

Address:	Land at Highgate Road Estate Glenhurst Avenue London NW5 1PU		1
Application Number(s):	2025/5314/P	Officer: Edward Hodgson	
Ward:	Highgate		
Date Received:	24/11/2025		
Proposal:	Redevelopment of existing car park and courtyard including erection of new residential building (Class C3) together with landscaping, public realm and playspace, car parking and associated works.		

Background Papers, Supporting Documents and Drawing Numbers:

Existing Drawings:

Site Location Plan HRE - JBW - ZZ - XX - DR - A – 02000 P01, HRE - JBW - ZZ - XX - DR - A – 02151 P02, HRE - JBW - ZZ - XX - DR - A – 02150 P02, HRE - JBW - ZZ - XX - DR - A – 02250 P02, , HRE - JBW - ZZ - 07 - DR - A – 02001 P03, 0114-PR-ZZ-ZZ-DR-L-2081 001, 0114-PR-ZZ-ZZ-DR-L-2080 001

Proposed Drawings:

HRE - JBW - ZZ - 02 - DR - A – 02017 P03, HRE - JBW - ZZ - XX - DR - A – 02155 P03, HRE - JBW - ZZ - XX - DR - A – 02156 P03, HRE - JBW - ZZ - XX - DR - A – 02100 P07, HRE - JBW - ZZ - XX - DR - A – 02102 P07, HRE - JBW - ZZ - XX - DR - A – 02103 P07, HRE - JBW - ZZ - XX - DR - A – 02200 P01, HRE - JBW - ZZ - XX - DR - A – 02201 P02, HRE - JBW - ZZ - XX - DR - A – 02255 P03, HRE - JBW - ZZ - XX - DR - A – 02256 P03, HRE - JBW - ZZ - 00 - DR - A – 02002 P09, HRE - JBW - ZZ - 00 - DR - A – 02003 P05, HRE - JBW - ZZ - 00 - DR - A – 02004 P05, HRE - JBW - ZZ - 00 - DR - A – 02010 P08, HRE - JBW - ZZ - 01 - DR - A – 02011 P08, HRE - JBW - ZZ - 02 - DR - A – 02012 P08, 0114-PR-ZZ-ZZ-DR-L-0003 005, 0114-PR-ZZ-ZZ-DR-L-0005 001, 0114-PR-ZZ-ZZ-DR-L-0006 001, 0114-PR-ZZ-ZZ-DR-L-1001 001, 0114-PR-ZZ-ZZ-DR-L-1002 001, 0114-PR-ZZ-ZZ-DR-L-1201 002, 0114-PR-ZZ-ZZ-DR-L-1202 002, 0114-PR-ZZ-ZZ-DR-L-2000 002, 0114-PR-ZZ-ZZ-DR-L-2001 002, 0114-PR-ZZ-ZZ-DR-L-6000 001, 0114-PR-ZZ-ZZ-DR-L-6010 001, 0114-PR-ZZ-ZZ-DR-L-6030 001, 0114-PR-ZZ-ZZ-DR-L-6031, 0114-PR-ZZ-ZZ-DR-L-6040 001, 0114-PR-ZZ-ZZ-DR-L-6041 001, 0114-PR-ZZ-ZZ-DR-L-6100 001, 0114-PR-ZZ-ZZ-DR-L-6110 001

Documents:

Plant Noise Impact Assessment Report P02 (17/11/2025), Tree Survey, Arboricultural Impact Assessment & Method Statement 241436/A2_AIA Nov 2025, Fire Statement S24053134 02, Rapid Health Impact Assessment Nov 2025, Energy Strategy Rev03 | Nov 2025, Air Quality Assessment October 2025, Biodiversity Net Gain Summary 17 November 25, Planning and Affordable Housing Statement November 2025, Design and Access Statement November 2025, Drainage Management Statement and Maintenance Schedule 11 Nov 2025, Transport Statement Rev 01 19 November 2025, Sustainability Statement

20 November 2025, Statement of Community Involvement, Flood Risk Assessment, Sustainable Drainage Management Statement and Maintenance Schedule Rev 03 23/01/26, Daylight and Sunlight Report and Overshadowing Addendum V1, Whole Life Carbon Assessment, Equality Impact Assessment Form, Heritage Statement November 2025

RECOMMENDATION SUMMARY:

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

Applicant:

Community Investment Programme
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Agent:

Turley
Brownlow Yard
12 Roger Street
London
WC1N 2JU

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
C3	Dwellings (flats)	0	924.6	+ 924.6
Total	All uses	0	924.6	924.6

Proposed housing mix and tenure						
Tenure	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Market	0	0	0	0	0	0
Social-affordable rent	4	5	0	0	1	10
Intermediate rent	0	0	0	0	0	0
Total homes	0	0	0	0	0	10

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	11	0	-11
Car - Disabled accessible	0	1	+1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	0	21	+21

EXECUTIVE SUMMARY

- i) The proposal involves the erection of a six-storey residential building on an existing car parking within the Highgate Road Estate, providing 10 new flats which would be 100% social-affordable rent.
- ii) The scheme would optimise an underused piece of brownfield land and would help to achieve housing delivery and in particular the delivery of social affordable rent housing and would thereby make a contribution to the Council's housing targets.
- iii) Following extensive pre-application discussions, the scheme has been carefully considered to be in keeping with its surroundings offering a sympathetic and high-quality design. The site is located within the

Dartmouth Park Conservation Area, and the proposal would not result in any harm to the character and appearance of the conservation area. It would have an acceptable impact on neighbouring occupiers in terms of loss of light, outlook and privacy. It would be sustainably designed, meeting Passivhaus building standards, with good thermal performance and would incorporate renewable energy in order to exceed carbon reduction targets.

- iv) The scheme would also provide estate wide improvements, including new child play facilities, landscaping, tree planting, and enhanced amenity space that would benefit existing as well as new residents on the estate.
- v) 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 10 or more new dwellings (Clause 3(i))

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Neighbourhood Plan Area	Dartmouth Park
Conservation Area	Dartmouth Park
PTAL (Public transport accessibility)	5 (very good)
Underground development constraints and considerations	<ul style="list-style-type: none">- Historically flooded street (Glenhurst Avenue)- Surface water flow and flooding- Slope stability
London View Management Framework	3A.1 Kenwood viewing gazebo to St Paul's Cathedral

Table 1 - Site designations and constraints

Description

1.2 The site consists of a car park (labelled car park 1 in figure 1 below) and the courtyard area within the Highgate Road Estate, a council owned residential estate. It is surrounded by Glenhurst Avenue to the north, Highgate Road to the east, Gordon House Road to the south and to the west of Gospel Oak and Hampstead Heath. The estate consists of four existing blocks, constructed in the 1960s as part of the Haddo House redevelopment. These include Haddo House (a part-7 part-9 storey block facing onto Highgate Enclosures/Highgate Road), Clanfield House (a 3-storey block facing onto Gordon House Road), Wheatley House (a 3-storey block split into 2 and connected via a link), and Ravenswood (a terrace of 2 storey houses facing onto Glenhurst Avenue). The car park is located to the northeast of the estate, adjacent to both Haddo House and Ravenswood and faces onto Glenhurst Avenue and Highgate Road.



Fig. 1 – The existing site with the development site outlined in red

- 1.3 The area around the site is primarily residential, with properties of varying age, architectural style and language, height, urban grain, materiality and character. Whilst the prevailing heights within the immediate vicinity of the site is that of 2-3 storey terraced houses, there are larger properties to the north and northwest, including the five storey mansion blocks facing Parliament Hill Fields (approx. 18m tall). Larger buildings to the south-east are also present, namely Denyer House and York Rise Estate, and Haddo House itself which is located immediately south of the site boundary.
- 1.4 The mansion blocks of Lissenden Gardens Estate, inspired by the Arts and Crafts movement, are characterful in their composition which includes regular articulated bays, expressive double balconies facing the street, and use of a distinctive orange-red brick. Two 1970s blocks echoing the mansion blocks sits at the southern end of the road, of a similar height and red brickwork. On Glenhurst Avenue, a row of Arts and Crafts terraces, are sat across from the 1960s Ravenswood terrace which forms part of the Highgate Road Estate. To the south, a row of Victorian terraced houses with

mansard roofs, which utilise yellow stock brickwork, terminate in the Heathview, an Art Deco block of flats, 4 storeys high with a mansard roof and rendered in a pale-yellow colour. Across Highgate Road, the row of Grade II and II* listed terraced houses have an elevated entrance and reach four storeys with basements, with yellow stock brickwork.

- 1.5 The variety of building heights, footprints, architectural character and materiality demonstrates that there is no established height or general architectural trend in the immediate area of the site
- 1.6 The site is within the Dartmouth Park Conservation Area and Neighbourhood Plan area. Haddo House is within Sub Area 1 (Highgate Road) of the Conservation Area but sits immediately adjacent to Sub Area 9 (Lissenden Gardens), and the proposed development site would be within Sub Area 9. The nearest listed buildings are Grove End House (Grade II), 175 Highgate Road (Grade II), 1-5 Grove Terrace (Grade II), and 6-27 Grove Terrace (Grade II*). Also adjacent to the site is the locally listed underground shelter in front of Haddo House. Directly outside Haddo House is Highgate Enclosures, which is one of three open spaces along the west side of Highgate Road which are designated in the local plan and neighbourhood plan as public open space and local green space.

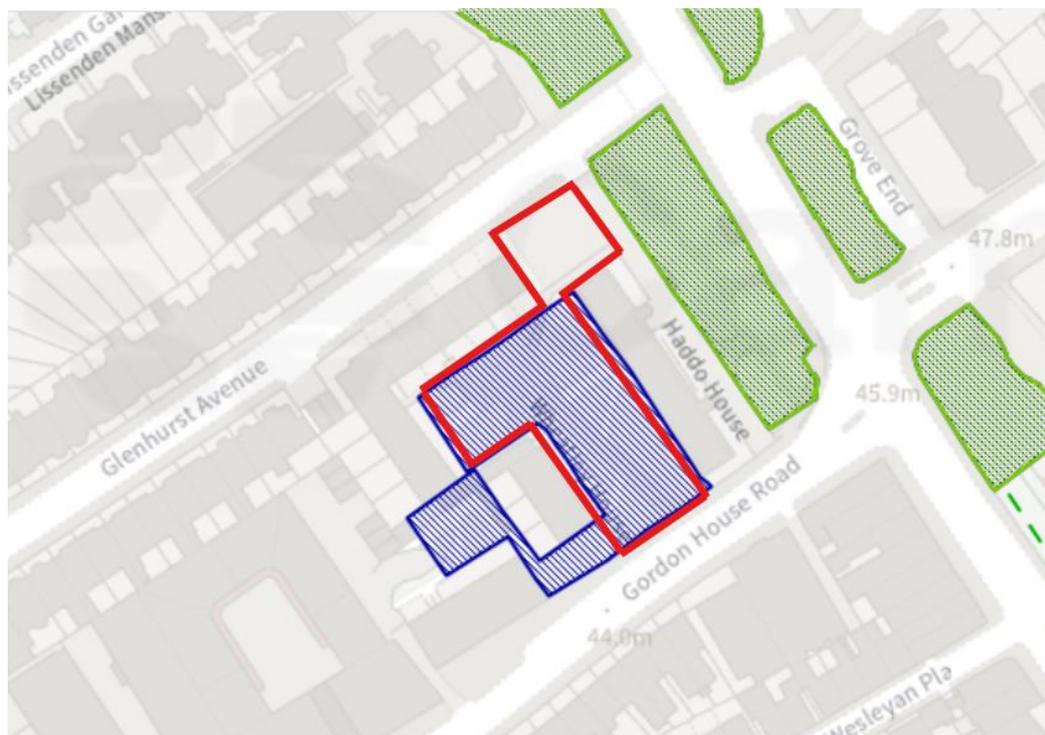


Fig. 2 Map showing the local green space in blue, and the local open space in green

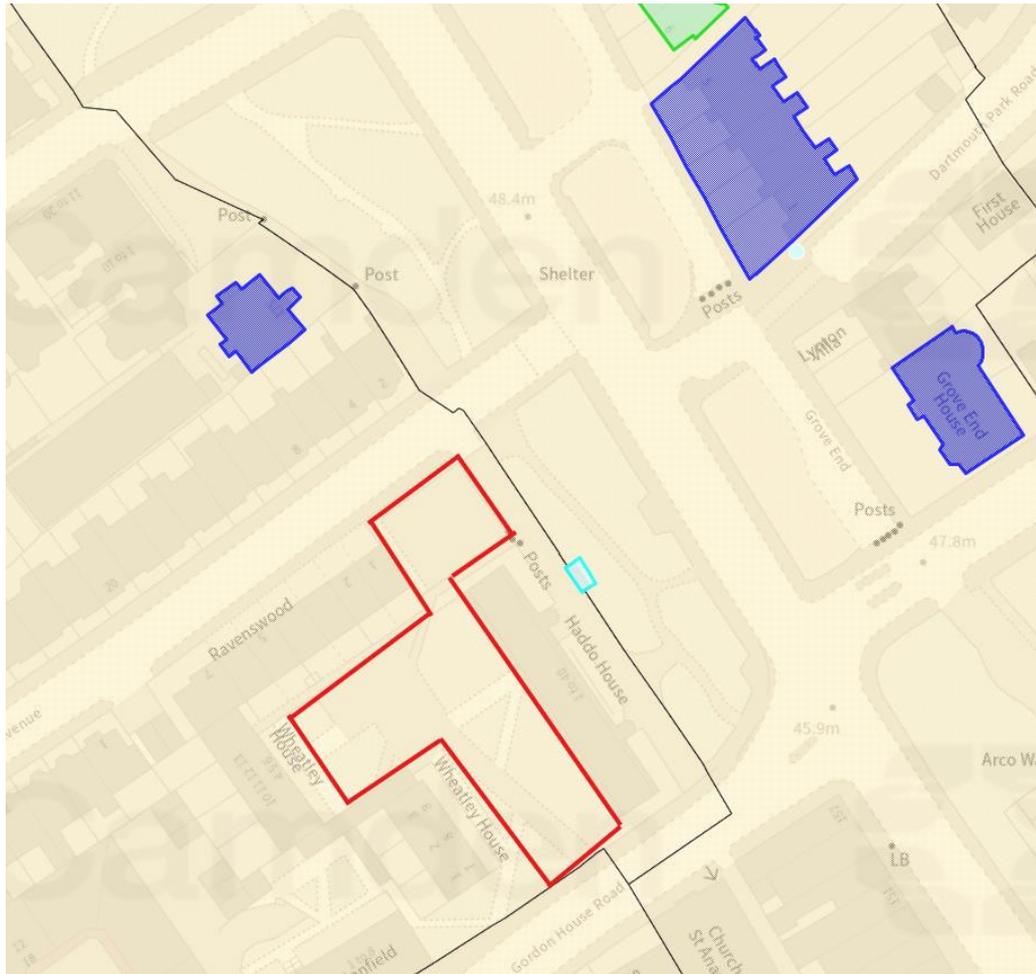


Fig. 3. Heritage map showing the conservation area in beige, Grade II listed buildings in green, Grade II listed buildings in dark blue, and locally listed buildings in light blue*

- 1.7 The site has a Public Transport Accessibility Level (PTAL) rating of 5 (very good) and is close to Gospel Oak Overground station and Kentish Town Underground and National Rail stations, as well as various bus services along Highgate Road and Gordon House Road.

2. THE PROPOSAL

- 2.1 The proposal forms part of the Council's New Homes for Small Sites programme (NHSS), which itself sits within the Council's wider Community Investment Programme. Cabinet approved the development of schemes for Phase 1 of the NHSS in February 2023. Phase 1 includes Package A, which contains both the Highgate Road Estate and the Raglan Street Estate, which seek to deliver 10 and 18 new affordable homes respectively.
- 2.2 The proposed development for Highgate Road is the erection of a six-storey residential building (Class C3) on an existing car park, providing 10 new flats, and improvements to the public realm on the estate including new play equipment, landscaping and tree planting. The car parking (providing 11 car

parking spaces) is currently used by 6 vehicles. These 6 vehicles that use the car park currently would be allowed to use either existing spaces in the Clanfield car park or spaces on-street nearby.

- 2.3 The building would provide 4 x 1B2P, 5 x 2B3P, and 1 x 5B8P flats which would be 100% social rent housing. One of the 2B3P would be M4(3) compliant providing wheelchair access. The building would have a similar footprint to the existing car park area. It would have access from Highgate Enclosures, with the main entrance between the building and Haddo House, although there would also be access for the ground floor flat from Glenhurst Avenue. Private amenity spaces would be provided in the form of balconies and space at ground floor facing Glenhurst Avenue for the ground floor flat.
- 2.4 The building would have a relatively simple composition, faced in grey/brown brickwork at upper floors with a lighter brickwork at ground floor, with white banding, concrete vertical piers, and metal windows and doors. PV panels would be provided on the flat roof, with plant and bin storage located internally at ground floor. The new cycle storage would be provided within the relandscaped estate courtyard.
- 2.5 With regards to the estate wide landscaping in the courtyard, this would include retaining a pedestrian route through the estate courtyard, new cycle storage, relocation of existing bins to a new bin store in place of the current pram stores under the Wheatley House link bridge, and new landscaping with tree planting, play equipment and greening.

3. SHADOW SECTION 106 AGREEMENT

- 3.1 The recommendations are based on certain planning requirements (“Heads of Terms”) being secured in the event of approval. These Heads of Terms would usually be incorporated in a s106 agreement. However, in this case the applicant is the council and as a matter of law the council cannot enter into a s106 agreement with itself.
- 3.2 Nevertheless, it is still imperative that this application is dealt with in a way that is consistent with the way the council would deal with non-council applications. Therefore, the Heads of Term will be embodied in a “shadow s106 agreement”. This will be in the same form as a “standard” s106 agreement, incorporating the usual legal clauses and is being negotiated by separate lawyers within the Borough Solicitor’s Department representing the interests of the council as landowner or applicant, and the council as local planning authority.
- 3.3 The shadow s106 agreement will include, among other things, a provision requiring (i) that in the event of any disposal of the relevant land the shadow s106 agreement terms will be included in the terms of the sale transfer and (ii) the purchaser will be formally required to enter into a shadow s106

agreement as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site).

- 3.4 Once the shadow s106 agreement has been finalised, the Director of Development (the applicant department) will sign a letter formally undertaking on behalf of the department that its provisions will be complied with during the course of the development and its subsequent operation.
- 3.5 The shadow s106 agreement and the Director's Undertaking of Compliance will be noted on the Planning Register (so the agreement is put on the record in the same way as a "standard" s106 agreement) and compliance with the shadow s106 agreement will be tracked and monitored by the Planning Obligations Monitoring Officers in the Planning Service in the same way as a standard agreement.

4. RELEVANT HISTORY

The site

- 4.1 The planning history of the application site is limited to minor works including changes to balcony screens (2017/5885/P granted in 2018), security enclosures and doors (PEX0201047 granted in 2003) and replacement aluminium windows (PEX0100345 granted in 2001) on Haddo House.
- 4.2 Similarly on Wheatley House and Clanfield, the history relates to replacement of windows, doors, boarding and panelling (2004/3906/P approved in 2004). For the terraces on Ravenswood, no 7 received permission for a single storey side extension allowed at appeal in 2009 (2007/4554/P).

The area

- 4.3 Of note in the immediate area is 138-140 Highgate Road, where planning permission was granted subject to a section 106 legal agreement in 2019 for the demolition of the petrol station and MOT centre and the erection of a three-storey terrace building providing 6 x 4-bedroom dwellinghouses. The permission was implemented and the development has recently been completed.

5. CONSULTATION

5.1 *Statutory Consultees*

Thames Water

- *No objection to the proposal in terms of impact on water network, waste water network, sewage treatment, surface water drainage, subject to a condition requiring a piling method statement to be submitted and an informative should be added with regards to pressure.*

Officer response:

- *The comments received are duly noted and the condition and informative will be added to the decision notice.*

Councillors

Cllr Lorna Russell (Highgate Ward)

5.2 Objection covering the following issue(s):

- Supportive of principle of entirely social rent housing.
- The scheme however represents overdevelopment.
- Height and scale inappropriate to the conservation area, in particular, would have an impact on the setting of Haddo House and surroundings estate buildings.
- Concerns over dark and narrow spaces between the buildings.
- Loss of mature and healthy trees, green space and planting in the estate, including the rose bush planted and maintained by residents.
- Concern over use of estate spaces during construction.

Officer response:

- *There is strong policy support for the development of brownfield sites for housing and in particular affordable housing. The new building would be below the shoulder height of Haddo House and there are a range of building heights in the area. The building would sit on a corner and it is not uncommon for corner buildings to be taller. Design and heritage are discussed further in section 12.*
- *There would be a sufficient gap with good sightlines and natural surveillance between the entrance of the building and Haddo House and this would form part of a pedestrian route through the estate and therefore there would be activity along here. The gap between the building and Ravenswood would be secured with planting with no public access and would serve the ground floor flat.*
- *All trees to be removed are category U and therefore have little amenity or ecological value. Trees would be fully replaced and additional tree planting is proposed. The proposal includes extensive landscaping which is discussed further in section 15.*
- *A construction management plan, and the requirement to form a construction working group with local residents and stakeholders, would be secured via a shadow section 106 legal agreement. Transport is discussed further in section 14.*

Local groups

Dartmouth Park Neighbourhood Forum

5.3 Objection covering the following issue(s):

- Understand the need for housing but concerns about overdevelopment.
- Building is too tall in relation to its neighbours. Glenhurst Avenue/Ravenswood and Haddo House are important examples of 20th Century social housing as noted in the neighbourhood plan and are positive contributors to the conservation area. The building would project beyond the building line of Haddo House and Ravenswood. Prominent height on this corner can only be justified by exceptional architectural quality.
- Concerns over full-width balconies fronting Highgate Road and poor proportions and fenestration on the west and north façades. North façade feels of lesser importance which is unacceptable and blocks views of Haddo House.

Officer response:

- *The new building would be below the shoulder height of Haddo House and there are a range of building heights in the area. The building would sit on a corner and it is not uncommon for corner buildings to be taller. Design and heritage are discussed further in section 12.*
- *Detailed design of the architecture including the balconies are covered in the design section. The proportions and glazing to solid ratio is also driven by thermal performance.*

Highgate Road Estate TRA

5.4 Objection covering the following issue(s):

- Understand need for additional housing but design is unsuitable.
- The building protrudes further than Haddo House which was designed with light and space in mind.
- Existing sheds would be removed in place of bin rooms and new sheds built in the courtyard taking space that could be used for TRA space or children's playspace.
- Design is cramped and out of character with the conservation area.
- Too many 1-bedroom units instead of family units.
- Resident feedback during consultation not addressed.

Officer response:

- *Design and heritage are discussed in section 12. Although the building extends beyond building line of Haddo House and Ravenswood, it is required to accommodate floorspace to meet space standards and to keep bin storage and plant space internally within the building footprint, instead*

of externally within Highgate Enclosures or elsewhere in the estate. There is a sufficient gap between the building and its neighbours, and the east elevation is set back to further increase this gap. In any case, the building lines of Haddo House and Ravenswood are not considered to be of heritage or design significance, and the proposal would sit comfortably alongside these neighbouring buildings.

- *Landscaping and estate improvements are covered in section 15. Play space would be provided as part of the proposal. Alternative uses, including TRA spaces, are not material in the consideration of the application.*
- *The proposed mix of flat sizes is discussed in section 9. It is based on a site-specific housing needs assessment of the estate, undertaken by the Council's housing team in 2024. It would alleviate issues with overcrowding, allowing residents to move into new homes.*
- *The Community Investment Programme have undertaken consultation which is outlined within the submitted Statement of Community Involvement and outlines the design responses to resident feedback. The application is assessed on its own merits against relevant planning policy and guidance. The local planning authority has undertaken its own consultation process and all responses are fully taken into consideration when making a decision.*

Glenhurst Avenue Residents Association

5.5 Objection covering the following issue(s):

- Need for new housing is understood and in particular, the need for social housing.
- Concerns over the size of the building. Initial options were for 6-8 new homes. Design doesn't fit in with local environment.
- Misrepresentations in the consultation process.
- Massing is out of scale especially with Glenhurst Avenue.
- Side elevation visible from Glenhurst Avenue is blank with little visual appeal.
- Building extends beyond the building line of Ravenswood and Haddo House.
- Concerns over daylight and sunlight impacts for properties on Glenhurst Avenue.
- Architecture is disappointing.

Officer response:

- *Design and heritage are discussed in section 12. There is a range of building heights in the vicinity, including the neighbouring Haddo House and the massing is appropriate for the context. It is accepted that the building will project beyond the building line of neighbouring buildings, however this to enable sufficient space to meet space standards and to internalise plant and bin storage, instead of locating these externally. In any case, the building*

lines of Haddo House and Ravenswood are not considered to be of heritage or design significance, and the proposal would sit comfortably alongside these neighbouring buildings.

- *Daylight and sunlight are discussed in section 11. The impact is considered acceptable and within the limits for a dense urban environment.*
- *The responses to resident feedback during pre-application are outlined in the Statement of Community Involvement. The application is assessed on its own merits against relevant planning policy and guidance. The local planning authority has undertaken its own consultation process, and all responses are fully taken into consideration when making a decision.*

Grove Terrace Residents Association

5.6 Objection covering the following issue(s):

- The listed Grove Terrace has not been assessed in the submission.
- Proposal would block a view from these properties between Haddo House and Ravenswood.
- The building would dominate Glenhurst Avenue and shouldn't protrude beyond Haddo House building line.
- Use of dark brick is out of character.
- Provision of parking should be made for residents of Haddo House and the new building.

Officer Response:

- *Heritage, including the impact on the listed Grove Terrace properties is assessed in section 12.*
- *Private views are not a material planning consideration. The proposal would not impact on outlook from the Grove Terrace properties given the distance.*
- *The extension beyond the building line is required to accommodate floorspace and internal bin storage and plant. The building lines of Haddo House and Ravenswood are not considered to be of heritage or design significance, and the proposal would sit comfortably alongside these neighbouring buildings.*
- *The 6 vehicles that currently use the car park would be given spaces elsewhere, either in the Clanfield car park or on-street nearby as outlined in the transport section 14. The new building would be car free, as secured via the shadow section 106 legal agreement, although 1 disabled parking space is proposed in line with transport policy.*

Adjoining occupiers

5.7 Eight sites notice were displayed around the site on Highgate Road, Glenhurst Avenue, Gordon House Road and within the estate. The notices

were displayed on 28/11/2025 until 22/12/2025 and the application was advertised in the local paper on 04/12/2024 (expiring 28/12/2025).

5.8 Objections were received from at least 50 local households. The objections received by the Council are on the Council's website. The key issues raised are.

- **Design and heritage**, including scale, massing and height of new building, extending beyond the building line of Haddo House and Ravenswood, inappropriate architecture in terms of dark bricks, concrete pillars, and balconies, dark and narrow spaces between buildings, impact on the conservation area and nearby listed Grove Terrace including views from these properties, and quality of proposed accommodation with no bathroom windows and small units.

Officer response:

- *Design and heritage are covered in section 12. Given the range of building heights found in the area, including Haddo House which is higher than the proposed building, the scale and height is considered acceptable. National and local planning policy seeks to make the best use of land, including brownfield sites, and prioritises developing such sites for housing and affordable housing. It is noted that the proposed building would project beyond the building line of Haddo House and Ravenswood, however there is a need to balance the quality of new residential accommodation in order to meet space standards, and plant and bin storage would be internalised in the building footprint, rather than located externally for example on Highgate Enclosures. In any case, the building lines of Haddo House and Ravenswood are not considered to be of heritage or design significance, and the proposal would sit comfortably alongside these neighbouring buildings.*
- *The detailed design, including materials, has been influenced by a study of the existing material palette on the estate. The choice of materials is therefore sympathetic to the existing estate while also not competing or trying to imitate buildings such as Haddo House.*
- *The gap between the new building and Haddo House is considered to be sufficient and would act as a pedestrian access which would create movement and activity here. Glazing at ground floor on the south elevation is proposed to create natural surveillance and the massing to the east is set back to create further space. The gap between Ravenswood would be for private access for the ground floor flat with no public access with planting proposed to stop access.*
- *The proposal is not considered to harm the character and appearance of the conservation area which is fully assessed in section 12. The listed Grove Terrace and the impact on its setting is assessed in section 12. Views from private properties are not a material planning consideration.*

- *All new homes would meet nationally described space standards, and it is not a requirement for bathrooms to receive natural light. The rooms that need natural light, such as living, kitchen and diners, would receive adequate natural light and would have acceptable outlook. The homes would benefit from mechanical ventilation and would perform well in terms of the thermal efficiency, capable of meeting Passivhaus standards.*
- **Impact on neighbouring occupiers**, including loss of light, overlooking, and construction.

Officer response:

- *A daylight/sunlight and overshadowing report has been submitted and assessed in section 11. The development would have an acceptable impact in terms of light for a dense urban environment. Any views from windows and balconies into existing windows and amenity spaces would be oblique, and/or a sufficient distance away in line with Camden planning guidance.*
- *A shadow section 106 legal agreement would secure a Construction Management Plan, including the requirement to form a construction working group with local residents and stakeholders. This would help mitigate the impact on the local road network, and on existing residents.*
- **Trees and landscaping**, in terms of loss of existing trees, proposed landscaping, location of new bin stores, cost of maintenance, and the money spent could have been spent on fixing current issues on the estate.

Officer response:

- *Trees and landscaping are discussed in section 15. All trees to be removed are category U and therefore have little ecological or amenity value. These trees would be fully replaced with better quality trees in any case. The proposed landscaping would provide new greening and play space for children which would benefit existing as well as new residents. Ongoing issues within the estate, and money going towards fixing these, are not material planning considerations.*
- *The proposal would consolidate the bin storage, currently located within the courtyard, to the existing pram sheds at ground floor of Wheatley House link bridge. This would reduce visual clutter in the courtyard and would provide safe and secure bin storage and is a sufficient distance to neighbouring properties.*
- **Transport**, in terms of impact on car parking, and proposed location of cycle parking.

Officer response:

- *The proposed development would be car free as secured by the shadow section 106 legal agreement. 1 new disabled parking space would be secured as required under planning policy. The existing 6 car parking spaces would be reprovided, either within the Clanfield car park or on nearby streets.*
- *The new cycle parking would be located within the central courtyard. It is accepted that the location is further from the new building than is ideal, and a few steps would have to be negotiated, however the building footprint is constrained with limited space for cycle parking. Using Highgate Enclosures would also not be supported.*
- *Transport is assessed in section 14.*
- **Safety and security**, including the need for controlled and gated access, and parking gate automation for the Clanfield car park.

Officer response:

- *The proposed landscaping would create more activation of the central courtyard space and the new building would have glazing at ground floor level to allow for natural surveillance of the gaps between the buildings. Camden planning guidance does not generally support gating off estates and prefers softer interventions such as landscaping and natural surveillance.*
- *The Clanfield car park is outside the red line boundary and is beyond the scope of the application.*
- *A new gate is proposed on the boundary with Gordon House Road and safety and security are discussed in section 19.*
- **Housing mix**, with too many 1-bed units and not enough family units.

Officer response:

- *The proposed mix provides a variety of sizes, including 1-bed, 2-bed and 5-bed homes. This has been influenced by a housing needs assessment for the estate undertaken by the Council's housing team in 2024. The scheme would help reduce overcrowding, and 1-bed homes allow people to move out to alleviate overcrowded family homes. This is discussed further in section 9.*
- **Other matters** such as impact on sewers, impact on the structure of Haddo House, viability and cost of the scheme.

Officer response:

- *Thames Water have raised no objection to the proposal subject to conditions and informatives.*
- *The impact on the structure of Haddo House is not a material planning consideration. The building would be subject to building regulations in any case.*
- *The viability and cost of the scheme is not a relevant planning consideration in this case as no financial viability assessment has been submitted, given it is providing 100% affordable housing.*
- **Consultation process** was insufficient and disregards resident feedback.

Officer response:

- *The Community Investment Programme have undertaken consultation with local residents and stakeholders and the response to feedback is outlined in the submitted Statement of Community Involvement.*
- *The Council as Local Planning Authority carries out its own consultation in line with the published Statement of Community Involvement and will assess applications on their own merit against the development plan and other material planning considerations. All comments the Council receives as a planning authority are fully taken into consideration when assessing applications.*

6. POLICY

National and regional policy and guidance

Draft National Planning Policy Framework 2025

[National Planning Policy Framework 2024 \(NPPF\)](#) (amended 7 Feb 2025)

[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](#)

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

[Policy D4 Delivering good design](#)

[Policy D5 Inclusive design](#)

[Policy D6 Housing quality and standards](#)

[Policy D7 Accessible housing](#)

[Policy D8 Public realm](#)

[Policy D11 Safety, security and resilience to emergency](#)

[Policy D12 Fire safety](#)

[Policy D14 Noise](#)

[Policy H1 Increasing housing supply](#)

[Policy H2 Small sites](#)

[Policy H4 Delivering affordable housing](#)

[Policy H6 Affordable housing tenure](#)
[Policy H7 Monitoring of affordable housing](#)
[Policy H10 Housing size mix](#)
[Policy HC1 Heritage conservation and growth](#)
[Policy HC3 Strategic and Local Views](#)
[Policy HC4 London View Management Framework](#)
[Policy G4 Open space](#)
[Policy G5 Urban greening](#)
[Policy G6 Biodiversity and access to nature](#)
[Policy G7 Trees and woodlands](#)
[Policy SI 1 Improving air quality](#)
[Policy SI 2 Minimising greenhouse gas emissions](#)
[Policy SI 3 Energy infrastructure](#)
[Policy SI 4 Managing heat risk](#)
[Policy SI 5 Water infrastructure](#)
[Policy SI 7 Reducing waste and supporting the circular economy](#)
[Policy SI 12 Flood risk management](#)
[Policy SI 13 Sustainable drainage](#)
[Policy T3 Transport capacity, connectivity and safeguarding](#)
[Policy T4 Assessing and mitigating transport impacts](#)
[Policy T5 Cycling](#)
[Policy T6 Car parking](#)
[Policy T7 Deliveries, servicing and construction](#)
[Policy T9 Funding transport infrastructure through planning](#)
[Policy DF1 Delivery of the Plan and Planning Obligations](#)
[Policy M1 Monitoring](#)

[London Plan Guidance \(LPG\)](#)

[Accessible London SPG](#)
[Planning for Equality and Diversity in London SPG](#)
[Characterisation and Growth Strategy LPG](#)
[Optimising Site Capacity: A Design-led Approach LPG](#)
[Small Site Design Codes LPG](#)
[Housing Design Standards LPG](#)
[Affordable Housing and Viability SPG](#)
[Housing SPG](#)
[Play and Informal Recreation SPG](#)
[London View Management Framework SPG](#)
[All London Green Grid SPG](#)
[London's Foundations SPG](#)
[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](#)
[Energy Planning Guidance](#)
[The control of dust and emissions in construction SPG](#)
[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 C1 Health and wellbeing](#)
[Policy C5 Safety and security](#)
[Policy C6 Access for all](#)
[Policy A1 Managing the impact of development](#)
[Policy A2 Open space](#)
[Policy A3 Biodiversity](#)
[Policy A4 Noise and vibration](#)
[Policy D1 Design](#)
[Policy D2 Heritage](#)
[Policy CC1 Climate change mitigation](#)
[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC4 Air quality](#)
[Policy CC5 Waste](#)
[Policy T1 Prioritising walking, cycling and public transport](#)
[Policy T2 Parking and car-free development](#)
[Policy T3 Transport infrastructure](#)
[Policy T4 Sustainable movement of goods and materials](#)
[Policy DM1 Delivery and monitoring](#)

Dartmouth Park Neighbourhood Plan (2020)

[Policy DC1 Enhancing the sense of place](#)
[Policy DC2 Heritage assets](#)
[Policy DC3 Requirement for good design](#)
[Policy H1 Meeting housing need](#)
[Policy H2 Affordable housing](#)
[Policy H3 Accessible housing](#)
[Policy CM1 Community facilities](#)
[Policy CE3 Public realm](#)
[Policy ES1 Green and open spaces](#)
[Policy ES2 Trees](#)
[Policy ES3 Biodiversity](#)
[Policy ES4 Energy efficiency](#)
[Policy TS1 Safety and accessibility for pedestrians and cyclists](#)
[Policy TS2 Cycling improvements](#)
[Policy TS3 Traffic reduction](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Access for All - March 2019](#)

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

Other guidance:

Dartmouth Park [Conservation Area Statement](#) (2009)

Proposed Submission Draft Camden Local Plan (DCLP)

- 6.1 The [Proposed Submission Draft Camden Local Plan](#) was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan will now be examined by a Planning Inspector in Spring 2026.
- 6.2 Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.
- 6.3 The Proposed Submission Draft Local Plan (DCLP) is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

7. ASSESSMENT

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

8	Principle of development
9	Housing mix
10	Quality of proposed housing

11	Impact on neighbouring amenity
12	Heritage and design
13	Sustainability and energy
14	Transport
15	Trees, greening and biodiversity
16	Water and flooding
17	Land contamination
18	Air quality
19	Safety and security
20	Health and wellbeing
21	Employment and training opportunities

8. PRINCIPLE OF DEVELOPMENT

- 8.1 The site is close to several rail and underground stations and is well connected by bus routes making it highly accessible. The site is brownfield land, comprising an underused car park within an estate. The existing estate has issues with overcrowding and the site was identified as a delivery site in the approved 2023 Cabinet report as part of CIP's New Homes for Small Sites programme.
- 8.2 Use of highly accessible brownfield sites for the delivery of new housing is promoted and supported by paragraphs 124-130 of the NPPF 2024 which deals with 'making effective use of land'. Reference is made in paragraph 125(d) to use of under-utilised sites, especially if this would meet housing need and in locations where land supply is constrained. Camden Local Plan policies are in accordance with the NPPF in this respect and seek to direct growth to the most sustainable locations. Policy H2 of the London Plan states that boroughs should proactively support well-designed new homes on small sites to meet London's housing needs. Policy G1 of the Camden Local Plan seeks to support development that makes the best use of sites. It also expects the most significant growth to be delivered partly by the Council's Community Investment Programme (CIP). Self-contained housing is the priority land use of the borough as stated in Policy H1 of the Camden Local Plan. Policy H4 of the Camden Local Plan seeks to maximise the supply of affordable housing and aims to exceed the borough wide strategic target of 5,300 additional affordable homes from 2016/17 to 2030/31. Policy H1 of the Dartmouth Park Neighbourhood Plan seeks to support a range of provision to meet current and future housing needs, including by supporting the building of more homes. Policy H2 of the Neighbourhood Plan supports the development of affordable homes.

- 8.3 The proposal is to develop underused brownfield for housing, and in particular 100% affordable housing and is therefore in general accordance with national, regional, local and neighbourhood planning policy.

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. Policy H1 (b) of the Neighbourhood Plan supports developments which include small homes to allow older residents to downsize from family housing to smaller units and to provide first homes for younger people.

	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 2 - Dwelling Size Priorities (Local Plan Table 1)

- 9.2 The CLP priorities table above shows the higher priorities for **Social Affordable Rented homes** are for 2 and 3-bed homes, with medium demand for 4-bed or more, and lower demand for 1-bed homes. In this instance, half of the homes would be 2-beds, with 40% being 1-beds and 10% being 5-beds. This is set out in the table below, showing a balanced mix that contributes to the LP priorities.

Home size	Number proposed	Proportion of homes
1-bed	4	40%
2-bed	5	50%
3-bed	0	0%
4-bed	0	0%
5-bed	1	10%
Total	10	100%

Table 3 - Dwelling mix summary for Social Affordable Rented homes

- 9.3 Given 50% of the homes would be priority home sizes, the mix is generally accepted. In addition, a site-specific housing needs assessment was carried out by the Council's housing team on the estate in 2024. This assessment identified a greater need for smaller homes in this instance. Although the Housing CPG indicates a preference for no more than 15% of 1-bed for social affordable rent, the 40% proposed would better meet the needs of the estate, compared to the policy and guidance which is based across the

borough generally. Moreover, the site is fairly constrained, with limited opportunities for a bigger floorplan and a taller building given the heritage and design constraints. 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 used safely, easily and with dignity by all, also reflected in CLP policies D1, H6, and C6.

Design and layout

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

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

Table 4 - Minimum internal space standards (London Plan Table 3.1, Policy D6)

- 10.5 All the residential units in the detailed scheme meet or exceed the minimum standards. The new units would have good floor to ceiling 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 communal amenity space.
- 10.6 CLP policy A2 states developments should seek opportunities for providing private amenity space, and LP policy D6 says that 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- 10.7 The balconies range from 5sqm to 16sqm, depending on the unit size, and ensure a good depth and width of 1.5m or more, with all units meeting the LP policy requirements. In addition, the homes would have access to the enhanced existing estate spaces, which offers greening and children's play space and forms part of the proposal. The proposal would therefore offer a mix of good quality private and publicly accessible amenity space.
- 10.8 The flats are served by residential cores with one staircase and one lift although the ground floor flat would also have private access from Glenhurst Avenue. The cores provide access to secure lobbies leading to the pedestrian route adjacent to Haddo House.
- 10.9 Overall, the proposed homes and amenity space comply with policy and would result in a high-quality development and provision for future occupiers.

Noise and vibration

- 10.10 The new homes are in a London location, so there would be an expected level of noise and disturbance. However, the site is fairly set back from Highgate Road, and Glenhurst Avenue is a quieter residential side street. The new homes would have insulation and triple glazed windows which would help reduce the impact of external noise.
- 10.11 Noise from plant within the building would be conditioned in terms of noise levels, and there would be a requirement for anti-vibration mounts (conditions 18 and 19). A noise impact assessment has demonstrated that noise from plant is capable of meeting the Council's standards.
- 10.12 The dwellings will be constructed to a high standard that would ensure that the occupiers are not unduly impacted by noise from inside the block, or outside the building, in accordance with the development plan.

Dual aspect units

- 10.13 LP policy D6 says the number of dual aspect homes should be optimised. The policy does however support a design-led approach where single aspect units are considered a more appropriate design solution to meet the requirements of Policy D3 - Optimising site capacity through the design-led approach. It can be acceptable where it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 10.14 All of the proposed homes would be at least triple aspect, with the 5-bed flat at first floor being quadruple aspect. This is welcomed and would ensure all homes have excellent outlook and access to natural light.

Daylight and sunlight

Methodology

- 10.15 The internal daylight/sunlight report applies the relevant BRE guidelines to the proposed units. The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to make a balanced judgement.
- 10.16 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.
- 10.17 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.

10.18 The recommended CBDM methodology is based on the British Standard 'Daylight in Buildings' (BS EN17037). The council supports use of Spatial Daylight Autonomy (sDA) to measure daylight, and Sunlight Exposure (SE) targets to measure sunlight. The British Standard contains guidance on interior daylighting for buildings across Europe but also has a UK National Annex with alternative sDA targets for dwellings in the UK. The council supports the use of these simpler alternative illuminance targets to take account of our denser context.

10.19 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.

Assessment

10.20 The results show the majority (97%) of the 30 habitable residential rooms will satisfy their target illuminance. The only room that would not meet the target is a single bedroom in the first floor flat (which is the 5-bed home) and is quadruple aspect. The median illuminance for this room would be 68 lux. Bedrooms generally require less natural light compared to other rooms such as kitchen and living rooms, given they are commonly used in darker hours. This home will still offer a very high standard of accommodation, with all the other rooms (including the living, kitchen and dining spaces) meeting the target illuminance.

10.21 The sunlight results show the 100% of the habitable rooms will meet the target for sunlight exposure.

10.22 The Sun Hours on Ground (SoG) for overshadowing demonstrates that more than half the outdoor space in the courtyard area will receive at least 120 mins of direct sunlight on 21 March (the spring equinox).

10.23 As set out within the BRE guidelines and the NPPF, daylight and sunlight availability are one of several considerations in site layout design. A balance

between the various design factors needs to be made to ensure an overall high quality of housing. Other issues such as provision of a balcony, for amenity space (see section below) and for shading to reduce solar gain, need to be considered together. Overall, whilst achieving this balance, the daylight and sunlight assessment results show a good level of compliance while ensuring the development makes optimal use of the potential for the site.

Outlook and privacy

- 10.24 The development site is close to both Haddo House (to the south approx. 3m away) and Ravenswood (to the west approx. 1.5m away) however both the north elevation of Haddo House and the east elevation of Ravenswood are blank and windowless elevations. The properties on the north side of Glenhurst Avenue are approx. 18.8m away and the east elevation of the proposed elevation faces out towards Highgate Enclosures, with the nearest residential properties being those on the east side of Highgate Road, some 70m away. Camden Planning Guidance on Amenity seeks a recommended separation distance of 18m, or the width of a street. The nearest windows are therefore a sufficient distance away from the new building that new residents won't feel overlooked. The windows and inset balconies on the west and east elevations of Haddo House would have only very oblique views into the windows on the south elevation of the proposed building.
- 10.25 It is noted that both Ravenswood and Haddo House would impact slightly on outlook from windows on the west and south elevations. However, Ravenswood is two storeys high and would only impact on outlook from ground and first floors. The ground floor room on the west elevation is a living, kitchen and dining room with north and south facing windows. The window on the west elevation is therefore secondary, and the room will still have adequate outlook. At first floor, the two windows on the west elevation serve bedrooms which are less impacted by outlook given their use. In any case, one of the bedrooms also has a north facing window making it dual aspect. The other bedroom would have slightly limited outlook; however, it is a single bedroom within a larger 5-bed home that is quadruple aspect and therefore on balance this home will still have a very reasonable outlook. To the south is Haddo House, which itself is a fairly narrow building, and the blank wall of the north elevation of Haddo House would face the proposed stair and lift core of the new building. Thus it would have limited impacted on proposed habitable windows. Views out of habitable windows on the south elevation of the proposed building would not align with Haddo House as shown on the indicative floor plan below.



Fig. 4. proposed indicative floor plan of levels 2-5

10.26 Overall, all the homes would have very good outlook, and they would not feel overlooked by neighbouring occupiers.

Accessible homes

10.27 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).

10.28 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.

10.29 1 of the homes (the ground floor flat) would be M4(3) compliant, which equates to 10% and is therefore policy compliant. The remaining 9 homes would be M4(2) compliant which equates to 90% which is also policy compliant.

- 10.30 A condition would be attached to secure the provision of the accessible and wheelchair dwellings (condition 26). The scheme would therefore have a positive impact on those experiencing barriers in terms of disabilities, paying due regard to the Public Sector Equality Duty.

Conclusion

- 10.31 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 has been submitted as part of the application which details any impacts upon neighbouring properties.
- 11.3 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 11.4 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

- 11.5 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:

- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
- *The BRE considers daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
- **No Sky Line (NSL)**, also known as **Daylight Distribution (DD)** – The daylight penetration into a room. It measures the area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
- *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
- **Annual Probable Sunlight Hours (APSH)** - The amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
- The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.
- **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
- The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.

11.6 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London. As a result, it recommends setting alternative targets which take account of relevant local context.

11.7 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.

11.8 For urban development densities found more typically in Camden, officers note that retained VSC values of 15% to 20% can be tolerated as an

acceptable norm. Often, windows at lower floors of residential buildings have VSC values of less than 10%.

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

Assessment

- 11.10 With regards to daylight and sunlight impacts, the properties assessed in the submitted daylight/sunlight report are 2, 4, 6 and 8 Glenhurst Avenue and Haddo House. These properties directly face the new building and are therefore more likely to be impacted on. The remaining properties on the north side of Glenhurst Avenue do directly face the new building and do not fail the 25-degree test and are therefore less likely to be impacted. No. 1 Ravenswood, which is adjacent to the new building to the south-west, has not been assessed as the windows do not fail the 45-degree test on plan as shown in the below image and therefore the windows will be less impacted.



Fig. 5. showing the 45 degree test from 1 Ravenswood

11.11 The residential properties assessed are therefore shown on the below image:



Fig. 6. showing the properties assessed for daylight and sunlight impacts

11.12 Nos. 2, 6 and 8 Glenhurst Avenue (labelled 1,3 and 4 on the above image) and Haddo House (labelled 5 on the above image) will all meet the BRE target values for daylight when tested using VSC and NSL, and sunlight, when tested using APSH. The only property therefore that falls below the target values is 4 Glenhurst Avenue (labelled 2 on the image above) which is discussed below.

4 Glenhurst Avenue

11.13 In terms of daylight impacts, the window serving the assumed living room at ground floor would see a loss of 24% VSC, resulting in a retained VSC of 26%. Although this would fall marginally below the BRE guidelines of a retained VSC of 27%, as mentioned above, in dense urban areas like Camden, retained VSC levels between 15% and 20% are common and can be tolerated. Therefore, given the urban location, the proposed loss of VSC is acceptable. In terms of NSL, this window would see a reduction of 5%, which is comfortably within the BRE guidelines. The remaining habitable rooms in this property would meet the BRE guidelines for VSC and NSL.

11.14 In terms of daylight, this window would retain 18% winter APSH and 63% annual APSH which is comfortably within the BRE guidelines and the remaining windows serving habitable rooms in the property will also be within the BRE guidelines for APSH.

11.15 It is noted that two other windows tested at this property will fall below the tests for daylight and sunlight, however, these are small windows that likely serve the hallway area and already have very low levels of daylight and sunlight. In any case, in line with BRE guidance, these areas don't need to be considered as they serve non-habitable space.

- 11.16 Overall, this property will still benefit from adequate levels of daylight and sunlight especially given the context within an urban environment.

Sun on Ground

- 11.17 An overshadowing assessment based on the Sun on Ground test has been undertaken to show the impact on surrounding amenity spaces, including Highgate Enclosures, the rear garden at 1 Ravenswood, and the estate courtyard area that is to be relandscaped.
- 11.18 The proposed development would not impact on these spaces, with more than 50% of these spaces receiving 2 hours of direct sunlight on the 21st March (the spring equinox) which is acceptable and in line with the BRE guidelines for sunlight to outdoor amenity spaces

Overlooking

- 11.19 Both the north elevation of Haddo House and the east elevation of 1 Ravenswood have blank, windowless facades and therefore the proposed windows on the south and west elevations of the building would not have direct views into any existing windows. On the north elevation, the distance between the proposed windows and the properties on the north side of Glenhurst Avenue is approx. 18.8m, and is over the width of the street, which is considered to be sufficient in line Camden Planning Guidance on Amenity. Views from the south elevation of the proposed building to windows and balconies on the front and rear of Haddo House would be at oblique angles with minimal opportunities for overlooking.

Sense of enclosure and outlook

- 11.20 It is noted that the footprint of the building would extend beyond the building line of Haddo House and Ravenswood. This is in order to accommodate homes compliant with space standards and means that plant and refuse can be located internally.
- 11.21 The footprint would extend by approx. 2.5m beyond the rear elevation of 1 Ravenswood, although it would be setback from the boundary by approx. 1.3m. This setback would help to soften the impact and as outlined above, the rear windows and garden space would comply with the BRE guidelines for daylight, sunlight and overshadowing. The new building, given its location to the side of 1 Ravenswood, would not impact on the outlook from the windows on the north and south elevations. The rear garden would still retain a sense of openness, and it wouldn't be overlooking by windows in the proposed building. On the north elevation, the building would project by approx. 0.9m, which, when considering the setback from the boundary of 1.3m, would not be overbearing or dominant on this elevation. The south elevation of the building would be set back from Haddo House by approx. 3.3m and the massing is cut out towards the east elevation to give more breathing space between the front elevation of Haddo House and the east

elevation of the new building. Given the height, scale and massing of Haddo House, the new building wouldn't impact on it in terms of being overbearing or dominant, nor would it impact on outlook from the windows in Haddo House given the distance and the oblique angles to the new building.

Noise

- 11.22 Policy A4 of the Local Plan seeks to ensure that noise and vibration is controlled and managed. Noise generating plant equipment is proposed although these would be located internally although they would be ducted to the atmosphere using grilles on the facades. As such, a noise impact assessment has been submitted to assess the impact on nearby residential occupiers. Conditions 18 and 19 are attached to ensure that noise and vibration don't exceed the Council's standards.

12. HERITAGE AND DESIGN

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. Section 72 of the same Act sets out that where the development is in a conservation area, special regard must be given to preserving or enhancing the character and appearance of that conservation area.

Dartmouth Park Conservation Area – No Harm

- 12.2 The Dartmouth Park Conservation Area sits below the higher areas of Hampstead, Highgate and Parliament Hill on land falling towards the Thames. It has a number of small valleys which provides many attractive views across London from the varied topography. The significance of the conservation area is its semi-rural quality on the fringes of the Heath, with a leafy feel derived from large trees in streets and gardens, and pockets of open green spaces such as those on the west side of Highgate Road. The variety and history of domestic architecture including late 18th century to present day building types gives it a complexity and interest. The presence of social housing estates also contributes to its significance, including the Brookfield Estate from the 1920s, the York Rise Estate (1930s), the Highgate Road flats (1950s and '60s) and the Whittington Estate of the 1970s.
- 12.3 The application site sits within sub areas 1, 'Highgate Road' and 9 (Lissenden Gardens). Highgate Road has a mix of uses, including some commercial uses to the south, and a wide range of building ages and typologies. Haddo House, Clanfield, Wheatley House and 1-7 Ravenswood which make up the estate are all positive contributors to the conservation area. All of the buildings in the immediate vicinity of the proposed development are of C20th date, with some dating from the early C20th and

the rest forming part of the development of the wider Haddo House site from c.1965-1970s. All of the houses on Glenhurst Avenue are typically of two storeys, and Haddo House is of seven main storeys (nine in places) and makes it particularly prominent given its location off Highgate Road.

- 12.4 The site of the proposed building is hard standing car parking and is of no heritage merit. The proposed development is of six storeys and is therefore closer to the height of Haddo House than the datum of Glenhurst Avenue. This shift in scale between the two areas already exists due to Haddo House, but the proposed development results in the more mass and height being brought closer to the Glenhurst Avenue side of the wider Haddo House site. The proposed development will therefore result in an alteration in the setting of Glenhurst Avenue (and all of its attendant properties) as well as an alteration to the setting of Haddo House. However, the shift in scale of height and massing already exists between the two pieces of land. The effect of the proposed development on the contribution which Glenhurst Avenue makes to the character and appearance of the conservation area will be to dilute some of the more open character of the skyline above the Ravenswood terrace. There will also be visibility of the scheme within Glenhurst Avenue more generally. The Dartmouth Park Conservation Area Appraisal notes that the character and appearance of Glenhurst Avenue chiefly relates to its arts and crafts architecture and the qualities of Ravenswood. None of these elements would be affected by the proposed development, although there would be an alteration to the setting of the buildings.
- 12.5 The proposed development will also affect the setting of Haddo House itself. Haddo House currently sits as the only building fronting the Highgate Road frontage of the site and is consequently symmetrical in its townscape presentation. The proposed development will create a less balanced frontage to Highgate Road, to the detriment of the setting of Haddo House.
- 12.6 However, there is no indication that the symmetry of the plot was of special importance in the design and commission of Haddo House, although it is a pleasing effect and one which does make a positive contribution the character and appearance of the conservation area, with the Conservation Area Appraisal and Management Strategy noting it “forms an important architectural component of this view [the view from Chetwynd Road towards Haddo House].”
- 12.7 The effect of the proposed development on the positive contribution which Glenhurst Avenue makes to the character and appearance of the conservation area is largely preserved. All of the architectural qualities of the street will be unaffected by the proposals and this is the chief reason for their inclusion within the conservation area. There will be an alteration to the setting of the street which fails to preserve an element of its original early C20th character due to the loss of some of the view of sky in the space to be occupied by the proposed development. Haddo House is within Sub Area

1 of the Conservation Area but sits immediately adjacent to Sub Area 9, and the proposed development site would be within Sub Area 9. There would therefore be a legible shift of the character of Sub Area 1 into Sub Area 9. However, in reality both sub areas are already inter-visible, including the existing shift in scale and character. It is also noted that the Conservation Area Appraisal and Management Strategy notes that Sub Area 9: "The most noticeable characteristic of this area is the larger scale of development with the predominant built form being higher and denser than other parts of the conservation area." This chiefly relates to the fact that the mansion block flats of Lissenden Gardens rise to around five storeys.

- 12.8 Haddo House is already visible from Glenhurst Avenue and while the proposal increases built form on the boundary with Glenhurst Avenue it does not introduce a new or fundamental shift in scale or character between Glenhurst Avenue and the Haddo House site.
- 12.9 The proposals will affect the setting of Haddo House, with some of its townscape merit arising from its symmetrical presentation towards Highgate Road. However, the proposed development is of a similar architectural language and typology as Haddo House and its scale and materials make reference to Haddo House.
- 12.10 The impact of the proposed development on the character and appearance of the Dartmouth Park Conservation Area is therefore slightly deleterious in the immediate vicinity of the proposal, but the character and appearance of the conservation area as a whole would be preserved. The scale, materials, form and typology (i.e. the character) of the proposed development all already exist within the context of the subject site, so those elements of the character of this part of the conservation area would not change.
- 12.11 The fact that land which is currently undeveloped above grade would be developed to six storeys is an alteration to the character and appearance of the immediate area and there is a slight degree of harm to the setting of unlisted buildings, which are positive contributors to the character and appearance of the conservation area.
- 12.12 However, all of the chief elements which the Dartmouth Park Conservation Area Appraisal and Management Strategy identifies as creating their positive contribution would be preserved, and therefore the impact of the proposed development on the character and appearance of the Dartmouth Park Conservation Area would meet the requirement of preservation of character and appearance.

1 to 5 Grove Terrace – No Harm

- 12.13 Terrace of 5 early 19th century yellow stock brick houses which are four storeys plus basement and are Grade II listed. Their significance is their group value, illustrating the expansion of London during the 18th to 19th centuries, along the main coaching route of Highgate Road. The development site is not a prominent element of the experience of the listed

buildings. The scale of proposed building, being six storeys, is such that the significance of the setting of the listed buildings is not affected.

6 to 27 Grove Terrace – No Harm

- 12.14 Terrace of 22 houses from the late 18th century, in yellow and brown stock brick. Most have slate mansard roofs and dormers and are three storeys with attics. They are Grade II* listed. As above, their significance comes from their group value and as their contribution to understanding the growth of London along a historic thoroughfare in Highgate Road. The development site, and the scale of the proposal, would not affect the setting of these listed buildings and are further from the development site than 1 to 5 Grove Terrace.

Grove End House – No Harm

- 12.15 This is a detached early 19th century 3 storey stock brick building which is Grade II listed. The significance comes from it being a well-preserved example of 19th century domestic architecture, and its location along Highgate Road as above. The setting of this listed building would not be affected, as the development site does not impact the appreciation of the listed building and the scale of the proposal would not affect its setting.

175 Highgate Road – No Harm

- 12.16 This is detached house from the early to mid-19th century in yellow stock brick with storeys and a basement. It is Grade II listed. As above, it is a well-preserved domestic property illustrating the growth of London along Highgate Road. The development site does not affect its setting, given that the properties on the north side of Glenhurst Avenue lie between. The proposal would therefore not impact on its setting.

URBAN DESIGN

Design Response

- 12.17 Positive changes and steps have been taken throughout the pre-application process, including input from Camden's Design Review Panel (DRP). The architectural principles and material palette are directly driven by those found on the estate and the scheme would provide a high standard of accommodation. It is deemed to be an appropriate design response for the site.

Design Review Panel

- 12.18 The scheme was seen by the Design Review Panel (DRP) in November 2024 and again in February 2025, the latter being a Chair's Review. The panel were supportive of optimising the site by delivering affordable housing in this location; while the height of the block was deemed appropriate, the panel found that the massing, appearance and architectural language

needed further development to ensure the scheme can fit well in the existing estate.

- 12.19 Some of the concerns raised by the DRP were the initial decision to contain the bike and bin store in a separate structure on Highgate Enclosures; the architectural approach which at the time was not considered to complement the estate, including the treatment of the stair core. For these reasons, the scheme was seen again by the panel, with suggestions made to improve architectural language, materiality, the public connecting route and the further development of the Glenhurst Avenue elevation, which the panel found inexpressive in comparison to the Highgate Road facade. Changes were made to the scheme following the first DRP meeting; the panel considered the scheme was progressing positively in the subsequent meeting and the suggestions were targeted to ensure the elevation design were resolved.
- 12.20 It was considered that the feedback from the DRP panels and the subsequent discussions with officers led to changes that sufficiently addressed these comments made by the panel, therefore needing no further review.

Scale and Massing

- 12.21 The proposed building is six storeys; the approach to height and massing is considered appropriate for the context which includes larger scale development and taller buildings than the rest of the conservation area.
- 12.22 The block's height is 66.7m AOD, this is 1.40m shorter than the shoulder height of Haddo House and 3.7m shorter than the set-back top floor of Haddo House. The impact of the massing on neighbouring heritage buildings is discussed as above. A clear example of height in this location is Haddo House itself, which is taller than both the immediate 2-3 storey terraces and 5 mansion-blocks further out. Given Camden Local Policy H4, which requires maximising the provision of affordable housing, and London Plan Policy GG2, which requires making the best use of land, the height of the block is considered acceptable in this location. While the block will inevitably change the setting of Haddo House, clear moves have been taken to ensure that the proposal does not distract but complements it and the impact in heritage terms is assessed above.
- 12.23 Amenity space and setbacks have been carved from the overall massing of the building to minimise impact on neighbouring properties, which are welcome. Much consideration has been given to the location of these setbacks and how they relate to the scheme's immediate neighbours. The setback on the corner with Haddo House is a positive move to increase visibility and sense of openness for the block's arrival point and the public

route, while the set back on the corner with Ravenswood minimises impact on the terraces.

Detailed Design and Materiality

- 12.24 The building has been designed with attention to composition and detail across all elevations, with a series of key design principles shaped by street condition, orientation and articulation related to context.
- 12.25 While the proposal is relatively simple in composition, its success is derived from the careful nod to the estate's cohesive architectural language and materiality, which has been studied in depth and applied in the scheme. This aspect of the proposal has been shaped and achieved through many constructive discussions with officers to ensure the proposal sits comfortably within the estate and shares a common visual language with it.
- 12.26 The strong horizontal banding found throughout the estate is mirrored in the proposal in a light-coloured pre-cast concrete, becoming the emphasis of the facade treatment. Unlike in the existing blocks, where the architectural language is driven by internal use and structural strategy expressed in the facades, this is harder to achieve in a modern development and therefore the vertical elements of the proposal are less prominent.
- 12.27 The lightness and filigree architectural language found on the estate – a kit of parts which includes both horizontal and vertical elements with a variety of materials present such as brick, concrete, metal and tiles – was important to replicate on the proposal to ensure a contextual response. The appearance of the block was tested in many iterations; a previous idea to express the stair core in a nod to Haddo House's lightweight stair cores, was removed as it was considered to be monumental and heavy-looking given the narrow profile of the block. This in turn allows for balconies running the full width of the facade facing Highgate Enclosures, their vertical balustrades reflecting those found on Haddo House, creating lightness and expression. Juliette balconies on the courtyard elevation provides activation of the facade and passive surveillance for both the public route and courtyard itself.
- 12.28 The placement and size of windows is driven by orientation, response to context, internal layouts as well as elevation principles derived from the module studies – for example, the white clay infill panels above and below windows reflect the infill panels found throughout the estate.
- 12.29 The base is treated differently to the rest of the building to respond to the residential context and make it more inviting, which is welcome. The white hit and miss recessed brickwork along Glenhurst Avenue, continued as white stretcher bond brickwork in the ground floor treatments on the other elevations, adds detail and interest, contrasting with the rest of the material palette which includes stacked grey/brown brickwork, a nod to the brown

feature tiles, the buff brick piers and flank walls of the existing blocks. The north-west ground floor is delineated from the rest of the building via pre-cast concrete panels with vertical grooves, replicating the tiled band of the Ravenswood terrace. Green front doors add accents of colour.

- 12.30 The design relies on the quality and subtlety of materials and detailing to deliver a contextual and robust building that will enhance the streetscape and sit comfortably alongside its neighbours on the estate. These would therefore be conditioned (3) to ensure a building of the highest quality with a durable finish that weathers gracefully and stands the test of time.

Layout and Ground Floor

- 12.31 The layout of the scheme is straight-forward, largely replicating the footprint of the existing car park. While it does step forward of Haddo House's building line, this is primarily to maximise the site and create high-quality, well-sized homes, which is acceptable and does not detract from the overall form and layout of the estate or its wider context. The main access point is off Highgate Enclosures, with additional front access for the ground floor flat off Glenhurst Avenue, continuing the well-established rhythm of Ravenswood front doors. The proposal steps back from neighbouring buildings to minimise impact and preserve the public route connecting into the central courtyard, which is welcome.
- 12.32 Much consideration has been given to the location of the block's entrance and arrival sequence, the relationship with the public route that is retained between the new block and Haddo House following community feedback, visibility and legibility, as well as how welcome, inviting and safe it feels. The ground floor layout has been positively adjusted following feedback from officers and the DRP. The entrance has been altered slightly from its initial location facing the public route to directly face Highgate Enclosures, therefore significantly increasing its visibility from the street and thus safety. The internal stair and the kitchen window of the ground floor flat facing the public route increases passive surveillance, making the route safer and more welcoming.
- 12.33 The refuse store, initially located on Highgate Enclosures as a stand-alone structure, has been absorbed into the plan and located next to the block's entrance to minimise trip distances and impact to habitable rooms, both within the block and the neighbouring properties. Steps have also been taken to improve the front garden of the ground floor flat, making it more inviting and open, and drawing from the character of the Ravenswood front gardens. The provision and location of entrances will help enliven the ground floor along all three sides of the building, engage with the prominence of the corner on Glenhurst Avenue and provide a better relationship with the streetscape.

- 12.34 The proposed size and layout of the block will ensure high-quality homes, which is welcome – all flats are triple aspect, well-sized, with good natural light and ventilation, level access and private amenity that is both generous and accessed from living spaces.

Conclusion

- 12.35 The scheme is a high-quality design response that directly draws from the architectural qualities of the existing Highgate Road Estate, maximising much needed affordable housing on an underutilised site in a location with good public transport links. The building improves the relationship with the street and context, introducing active ground floor frontages. Composition, detailing and materiality have been well considered, rooted in the estate's architectural language and demonstrate a high-quality example of how to positively increase housing numbers on small sites such as this.
- 12.36 The evolution of the designs following sustained and constructive feedback from officers, the DRP panel and stakeholders has led to a positive scheme that sits comfortably in its context, improves safety and enhances the entire estate through the landscape changes proposed for the benefit of existing and new residents alike.

13. SUSTAINABILITY AND ENERGY

- 13.1 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.
- 13.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Energy and carbon reductions

- 13.3 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).
- 13.4 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

- 13.5 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)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	33.7 %
Be green stage (renewables): CLP policy CC1	20%	82.2%
Total carbon reduction: LP policy SI2 and LP CC1	35%	88.2%

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

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

Total carbon reductions

- 13.7 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.
- 13.8 This is charged at £95/tonne CO₂/yr (over a 30-year period) which is 1.202 tonnes x £95 x 30 years = £3,426. This amount will be spent on delivery of carbon reduction measures in the borough.
- 13.9 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.
- 13.10 In this case, the development significantly exceeds the policy target of 35% reductions and the residential aspirational target of 50% reductions, achieving an overall on-site reduction of 88.2% below Part L requirements as shown in Table 5 above. The **carbon offset of £3,426 will be secured by the shadow Section 106 legal agreement** to and is necessary to bring it to zero carbon in order to reach 100% reduction in carbon emissions, in compliance with the development plan.

Be lean stage (reduce energy demand) -

- 13.11 London Plan policy SI 2 sets a policy target of at least a 10% (residential) reduction through reduced energy demand at the first stage of the energy hierarchy.
- 13.12 In this case, the development exceeds the policy target of 10%, reducing emissions by 33.7% at this stage through energy efficient design, in compliance with the development plan. The building would have high thermal performance through triple glazing, airtightness and well-insulated thermal envelope. The glazing ratio would be 13-20% which is less than Part L max value of 25%. Wastewater Heat Recovery, and Mechanical Ventilation with Heat Recovery is also proposed. Passivhaus Planning Package methodology has been used to reduce energy demand. The development proposes to use Exhaust Air Heat Pump (EAHP) for space heating the development, which is an individual heating system, with heating output capacity more suitable for small flats and houses with very low space heating demands. Exhaust Air Heat Pumps (EAHP) utilise the waste heat extracted from the apartment ventilation system to contribute towards the space heating and domestic hot water requirements of the dwellings.
- 13.13 EAHP is considered appropriate only where the development demonstrates a reduced demand for space heating compared with non-Passivhaus schemes, and only where a robust post-construction quality assurance process is committed to. As this proposal is targeting Passivhaus certification, the required certification process effectively provides that post-construction quality assurance. As such, in this instance, EAHPs are considered acceptable.
- 13.14 The cooling hierarchy has been used to reduce overheating, including LED lighting, insulated pipework, cross ventilation via dual aspect homes, fixed shading from balconies, window recesses and good G-value windows. Louvred windows have been included in ground floor bedrooms to provide secure night ventilation. As such, no active cooling is required for the development which is welcomed.

Be clean stage (decentralised energy supply)

- 13.15 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.
- 13.16 EAHPs are an individual system, that are not able to connect to District Heat Networks (DHN). However, as above, the use of EAHPs are accepted in this instance and in addition, the shadow section 106 agreement will ensure

the development is future proofed in order to allow for future connections to a local heat network, as and when the EAHPs come to the end of their working life.

Be green stage (renewables)

- 13.17 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.
- 13.18 In this case, the development significantly exceeds the policy target of 20%, reducing emissions by 82.2% at this stage through renewables, in compliance with the development plan. The proposal includes PV panels on the roof, covering around 46% of the roof area, with full details secured by condition 5. The remainder of the roof would be used for the lift overrun, lift generator and smoke shafts. A condition will be added to secure a meter to monitor the energy output from the approved renewable energy systems (condition 5). The proposal includes low carbon heating like Exhaust Air Heat Pumps which are proposed internally. It is noted that the refrigerant of EAHP uses R134a with Global Warming Potential (GWP) of 1,430 which is considered high but accepted that this is mainly due to the limited choice in refrigerants for EAHP units. It should be noted that the volume per unit is smaller compared to an ASHP. The applicant has stated that the manufacturer is developing an EAHP with a lower GWP refrigerant. The applicant has therefore agreed to a condition (10) requiring further exploration of alternative refrigerants, subject to their availability and feasibility, including any cost or technical constraints and therefore on balance this is considered acceptable

Be seen (energy monitoring)

- 13.19 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. Condition 5 and 10 would secure details of monitoring for the PV panels.
- 13.20 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

- 13.21 Local Plan policy CC2 encourages new build residential development to use the Home Quality Mark and Passivhaus design standards.
- 13.22 The building has been designed to ensure that Passivhaus, or AECB (Association for Environment Conscious Building) as an alternative, remains achievable at a later project stage which is welcomed.

- 13.23 The building has incorporated sustainable design measures. No active cooling is required, and dynamic thermal modelling using CIBSE TM59 and TM49 (resi) has been undertaken showing no overheating and that cooling demand minimised. Although a green roof is not proposed on the flat roof of the building, the space has been given over to an extensive array of PV panels which covers around 46% of the roof area. The proposed development will benefit from a Power Division Control System (PDCS) which allows on-site generated solar energy to be optimally shared between dwellings, thereby reducing demand on the National Grid. Additionally, dwellings will be provided with thermal hot water storage within each dwelling which could be configured to charge during periods of lower-carbon or lower-cost grid electricity which is welcomed. Green roofs are proposed on the storage structures within the courtyard area and details of these are secured via condition 6. The building has been designed with a low glazing ratio, with larger areas of solid on the facades, which is beneficial for thermal insulation and would still ensure an adequate level of light within the homes. Options to provide a green or biosolar roof on the building were explored however these were discounted as it would require significant additional structure, increasing embodied carbon, raising the building height and potentially harming both heritage relationships and neighbour amenity. The benefit would be limited, as the remaining available roof area is small due to the smoke shaft, lift overrun and life generator and would reduce space for PV panels. The scheme already exceeds greening and biodiversity requirements in other areas of the development, which some would deliver SuDS improvements. Given the cost and maintenance implications for a publicly funded affordable housing scheme on a constrained site, prioritising PV and minimising structural demand is considered an appropriate and policy-compliant approach
- 13.24 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.
- 13.25 In this case, the development incorporates green roofs on the storage facilities in the courtyard, and soft landscaping as well and the existing hard standing in the car parking would be developed. Details of the SuDS system will be secured by condition 6. Condition 27 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.

Whole Life Carbon

- 13.26 Whilst Whole Life Carbon Assessment (WLCA) is not a policy requirement for this case (not a GLA referable scheme nor it was built via substantial demolition of a previous structure), the submission of WLCA is welcomed

and aligns with the draft new local plan the Council will require developers for all new build major development WLCA as part of the planning application.

Modules	Min benchmark RESIDENTIAL (kgCO₂e/m² GIA)	Aspirational Benchmark for RESIDENTIAL (kgCO₂e/m² GIA)	Proposal (kgCO₂e/m² GIA)
A1-A5	<850	<500	1107
B-C (excl B6 & B7)	<350	<300	763/769
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1866

Table 6 – Whole Life Carbon results

- 13.27 The proposed development exceeds all of the GLA benchmarks. MEP services is the largest contributor accounting for 30% of the embodied emissions over the lifecycle of the proposed scheme. This is primarily due to the use of the refrigerant R134A (EAHP), which is having a significant impact on the B1 module as well as the replacement cycles of all MEP plant impacting the B4 module.
- 13.28 The substructure is responsible for the highest proportion of upfront carbon emissions (A1–A5), contributing 25%. This elevated figure is a direct result of site constraints, most notably, the need to protect mature trees, which has led to a more material-intensive foundation design. It is anticipated that the substructure design will be optimised during the technical design phase, following verification of ground conditions through appropriate testing.
- 13.29 Façade (external walls) is also a large contributor to embodied carbon. The use of a highly insulated façade with triple glazing, while beneficial for the operational energy target of an EUI of 35 kWh/m² GIA, also adds to the embodied carbon.
- 13.30 Other opportunities to reduce the carbon associated with the scheme at Stage 4 could include an increase from 20% to 50% recycled binders in cement (concrete C30/37 only), and Specification of timber studwork in the internal walls.
- 13.31 Overall, the scheme would far exceed carbon reduction targets, and would be capable of meeting Passivhaus certification which is welcomed and would overall have strong sustainability credentials. It would therefore be in general accordance with policies CC1 and CC2 of the Local Plan.

14. TRANSPORT

- 14.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 14.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.
- 14.3 Policy TS1 of the Dartmouth Park Neighbourhood Plan seeks to improve safety and accessibility for pedestrians and cyclists. Policy TS2 states that developments should improve the local environment for cycling for all ages and abilities, and policy TS3 seeks to reduce the effects of traffic on residents in the plan area.
- 14.4 Camden's Transport Strategy (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal. Our priorities include:
- increasing walking and cycling
 - improving public transport in the Borough
 - reducing car ownership and use
 - improving the quality of our air
 - making our streets and transport networks safe, accessible, and inclusive for all.

Site Access

- 14.5 The application site has a PTAL score of 5, which indicates that it has a very good level of accessibility by public transport. The nearest station is Gospel Oak, located to the west of the site, whilst Tufnell Park station is located to the east and Kentisth Town Road station to the south. The nearest bus stops are located on Highgate Road and Gordon House Road, these are served by bus routes 88, 214 and C11.

Cycle Parking

- 14.6 In line with Policy T1 of the Camden Local Plan and TS2 of the Dartmouth Park Neighbourhood Plan, the Council expects cycle parking at developments to be provided in accordance with the London Plan standards. For 1-bedroom 2-person residential units, the requirement is for

1.5 spaces per unit, whilst for units with 2 or more bedrooms, it is 2 spaces per unit. This gives a requirement for 18 spaces for this development plus 2 spaces for visitors. Whilst the ground floor 2-bedroom wheelchair unit has an accessible bike store in the front courtyard, cycle parking for the rest of the flats will be provided through means of cycle lockers for 20 cycles being provided to the west of the housing block, within the landscaped courtyard area of the wider estate. Given the distance from the new housing block, this is not the ideal location. It also involves negotiating a flight of stairs down to the courtyard. However, it is acknowledged that space within the car park site is very limited and that it is not possible to accommodate the required cycle parking within the ground floor of the building. The provision of the cycle parking facilities would be secured by means of a condition (25).

Car Parking

- 14.7 In accordance with Policy T2 of the Camden Local Plan, the development would be secured as Residents parking permit (car) free by means of a Shadow Section 106 Agreement. The applicant has acknowledged this in their submission documents and is willing to enter into such an arrangement.
- 14.8 With regards to disabled parking provision, whilst this cannot be provided on site due to site constraints, a Shadow Section 106 contribution of £5,000 should be sought towards the provision of an off-site (on-street) disabled parking space on Glenhurst Avenue, by converting an existing Residents bay to this use. The Transport Statement (TS) that has been submitted in support of the application identifies a possible location for this adjacent to the development site.
- 14.1 The existing car park has a capacity for 11 vehicles, of which 6 spaces are in active use. The TS states that the 6 vehicles that are displaced from the car park can be accommodated within the basement car park beneath Clanfield, which is located a short walk to the west of the site on Gordon House Road. This arrangement is accepted and details would be secure via the shadow section 106 agreement.

Construction Management

- 14.2 Given the extent of construction proposed, it will be necessary to secure a Construction Management Plan (CMP) and associated Implementation Support Contribution of £12,000 and Impact Bond of £16,000 by means of the Shadow S106 Agreement. It will also be necessary to secure the requirement to create a construction working group to liaise with residents and stakeholders. This will help ensure that the proposed development is carried out without unduly impacting neighbouring amenity, or the safe and efficient operation of the local highway network, in line with Policy A1 of the Camden Local Plan. Whilst a draft CMP has been submitted in support of the application, this will need to be updated once a principal contractor has

been appointed and submitted for approval once local consultation has been undertaken, prior to any works commencing on site.

Highways works

- 14.3 As the crossover and footway adjacent to the site are likely to sustain damage as a result of construction activity, a Shadow S106 highways contribution will be necessary for resurfacing them.

Pedestrian, Cycling and Environmental Improvements

- 14.4 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes we are delivering across the borough, as well as complementary initiatives. In line with the increase in walking and cycle trips generated by the proposed development, a contribution of £20,000 would be secured via shadow section 106 legal agreement towards transport improvements in the local area.

Micro and Shared Mobility Improvements

- 14.5 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 borough. Given the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 14.6 A cycle/e-scooter hire improvements contribution of £2,000 would therefore be secured under the shadow S106 legal agreement. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g. by expanding existing bays and providing additional bays).

15. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 15.1 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. Policy ES1 of the Neighbourhood Plan seeks to preserve and enhance the green and open feel of the area. Policy ES2 seeks to protect and to increase the

number of healthy trees that contribute to the character of the area and green spaces. Policy ES3 seeks to protect and enhance biodiversity, by supporting development which provide new areas of biodiverse habitats.

- 15.2 The proposal would involve the removal of 7 trees which are all Category U, which are trees considered to have a curtailed life expectancy that should not constrain development. There is an 8th category U tree (tree T3) shown in the submitted arboriculture assessment, but this is off site and not listed for removal. The removal and replacement of the 7 Cat U trees is acceptable, due to their condition, and the replacement planting in terms of species and positioning is acceptable. Greater numbers are proposed for planting than are being removed which is welcomed. 18 trees are proposed to be planted, which include a mix of sizes and native species that would provide biodiversity value as well as visual interest. 2 newly planted trees on the estate next to the car park would be replanted in the courtyard area close to Gordon House Road. This is needed to make way for the new building and is acceptable. A tree protection plan, demonstrating how retained trees and root protection areas would be protected during construction, has been submitted and is deemed to be adequate by the Council's Tree officers. A condition (24) is attached to ensure that the works are carried out in accordance with the submitted tree protection plan.
- 15.3 The scheme would provide enhanced planting, a natural play trail, replacement of existing hard standing with permeable surfaces and planting in places, and drainage and greening strategies. This would be a considerable improvement on the existing courtyard condition, which has areas of hard standing and little on offer in terms of play areas. The courtyard would also provide the bicycle storage, reprovided pram sheds, and a new store to replace the existing under-stair store. Green roofs would be added to these stores and details of the green roofs are secured via condition 6. Play equipment would be interspersed throughout the courtyard area, including timber railway sleepers, tree trunks, clamber stacks, hopscotch, and balancing trails for children on the estate to use. Insect hotels and bird boxes would also be installed and details of these are secured via condition 9.
- 15.4 The London Plan uses the UGF scores to help objectively evaluate the quality and quantity of urban greening. Given this is a residential-led scheme, the 0.4 value is an appropriate target. The proposals achieve an UGF of 0.43 which exceeds the target which is welcomed. The requirement to meet the UGF of 0.4 is secured via condition 14.
- 15.5 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

- 15.6 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 15.7 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.
- 15.8 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.
- 15.9 Based on the information provided, this scheme will require the approval of a BGP before development begins. The current baseline for the site equates to 1.50 habitat units, and consists of urban trees, modified grassland, developed lands and shrubs.
- 15.10 The proposal would meet the 10% gain requirement on site, providing a 14.86% gain with 1.73 habitat units.
- 15.11 Council's Nature Conservation Officer considers that the biodiversity gain condition is capable of being discharged successfully. The 10% gain can be met on-site. This would be confirmed via discharge of the statutory BNG condition. The statutory condition will not be repeated on the decision notice, in line with guidance, but informatives explaining the statutory obligations will be included on the decision. A Habitat Management and Monitoring Plan is secured via condition 12.

16. WATER AND FLOODING

- 16.1 Camden Local Plan policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. Major developments should achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run off rates. Development should also follow the drainage hierarchy in policy SI 13 of the London Plan.
- 16.2 The application site is located on previously flooded streets (Highgate Road and Glenhurst Avenue) and has a low to medium risk of surface water flooding.
- 16.3 In order to mitigate against the flood risk, various SuDS techniques are proposed. The roofs on the bin and bike storage in the courtyard would have green roofs and can reduce the runoff of rainfall entering the drainage system. Soft planting in the courtyard and around the new building will help

to reduce runoff. Stormwater attenuation would provide the main reduction in surface water runoff, through below-ground geocellular storage crates providing 13.755m³ storage volume. Although greenfield runoff rates of 0.7l/s aren't met, there would still be a significant improvement compared to the existing brownfield runoff rates which help to reduce the impact of flooding off site. The proposed runoff rate is to be 0.2l/s. Details of the SuDS would be secured via condition 6, and details of the green roofs would also be secured via condition 6 to ensure they have sufficient substrate depth and will be appropriately maintained.

17. LAND CONTAMINATION

- 17.1 Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. As part of this, we will consider factors including contaminated land.
- 17.2 Records indicate that historic uses of the site include garages, motor engineers and a wallpaper factory. Given the proposal involves sensitive end uses (residential), and soft landscaping which is a plausible pathway for potential contaminants, a condition is attached (4) so that a preliminary risk assessment and site investigation is undertaken, to ensure the risk from land contamination to the future users of the site are minimised.

18. AIR QUALITY

- 18.1 Policy CC4 of the Local Plan states the Council will ensure that the impact of development on air quality is mitigated and will ensure that exposure to poor air quality is reduced in the borough.

Operational impact of development on the local area

- 18.2 The development would be car-free, and no combustion heating is proposed. The proposal is therefore considered as air quality neutral.

Operational impact on occupants

- 18.3 The closest non-automatic monitoring site to the development is CAM279, which measured 24.7µg/m³ of NO₂ in 2024. This reading is considered representative to the development site, and meets the air quality objective of the UK limit, London Plan and World Health Organisation (WHO) of 40µg/m³ by 2030. The proposed residential use is considered to be suitable from an air quality point of view. Condition 7 requires further details of the mechanical ventilation system to ensure that air inlets are located away from busy roads or other emission sources. Details of the backup power supply systems are secured via condition 11.

Construction impacts risk assessment

- 18.4 A construction dust assessment was carried out, and the risk of construction effects are considered low risk and negligible. No air quality monitoring is therefore required on site.
- 18.5 Given the above, it is considered that the development would be in accordance with policy CC4 of the Local Plan.

19. SAFETY AND SECURITY

- 19.1 Policy C5 of the Local Plan requires developments to demonstrate that they have incorporated design principles that contribute to community safety and security.
- 19.2 The proposal would include the provision of enhanced landscaping and play equipment within the courtyard space. This would provide opportunities for younger children and families to use this space, which is overlooked on all sides by the existing estate blocks and also has good visibility from Gordon House Road. There is an existing railing along the boundary with Gordon House Road and there is a gap to access the courtyard. A gate is proposed here to provide access.
- 19.3 The pedestrian route between Haddo House through down to the courtyard space would be retained and the space between the new building and Haddo House is approx. 3.3m which would provide sufficient space and sightlines. The south elevation at ground floor would have glazed elements around the stair core and entrance lobby area to provide visibility and natural surveillance over this area. There would be access to the staircase from this location which would provide activity in and out of the building. The upper levels on the south elevation have windows and Juliet balconies which would provide natural surveillance over this space. The existing car park is currently not overlooked due to the lack of windows on the flank elevations of Haddo House and 1 Ravenswood. The south-east corner at ground floor is cut away to provide greater visibility and legibility to the building entrance and the route through to the courtyard from Highgate Road.
- 19.4 The gap between the new building and 1 Ravenswood would be blocked off by a planter, and the space behind this would only be accessible from the occupiers of the ground floor home. This would prevent access between the buildings and would design out space that could have been used for anti-social behaviour.
- 19.5 The space to the north of the new building would be an amenity space for the ground floor home, and direct access would be provided to this home

from Glenhurst Avenue with a gate and a separate front door. This would create a sense of activity in this area.

20. HEALTH AND WELLBEING

- 20.1 Policy C1 of the Local Plan notes that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing and reduce inequalities.
- 20.2 The application includes a Health Impact Assessment (HIA) that has been created and submitted in line with policy C1. An HIA is a structured process that evaluates how a proposed development might affect the health and well-being of local people. Its purpose is to ensure health considerations are fully integrated into the design and delivery of the development. It has been assessed in the context of three relevant documents, namely We Make Camden, Camden Joint Health and Wellbeing Strategy, and Camden Annual Public Health Report.
- 20.3 The We Make Camden (WMC) vision identifies four missions that guide the borough's long-term ambitions: young people's opportunity, healthy food, diverse leadership, and healthy, sustainable estates and neighbourhoods. The Highgate Road Estate development contributes to these missions in several key areas. The proposal makes meaningful improvements to the estate environment by delivering new landscaping, urban greening, enhanced accessibility, and safe, walkable routes throughout the site. These align directly with the WMC mission to ensure that Camden's estates are healthy, sustainable and enable creativity and connection among residents.
- 20.4 By providing 10 new 100% social affordable rent homes, the scheme contributes to WMC's challenge of ensuring decent, safe, warm and family-friendly housing. Excessive housing costs, overcrowding, and inequality are recognised borough-wide issues; this development helps address these through the provision of high-quality, energy-efficient affordable homes. The proposal takes a fabric-first, fossil-fuel-free approach, incorporating heat pumps, solar PV and urban greening. These measures support Camden's climate emergency ambitions and the WMC challenge to create cleaner, greener neighbourhoods. The new and enhanced shared spaces, including informal play areas and a reconfigured courtyard, strengthen opportunities for social connection, echoing WMC's ambition to reduce loneliness and build strong, inclusive communities.
- 20.5 The Rapid HIA demonstrates strong alignment with Camden's strategic health and wellbeing priorities. The scheme provides clear public health benefits through provision of high-quality, energy-efficient social homes, accessible, inclusive design for all residents, enhanced public realm and

green infrastructure, support for active travel and reduced car dependency, commitment to sustainability and climate resilience.

21. EMPLOYMENT AND TRAINING OPPORTUNITIES

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

During construction

- **Apprenticeships** - the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs (or every 1,000sqm GIA newbuild) with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the council's Euston Skills Centre (moved to a new location hence a new name). With an estimated build cost of £4.5 million this would mean 1 construction apprentices and a £1,700 support fee.
- **Local Recruitment** - the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.
- **Local Procurement** - the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.

21.2 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.

22. COMMUNITY INFRASTRUCTURE LEVY (CIL)

22.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling, however, there are exemptions for the development of social housing. The applicant will need to make a formal application.

23. CONCLUSION

23.1 Overall, the scheme would optimise a piece of underused brownfield land, making a contribution to the borough's housing supply and in particular

would make a contribution to affordable housing supply. The new building is considered to be a high-quality contextual design, which would tie in with the surroundings and conservation area. The scheme would exceed carbon reductions targets and would be capable of meeting Passivhaus or equivalent standards. The scheme would also deliver enhancements to the existing estate land, providing new landscaping and play equipment for existing and new residents.

Public benefits

23.2 No harm has been identified to heritage assets but if the committee decides there is harm, there are a number of public benefits that could weigh against that harm:

- Provision of 100% social housing
- Enhanced landscaping and play equipment for all estate residents
- Improved safety and security for the estate
- Highly sustainable development exceeding policy targets for carbon
- Employment and training opportunities for Camden residents during construction

24. RECOMMENDATION

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

- Secure 10 social-affordable rent home
- Construction management plan (CMP)
- CMP implementation support contribution of £12,000
- CMP Impact Bond of £16,000
- Creation of construction working group
- Car free
- Provide access to existing car parking spaces for 6 existing car park users.
- 1 disabled parking space £5,000
- Highways contribution
- Pedestrian, cycling and environmental contribution of £20,000
- Micromobility contribution of £2,000
- Energy and sustainability plan
- Future proof connections to a district heat network
- Construction apprenticeship and £1700 support fee.
- Local recruitment 20%
- Local procurement 10%
- Carbon Offset Payment of £3,426

25. LEGAL COMMENTS

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

26. CONDITIONS

Standard conditions

1 Time limit

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

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

2 Approved drawings

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

Existing Drawings:

Site Location Plan HRE - JBW - ZZ - XX - DR - A – 02000 P01, HRE - JBW - ZZ - XX - DR - A – 02151 P02, HRE - JBW - ZZ - XX - DR - A – 02150 P02, HRE - JBW - ZZ - XX - DR - A – 02250 P02, , HRE - JBW - ZZ - 07 - DR - A – 02001 P03, 0114-PR-ZZ-ZZ-DR-L-2081 001, 0114-PR-ZZ-ZZ-DR-L-2080 001

Proposed Drawings:

HRE - JBW - ZZ - 02 - DR - A – 02017 P03, HRE - JBW - ZZ - XX - DR - A – 02155 P03, HRE - JBW - ZZ - XX - DR - A – 02156 P03, HRE - JBW - ZZ - XX - DR - A – 02100 P07, HRE - JBW - ZZ - XX - DR - A – 02102 P07, HRE - JBW - ZZ - XX - DR - A – 02103 P07, HRE - JBW - ZZ - XX - DR - A – 02200 P01, HRE - JBW - ZZ - XX - DR - A – 02201 P02, HRE - JBW - ZZ - XX - DR - A – 02255 P03, HRE - JBW - ZZ - XX - DR - A – 02256 P03, HRE - JBW - ZZ - 00 - DR - A – 02002 P09, HRE - JBW - ZZ - 00 - DR - A – 02003 P05, HRE - JBW - ZZ - 00 - DR - A – 02004 P05, HRE - JBW - ZZ - 00 - DR - A – 02010 P08, HRE - JBW - ZZ - 01 - DR - A – 02011 P08, HRE - JBW - ZZ - 02 - DR - A – 02012 P08, 0114-PR-ZZ-ZZ-DR-L-0003 005, 0114-PR-ZZ-ZZ-DR-L-0005 001, 0114-PR-ZZ-ZZ-DR-L-0006 001, 0114-PR-ZZ-ZZ-DR-L-1001 001, 0114-PR-ZZ-ZZ-DR-L-1002 001, 0114-PR-ZZ-ZZ-DR-L-1201 002, 0114-PR-ZZ-ZZ-DR-L-1202 002, 0114-PR-ZZ-ZZ-DR-L-2000 002, 0114-PR-ZZ-ZZ-DR-L-2001 002, 0114-PR-ZZ-ZZ-DR-L-6000 001, 0114-PR-ZZ-ZZ-DR-L-6010 001, 0114-PR-ZZ-ZZ-DR-L-6030 001, 0114-PR-ZZ-ZZ-DR-L-6031, 0114-PR-ZZ-ZZ-DR-L-6040 001, 0114-PR-ZZ-ZZ-DR-L-6041 001, 0114-PR-ZZ-ZZ-DR-L-6100 001, 0114-PR-ZZ-ZZ-DR-L-6110 001

Documents:

Plant Noise Impact Assessment Report P02 (17/11/2025), Tree Survey, Arboricultural

Impact Assessment & Method Statement 241436/A2_AIA Nov 2025, Fire Statement S24053134 02, Rapid Health Impact Assessment Nov 2025, Energy Strategy Rev03 | Nov 2025, Air Quality Assessment October 2025, Biodiversity Net Gain Summary 17 November 25, Planning and Affordable Housing Statement November 2025, Design and Access Statement November 2025, Drainage Management Statement and Maintenance Schedule 11 Nov 2025, Transport Statement Rev 01 19 November 2025, Sustainability Statement 20 November 2025, Statement of Community Involvement, Flood Risk Assessment, Sustainable Drainage Management Statement and Maintenance Schedule Rev 03 23/01/26, Daylight and Sunlight Report and Overshadowing Addendum V1, Whole Life Carbon Assessment, Equality Impact Assessment Form, Heritage Statement November 2025.

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

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

3 Detailed design drawings and samples

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

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

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

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

d) Detail drawings of garden walls, gates, doors and louvres on all parts of the building which face the public realm at a scale of 1:10.

e) Detailed drawings, including plans, elevations and sections at 1:50 of the landscape works for the block and across the estate.

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 area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017

4 Contaminated Land

Part A:

No development (other than demolition and site clearance) shall commence until a preliminary risk assessment report is submitted to and approved in writing by the local planning authority. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses. A conceptual site model should be produced indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks to identified receptors. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Subsequent parts are subject to the findings of the desk study:

Part B:

No development (other than demolition and site clearance) shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority.

The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Part C:

No development (other than demolition and site clearance) 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 D:

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 Camden Local Plan 2017.

Prior to above ground works (other than demolition and site clearance)

5 PV panels

Prior to commencement of above ground works (other than demolition and site clearance) drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The 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. Prior to first occupation the cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policy CC1 of the Camden Local Plan 2017.

6 Details of SUDS

Prior to commencement of above ground works (other than demolition and site clearance), full details of the sustainable drainage system including geocellular storage / rain gardens and green roof 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 greenfield run-off rate or other rate of 2.0l/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.

The proposed surface water discharge rates or volumes.

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, where this is not considered feasible justification should be provided) 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.

Prior to first occupation of the SuDS shall be installed in accordance with the approved details and be retained and maintained thereafter.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the Camden Local Plan 2017 and Policy SI 13 of the London Plan 2021.

7 Mechanical Ventilation

Prior to commencement of above ground works (other than demolition and site clearance), full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and any other emission sources and as close to roof level as possible, to protect internal air quality. Prior to first occupation the mechanical ventilation system and air inlets as approved shall be provided and retained and maintained in accordance with the approved details thereafter.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.

8 Piling

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) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling shall be undertaken in accordance with the terms of the approved piling method statement.

Reason: To safeguard the existing public sewer infrastructure, controlled waters and the structural stability of the neighbouring structures, in accordance with the requirements of Policy CC3 of the Camden Local Plan 2017.

9 Bird and insect boxes

Prior to commencement of above ground works (other than demolition and site clearance), details of bird boxes and insect hotels shall be submitted to and approved in writing by the Local Planning Authority. These should be incorporated into the fabric of the building where feasible.

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 policy A3 of the Camden Local Plan 2017.

10 Exhaust Air Heat Pump

Prior to commencement of above ground works (other than demolition and site clearance), details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more), the refrigerants used in the system is of global warming potential at or lower than 1,430, 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 prior to first occupation and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities and to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy, in accordance with the requirements of policy CC1 and CC2 of the Camden Local Plan 2017.

11 Emergency Backup power

Prior to commencement of above ground works (other than demolition and site clearance) details of the proposed back up power supply including make, model and capacity details shall have been submitted to and approved by the Local Planning Authority in writing. The proposed System/Equipment should be appropriately sized for life saving functions only.

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 Camden Local Plan 2017

12 Biodiversity Net Gain

Prior to commencement of above ground works (other than demolition and site clearance) a Biodiversity Gain Plan and Habitat Management Monitoring Plan shall be submitted to and approved in writing by the local planning authority.

The Habitat Management and Monitoring Plan (HMMP) should include:

- a non-technical summary;
- the roles and responsibilities of the people of organisations delivering the HMMP;
- the planned habitat creation and enhancement works to create or improve habitat to achieve the Biodiversity Net Gain in accordance with the Biodiversity Gain Plan;
- the management measures to maintain habitat in accordance with the Biodiversity Gain Plan for a period of 30 years from the completion of the development; and
- the monitoring methodology and frequency in respect of the created or enhance habitat to be submitted to the local planning authority.

b) The developer shall notify the local planning authority in writing 1) when the HMMP has been implemented; and 2) the habitat creation and enhancement works as set out in the HMMP have been completed.

c) No development shall take place until the habitat creation and enhancement works set out in the approved HMMP have been completed and a completion report, evidencing the completed habitat enhancements, has been submitted to and approved in writing by the local planning authority.

The created and/or enhanced habitat specifically in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to the local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Reason: To secure Biodiversity Net Gain in accordance with policy A3 of London Borough of Camden Local Plan 2017.

Prior to occupation or use

13 Waste and refuse storage

The refuse and recycling facility as approved shall be provided prior to the first occupation of any of the new homes and permanently retained and maintained thereafter.

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

14 Urban Greening Factor

Prior to first occupation of the development, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate that the development achieves an Urban Greening Factor of 0.4.

Reason: To ensure a satisfactory level of green infrastructure in the interests of the amenity, biodiversity and sustainability of the development in accordance with policy LG5 of the London Plan 2021.

15 Whole Life Carbon – post construction assessment

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

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

16 Landscape maintenance plan

Prior to occupation, a landscape management plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include irrigation requirements that covers at least the first 3 years following planting and the maintenance of the 18 new trees. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

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

Compliance conditions

17 Non-road mobile machinery (NRMM)

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

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough

in accordance with the requirements of policy A1 and CC4 of Camden Local Plan 2017.

18 Noise limits for plant

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

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

19 Anti-vibration isolators for plant

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

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

20 Controlling use – residential only for permanent accommodation

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

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

21 No additional external fixtures

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

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

22 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 2017.

23 Hard and Soft Landscaping

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. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

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

24 Tree Protection Methods

The works hereby approved shall be carried out in accordance with the methods outlined in the submitted Tree Survey, Arboricultural Impact Assessment & Method Statement (Indigo Surveys, November 2025).

Reason: To ensure that the development will not have an adverse impact on existing trees and in order to maintain the character and amenity of the area in accordance policies A2 and A3 of the Camden Local Plan 2017.

25 Cycle Parking

Prior to first occupation of the development, the cycle parking shown on the approved plans 0114-PR-ZZ-ZZ-DR-L-1001 rev 001 and 0114-PR-ZZ-ZZ-DR-L-1002 rev 001 shall be provided in full and shall be permanently retained and maintained thereafter.

Reason: To ensure adequate cycle parking is available on site and to promote sustainable modes of transport in accordance with policy T1 of the Camden Local Plan 2017.

Building regulations (imposed optional requirements)

26 Wheelchair and accessible homes (building control optional requirements)

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

2B3P - WAU

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.

27 Water use

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

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

28 ** Car-free development

The development shall be car free.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policy T2 of the Camden Local Plan 2017.

29 ** CMP

Prior to commencement of above ground works (excluding demolition), a Construction Management Plan (CMP) (including mitigation measures to control construction-related air quality impacts on the site) shall be submitted to and approved by the local planning authority. The CMP shall set out all measures that the Owner will adopt in undertaking the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual. Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials throughout the construction period and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time. The measures contained in the

Construction Management Plan shall at all times remain implemented during all works of construction.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies A1, T3 and T4 of the Camden Local Plan 2017.

30 **CMP Impact Bond

On or prior to Implementation, confirmation that the necessary measures for a bond for the Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies A1, T3 and T4 of the Camden Local Plan 2017.

31 **CMP Monitoring Fee

On or prior to Implementation, confirmation that the necessary measures for the provision monitoring the Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies A1, T3 and T4 of the Camden Local Plan 2017.

32 **Highways Contribution

On or prior to Implementation, confirmation that the necessary measures for the provision of highways, pedestrian, cycling, environmental and public realm improvements in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

33 **Pedestrian, Cycling and Environment Contribution

On or prior to Implementation, confirmation that the necessary measures for the provision of, pedestrian, cycling, environmental and public realm improvements in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

34 **Micromobility Contribution

On or prior to Implementation, confirmation that the necessary measures for the provision of the micromobility measures in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

35 **Accessible Parking

On or prior to Implementation, confirmation that the necessary measures for the provision of accessible car parking spaces in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that suitable provision of accessible car parking is provided in accordance with policy T2 of the Camden Local Plan 2017.

36 **Reprovision of existing car parking

On or prior to Implementation, confirmation that the necessary measures for the reprovision of car parking for the existing car parking users in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that suitable provision of car parking is provided in accordance with policy T2 of the Camden Local Plan 2017.

37 **Carbon offset payment

On or prior to Implementation, confirmation that the necessary measures for carbon offsetting shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the proposal is energy efficient and sustainable in accordance with Policy CC1 of the London Borough of Camden Local Plan 2017.

38 **Sustainability and energy

Prior to commencement of above ground works (excluding demolition and site clearance), a sustainability plan and an energy plan shall be submitted to and approved in writing by the local planning authority. Such plans shall demonstrate:

- Sustainability measures to be secured through sustainability plan
- Future proofing connections to a District Heat Network, this should include a single point of connection to the district heating network. Drawings should be provided demonstrating space for heat exchangers in the energy centres, and a safe-guarded pipe route to the site boundary, heat interface unit(s)

and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors.

- Water efficiency targets to be secured through sustainability plan
- Energy provisions to be secured through EE&RE plan:
 - Passive and efficiency measures in accordance with the proposed plans
- Overall minimum 88.2% CO2 reductions beyond Part L 2013 (using SAP 10 factors); minimum 33.7% Be Lean stage reduction through building efficiency using SAP 2012 factors); minimum 82.2% Be Green stage reduction (reduction against the previous stage) through renewables (using SAP 10 factors)

Reason: To ensure the proposal is energy efficient and sustainable in accordance with Policies CC1, CC2 and CC3 of the Camden Local Plan 2017.

39 **Employment and training opportunities

Prior to commencement of the development (excluding demolition and site clearance) the applicant and/or developer shall:

- have entered into an agreement with the Euston Construction Skills Centre to support the recruitment of Camden residents to jobs created during the construction of the development; to advertise all construction job vacancies locally; and to work towards a target that 20% of jobs are filled by Camden residents.
- have entered into an agreement with the Euston Construction Skills Centre to provide 1 construction industry apprenticeships to Camden residents using a range of options tailored to the build requirements of the development. The placements would be delivered throughout the course of the development.
- have signed 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

Reason: In order to ensure that unemployed people within the London Borough of Camden have training and employment opportunities during the construction phase of major developments in accordance with Policies E1 and E2 of the London Borough of Camden Local Plan 2017.

40 **Affordable Housing

Affordable housing shall be provided in accordance with the conditions and approved documents as set out in this decision. All affordable housing units

shall be constructed and fitted out as units which are suitable for occupation as affordable housing and shall only be occupied and shall be retained in perpetuity for no purpose other than for the provision of intermediate and social rented housing in accordance with the targets set by the Regulator or the Intermediate Housing Scheme as the case may be; not disposing of any interest in the Affordable Housing Units (except by way of mortgage) other than to any other Registered Social Landlord registered with the Regulator or any other body organisation or company registered with the Charity Commissioners for England and Wales and approved by the Homes and Communities Agency or the Regulator or the Council.

Reason: To secure sufficient provision of affordable housing in the development in accordance with the requirements of policy H4 of the Camden Local Plan 2017.

41 **Need for a legal agreement

In the event that any owners of the land have the legal locus to enter into a Section 106 Agreement no works shall be commenced on site until such time as they have entered into such an Agreement incorporating obligations in respect of the matters covered by conditions marked with ** in this planning permission and those obligations shall apply to all conditions above marked with **.

Reason: In order to define the permission and to secure development in accordance with Policy DM1 of the London Borough of Camden Local Plan 2017.

27. INFORMATIVES

1	<p>Conditions marked with **</p> <p>The matters covered by conditions marked with an ** are matters which would usually be incorporated into a Section 106 Agreement. On Council own schemes because the Council cannot enter into an agreement with itself the usual practice would for the permission to reference the Section 106 requirements for information.</p> <p>If the Council retains ownership of the application site although the reference to Section 106 requirements would not be legally binding they would act as a record of the requirements the Council as planning authority expects the Council as landowner to comply with. If the Council disposes of a relevant interest in the Application Site (which for the avoidance of doubt will not include disposals to individual tenants and occupiers) the incoming owner will be required to enter into a Section 106 giving effect to those requirements which will then become a legally binding document.</p>
---	---

2	<p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.</p>
3	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</p>
4	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
5	<p>Biodiversity Net Gain (BNG) Informative (1/3): 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.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this permission WILL require approval of a BGP before development is begun because none of the statutory</p>

	<p>exemptions or transitional arrangements summarised below are considered to apply.</p>
<p>6</p>	<p>Biodiversity Net Gain (BNG) Informative (2/3): + Summary of transitional arrangements and exemptions for biodiversity gain condition The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because of one or more of the reasons below: <ul style="list-style-type: none"> - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
<p>7</p>	<p>Biodiversity Net Gain (BNG) Informative (3/3): + Irreplaceable habitat:</p> <p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town & Country Planning Act 1990 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</p>

	<p>arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development</p> <p>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>
8	<p>You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at https://beta.camden.gov.uk/web/guest/construction-management-plans or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.</p>
9	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
10	<p>The Health and Safety Executive (HSE) states that work-related stress and poor mental health should be treated with the same significance as risks of poor physical health and injury. The Council views this as particularly pertinent to the construction industry, a predominantly male environment where the risk of suicide is around 3.5 times higher than men in general. Approximately one-third of construction workers report increased levels of anxiety every day. The Council strongly encourages developers of major construction sites to sign up to one of two construction industry led initiatives, Building Mental Health (Building Mental Health - Home) or Mates in Mind (Home Page), train a proportionate number of staff in Mental Health First Aid, and offer drop-in sessions/or spaces at construction sites for workers.</p>

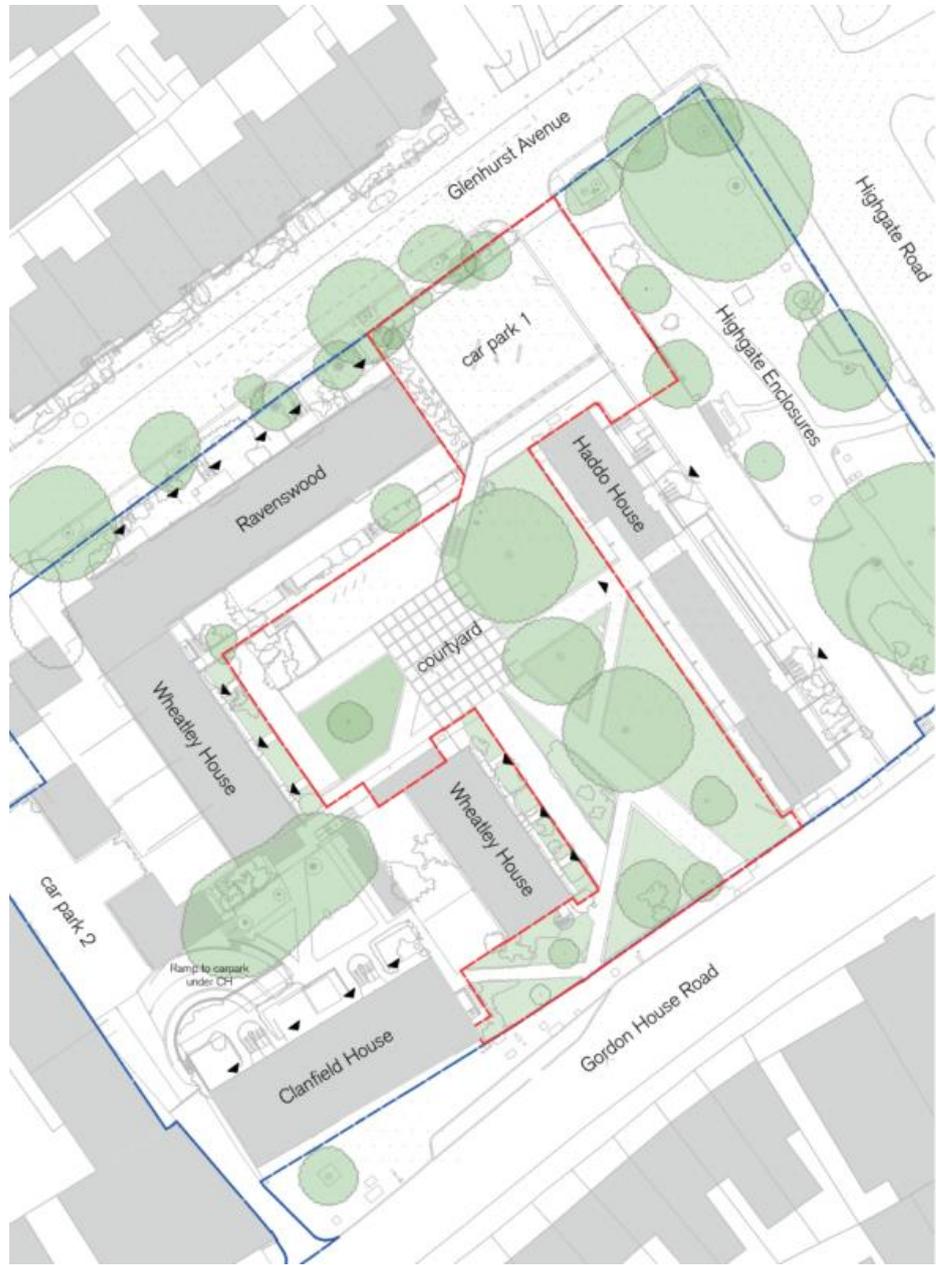
	<p>The Council will support the construction industry working in Camden with an offer of free Mental Health First Aid and other training, and information on local resources and signposting to sources of help.</p>
--	--

Planning Committee

11th March 2026

2025/5314/P

Land at Highgate Road Estate
Glenhurst Avenue
London
NW5 1PU























- 3nr collapsible bollards
- New store to replace existing under-stair storage
- 5nr. reprovided pram stores and 2 bike stores to accommodate 21nr bikes
- Replacing existing hard-standing with permeable surface
- 2nr relocated pram stores
- Relocated cycle stands
- Growing spaces, composting and storage
- Consolidated bin store
- Retained paths
- Legend
 - Site Development Boundary
 - Wider Estate Boundary



- Tar spray & chip surface to existing asphalt
- Natural play trail
- Enhanced planting
- Site-won reclaimed brick stepping stones
- Retained paths
- Gate to match existing fence (self-lock mechanism)



