the most of the site requires a new approach to site layout.

14.12 Nonetheless, to ensure greater resource efficiency through recycling and reuse of materials, condition 27 requires 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use is attached in line with policy S12 of the London Plan.

Whole Life Carbon

14.13 Whole-life carbon (WLC) emissions are the total carbon emissions resulting from the construction and use of a building over its entire life (this is assessed as 60 years), including its demolition and disposal. The WLC is split into modules that assess each stage of the building's life.

14.14 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).

14.15 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).

14.16 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).

14.17 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.

14.18 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 show how the development performs against the benchmarks and aspirational targets. The proposal does not comply with the min B-C target (which can be challenging to achieve) but complies with A1-A5 and A-C. Condition 4 requires the approval of an updated version of the Whole Life Carbon Assessment prior to commencement of any work on site and prior to commencement of any construction works. This allows the opportunity to further minimise the operational and end of life phases under the B-C modules.

Modules	**Min benchmark RESIDENTIAL ($kgCO_2e/m^2$ GIA)**	**Aspirational Benchmark for RESIDENTIAL ($kgCO_2e/m^2$ GIA)**	**Proposal ($kgCO_2e/m^2$ GIA)**
A1-A5	<850	<500	806
B-C (excl B6 & B7)	<350	<300	426
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	997

Table 10 - Summary of Whole-Life Carbon results for the residential development

Operational energy and carbon reductions

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

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

Energy and carbon summary

14.21 The following summary table 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) commercial PBSA	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	21%
Be green stage (renewables): CLP policy CC1	20%	15%
Total carbon reduction: LP policy SI2 and LP CC1	35%	36%

Table 11 - Carbon saving targets and the scheme results for non-residential new build PBSA

Policy requirement (on site) residential flats	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	12.1%
Be green stage (renewables): CLP policy CC1	20%	72.6%
Total carbon reduction: LP policy SI2 and LP CC1	35%	76%

Table 12 - Carbon saving targets and the scheme results for residential new build

Site wide	Min Policy target	Proposed reductions
Be lean stage (low demand): LP policy SI2	10%	21%
Be green stage (renewables): CLP policy CC1	20%	39%
Total carbon reduction: LP policy SI2 and LP CC1	35%	61%

Table 13 - Carbon saving targets and the scheme results for entire site/development

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

Total carbon reductions

14.23 Reductions are measured against the baseline, 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.

14.24 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.

14.25 In this case, the residential development significantly exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 76% below Part L requirements, as shown in Table 12 above. The residential element also improves on the aspirational 50% target, with the PBSA improving on the 35% target by achieving 36% total savings.

14.26 The site-wide total carbon reduction is 61% over the baseline, with the 39% shortfall met through a carbon off-set contribution of £49,961.

14.27 For the residential, this is charged at £95/tonne CO2/yr (over a 30-year period) which is 6.63 tonnes x £95 x 30 years = £18,892. This amount will be spent on the delivery of carbon reduction measures in the borough.

14.28 For the commercial, this is charged at £95/tonne CO2/yr (over a 30-year period) which is 10.9 tonnes x £95 x 30 years = £31,072. This amount will be spent on the delivery of carbon reduction measures in the borough.

14.29 The total **carbon offset of £49,961 will be secured by section 106 agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

14.30 London Plan policy SI 2 sets a policy target of at least a 10% for residential and 15% for non-residential reduction through reduced energy demand at the first stage of the energy hierarchy.

14.31 In this case, the development exceeds the policy target of 10% residential reducing emissions by 12.1 % at this stage through energy efficient design, in compliance with the development plan. For the non-residential (PBSA), the scheme achieves a 21% reduction. The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy. The proposal includes energy efficient measures like MVHR, Waste Water Heat Recovery, low energy light fittings.

Overheating

14.32 The applicant has explored other ventilation options and design mitigations but that ambient noise concerns remain as shown in the Acoustic report by RBA Ltd, which indicates that average overnight noise levels are such that windows are likely to be closed. It is also noted that windows on the student accommodation are to be restricted due to safety concerns which will limit the natural ventilation and mean that there would likely be overheating in high temperatures or for periods of prolonged heat. It is also noted that the

student accommodation in particular will not have cross ventilation. As such, in this case, the active cooling through air tempering of the MVHR (referred to as 'Trim cooling') is accepted with cooling using VRF in the non domestic areas only.

14.33 Given the mixed mode system - further details such as deactivation of the ventilation when windows are open to minimise cooling demand are recommended to be conditioned 40. This will further help reduce energy demand in the buildings.

Be clean stage (decentralised energy supply)

14.34 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.

14.35 In this case, an assessment of the existing London heat map has been made, and it is demonstrated that there are no existing local networks present within the scheme's connectable range. However, given its location, a **s106 agreement would require future connections to be safeguarded**.

Be green stage (renewables)

14.36 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.

14.37 In this case, the site-wide development meets the policy target of 20%, reducing emissions by 39% at this stage through renewables, in compliance with the development plan. The proposal includes 181 sqm of PV panels on the roof with full details secured by condition 19. Condition 19 requires a meter to monitor the energy output from the approved renewable energy systems.

14.38 There is no natural gas connection to the building. The proposal includes low carbon heating, Air Source Heat Pumps (ASHPs), which are proposed on the roof of the building. Air Source Heat pump (5th generation) community heat networks operate at ultra-low temperatures often in the form of 'ambient loops. It would operate on a Centralised Ambient Loop, ASHP system, SCoP 3.4. The Council prefers a minimum SCOP of at least 3.4 unless justified. Condition 21 requires details of a Be Green carbon savings and datasheets of the SCOP 3.4 from the ASHP.

Be seen (energy monitoring)

14.39 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. The proposal includes has proposed building management system / energy monitoring equipment.

14.40 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

14.41 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The scheme has an overall score of Excellent (75.44%), which meets the requirements:

- Energy 17 out of 23 credits targeted = 73.9% (exceeds the 60% minimum)
- Water 7 out of 9 credits targeted = 77.8% (exceeds the 60% minimum)
- Materials 12 out of 14 credits targeted = 85.7% (exceeds the 40% minimum)

14.42 The proposal considers and mitigates overheating. There was a technical overheating analysis which shows that some active cooling is required in the PBSA block. Risk is minimised using passive measures like deep window reveals, balconies, external shading, and high performance materials to minimise active cooling in line with policy CC2.

14.43 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.

14.44 In this case, the development incorporates SUDS. The submitted Flood Risk and Drainage Strategy confirms that the Proposed Development will not lead to any increase in flood risk on or off site. In terms of SuDS, measures have been incorporated including an attenuation tank at basement level, and green roofs to reduce surface water run off to 2.0l/s which is the calculated greenfield runoff rate.

14.45 Condition 42 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in the ‘Flood risk and drainage’ section of this report.

15. AIR QUALITY

Operational impact of development on the local area

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

15.2 The Air Quality Assessment (AQA) states, “A diesel generator is proposed to provide backup, secondary power. The generator will only operate routinely during testing and maintenance. The generator will be approximately 250kW/ 315kVA, and the flue will be taken to the roof of the building, approximately 26 m above ground, where dispersion conditions are optimal, and higher than all surrounding buildings. The testing regime will comprise a monthly test, for up to 30 minutes, and a three-hour run every six months; the generator emissions will therefore affect up to 16 hours per annum.”

15.3 The flue to the roof is higher than surrounding buildings, which should ensure adequate dispersion, assuming no air inlets are located within 20m of the flue. Condition 20 is attached to secure details of the emergency diesel generator.

Operational impact on occupants

15.4 The air quality in the area is considered suitable for the proposed uses of the site. The air quality monitoring on the road and in close proximity to the site indicates that NO2 levels were 21.1µg/m3 in 2023 which is well below the 38µg/m3 at which further mitigation should be considered.

Construction impacts risk assessment

15.5 The construction dust risk is assessed as Medium without mitigation. Therefore, real-time dust monitoring with 2 monitors is required and is secured by condition 3. Appropriate mitigation measures would also be secured through the **Construction Management Plan secured by section 106 agreement**.

16. TRANSPORT

Modes of transport

16.1 The site is bordered by Jamestown Road (north) and Arlington Road (east), near Camden High Street which is part of the Transport for London Road Network (TLRN), which TfL is responsible for maintaining.

16.2 The site has excellent public transport accessibility with a PTAL rating of 6a. Camden Town (London Underground) is about 300m east, and Camden Road (London Overground) is about 700m north-east of the site.

16.3 Several bus stops, including on Camden High Street and in Camden Town, are within a few minutes' walk from the site. A Santander Cycle docking

station is opposite the site on Arlington Road. The nearest dedicated parking bay for dockless rental e-bikes and e-scooters is on Jamestown Road.

16.4 A Shared Transport Availability Level (STAL) analysis indicates a low grade of 3 in the area, with room for improvement towards a target STAL of 6b. This suggests a need for more micro and shared-use mobility parking bays for those living and working in the area.

16.5 The offices have been vacant since early 2022. The multi-modal trip generation for the proposed student housing and office use is based on the methodology in the planning application at 17-37 William Road, planning Ref. 2020/5473/P for redeveloping existing buildings to provide student accommodation and office workspace. The TRICS database derived the anticipated total person trip rates for the proposed residential dwellings. The net change in trip generation was derived by subtracting the existing vacant office trip forecasts from the proposed development.

16.6 The existing baseline does not account for the vacancy (three years). The existing (vacant) use provides a contrasting picture of the proposed development's immediate impact. The existing office situation involves zero trips (e.g., a vacant site), while the lawful use provides 48 PM peak hour trips. The net increase is 45 PM trips (45 - 0) compared to the vacant site.

16.7 The table below shows Table 6.11 presented in the TA, which shows the anticipated total multi-modal person trip rates for the proposed development.

Mode	AM Peak Hour			PM Peak Hour		
	Arrive	Depart	Total	Arrive	Depart	Total
Underground / Train	8	10	18	8	10	18
Bus	2	7	9	6	4	10
Cycle	1	2	3	2	1	3
On foot	2	12	14	9	5	15
Total	**12**	**31**	**43**	**25**	**20**	**45**

Table 14 - Table 6.11 presented in the TA

16.8 The proposal will result in a significant increase in person trips compared to the current condition, especially during peak hours. The impact compared to the previous use would be less. The anticipated high volume of walking trips is likely to be made from Camden Town (London Underground), Camden Road (London Overground), nearby bus stops on Camden High Street, and elsewhere in Camden Town.

16.9 The TA's Active Travel Zone (ATZ) assessment focuses on six routes to key destinations. The analysis recommends tactile paving on the corner of Jamestown Road and Arlington Road to enhance the walking environment.

16.10 A Framework Travel Plan demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. Modal share projections for walking and cycling must follow Camden's Transport Strategy and the Mayor's Transport Strategy.

16.11 A **s106 legal agreement would secure a Travel Plan covering an associated monitoring and measures contribution of £11,348**.

16.12 The site is accessible and permeable. Cycle access for student housing and commercial use will be from Jamestown Road and the internal courtyard for the residential element of the proposal. The existing vehicular crossover on Arlington Road will be removed, and the footway will be reinstated. Servicing activity will take place from Jamestown Road.

Cycle parking

16.13 The Council requires high quality cycle parking to be provided per CLP Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5.

16.14 In compliance with the cycle parking standards, the proposed development will provide 136 long stay spaces for the student accommodation, 54 for the affordable residential units, 6 for the office/employment use, and 8 for visitor spaces. Dedicated cycle stores for each land use will be provided, with the residential use and student accommodation benefiting from a mixture of two-tier stands, Sheffield stands and spaces for larger bikes. Visitor cycle parking in Camden cycle parking stands will be provided throughout the public realm to the front of the development with 4 stands to provide 8 spaces. These are charged at £300 per stand if provided on the public highway outside the red line, which is a total of **£1,200 for cycle parking secured by the s106 agreement**. Final details of the on-site cycle parking will be secured by condition 14.

Car parking and vehicle access

16.15 The site is located in controlled parking zone CA-F(n) Camden Town Area, which operates:

- Monday to Friday: 08:30-18:30,
- Saturday: 09:30-17:30,
- Sunday: 09:30-17:30.

16.16 The entire development will be secured car permit free by legal agreement, significantly reducing the car burden on the site.

16.17 Regarding disabled parking, London Plan Policy T6.1 'Residential parking,' section G states: 'Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

1. Ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset

2. Demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.'

16.18 London Plan Policy T6.5 further states 'Non-residential disabled persons parking,' section A states: '…all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.'

16.19 In line with the London Plan standards, three accessible parking spaces should be provided. Whilst it is noted that there are two accessible parking bays located on Arlington Road near the site, these are already heavily used. Therefore, the **s106 agreement would secure £4,000 for one disabled parking space** to be provided on the public highway in a suitable location within 50m from the site is secured.

16.20 Most visitors will travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. An additional electric vehicle charging point (fast charger) will be provided on the public highway in the general vicinity of the site. A financial contribution of **£20,000 for EV charging will be secured by s106 agreement** in accordance with Local Plan Policy A1 and T1.

CPZ Review

16.21 Objective 2 of the Camden Transport Strategy (CTS) is to reduce car ownership and use, as well as motor traffic levels in Camden, and features several measures to support this objective. One of the measures is to '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.'

16.22 In alignment with that action, Camden's Controlled Parking Zones (CPZ) Review final report 2023, independently appraised all of Camden's CPZs using a multi-criteria assessment. The review recommends, amongst others, that the CA-F(n) hours of operation be extended and subject to consultation and decision-making processes.

16.23 Considering the location of the proposed development, it is appropriate to request a contribution of £30,000 towards final consultation on the current trial hours, future consultations on CA-F including sub-zone CA-F (n), and consultation on extending hours of control of nearby CA-J due to the risk of

overspill parking from changes in the Camden Town area. The **£30,000 towards the CPZ review would be secured by s106 legal agreement**.

Construction management

16.24 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the demolition and construction process. A Construction Management Plan (CMP) was submitted with the application, however, the document does not adhere to LB Camden guidance on construction management.

16.25 The site is near Camden Town. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal could lead to various 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.

16.26 A Demolition Management Plan (DMP) document will also be secured by legal agreement in accordance with Local Plan Policy A1.

16.27 The development will require input from officers at the demolition and construction stages. This will relate to the development and assessment of the CMP and ongoing monitoring and enforcement of the DMP and CMP during demolition and construction. Splitting the management of demolition and construction allows greater phased control over the impacts which vary across the different stages of the project.

16.28 An implementation support contribution of £30,513 and construction impact bond of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement per Local Plan Policy A1.

16.29 The s106 agreement will also secure the requirement to form a Construction Working Group consisting of representatives from the local community prior to the commencement of demolition or construction.

Deliveries and servicing

16.30 The proposed development is expected to generate 12 servicing trips per day. Servicing will occur along a newly created area along Jamestown Road. Officers are content with this arrangement. The swept paths analysis for the refuse truck, the largest servicing vehicle expected to use the proposed location, is acceptable. A **Delivery and Servicing Plan will be secured by s106 agreement**.

Highway works

16.31 Apart from stopping up the access, the proposal requires little physical alterations to the public highway. However, it is suggested that a **highways bond of £50,000 is secured by s106 agreement** towards repairing any damage potentially caused to the public highway during construction.

16.32 At the pre-application meeting, officers recommended improvements to Jamestown Road, including rain gardens, which are increasingly introduced in the borough to encourage infiltration and enhance the pedestrian environment. The **s106 agreement would secure £10,000 to install rain gardens within pavement buildouts** adjacent to the site frontage.

Pedestrian, cycling and environmental (PCE) improvements

16.33 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when considering that a development will significantly impact the local area which planning conditions cannot mitigate. New developments place pressure on the existing infrastructure and services, and benefit directly from new and improved safe and healthy street schemes we deliver across the borough and complementary initiatives (such as cycle training – covered through Travel Plan contributions). These Safe & Healthy Streets schemes are delivered based on our ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a funding source.

16.34 All developments, even those with limited transport impact, should contribute to active travel infrastructure to mitigate the additional pressure on infrastructure. This approach supports environmental and public health goals, prepares for future demand, spreads funding responsibility fairly, manages cumulative impacts from smaller developments, and helps build a greener, more sustainable Camden.

16.35 The development proposal will increase pedestrian and cycle activity, which the Travel Plan will further promote. The **s106 agreement would secure a financial PCE contribution of £350,000** towards multimillion-pound improvement schemes to enhance the pedestrian and cycling environment in the vicinity of the site. This would include:

- Implement trial traffic-free Phase 1 (Brittania Junction to Hawley Crescent) and Phase 2 (Hawley Crescent to Chalk Farm Road) schemes on Camden High Street (north) that transform this part of Camden Town for the millions of visitors each year, which includes one-way working on Jamestown Road and associated public realm improvements,

- Provide east-west cycle corridors linking multiple trip attractors through Camden Town, which are part of the Cross-Camden Cycleway strategic cycle corridor schemes.

Micro and shared mobility improvements

16.36 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.

16.37 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the low STAL grade and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.

16.38 A **shared and micro mobility improvements contribution of £10,000 would be secured by the s106 agreement** if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters, car club vehicles, and the provision of electric vehicle charging points in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by shared and micro mobility vehicles.

Conclusion

16.39 The proposal is acceptable in terms of transport implications subject to the following planning obligations being secured by s106 agreement:

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Car-free development.
- Off-site contribution of £4,000 for a disabled parking space.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- £1,200 for 4 x off site cycle stands in the public highway
- CA-F(n) CPZ review contribution of £30,000.
- Construction management plan (CMP), and if necessary, a separate Demolition Management Plan (DMP), CMP implementation support contribution of £30,513, and CMP Impact Bond of £32,000.
- Requirement to form a construction working group consisting of representatives from the local community.
- Highway works contribution of £50,000.
- Public realm contribution of £10,000 towards the rain gardens.

- Pedestrian, Cycling and Environmental Improvements contribution of £350,000.
- Micro and shared mobility contribution of £10,000
- Delivery and Servicing management plan.

17. PUBLIC OPEN SPACE

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

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

- 11 or more self-contained homes
- 11 or more student rooms, units, or occupiers

17.3 The CPG expects developments with 11 or more dwellings to provide 9 sqm of POS for every occupant. This development, with 27 new homes, triggers the requirement. The residential requirement for the POS is 9 sqm x 27 (the number of additional dwellings) x 2.12 (the average dwelling occupancy for the ward) = **515.16 sqm**.

17.4 The CPG expects developments with 11 or more student bedspaces to provide 9 sqm of POS for every occupant. This is then reduced by 25%, recognising that student accommodation is often unused for part of the year. With 178 new student occupiers, this development triggers the requirement. The student housing requirement for the POS is 9 sqm x 178 (the number of additional bedspaces) 1,602 sqm – 25% (to account of under occupancy) = **1,201.5**

17.5 The total POS requirement is therefore, **1,716.66 sqm**

17.6 A total of 70 sqm of play space is provided, exceeding the 62 sqm required. The style and design of the play equipment are well suited to the context of a courtyard space that will be overlooked. The wider landscape design and planting are well-reasoned, with maintenance considered. The communal landscapes will provide an important opportunity for socialising and community cohesion for both students and residents.

17.7 Although the proposal has private and communal landscaped areas and terraces for the occupiers, the scheme would provide no publicly accessible space, so it cannot count towards the POS provision. With a site area of around 2000 sqm, providing 1,716 sqm of POS on this site would leave almost 89% of the site undeveloped. In a dense urban environment, near a Town Centre high street, this would not be an efficient use of land and would

leave a hole in the townscape. There are also limited options for off-site provision within a reasonable distance.

17.8 For the financial contribution as per 1.52 of CPG Open Space:

- Capital costs: 1,716.66 sqm x £200 per sqm = £343,332
- Maintenance costs: 1,716.66 sqm x £7 per sqm per year x 10 years = £120,166.20

17.9 The total contribution is therefore £343,332 + £120,166.20 = **£463,498.20**. As such, the scheme would make an adequate contribution to POS in line with the development plan.

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 The student courtyard has a 'woodland' feel, providing small gathering spaces for students as well as those using the commercial space. The courtyard will contain new planting including new trees comprising a range of heights, textures and seasonality. This area links to a biodiverse green buffer space at the southern boundary.

18.3 The proposed landscaping scheme would achieve a UGF score of 0.42 (secured under condition 35) and result in a sizeable biodiversity gain for the site (see statutory BNG section below).

18.4 The London Plan uses the UGF scores to help objectively evaluate the quality and quantity of urban greening. Given this is a PBSA led scheme, the 0.4 to 0.3 value is an appropriate target. The proposals achieve an UGF of 0.43 is welcomed

18.5 The proposed green infrastructure would be conditioned (condition 15), such as green roofs and planting, contributing to the UGF.

18.6 A Preliminary Ecology Appraisal confirms that the site has low potential for nesting birds. However, further survey work is not required, and recommended details relating to construction management have been made

as part of the conclusions. No other protected ecological species were identified as part of the survey.

18.7 Condition 18 requires details of the location (including elevations) of a minimum of six bird boxes, for house sparrow and/or starling and/or swift (if swift, more than one box should be provided in the same location), to be incorporated into the fabric of the building where possible. Details of the location (including elevations) of a minimum of four bat boxes to be incorporated into the fabric of the building, where possible, are also secured.

18.8 Landscaping details shall include species of value to biodiversity, and consistent with the BGP/PEA. It is proposed that some council street trees be pollarded. An informative (number 14) is added to liaise with the Council Tree team. This application process is sperate from the planning application.

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

Statutory Biodiversity Net Gain

18.10 In addition to the development plan's requirements, there are statutory requirements for 10% Biodiversity Net Gain (BNG).

18.11 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.

18.12 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.

18.13 A biodiversity matrix and biodiversity plan where submitted in support of this application. This provides a pre-development biodiversity value of the on-site habitat including a map, a completed baseline Metric, and completed baseline condition assessments. The statement confirms that the pre-development biodiversity value of the onsite habitat is 0.03 (dated 01/08/2024).

18.14 The matrix shows that the proposed development will have a biodiversity net gain of 3,127%, equating to an uplift of 0.88 habitat units, exceeding the Government’s mandatory 10% target.

18.15 Owing to the increase and presence of medium distinctiveness habitats, the proposed post-development baseline is 'significant on-site' gains. As such, a

Habitat Management and Monitoring Plan would be secured to ensure ongoing management and monitoring in conjunction with the Biodiversity Gain Plan (BGP) which is required under the statutory biodiversity gain condition. The plan will need to cover a 30-year period and include information on when we can expect reports.

18.16 The **s106 would secure the Habitat Management and Monitoring Plan covering 30 years, including monitoring fees** so we can check and monitor their reports). The application would be subject to the biodiversity gain 'condition' (actually an informative). An informative will require a Biodiversity Gain Plan to be prepared in accordance with the relevant information provided at the application (PEA).

19. HEALTH

19.1 The applicant has submitted a Health Impact Assessment (by Volterra dated October 2024) which has assessed primary care capacity as being constrained. At paragraph 5.31 the applicant has indicated that student residents would likely access GP services nearest to their university. The Student Accommodation Management Plan (by Homes for Students, dated September 2024, Rev B) names several universities for which the development would serve. All advise their students to register with a GP in the area where they reside. Even where on-campus GP provision is provided in a few cases in London such GPs are commissioned by the NHS in the same way as any other.

19.2 HUDU, on behalf of North Central London Integrated Care Board, requests a contribution of £77,900 to mitigate the impacts of the proposed development on local health infrastructure through added pressure. The contribution will enable the expansion of clinical capacity within the local PCNs and is considered to meet the tests set out in the CIL Regulations for contributions. Student residents may not spend the full year at their accommodation, so the contribution is adjusted accordingly to account for this.

19.3 The 27 new affordable homes will also provide accommodation for residents in Camden and residents will also have need for primary care services in the area. The HUDU Planning Contributions Model has been run on the proposed development in accordance the London Plan to calculate capital costs for increased demand arising from the proposed development.

19.4 The model calculates the capital cost to the NHS of creating additional capacity across acute, secondary, and primary care in the region of £300,000 for whole development. This assumes new buildings/extensions but does not include outpatients, accident and emergency, and ambulance infrastructure.

19.5 The focus at this time is Primary Care and the requested £77,900 would be considered proportionate to the impacts of this specific development on local Primary Care infrastructure, taking into account the proposed uses. The **Health Impact Contribution of £77,900 would be secured by s106 agreement**.

20. BASEMENT

20.1 Camden Local Plan policy A5 (Basements) seek to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.

20.2 The application was accompanied by a Basement Impact Assessment (BIA) authored by individuals with appropriate qualifications. The council's basement consultant (Campbell Reith) carried out an independent review, reviewing the Assessment for potential impacts on land stability and local ground and surface water conditions arising from basement development. The BIA includes a screening and scoping assessment. The BIA confirms that the proposed basement will be found within the London Clay Formation using a combination of pile walls and reinforced concrete retaining walls.

20.3 The BIA audit review dated November 2024 concludes the following:

- A maximum damage of Burland Category 1 ('very slight') to neighbouring properties;
- The basement would not impact groundwater or surface water flows and is not in an area subject to flooding; and
- The BIA recommends movement monitoring during excavation and construction.

20.4 Campbell Reith concludes that the BIA is adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements. The appointment of a suitably qualified engineer to oversee the works will be secured by condition (Condition 6), and the build to be in accordance with the audited BIA will also be secured by condition.

21. CONTAMINATED LAND

21.1 The site investigation was completed in June 2024. It comprised three windowless boreholes down to 5.45m, three cable percussion boreholes down to 25.0m, and one foundation pit to 1.35 m, with six gas/groundwater standpipes installed. To date, three gas monitoring visits have been completed, with a further four still to be completed.

21.2 The Council's Contaminated Land Officer has reviewed the Ground Investigation Report and Geo-environmental Desk Study. They advise that further works should be undertaken to determine the extent of hydrocarbon-

impacted soils to inform the site's remediation strategy and achieve better site coverage. In addition, the remainder of the gas monitoring visits should be completed with an updated ground gas risk assessment submitted for review and approval. Following the updated gas risk assessment and completion of additional work on-site, a remediation strategy should be submitted for review and approval. This should address the requirements to remove the UST infrastructure and associated impacted soils and detail the cover system requirements in the soft landscaped areas to ensure no unacceptable risks remain for end users. As such, pre-commencement condition 5 is added to ensure the further investigations.

22. EMPLOYMENT AND TRAINING OPPORTUNITIES

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

During construction

22.2 **Apprenticeships** - the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3 million of build costs or Gross Development Value is also accepted in this case (or every 1,000sqm GIA newbuild) with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's Euston Skills Centre (moved to a new location, hence a new name). Based on a GDV of £51M (which is a conservative estimate) = 1 apprentice per 3M = **17 apprentices**. Apprenticeship support fee = 17 * £1,700 = £28,900

22.3 **Construction Work Experience Placements** - the applicant should provide **10 construction work placements** of not less than 2 weeks, to be undertaken over the course of the development construction. This would be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.

22.4 **Local Recruitment** - the applicant will work with the Euston Skills Centre to recruit **vacancies**, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.

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

and assist with the developer to provide details of local suppliers and subcontractors.

Post construction/end use

22.6 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements. The CPG advises this and applies to major commercial developments, including office, hotel, and leisure developments, that will result in a net increase of 1,000 sqm (GIA) or more of employment space.

22.7 As the proposal is for a PBSA-led scheme with affordable C3 housing. The modest (339 sqm) element of commercial floorspace would not trigger a requirement for end-use apprenticeships or training placements.

22.8 However, the developer will be encouraged to work with Camden Learning/STEAM on school engagement and with their commercial occupiers to offer work experience placements.

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

23. FIRE

23.1 A comprehensive Fire Statement has been submitted in support of the application, prepared by qualified fire engineers from Jensen Hughes. The development comprises a purpose-built student accommodation block (Sui Generis) and a residential block (Class C3), both with a maximum height below 18m, meaning they do not fall within the "higher-risk building" category as defined in the Building Safety Act 2022.

23.2 The Fire Statement confirms that fire safety has been considered from the earliest design stages and demonstrates compliance with the requirements of the London Plan 2021, specifically Policies D5(B5) and D12. The design is informed by current guidance, including BS 9991:2024, BS 9999:2017, and Approved Document B, and includes the following key provisions:

- Evacuation Strategy: A ‘stay put’ strategy will be adopted for the residential units, supported by compartmentation and active fire systems. Non-residential areas will adopt immediate evacuation procedures.
- Fire Detection and Alarm Systems: LD1 detection is proposed within apartments, with appropriate levels of detection (L3 and L5) in communal and ancillary areas in line with British Standards.
- Sprinkler Systems: All apartments will be fitted with sprinklers compliant with BS 9251:2021. Non-residential and ancillary spaces will be served by a commercial sprinkler system (BS EN 12845:2015).

- Access and Facilities for the Fire Service: Both blocks provide fire-fighting access, including a firefighting shaft in the student accommodation block and dry risers in both buildings. Fire appliance access is within 18m of riser inlets, and wayfinding signage is included in accordance with Approved Document B.
- Emergency Provisions: Emergency lighting, power supply, escape signage, and smoke ventilation systems will be provided throughout the development. A minimum of one evacuation lift per core will be included.
- External Fire Spread: The external wall construction will use materials achieving Class A1 or A2-s1, d0, and the design considers boundary distances to mitigate risk of fire spread.
- Future Proofing: A Fire and Emergency File (FEF) and digital records will form part of the 'golden thread' of information, to ensure continuity of safety management through the building lifecycle.

23.3 The Fire Statement confirms that the fire safety strategy has been reviewed by competent fire professionals, and that the scheme will continue to be developed in compliance with relevant legislation and best practice.

23.4 Officers consider that the proposed fire safety measures are robust and proportionate to the scale and nature of the development and are in accordance with national and regional fire safety policy.

24. COMMUNITY INFRASTRUCTURE LEVY (CIL)

24.1 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.

24.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of £551,381.38. This includes an affordable housing relief of £217,158.

24.3 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 £3,246,650.96

24.4 The total CIL liability is therefore £3,798,332.34. The above are estimates based on the information available at the time of determination and may be subject to change based on assessment by the Councils CIL team.

25. CONCLUSION

25.1 The proposal engages the “titled balance” outlined at paragraph 11(d) of the NPPF. It is considered that there are no areas or assets of particular importance which would weigh against the proposal individually or in combination that would constitute a strong reason for refusal in line with the Framework. Whilst harm has been identified to the locally listed building, this is not a designated heritage asset so the harm is a matter of planning balance. There is also harm to the light in some rooms near the site. However, those are limited to two properties very close to the property boundaries of a draft site allocation, taking their light from the currently underdeveloped site.

25.2 The proposal is an accomplished mix of buildings of different uses that successfully reintegrates the site into its varied, eclectic context. It responds well to the different characters and neighbouring conservation areas in an architecturally sensitive manner. Where there are impacts, it has been designed to minimise or mitigate those impacts as far as possible.

25.3 The presumption in favour of sustainable development – particularly the housing delivery, has been given significant weight. Overall, the proposed development is in accordance with the development plan as a whole.

Public benefits

25.4 Harm has been identified to a non-designated heritage asset, but that harm is less than substantial. No harm has been identified to any designated heritage assets. However, if members identify such harm, considerable weight and importance must be given to that harm. There are several public benefits that may outweigh any harm identified.

25.5 The key public benefits of the proposal are:

- Housing delivery
- Affordable homes on site and a £3.6m contribution to the AHF
- Significant transport improvements from a car-free active travel development and financial contributions for infrastructure
- Increasing permeability into the site
- Improving the relationship of the building to the street by introducing active frontage and entrances along Jamestown Road
- Stitching the site back into its context and responding to the varying boundary conditions through high-quality architecture
- Significantly improving biodiversity and greening in the area
- A package of employment and training benefits and contributions
- Optimising an underdeveloped, vacant, and derelict brownfield site that has good connectivity to public transport and sits just outside Camden Town Centre, and

- Improving its relationship with the broader context and conservation areas

26. RECOMMENDATION

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

Affordable housing

- Affordable housing (C3) - 27 units
- Payment in Lieu of Affordable Housing £3,600,000

Transport

- Car Free development
- Delivery and Servicing management plan
- £10,000 for shared and micro mobility improvements contribution
- £350,000 towards improvement schemes to enhance pedestrian and cycling environment in the area
- £10,000 to install rain gardens within pavement buildouts next to the site
- £50,000 highways contribution
- £1,200 for 4 x cycle stands to provide 8 space in the public highway
- Demolition Management Plan (DMP) and Construction Management Plan (CMP)
- DMP/CMP Implementation support contributions of £30,513 and construction impact bond of £32,000
- Construction Working Group
- £30,000 towards the CA-F(n) CPZ review
- £20,000 towards an Electric Vehicles Only' parking bay
- £4,000 for one disabled parking space to be provided on the public highway in a suitable location within 50m from the site.
- A Travel Plan covering a monitoring and measures contribution of £11,348

Employment

- £103,870 Payment for the loss of employment space
- 17 construction apprentices with support fee of £28,900
- 10 construction work placement opportunities through the Euston Skills Centre
- Local employment
- Local Procurement

Energy and sustainability

- Future proofing of connection to district heating
- Energy and Sustainability Strategy
- Carbon offset contribution £49,961
- Be Seen' energy monitoring
- BREEAM Pre assessment scores:
    - Overall score of Excellent (75.44%):
    - Energy 17 out of 23 credits targeted = 73.9%
    - Water 7 out of 9 credits targeted = 77.8%
    - Materials 12 out of 14 credits targeted = 85.7%

Other

- Health infrastructure financial contribution of £77,900
- Open space contribution £463,498.20
- Agent of Change
- Student Management Plan
- Non-student Management Plan (for outside of term time)
- Retention of scheme architect

27. LEGAL COMMENTS

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

28. CONDITIONS

Standard conditions

1. Three years from the date of this permission

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

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

2. Approved drawings

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

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

Existing Drawings:

23054 MCO XX ZZ DR A 05001 EXISTING SITE LOCATION PLAN October 2024 P01, 23054 MCO XX ZZ DR A 05002 EXISTING SITE PLAN

October 2024 P01, 23054 MCO XX B1 DR A 05109 EXISTING PLAN LEVEL B1 October 2024 P01, 23054 MCO XX 00 DR A 05110 EXISTING PLAN LEVEL 00 October 2024 P01, 23054 MCO XX 01 DR A 05111 EXISTING PLAN LEVEL 01 October 2024 P01, 23054 MCO XX R1 DR A 05112 EXISTING PLAN LEVEL R1 October 2024 P01, 23054 MCO XX ZZ DR A 05201 EXISTING ELEVATION NORTH + EAST October 2024 P01, 23054 MCO XX ZZ DR A 05202 EXISTING ELEVATION SOUTH + WEST October 2024 P01, 23054 MCO XX ZZ DR A 05301 EXISTING SECTION AA October 2024 P01

Proposed Drawings:

23054 MCO XX ZZ DR A 06001 PROPOSED SITE LOCATION PLAN March 2025 P02, 23054 MCO XX ZZ DR A 06002 PROPOSED SITE PLAN March 2025 P02, 23054 MCO XX B1 DR A 06109 PROPOSED PLAN LEVEL B1 March 2025 P02, 23054 MCO XX 00 DR A 06110 PROPOSED PLAN LEVEL 00 April 2025 P03, 23054 MCO XX 01 DR A 06111 PROPOSED PLAN LEVEL 01 April 2025 P04, 23054 MCO XX 02 DR A 06112 PROPOSED PLAN LEVEL 02-04 April 2025 P04, 23054 MCO XX 05 DR A 06115 PROPOSED PLAN LEVEL 05 April 2025 P04, 23054 MCO XX 06 DR A 06116 PROPOSED PLAN LEVEL 06 March 2025 P02, 23054 MCO XX 07 DR A 06120 PROPOSED PLAN LEVEL R1 March 2025 P02, 23054 MCO XX ZZ DR A 06201 PROPOSED ELEVATION NORTH March 2025 P02, 23054 MCO XX ZZ DR A 06202 PROPOSED ELEVATIONS PBSA COURTYARD March 2025 P02, 23054 MCO XX ZZ DR A 06203 PROPOSED ELEVATIONS PBSA GABLES + SOUTH WEST March 2025 P02, 23054 MCO XX ZZ DR A 06204 PROPOSED ELEVATIONS C3 EAST + SOUTH GABLE March 2025 P02, 23054 MCO XX ZZ DR A 06205 PROPOSED ELEVATIONS C3 COURTYARD March 2025 P02, 23054 MCO XX ZZ DR A 06301 PROPOSED SECTION AA March 2025 P02, 23054 MCO XX ZZ DR A 06302 PROPOSED SECTION BB March 2025 P02, 23054 MCO XX ZZ DR A 06303 PROPOSED SECTION CC March 2025 P02

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

Pre-start conditions (any works)

3. Air Quality monitoring

Construction related impacts - Monitoring

Prior to commencement of development real time dust monitors appropriate to the dust risk shall be installed:

a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;

b) a confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details.

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

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

Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017 and the Mayor's SPG: The Control of Dust and Emissions During Construction and Demolition.

4. Whole Life-Cycle Carbon Assessment

Prior to commencement of any above ground works an updated version of the Whole Life Carbon Assessment should be submitted and approved in writing.

Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 686kgCO2e/m2 and/or Whole Life Carbon (A1-C4) above 898kgCO2e/m2, which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. You must not commence any work on site and/or construction works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

Reason: To ensure the development minimises carbon emissions throughout its whole life cycle and optimises resource efficiency in accordance with Policy SI2 in the London Plan 2021 and Policy CC1 of the Camden Local Plan.

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

5. Land contamination

Part A:

No development shall commence below ground (other than demolition) 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.

6. Suitably qualified engineer

The development hereby approved shall not commence (other than demolition, site clearance and preparation), until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the

appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

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

7. Waste Water Heat Recovery

Prior to commencement of above ground works manufacturer's data sheets and modelling snapshots (including assumptions and methodology) together with evidence that demonstrates the percentage of the hot water demand the wastewater heat recovery technology offsets should be submitted to and approved in writing by the Local Planning Authority.

The equipment shall be installed in full accordance with the approved details and permanently retained and maintained thereafter.

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

8. Rainwater/greywater harvesting

Prior to commencement of above ground works a feasibility assessment for rainwater/greywater recycling should be submitted to and approved in writing by the local planning authority. If considered feasible, details shall be submitted to the local authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.

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

9. Foul water capacity

No development shall be occupied until confirmation has been provided that either:-

a. Foul water Capacity exists off site to serve the development, or

b. development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or

c. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents this ensuring that the development does not impact on existing Thames Water infrastructure, in accordance with policy T3 of the London Borough of Camden Local Plan 2017.

10. Water network upgrades

No development shall be occupied until confirmation has been provided that either:

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

b) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

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

11. Piling method statement

No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken by the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure thus to ensure that the development does not impact the existing Thames Water infrastructure, in accordance with policy T3 of the London Borough of Camden Local Plan 2017.

12. SuDS - Further details

Prior to commencement of above-ground development, full details of the sustainable drainage system including attenuation tanks and viability of blue roofs 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, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the run-off rate 2l/s approved by the Local Planning Authority. An up to date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including:

- The proposed SuDS or drainage measures including storage capacities including demonstrating the viability for including blue roofs in the design

- The proposed surface water discharge rates or volumes

Correct storage volumes in the calculations, and the area summary which should show the full site area

- Greenfield and existing runoff volumes for the 1 in 100-year 6-hour storm event

- Investigation of groundwater encountered close to the proposed attenuation tank

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 Policies and Policy SI 13 of the London Plan 2021.

Prior to above ground works

13. Detailed drawings/samples

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

a) Details, including plans, coloured elevations and sections at 1:20 of all new typical facade junctions (including at ground level, window / external door head and cill, and at junction with roof). To include any ventilation grills, screening, balustrades, parapets, gates, planters and associated elements and lighting fixtures;

b) Bay study drawings, including plans, coloured elevations and sections at 1:50 of all typical façade types.

c) Details, including plans of coloured elevations and sections at 1:20 of all cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof levels;

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

e) Sample panel(s) of typical sections of the façade at 1:1 scale (minimum 2m x 2m in size) of each façade material including a glazed opening, showing reveal and header detail and neighbouring facing materials. To include the potential for reclaimed bricks proposed in the landscaping. To be installed on site for review, or at alternative pre-arranged location if necessitated by construction methodology.

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

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

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

14. Cycle parking

The cycle storage area shown on the floorplans hereby approved for 136 long stay spaces for the student accommodation, 54 long stay spaces for the affordable residential units, and 5 long stay spaces for the office/employment use shall be provided in its entirety prior to the first occupation of any of the new units, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

15. Green roof details

Prior to above ground works other than site demolition and clearance, full details in respect of the green roof in the area (at least 635m2) indicated on the approved roof plan shall be submitted to and approved by the local planning authority. Details of the green roof provided shall include: species, planting density, substrate and a section at scale 1:20 showing that adequate depth (expected to be at least 150mm for substrate) is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof. The buildings

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

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

16. Sound insulation and noise protection

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

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

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

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

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

17. Landscaping

Prior to commencement of relevant works details of hard and soft landscaping and means of enclosure of all un-built, open areas and a timetable for implementation, shall be submitted to and approved in writing by the local planning authority. The details shall include tree planting schedule (including replacement trees) including species and tree pit sizes, any proposed earthworks including grading, mounding and other changes

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

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

18. Bird and bat boxes

Prior to commencement of relevant works, details of the location of the following should be submitted to and approved in writing by the Local Planning Authority:

- The location (including elevations) of a minimum of six bird boxes, for house sparrow and/or starling and/or swift (if swift, more than one box should be provided in the same location), to be incorporated into the fabric of the building.

- The location (including elevations) of a minimum of four bat boxes to be incorporated into the fabric of the building where possible.

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

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

19. Solar PV

Prior to commencement of relevant works, drawings and data sheets showing the location, extent (no.93 panels /at least 181m2) and predicted energy generation of photovoltaic cells energy generation capacity (at least 38kWp) and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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

20. Diesel backup generators

Prior to 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 the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.

21. Air source heat pumps centralised ambient loop

Prior to commencement of above ground works, details, drawings and data sheets showing the location, SCOP of 3.4 or more and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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

Prior to occupation or use

22. Refuse and recycling

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

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

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

23. SuDS - Evidence of installation

Prior to occupation, evidence that the SUDS system has been implemented in accordance with the approved details as part of the development shall be

submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies.

24. Whole Life-Cycle Carbon Assessment

Prior to the occupation of the development:

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

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

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

25. Secure by design

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

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

26. Full fibre connectivity

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

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

27. Reuse and recycling of demolition waste

The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation,

evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

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

Compliance conditions

28. Non-road mobile machinery

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

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.

29. External fixtures

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

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

30. Fire statement

The relevant development shall be carried out in accordance with the details outlined in the Fire Statement and London Plan Fire Statement, prepared by Jenson Hughes and the Fire Statement Addendum Jenson Hughes.

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

31. Basement impact assessment

The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment (Basement Impact Assessment, prepared by HDR dated September 2024) hereby approved, and the confirmation at the detailed design stage that the damage impact assessment would be limited to Burland Category 1.

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

32. Plant noise

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

b.) The external noise levels emitted from the Air Source Heat Pumps shall ensure that the rating level of the noise emitted from the proposed installation located at the site shall not exceed the existing background level at any noise sensitive premises when measured and corrected in accordance with BS4142:2014 +A1:2019 “Methods for rating and assessing industrial and commercial sound.”

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

33. Anti-vibration

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

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

34. Landscaping – replacement planting

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

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in

accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.

35. Urban Greening Factor

The development shall achieve a UGF Score of at least 0.4 prior to occupation and shall be retained as such in perpetuity.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity, character and biodiversity of the area in accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017 and policy G5 of the London Plan 2021.

36. Emergency generator flues

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

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

37. Wheelchair accessible student accommodation

The 18 wheelchair accessible student units shown labelled on the approved floorplans shall be constructed as Wheelchair-Accessible rooms/units to comply with the relevant parts of Part M of the Building Regulations.

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

38. TMVHR activation

The TMVHR should not be activated unless the internal temperature exceeds 22 degrees Celsius. The equipment shall be installed in full accordance with the details hereby approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: In order to minimise energy consumption and following the energy and cooling hierarchies, in accordance with policies CC1, CC2, D1 of the Camden Local Plan 2017.

39. 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.

40. Active Cooling

Active cooling should be deactivated when windows are opened. The development should use windows with a g-value of 0.4, window recesses of 225mm and internal solar blinds.

Reason: To ensure that all development reduces 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

Building regulations (imposed optional requirements)

41. Wheelchair and accessible homes (building control optional requirements)

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

2B4P unit numbers C3.2.02, C3.3.02, C3.4.02

The following dwelling shown labelled on the approved floorplans shall be constructed as Wheelchair Adaptable Dwelling to comply with Part M4(3)(2)(a) of the Building Regulations:

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

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

42. Water use (building control optional requirements)

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

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

29. INFORMATIVES

Waste comments (Thames Water)

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

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

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

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to

Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would

have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

Should you require further information please refer to our website.

https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices

Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments (Thames Water)

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Non-road mobile machinery

Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit “http://nrmm.london/”.

Archaeology

The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England’s Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

It is proposed that some council street trees be pollarded. Liaise with the Council Tree team for permission for these works.

Biodiversity Net Gain (BNG) Informative:

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan.

The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.

Based on the information provided, this permission WILL require approval of a BGP before development is begun because none of the statutory exemptions or transitional arrangements summarised below are considered to apply.

++ Summary of transitional arrangements and exemptions for biodiversity gain condition

The following are provided for information and may not apply to this permission:

1. The planning application was made before 12 February 2024.

2. The planning permission is retrospective.

3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.

4. The permission is exempt because of one or more of the reasons below:

- It is not “major development” and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.

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

- The application is a Householder Application.

- It is for development of a “Biodiversity Gain Site”.

- It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).

- It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).

+ Irreplaceable habitat:

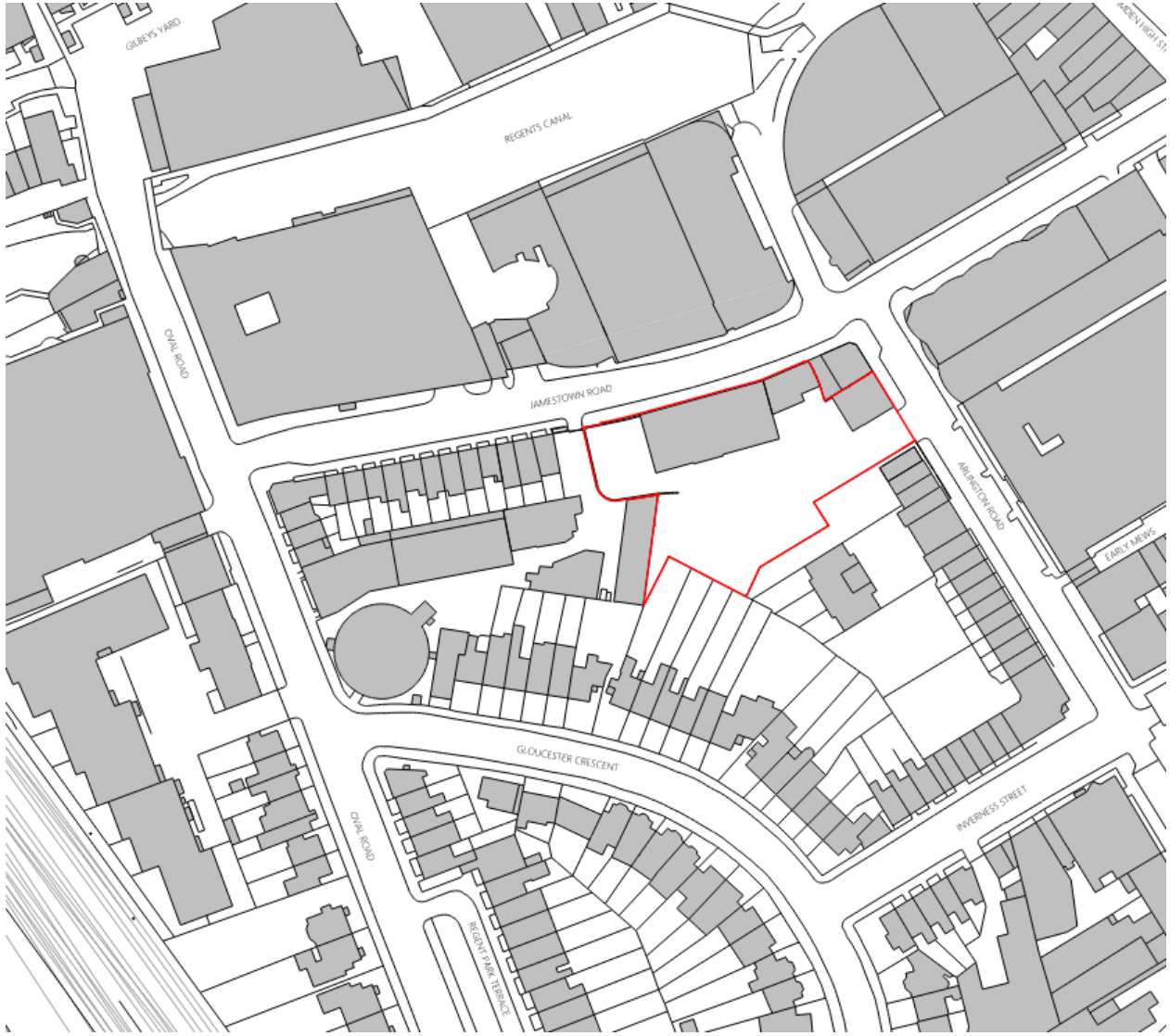
If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.

++ The effect of section 73(2D) of the Town and Country Planning Act 1990

If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission (“the earlier BGP”), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.

++ Phased development

In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.



Site location plan

Aerial photo showing existing site

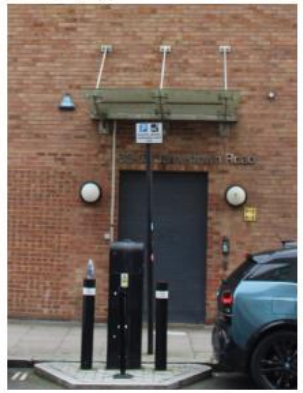
Aerial photo showing existing site

Existing view from Jamestown looking west

View from Jamestown Road and Arlington Road (left bottom)

'Cushla Public House'

EV charging



E-scooter and Cycle Hire. Existing trees.

Camden Works access

Townhouses

Long view of Jamestown Road above, with zoomed in images below

Site

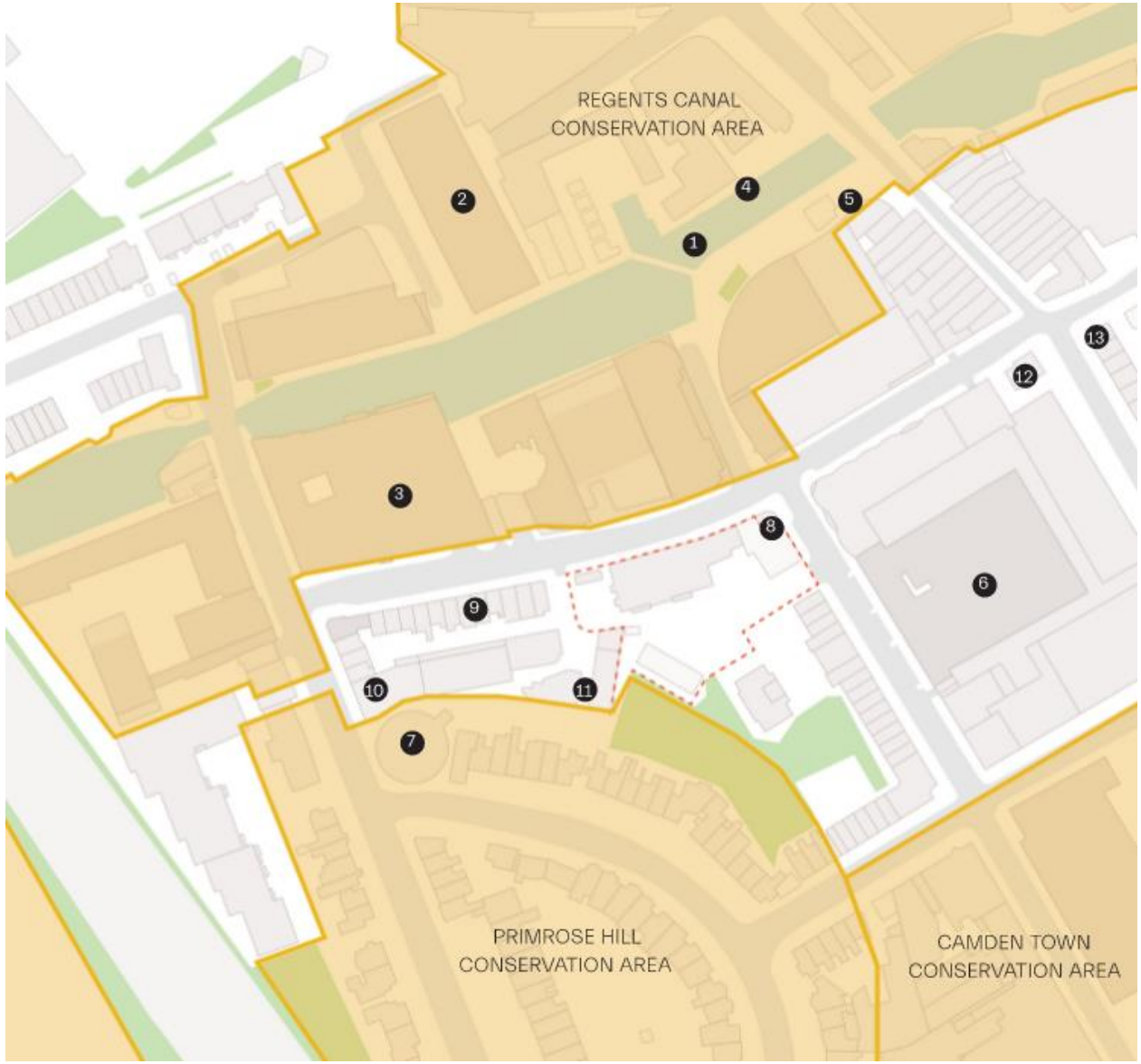
Neighbouring 'One Housing' residences

Entrance into existing car park. Footway to be built out as continuous in proposal

Looking south

Long view of Alington Road above, with zoomed in images below

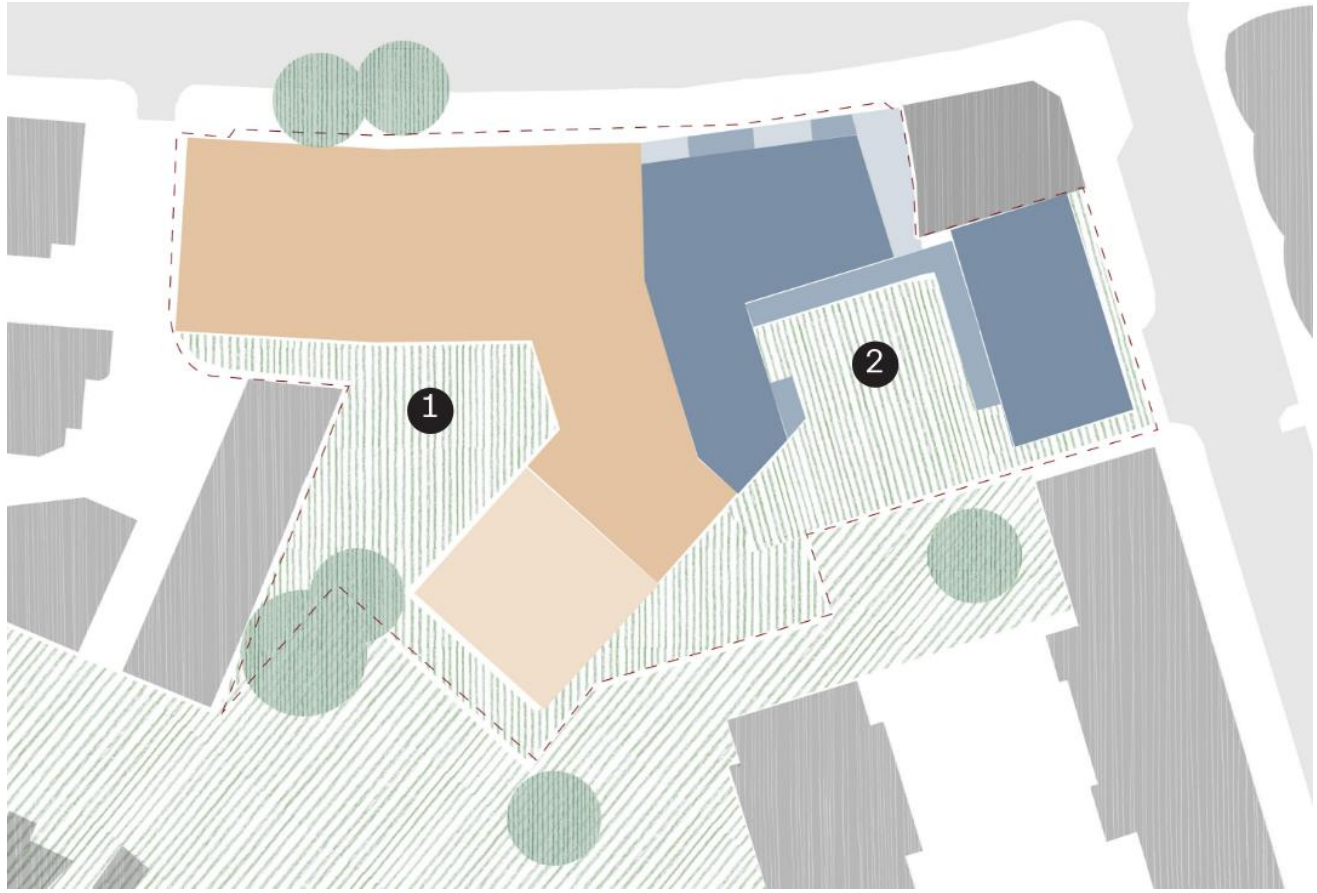
Photographs from within the site



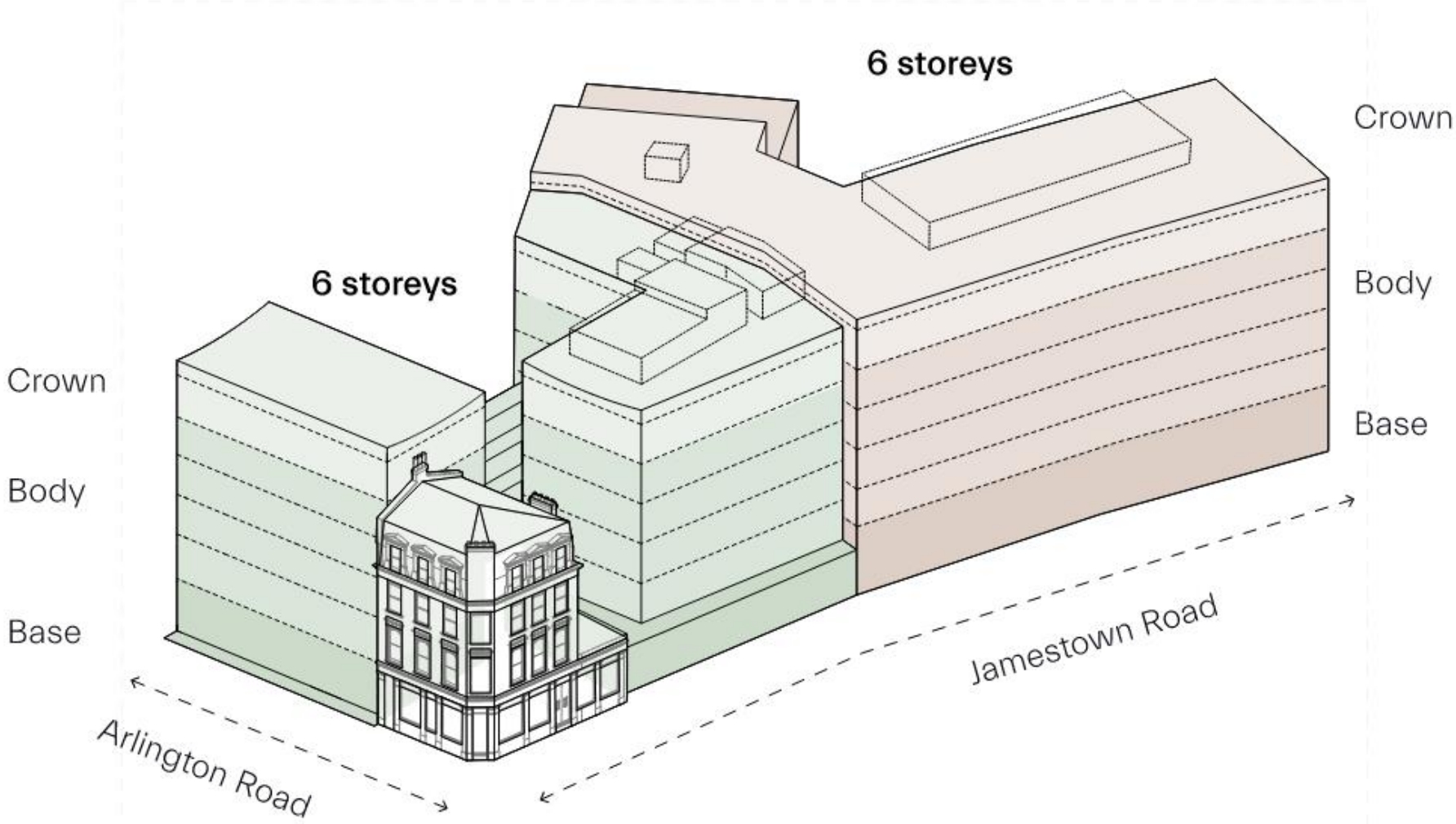
Heritage Map CAs in yellow

Key

- Student Accommodation
- 1 Student Courtyard
- C3 Affordable Housing
- 2 Affordable Housing Courtyard



Proposed affordable block in blue and PBSA in yellow



Proposed axonometric

Proposed Jamestown Road looking west

Proposed Jamestown Road illustration looking east

Proposed Massing townscape view from Jamestown Road

Proposed Jamestown Road elevation

C3 Entrance | Post | C3 Services | Escape | Bikes | PBSA Front Door | Flexible Workspace | Services

Morris & Company

Proposed ground floor with frontage of Jamestown Road

Proposed ground floor showing PBSA access/entrance

camden.gov.uk Proposed basement plan, purple PBSA and red Class E

Camden

- Student cycle store & access
- Commercial cycle zone
- Residential cycle store
- Short stay CaMden M stands

Ground Floor Plan - amended

Basement Plan - amended

Proposed cycle stores at basement and ground floor

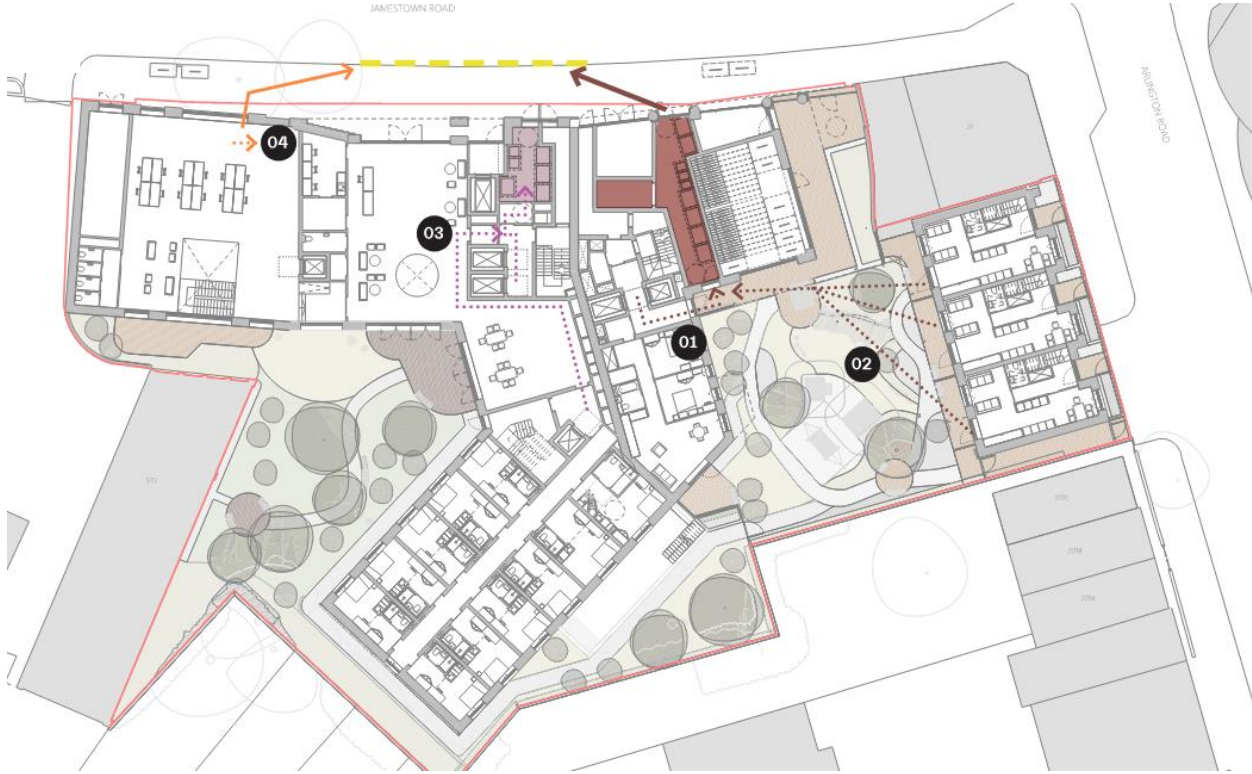
Commercial refuse
Student accommodation refuse
Residential refuse
Double yellow line (delivery/servicing vehicle set down)

WASTE DROP-OFF

C3 Internal access / refuse drop-off
PBSA Internal access / refuse drop-off
Commercial Internal access / refuse drop-off

REFUSE COLLECTION

C3 External access / refuse collection & drop off
PBSA External access / refuse collection & drop off
Commercial / refuse collection & drop off



Proposed refuse storage and servicing

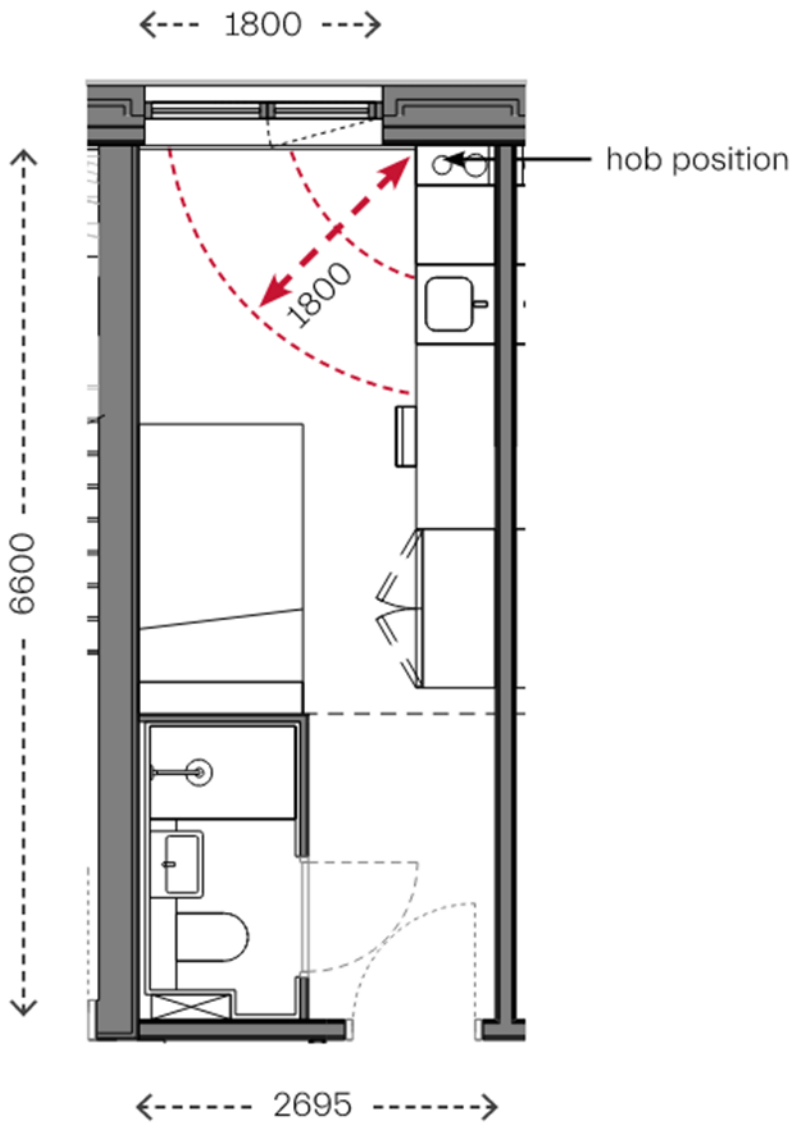
Regular Studio
26 Rooms
17–18sqm

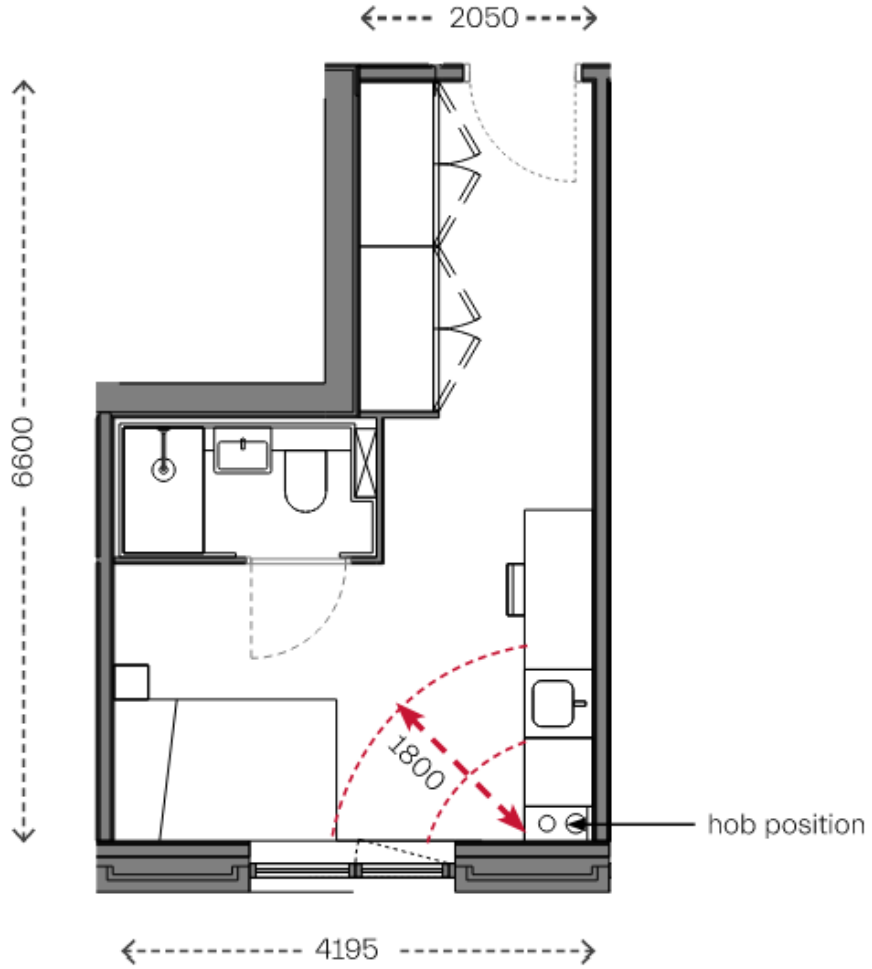
Premium Studio
6 Rooms
22–25sqm

Wheelchair Accessible Studio (WCA)
3 Rooms
25–27sqm

Typical Floor Total
35 Rooms

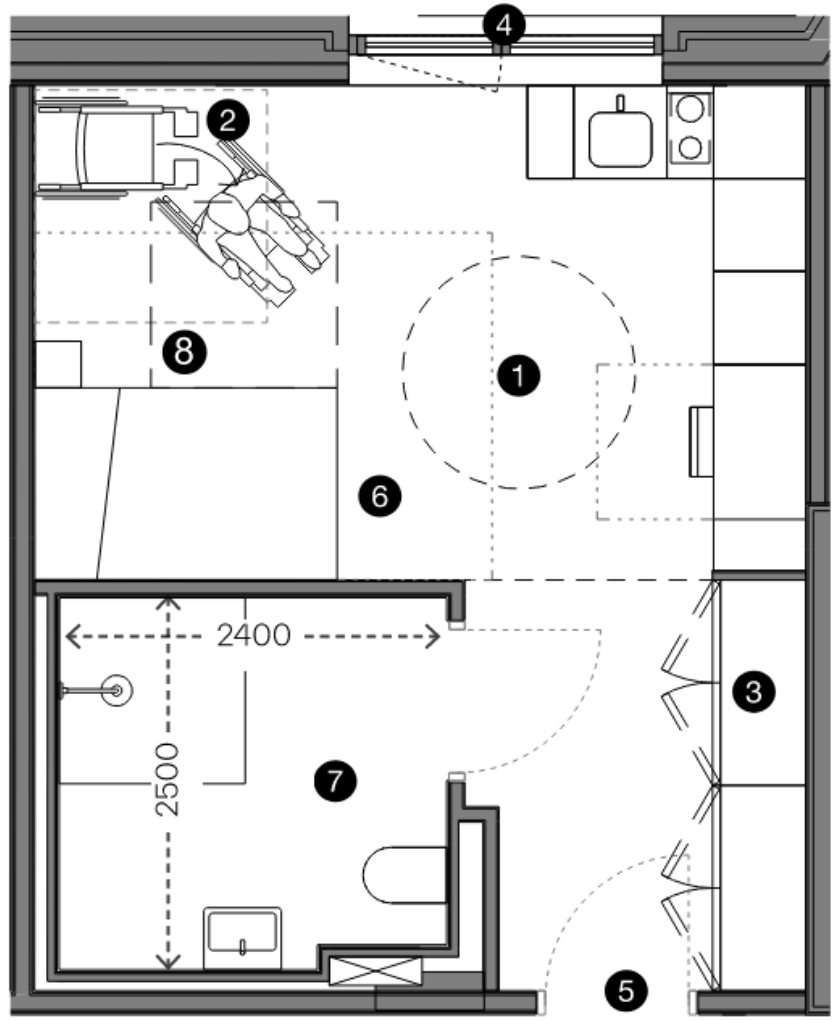
Proposed PBSA typical floor plan



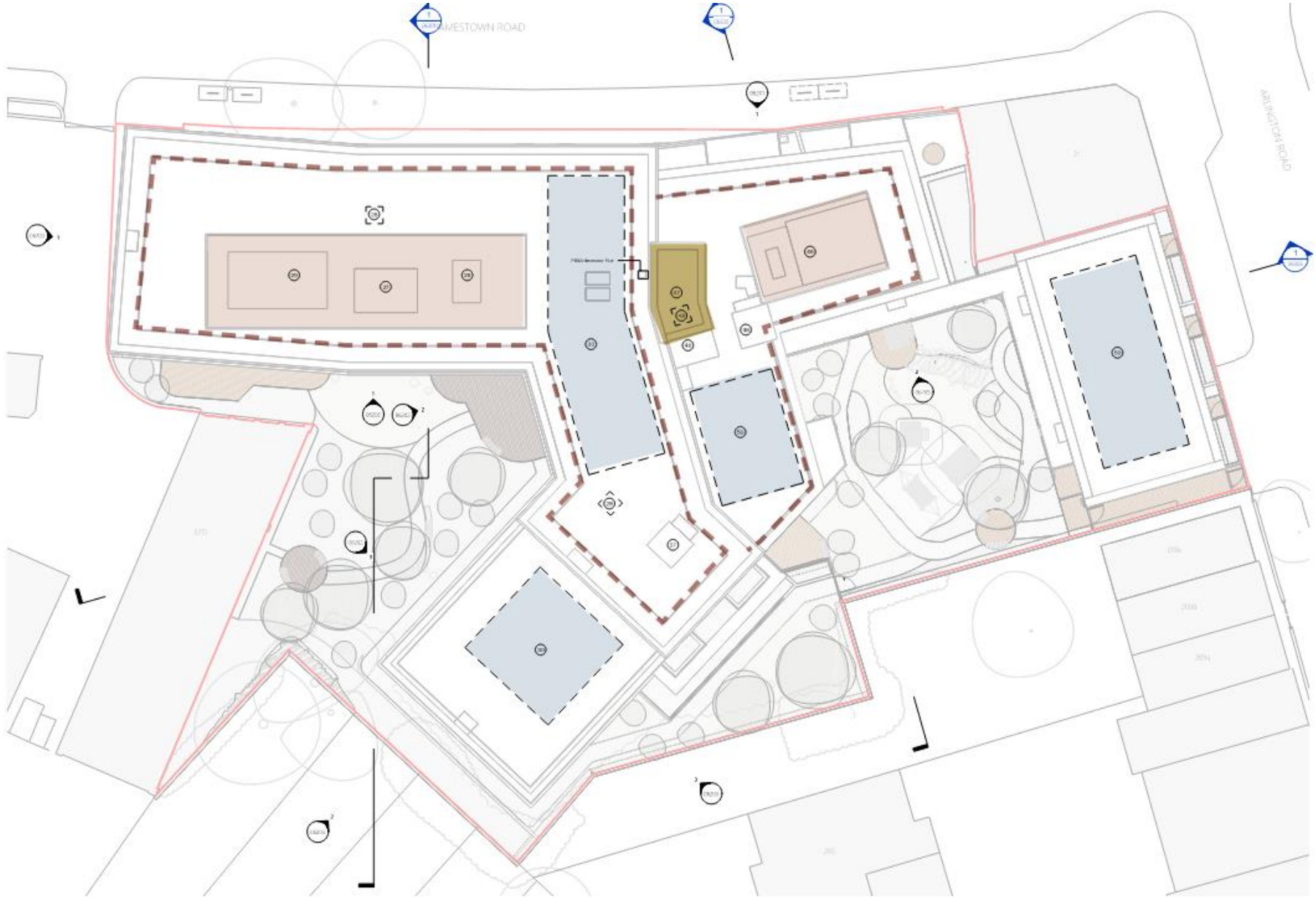


Proposed standard studios (left) premium studios (right)

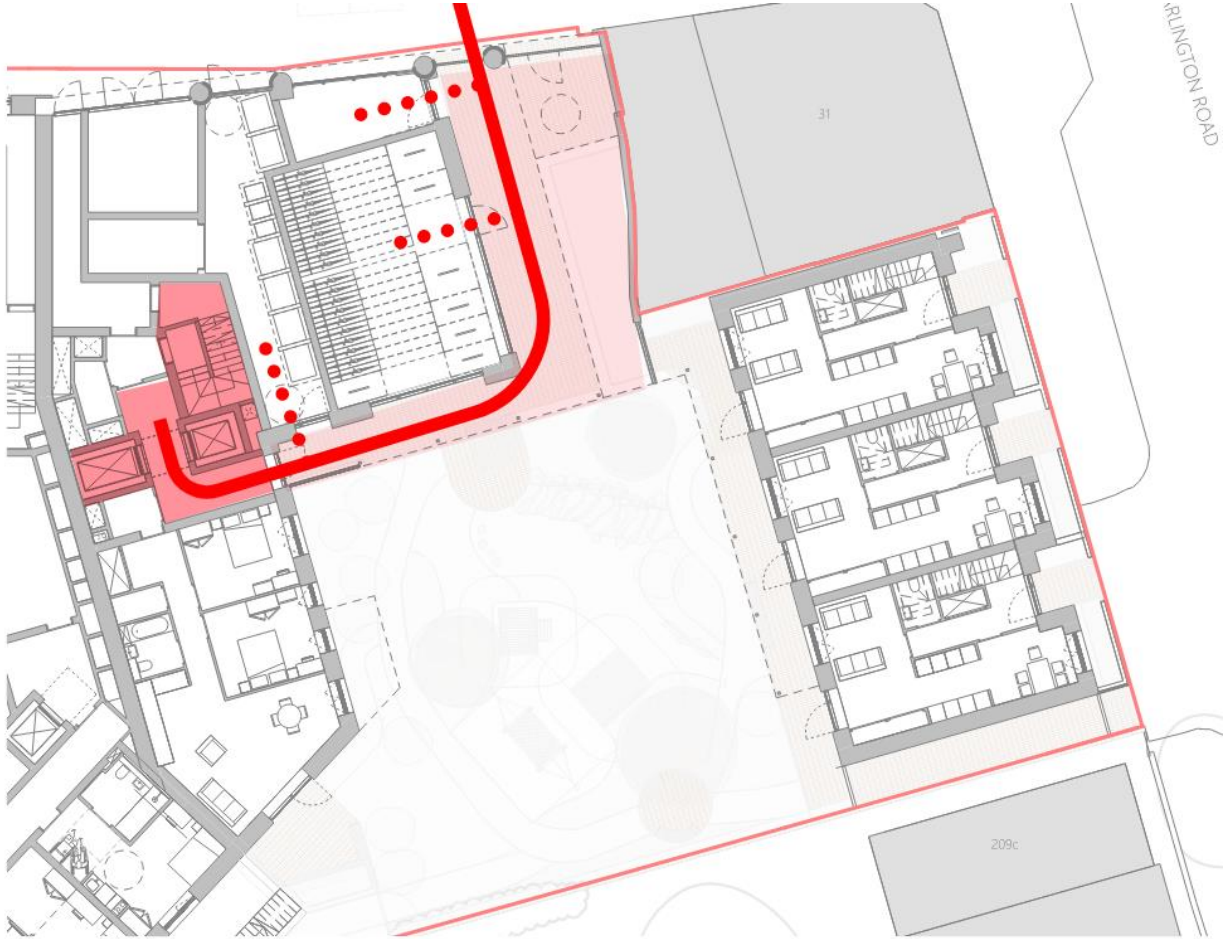
1. Sufficient maneuvering space required (1500mm).
2. Wheelchair transfer area
3. Storage/Wardrobe swing doors open to 180 degrees.
4. Openable windows 800–1000mm above FFL.
5. Door clear width 800/825mm + 300 nib
6. 1000m manoeuvre space next to side of bed.
7. Wheelchair shower/bathrooms to meet Part M (vol2) 5.15 - 5.21
8. 1200 x 1200mm clear zone



Typical Accesible Studio



Proposed roof plan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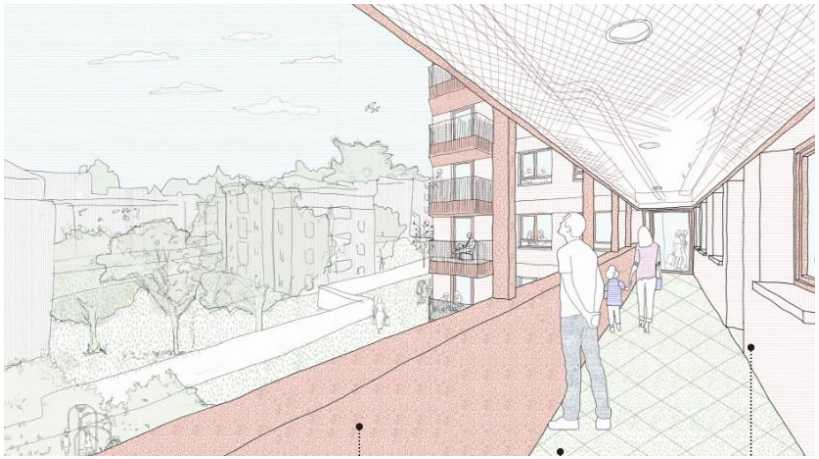
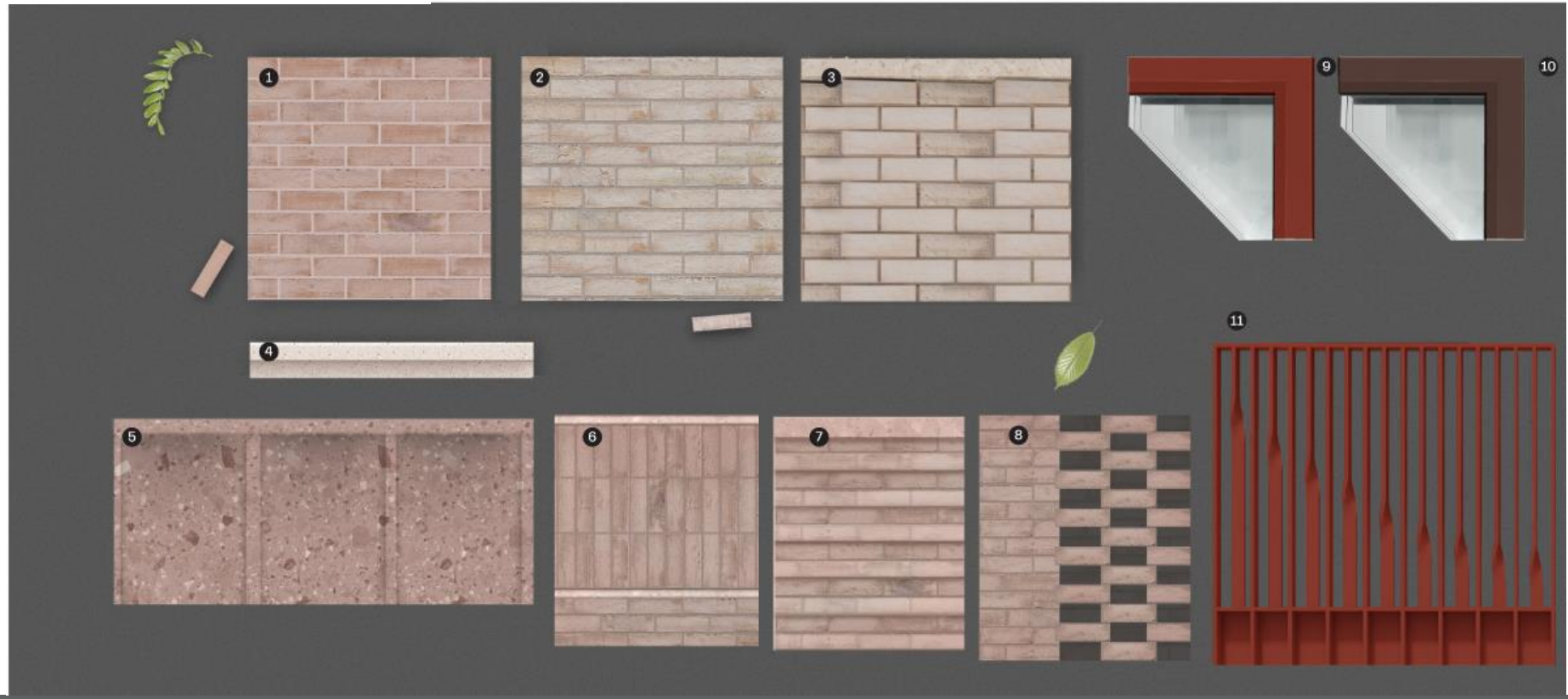
209c

Proposed residential typical floorplan



Affordable housing courtyard with deck access

1. C3 - Peach Brickwork
2. PBSA Body - Light Brickwork
3. PBSA Banding - Light Brickwork Detailing
4. PBSA Precast Stringer
5. C3 Precast Plinth
6. C3 Detailing - Soldier Course Banding
7. C3 Detailing - Rusticated Brickwork
8. C3 Detailing - Hit-and-Miss Brickwork
9. C3 Windows
10. PBSA Windows
11. C3 Balconies and Railing



Proposed samples showing material palette

33-35 Jamestown Road, London NW1 7DB

Addendum Report 1

Prepared on behalf of the London Borough of Camden

Issued: 16th January 2025

Planning Reference: 2024/4953/P

BPS Chartered Surveyors

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Contents

1.0 Introduction

1.1 BPS Chartered Surveyors have been instructed by The London Borough of Camden ('the Council') to provide a review and analysis in response to the BNP Paribas Real Estate ('BNPPRE') letter dated 23rd December 2024. This BPS Addendum follows on from our report of the 12th of December 2024, which was issued in response to BNPPRE's Financial Viability Assessment ('FVA') dated November 2024, prepared on behalf of 4C – Jamestown Road Limited ('the Applicant') in connection with the redevelopment of the above site.

1.2 This addendum should therefore be read in conjunction with the above reports.

1.3 BPS concluded in our previous report that the proposals produced a surplus of £5.2m.

1.4 Having considered BNPPRE's latest comments, the following table summarises our ***current*** respective positions:

Input	BNPPRE Nov 24	BPS Dec 24	BNPPRE Dec 24	BPS Jan 25	Comments
Income					
PBSA GDV	£63,810,533 (£341,000 per bed)	£74,183,747 (£397,000 per bed)	£63,810,533 (£341,000 per bed)	£73,143,910 (£391,000 per bed)	Disagreed
Social Rent GDV	£2,903,099 (£2,245psm/ £209psf)	£3,550,000 (£2,743psm/ £255psf)	£2,903,099 (£2,245psm/ £209psf)	£3,550,000 (£2,743psm/ £255psf)	Disagreed
Intermediate GDV	£3,644,215 (£4,867psm/ £452psf)	£3,644,215 (£4,867psm/ £452psf)	£3,644,215 (£4,867psm/ £452psf)	£3,644,215 (£4,867psm/ £452psf)	Agreed
Commercial GDV	£2,050,874 (£7,000psm/ £650psf)	£2,575,045 (£8,783psm/ £816psf)	£2,050,874 (£7,000psm/ £650psf)	£2,575,045 (£8,783psm/ £816psf)	Disagreed
Expenditure					
Benchmark Land Value	£11.7m	£8.3m	£11.7m	£8.3m	Disagreed
Build Costs (inc. contingency)	£51,583,216	£41,532,287	£51,583,216	£41,532,287	Ambiguous- Further information required
Professional Fees	10%	10%	10%	10%	Agreed
Private Legal & Agent Fees	2%	2%	2%	2%	Agreed
Commercial Letting & Legal Fees	15%	15%	15%	15%	Agreed
CIL	£3,511,592	£3,511,592	£3,511,592	£3,511,592	Ambiguous - We require confirmation from the

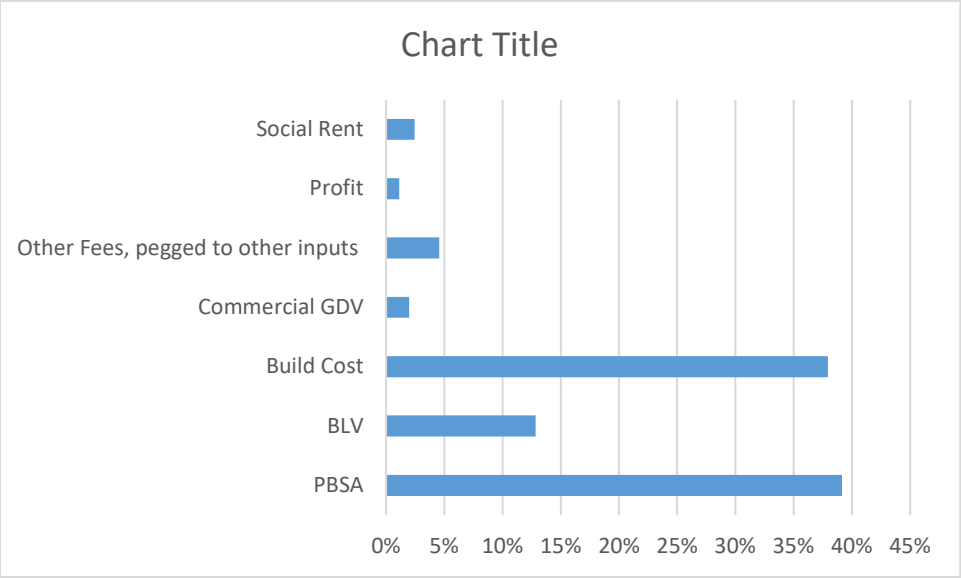
					Council on this input.
S106	£734,510	£734,510	£734,510	£734,510	Ambiguous - We require confirmation from the Council on this input.
Finance	7%	7%	7%	7%	Agreed
Profit: PBSA Affordable Commercial	 15% 6% 15%	 12.5% 6% 15%	 15% 6% 15%	 12.5% 6% 15%	Disagreed
Development Timeframes					
Pre-construction Period	6-months	6-months	6-months	6-months	Agreed
Construction Period	30-months	30-months	30-months	30-months	Agreed
Sales Period	1-month	1-month	1-month	1-month	Agreed
Viability Position	-£22.2m	+£5.2m	-£22.2m	+£4.3m	Disagreed
Actual Profit	-£11.9m (-16.5% on GDV)	+£15.2m (18.5% on GDV)	-£11.9m (-16.5% on GDV)	+£14.3m (17.2% on GDV)	Disagreed

1.5 Our updated conclusions are as follows:

- Based on the additional evidence supplied by BNPPRE, we have accepted their adopted OPEX of £3,250 per bed, however we maintain our adopted rental values to be appropriate. In consequence, we have increased our assessment of the PBSA GDV by c £1m, arriving at the GDV £73,143,910.
- We consider further evidence should be provided by the Applicant to support their opinion of the build cost. Details are outlined in the email from GBA, included in Appendix 1 of this Addendum.
- Should BNPPRE wish to contest rental values attributed to the proposed PBSA, we consider further evidence from Homes for Students should be supplied. The exact parameters are outlined in para 2.5 of this report.
- Due the absence of further evidence being provided, we maintain our position on other inputs to be appropriate.

1.6 The above revisions reflect a reduction to our assessed viability surplus from £5.2m to **£4.3m**. We, however, maintain that the surplus could contribute towards additional affordable housing.

1.7 The difference between ours and BNPPRE's assessment equates to c. £26.5m The chart below, presents the level of how each area of difference contributes to the said difference. It can be seen that Build Cost and PBSA assessments are the most significant area of disagreements:



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

2.0 Response to BNPPRE

PBSA GDV

2.1 In our review, we have disagreed with BNPPRE's assessment of the student accommodation component. Our assessment reflects GDV of £74,183,747 (£397,000 per bed), whilst BNPPRE adopted £63,810,533 (£341,000 per bed). In our assessment we accepted BNPPRE's yield, however we adopted higher rental values and lower OPEX. Our respective conclusions are outlined in the table below:

Input	BNPPRE	BPS
Rent (net of voids)	£3,479,225	£3,900,000
OPEX	£3,250 per bed	£3,000 per bed
Yield	4.5%	4.5%
GDV	£63,810,533	£74,183,747

2.2 BNPRRE provided evidence produced by Homes for Students, which states that estimates OPEX per annum per bed equates to £3,261.23. We note that the figure is inclusive of VAT, which is potentially recoverable tax. Assuming recovery of 20%, the figure would actually equate to £2,717, which is lower than our adopted £3,000. It is unclear from the information provided online whether or not the company is in fact VAT registered.

2.3 Given the assessment is conducted on a non-specific basis, where there is no requirement for the operator to be VAT registered, we have adopted the Applicant's OPEX on a without prejudice basis.

2.4 BNPPRE maintains their originally adopted rent assessment is appropriate. They also state that "Homes for Students", who will be the operator, maintains the previously adopted rents are appropriate. We also note that no evidence directly from Homes for Students have been provided to support this.

2.5 Given the local evidence clearly states a higher pricing level than proposed by the applicant, we question why this the applicant anticipates this scheme trading at a discount to other nearby schemes. In order for us to consider BNPPRE's position further, we would require Homes for Students to provide us with the following additional evidence:

- Details of rental values achieved in their other student schemes in the area, which would include dates and rental period. It would need to comprise unit by unit pricing. We would accept the evidence of rentals agreed over the current academic year.

- Confirmation that all the achieved rents reflect any subsidies or university grants provided to support the cost of student accommodation
- Any evidence would need to be provided in writing, directly by the operator. It would also need to include information such as unit size, floor number and amenities available in the building.

2.6 Given the clear contradiction between the available evidence and the operator's more limited assessment, we consider the above to represent a minimum level of information that should be provided.

2.7 We note BNPPRE commented that the evidence of the student accommodation included in our report reflected asking prices. From our conversations with other student accommodation operators, we understand there is a very limited scope for negotiation on asking prices when booking a room. Hence, we maintain our previous analysis to be appropriate.

2.8 Overall, our revised values are outlined below:

Input	BNPPRE	Revised BPS
Rent (net of voids)	£3,479,225	£3,900,000
OPEX	£3,250 per bed	£3,250 per bed
Yield	4.5%	4.5%
GDV	£63,810,533	£73,143,910

2.9 Given the operator has been appointed, we require clarification from the Applicant whether the proposed scheme would be in fact forward funded, which would also impact the finance cost.

Social Rent Values

2.10 We disagreed with BNPPRE in their assessment of the Social Rent Values. We highlighted in our report that BNPPRE assessment was conducted on the basis of outdated social rent caps, albeit this has not been addressed by BNPPRE and revised in their response.

2.11 We consider the most appropriate assessment of Social Rent values would comprise transactional evidence. We encourage BNPPRE to provide comparable evidence to support their position of values.

Commercial GDV

2.12 In our assessment of commercial component, we applied an estimated rental level of £45psf to the basement level and £62psf to the upper floor levels of the proposed scheme. We note BNPPRE's comment about the absence of comparable evidence supporting a rental value

applied to the basement of £45psf. We found there to be limited evidence of basement office rentals the area, and in our assessment, we applied an arbitrary discount of c. 30% to the ground floor office space.

2.13 The rental value of £45psf was a figure adopted by BNPPRE for both ground floor and basement levels. It is, therefore, unclear why BNPPRE requires evidence from BPS to support this, it appears that BNPPRE is now critiquing their own assessed figures. Moreover, NPPG is clear that in viability process, it is up to the Applicant to demonstrate responsibility to evidence their position.

Profit Target on PBSA

2.14 BNPPRE adopted a profit target of 15%, we consider 12.5% to be reasonable. Given that no supporting evidence have been provided by BNPPRE in their response, we are not prepared to change our position. We have however sensitivity tested 15% to illustrate the impact on our identified surplus.

Construction Costs

2.15 In our assessment we attributed a lower figure than BNPPRE to the construction costs by c £10m, based on an assessment undertaken by our appointed Cost Consultant, Geoffrey Barnett Associates ('GBA'). We note BNPPRE provided Response from Gardiner & Theobald ('G&T'), dated 20th December 2024.

2.16 GBA reviewed the G&T's response which is outlined in Appendix 1 of this Addendum. GBA clearly state that their assessment is based on BCIS data and that further information should be submitted by the Applicant to support their position. Pending such information being provided, we maintain the previously adopted figure in our assessment.

Benchmark Land Value

2.17 In our review, we disagreed with BNPPRE assessment of BLV, resulting in c. £3m difference between our respective positions. We find that the poor condition and significant design limitations of the building have been appropriately accounted for in BNPPRE's assessment.

2.18 In their response, BNPPRE admit that the existing building is in fact of a poorer quality than the comparable evidence, however they have not offered their own revised assessment which would account for this factor. In turn, BNPPRE comment on the fact that the location of the site was not appropriately accounted for in our assessment, as well as a yield of 10% to the yard space is unrealistic- they do not, however, offer any comparable evidence to support this.

2.19 Overall, we consider that BNPPRE position should be supported by reliable comparable evidence or alternative analysis which would account for the poor quality and design issues, identified in our review. In absence of these, we maintain our adopted £8.3m to be appropriate.

3.0 Author Sign Off

3.1 This report is provided for the stated purpose and for the sole use of the named clients. This report may not, without written consent, be used or relied upon by any third party.

3.2 The author(s) of this report confirm that there are no conflicts of interest and measures have been put in place to prevent the risk of the potential for a conflict of interest. In accordance with the RICS Professional Statement *Financial Viability in Planning: Conduct and Reporting* September 2019, this report has been prepared objectively, impartially, and with reference to all appropriate sources of information.

3.3 The following persons have been involved in the production of this report:

Agnes Mrowiec MRICS
RICS Membership no. 6821180
For and on behalf of
BPS Chartered Surveyors

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

January 2025

Appendix 1: GBA Response- Build Cost

From: Tatiana Vodovoz <Tanya@gabarnett.co.uk>
Sent: 13 January 2025 16:39
To: Agnes Mrowiec <AgnesM@bps-surveyors.co.uk>
Subject: RE: 33 - 35 Jamestown Road, Camden, NW1 7DB (Ref 2024/4953/P) - Report 04.12.24

Hi Agnes,

In response to Gardiner and Theobald GBA Associates Review Comments dated 20th December 2024 we would like to point out the following:

Statement: "G&T have reviewed GBA's comments and do not propose to reduce the Construction Cost. BCIS should not be used as a cost modelling tool alone. BCIS does not account for project specifics, only uses Traditional contracts and not Design and Build, and is not based on London schemes (despite the rebasing). It is unknown when the BCIS data was collected, and there have been significant recent inflationary pressures within the last 5 years, including recent Building Safety Act impacts, which will have impacted design and fire safety aspects. In this case, the BCIS data is known as to what it is based on. In addition, BCIS data does not account for any Post Contract Change or Contingency that may be spent getting to Final Account stage."

GBA Response: Guidelines for Viability Assessment as per GOV.UK advise to assess "build costs based on appropriate data, for example that of the Building Cost Information Service" with addition of abnormal costs and site-specific costs. The statement that "BCIS data only uses Traditional Contracts and not Design and Build contracts "is not accurate, as can be found under "Analysis" pages where the type of contract is stated, for example D&B contracts are noted for analysis #33848, #33849, #33868, #34122 etc. In our assessment we have not just used a BCIS rate but added £7.8M abnormal costs (including fire-safety aspect – sprinkler system) and allowed 5% for contingency on top of BCIS rate, additional and abnormal costs. The full list of abnormal costs can be seen in App A of our report dated 04.12.24.

Statement: "G&T internal benchmarking on projects that have been tendered, reached CSA and an agreed Final Account in the last 5 years can be seen below. These are all residential schemes within London."

GBA Response: There are no specifics given for mentioned projects, apart from that they are "residential" and "within London". They have provided no information as to whether they are student accommodations or luxurious residential developments in the most desirable parts of London with the top end market specification, for which very high build costs per m2 will be justifiable. It should be noted that in the proposed development only 30% of the total GIA is related to residential flats and 70% to student accommodations.

We have reviewed Analysis for student residences available on BCIS from 2017 and rebased the costs to 4Q2024 (the time of our assessment) and Camden (the location of the proposed development) and identified those with the highest costs per m2, as listed below:

Analysis #	Location	Type of Contract	Number of floors	GIA,m2	Contract sum,£	Rate £/m2
#34122	London	Design and Build	33 (incl. basement)	18,222	£64,988,805	£3,567
#33940	Farnham (Surrey)	NEC4 priced contract 2017	4	6,649	£27,219,089	£4,094
#33868	London	Design and Build	32	12,726	£62,703,058	£4,927
#33849	South West	Design and Build	8	31,520	£141,106,511	£4,477
#33848	South West	Design and Build	7	6,484	£25,356,438	£3,911

The above contract sums and rates per m2 are inclusive of preliminaries and OHP, external works and services, abnormal costs, contingencies/variations and project design team fees. The average of the above rates is £4,195/m2, even below our rate of £4,483/m2. We have not found any evidence in BCIS database of student accommodations as £5,567.54 per m2 as proposed (we appreciate that it is a blended rate of student residents and residential flats).

We also would like to point out that in proposed costs sub-contractors' preliminaries at 20% are included for all elements of work as well as main-contractor's preliminaries at 15%. We consider that to be incorrect and appears to contain a duplication of preliminaries costs. We query what exactly is included in sub-contractors' preliminaries?

We would appreciate if G&T could be asked to submit more detailed information on mentioned projects (99,132,28,61,145,42,183,142,130,59 and 141) to allow us to understand why the cost of these projects is higher than BCIS data and also provide a breakdown of the 20% on-cost for preliminaries applied to sub-contractors.

If G&T provide the further information requested, then GBA will be able to respond further.

Kind regards,

Tanya Vodovoz

Geoffrey Barnett Associates

Chartered Quantity Surveyors

Project Co-ordinators

Appendix 2: Argus Appraisal

APPRAISAL SUMMARY — BPS SURVEYORS

Jamestown Road
PBSA with 33% C3 affordable- Net Profit

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	**Units**	**ft²**	**Sales Rate ft²**	**Unit Price**	**Gross Sales**	**Adjustment**	**Net Sales**
C3 Social Rent	17	13,923	254.97	208,824	3,550,000	0	3,550,000
C3 Intermediate	10	8,060	452.14	364,421	3,644,215	0	3,644,215
Totals	**27**	**21,983**			**7,194,215**	**0**	**7,194,215**

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
PBSA	187	39,457	98.83	20,852	3,291,476	3,899,391	3,291,476
Flexible commercial	1	3,155	56.50	178,258	178,258	178,258	178,258
Totals	**188**	**42,612**			**3,469,733**	**4,077,649**	**3,469,733**

Investment Valuation

PBSA						
Current Rent	3,291,476	YP @	4.5000%	22.2222	73,143,910	
Flexible commercial						
Market Rent	178,258	YP @	6.5000%	15.3846		
(1yr Rent Free)		PV 1yr @	6.5000%	0.9390	2,575,045	
Total Investment Valuation					**75,718,955**	

GROSS DEVELOPMENT VALUE				**82,913,170**
Purchaser's Costs			(2,271,569)	
Effective Purchaser's Costs Rate		3.00%		
				(2,271,569)
NET DEVELOPMENT VALUE				**80,641,601**
NET REALISATION				**80,641,601**
OUTLAY				
ACQUISITION COSTS				
Benchmark Land Value		8,300,000		
Benchmark Land Value			8,300,000	
				8,300,000
Stamp Duty		5.00%	415,000	
Agent Fee		1.00%	83,000	
Legal Fee		0.80%	66,400	
				564,400

CONSTRUCTION COSTS				
Construction	**Units**	**Unit Amount**	**Cost**	
Construction	1 un	41,532,287	41,532,287	
CIL			3,511,592	
S106			734,510	
				45,778,389
PROFESSIONAL FEES				
Professional fees		10.00%	4,153,229	
				4,153,229
MARKETING & LETTING				
Letting Agent Fee		10.00%	17,826	
Letting Legal Fee		5.00%	8,913	
				26,739
DISPOSAL FEES				
Sales Agent Fee		1.50%	1,209,624	
Sales Legal Fee		0.50%	403,208	
				1,612,832

APPRAISAL SUMMARY BPS SURVEYORS

Jamestown Road
PBSA with 33% C3 affordable- Net Profit

FINANCE

Debit Rate 7.000%, Credit Rate 0.000% (Nominal)			
Land		1,987,354	
Construction		3,929,584	
Total Finance Cost			5,916,938
TOTAL COSTS			**66,352,526**
PROFIT			**14,289,075**

Performance Measures

Profit on Cost%	21.54%
Profit on GDV%	17.23%
Profit on NDV%	17.72%
Development Yield% (on Rent)	5.23%
Equivalent Yield% (Nominal)	4.57%
Equivalent Yield% (True)	4.71%
IRR% (without Interest)	21.37%
Rent Cover	4 yrs 1 mth
Profit Erosion (finance rate 7.000)	2 yrs 10 mths

APPRAISAL SUMMARY — BPS SURVEYORS

Jamestown Road
PBSA with 33% C3 affordable

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales	Adjustment	Net Sales
C3 Social Rent	17	13,923	254.97	208,824	3,550,000	0	3,550,000
C3 Intermediate	10	8,060	452.14	364,421	3,644,215	0	3,644,215
Totals	**27**	**21,983**			**7,194,215**	**0**	**7,194,215**

Rental Area Summary	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV	Net MRV at Sale
PBSA	187	39,457	98.83	20,852	3,291,476	3,899,391	3,291,476
Flexible commercial	1	3,155	56.50	178,258	178,258	178,258	178,258
Totals	**188**	**42,612**			**3,469,733**	**4,077,649**	**3,469,733**

Investment Valuation

PBSA						
Current Rent	3,291,476	YP @	4.5000%	22.2222	73,143,910	
Flexible commercial						
Market Rent	178,258	YP @	6.5000%	15.3846		
(1yr Rent Free)		PV 1yr @	6.5000%	0.9390	2,575,045	
Total Investment Valuation					**75,718,955**	

GROSS DEVELOPMENT VALUE				**82,913,170**
Purchaser's Costs			(2,271,569)	
Effective Purchaser's Costs Rate		3.00%		
				(2,271,569)
NET DEVELOPMENT VALUE				**80,641,601**
NET REALISATION				**80,641,601**
OUTLAY				
ACQUISITION COSTS				
Benchmark Land Value		8,300,000		
Benchmark Land Value			8,300,000	
				8,300,000
Stamp Duty		5.00%	415,000	
Agent Fee		1.00%	83,000	
Legal Fee		0.80%	66,400	
				564,400

CONSTRUCTION COSTS				
Construction	**Units**	**Unit Amount**	**Cost**	
Construction	1 un	41,532,287	41,532,287	
CIL			3,511,592	
S106			734,510	
				45,778,389
PROFESSIONAL FEES				
Professional fees		10.00%	4,153,229	
				4,153,229
MARKETING & LETTING				
Letting Agent Fee		10.00%	17,826	
Letting Legal Fee		5.00%	8,913	
				26,739
DISPOSAL FEES				
Sales Agent Fee		1.50%	1,209,624	
Sales Legal Fee		0.50%	403,208	
				1,612,832

APPRAISAL SUMMARY BPS SURVEYORS

Jamestown Road
PBSA with 33% C3 affordable

MISCELLANEOUS FEES			
Profit on PBSA	12.50%	9,142,989	
Profit on Commerical	15.00%	386,257	
Profit on affordable	6.00%	431,653	
			9,960,898
FINANCE			
Debit Rate 7.000%, Credit Rate 0.000% (Nominal)			
Land		1,987,354	
Construction		3,929,584	
Total Finance Cost			5,916,938
TOTAL COSTS			**76,313,425**
PROFIT			
			4,328,176

Performance Measures	
Profit on Cost%	5.67%
Profit on GDV%	5.22%
Profit on NDV%	5.37%
Development Yield% (on Rent)	4.55%
Equivalent Yield% (Nominal)	4.57%
Equivalent Yield% (True)	4.71%
IRR% (without Interest)	11.43%
Rent Cover	1 yr 3 mths
Profit Erosion (finance rate 7.000)	10 mths

APPRAISAL SUMMARY — BPS SURVEYORS

Jamestown Road
Revised (BNPPR's Cost)

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	**Units**	**ft²**	**Sales Rate ft²**	**Unit Price**	**Gross Sales**	**Adjustment**	**Net Sales**
C3 Social Rent	15	12,285	254.97	208,824	3,132,353	0	3,132,353
C3 Intermediate	12	9,672	452.14	364,421	4,373,058	0	4,373,058
Totals	**27**	**21,957**			**7,505,411**	**0**	**7,505,411**

Rental Area Summary	**Units**	**ft²**	**Rent Rate ft²**	**Initial MRV/Unit**	**Net Rent at Sale**	**Initial MRV**	**Net MRV at Sale**
PBSA	178	37,558	98.83	20,852	3,133,063	3,711,720	3,133,063
Flexible commercial	1	3,155	56.50	178,258	178,258	178,258	178,258
Totals	**179**	**40,713**			**3,311,320**	**3,889,977**	**3,311,320**

Investment Valuation

PBSA						
Current Rent	3,133,063	YP @	4.5000%	22.2222	69,623,615	
Flexible commercial						
Market Rent	178,258	YP @	6.5000%	15.3846		
(1yr Rent Free)		PV 1yr @	6.5000%	0.9390	2,575,045	
Total Investment Valuation					**72,198,660**	
GROSS DEVELOPMENT VALUE				**79,704,071**		
Purchaser's Costs			(2,165,960)			
Effective Purchaser's Costs Rate		3.00%				
				(2,165,960)		
NET DEVELOPMENT VALUE				**77,538,111**		
NET REALISATION				**77,538,111**		
OUTLAY						
ACQUISITION COSTS						
Benchmark Land Value		8,300,000				
Benchmark Land Value			8,300,000			
				8,300,000		
Stamp Duty		5.00%	415,000			
Agent Fee		1.00%	83,000			
Legal Fee		0.80%	66,400			
				564,400		

CONSTRUCTION COSTS				
Construction	**Units**	**Unit Amount**	**Cost**	
Construction	1 un	45,073,730	45,073,730	
CIL			3,511,592	
S106			1,212,570	
				49,797,892
Section 106 Costs				
PIL			3,600,000	
				3,600,000
PROFESSIONAL FEES				
Professional fees		10.00%	4,507,373	
				4,507,373
MARKETING & LETTING				
Letting Agent Fee		10.00%	17,826	
Letting Legal Fee		5.00%	8,913	
				26,739

DISPOSAL FEES

Jamestown Road
Revised (BNPPR's Cost)

Sales Agent Fee	1.50%	1,163,072	
Sales Legal Fee	0.50%	387,691	
			1,550,762
MISCELLANEOUS FEES			
Profit on PBSA	12.50%	8,702,952	
Profit on Commerical	15.00%	386,257	
Profit on affordable	6.00%	450,325	
			9,539,533
FINANCE			
Debit Rate 7.000%, Credit Rate 0.000% (Nominal)			
Land		1,987,283	
Construction		4,615,362	
Total Finance Cost			6,602,645
TOTAL COSTS			**84,489,344**
PROFIT			
			(6,951,233)

Performance Measures

Profit on Cost%	-8.23%
Profit on GDV%	-8.72%
Profit on NDV%	-8.96%
Development Yield% (on Rent)	3.92%
Equivalent Yield% (Nominal)	4.58%
Equivalent Yield% (True)	4.71%
IRR% (without Interest)	-0.37%
Rent Cover	-2 yrs -1 mths
Profit Erosion (finance rate 7.000)	N/A