

Address:	Land at Raglan Street Estate Raglan Street London NW5 3BX		2
Application Number(s):	2025/5601/P	Officer: Edward Hodgson	
Ward:	Kentish Town South		
Date Received:	12/12/2025		
Proposal:	Demolition of existing garages, playspace and associated structures and erection of a building to provide residential units (Use Class C3) together with external storage, new playspace, landscaping, cycle parking and disabled car parking spaces.		
Background Papers, Supporting Documents and Drawing Numbers:			
Existing Drawings:			
Site Location Plan CSS-MR-XX-00-DR-A-00101 01, CSS-MR-XX-00-DR-A-00100 01, 0113-PR-ZZ-ZZ-DR-L-2080 002, 0113-PR-ZZ-ZZ-DR-L-2081 001,			
Proposed Drawings:			
CSS-MR-XX-00-DR-A-00102 01, CSS-MR-XX-ZZ-DR-A-00300 01, CSS-MR-XX-04-DR-A-01104 01, CSS-MR-XX-00-DR-A-01100 01, CSS-MR-XX-04-DR-A-01114 01, CSS-MR-XX-03-DR-A-01113 01, CSS-MR-XX-02-DR-A-01112 01, CSS-MR-XX-01-DR-A-01111 01, CSS-MR-XX-00-DR-A-01110 01, CSS-MR-XX-ZZ-DR-A-01210 01, CSS-MR-XX-ZZ-DR-A-01310 01, CSS-MR-XX-ZZ-DR-A-01300 01, 0113-PR-ZZ-ZZ-DR-L-0001 09, 0113-PR-ZZ-ZZ-DR-L-0004 003, 0113-PR-ZZ-ZZ-DR-L-1001 004, 0113-PR-ZZ-ZZ-DR-L-1002 002, 0113-PR-ZZ-ZZ-DR-L-1201 004, 0113-PR-ZZ-ZZ-DR-L-1202 003, 0113-PR-ZZ-ZZ-DR-L-2000 003, 0113-PR-ZZ-ZZ-DR-L-2001 002, 0113-PR-ZZ-ZZ-DR-L-6041 001, 0113-PR-ZZ-ZZ-DR-L-6042 001, 0113-PR-ZZ-ZZ-DR-L-6100 001, 0113-PR-ZZ-ZZ-DR-L-6110, 0113-PR-ZZ-ZZ-DR-L-6000 001, 0113-PR-ZZ-ZZ-DR-L-6010 001, 0113-PR-ZZ-ZZ-DR-L-6020 004, 0113-PR-ZZ-ZZ-DR-L-6021 002, 0113-PR-ZZ-ZZ-DR-L-6030 001, 0113-PR-ZZ-ZZ-DR-L-6040 001			
Documents:			
Tree Survey, Arboricultural Impact Assessment & Method Statement (Nov 2025), Air Quality Assessment (Dec 2025), Biodiversity Net Gain Summary (Dec 2025), Daylight and Sunlight Report (Nov 2025), Construction Management Plan pro-forma, Energy Strategy (Nov 2025), Equality Impact Assessment Form, London Plan Fire Statement and Planning Fire Safety Strategy, Heritage Statement (Dec 2025), Plant Noise Impact Assessment Report (June 2025), Rapid Health Impact Assessment (Dec 2025), Transport Statement (Dec 2025), Planning and Affordable Housing Statement (Dec 2025), Design and Access Statement, Landscape Details rev 05 (Dec 2025), Drainage Management Statement and Maintenance Schedule (Dec 2025), Sustainability Statement (Dec 2025), Flood Risk Assessment, Sustainable Drainage Management Statement and Maintenance Schedule (Jan 2025), Landscape Management Plan (May 2025), Landscape Risk Assessment (June 2025), Landscape Pictorial Specification (Dec 2025), Tree Schedule, Soft Landscape Planting Schedule			

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	1505	+ 1505
Total	All uses	0	1505	+1505

Proposed housing mix and tenure

Tenure	Studio	1 bed	2 bed	3 bed	4 bed	Total
Market	0	0	0	0	0	0
Social-affordable rent	0	2	1	4	0	7
Intermediate rent	0	3	8	0	0	11
Total homes	0	5	9	4	0	18

Existing and proposed homes

Tenure	Existing homes	Proposed homes	Difference in homes
Market homes	0	0	+ 0
Affordable homes	0	18	+ 18
Tenure	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Market homes	0	0	+0

Affordable homes	0	1505	+ 1505
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Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	20	0	-20
Car - Disabled accessible	0	2	+2
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	0	44	+44

EXECUTIVE SUMMARY

- i) The proposal involves the demolition of existing residential garages and various play structures at the north end of the Raglan Street Estate, and the erection of a four storey L-shaped building providing 11 intermediate rent homes and 7 social-affordable rent homes. The building would face onto Raglan Street and wrap around to face Monmouth House. A courtyard area is proposed to the north of the building. In addition, landscaping including re-provided children’s play spaces are proposed. An existing storage area next to Monmouth House would be removed and re-provided to the northeast of the site, adjacent to the party wall with Old Dairy Mews. New refuse storage is proposed between Monmouth House and the new building to provide a better storage waste solution for existing residents while also providing for the new homes. Two new secure lines, with pedestrian gates, are proposed to help improve the safety and security of the estate. This will create a secure line around the open space and play area to the east part of the estate.
- ii) The proposal would seek to make best use of an underutilised brownfield site and would contribute to housing delivery in the borough. In particular it would provide 100% affordable homes consisting of social-affordable rent and intermediate housing with a range of home sizes.
- iii) The scheme has been thoughtfully designed, and is appropriate in scale, massing and materiality, providing a contextual development that makes the best use of the site. The proposal would improve safety and security in the estate, provide new play spaces for children of different ages, and would provide enhanced refuse storage for existing residents. It would provide high quality landscaping with new tree planting and greening.
- iv) The impact of the new building on the amenity of neighbouring occupiers is considered acceptable, given the dense urban location of the site, and the weight that is attributed to new housing on brownfield sites.

- v) The scheme would be sustainably design, meeting policy targets for carbon reduction and the building would be capable of meeting Passivhaus standards. In addition, it would meet the requirements for Biodiversity Net Gain and would comply with policy targets for Urban Greening Factor.
- vi) 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
Town Centre (TC)	Kentish Town
Neighbourhood Plan Area	Kentish Town
PTAL (Public transport accessibility)	6a
Underground development constraints and considerations	<ul style="list-style-type: none">- Subterranean ground water flow- Surface water flow and flooding- Slope stability

Table 1 - Site designations and constraints

Description

1.2 The site consists of garages, a playground and the open landscaping space within the Raglan Street Estate. The garages and play space are directly to the north of Monmouth House, an existing 13 storey block of flats that forms part of the estate. The garages lie to the south of 51 Raglan Street and 5 to 23 Holmes Road. To the east are the residential properties at 1-8 Old Dairy Mews. The site consists of single storey residential parking garages on hardstanding, some play equipment and areas of lawn and trees in the open area of the site to the south-east of the estate. A single storey storage building is also located directly to the east of Monmouth House.



Figure 1 – The existing site

- 1.3 The existing estate consists of 3 blocks of flats (A, B and C), which comprises Monmouth House (Block A) which is 13 storeys, and Alpha Court (Blocks B and C). Alpha Court is located in the south part of the estate, with Block B being four storeys and Block C two storeys. The blocks are surrounded by lawns and low brick walls with black railings. Hard paving provides access to the blocks through the landscaped areas.
- 1.4 To the south of the estate, on the other side of Raglan Street are two storey terraced houses, from varying ages. Opposite the garages on the other side of Raglan Street is St Patrick's Primary School, a part one and part two storey school building set back from the street. Further east of the site are the properties facing onto Kentish Town Road, which is the local high street and is a designated town centre. These buildings are generally three to four

storeys high and are mostly in commercial use although there is some residential at upper levels. The buildings on the south side of Holmes Road are three storey residential period properties, as is 51 Raglan Street. This reads as a standalone house which would have formed part of a wider terrace prior to bomb damage and clearance which paved way for the estate.

- 1.5 The site is located within the Kentish Town Neighbourhood Plan Area. It is not located within a conservation area, however, the Inkerman Conservation Area is located to the west and south-west of the site. The properties on the south-west side of Raglan Street are located within the conservation area as shown on the heritage map below. The site is also near 281 Kentish Town Road, which is Grade II listed, and the Holmes Road Police Station which is also Grade II listed. The locally listed 263 Kentish Town Road and 289-291 Kentish Town Road are also near the site.

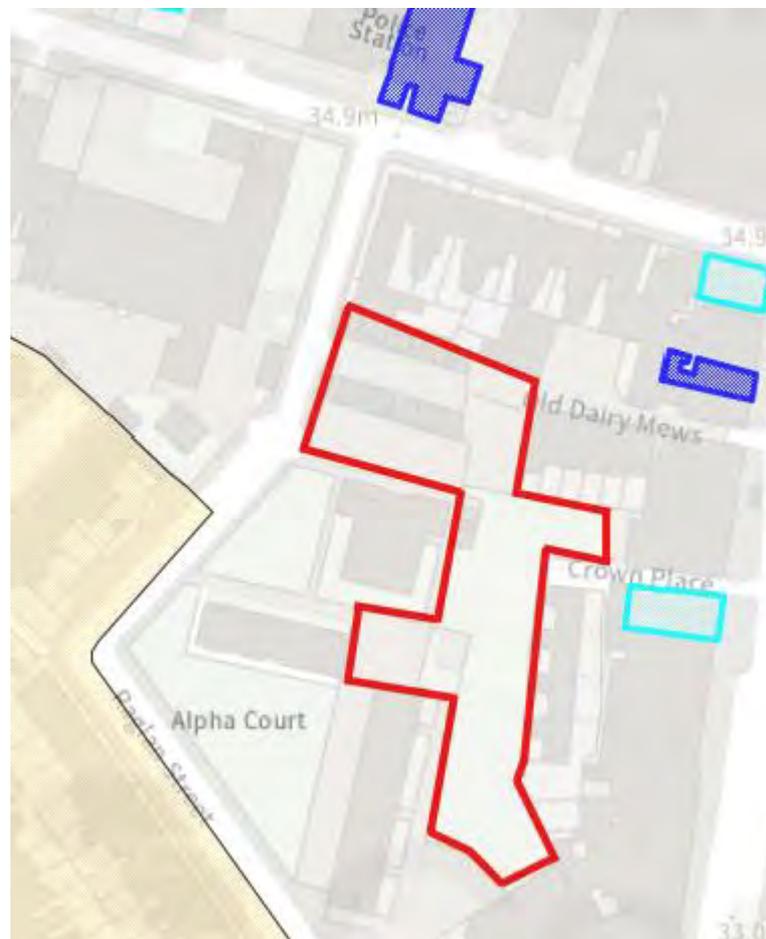


Figure 2. Heritage map showing the site in red, with the Inkerman Conservation Area in beige, Grade II listed buildings in dark blue, and locally listed buildings in light blue

- 1.6 The site has a Public Transport Accessibility Level (PTAL) rating of 6a (Excellent) and is close to Kentish Town Underground and National Rail Stations and Kentish Town West Overground Station, as well as 88, 134, 214 and 393 bus services along Kentish Town 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 seeks to deliver 10 and 18 new affordable homes respectively.
- 2.2 The proposal for Raglan Street Estate is for the demolition of the existing garage structures and play equipment and the erection of a four storey L-shaped building, comprising 18 new affordable homes which would be a mix of flats and duplexes. A courtyard space, containing planting and cycle storage would be created to the rear of the block. The Raglan Street elevation would feature bay windows at ground floor, and the third floor would be set back from No. 51 Raglan Street to provide private amenity space. The building wraps around to face Monmouth House. The massing at the two top floors in this part of the building would be set back to the rear to create deck access to the duplexes at second and third floors. The elevation facing Monmouth House at third floor would have pitched element with dormer windows. Balconies would be provided on both the south facing and Raglan Street elevations, as well as individual front doors and a main entrance door on the south facing elevation and the ground floor homes would also have small front garden areas.
- 2.3 A new shared bin store is proposed between the building and Monmouth House to provide waste storage for existing and new residents. An existing storage structure located immediately to the east of Monmouth House would be removed, and a new single storey storage structure would be located to the northeast of the site, adjacent to the boundary wall with Old Dairy Mews.



Fig 3. Proposed site plan showing the new L-shaped building and courtyard to the north, the bin storage between Monmouth House and the new building, the new storage structure to the east of the site, and the wider landscaping across the estate

- 2.4 The wider changes to the estate include the installation of secure lines, consisting of fences with 3 pedestrian gates. These would be in two locations, two between Monmouth House and the new storage structure to the east, and one between Monmouth House and Alpha Court to the south. In addition, new play spaces are proposed in the open spaces in the south-east part of the estate. New planting and vegetation would be provided in these spaces.

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 There is no planning history for the site that is relevant to the assessment of this application.

The area

- 4.2 Of note in the area is the development at Raglan House, 1 Raglan Street, where permission was granted in 2020 for the change of use from a day centre to residential dwellings and the erection of side extensions and dormers.

5. CONSULTATION

Statutory consultees

Historic England GLAAS

- The site lies partly within the Archaeological Priority Area, however it is set back from the former medieval street and has been extensively impacted by previous development.
- The proposal is unlikely to have a significant impact on heritage assets of archaeological interest.

Officer response:

- *The comments received are duly noted*

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.*

Design Out Crime Officer (Metropolitan Police)

- Concerns that although hot spot crime areas will have better sight lines, they are still out of sight from the main road. The layout is permeable and existing buildings are angular which creates areas to loiter and conceal. The existing buildings do not benefit from secure by design features.
- Removal of garages is welcome, these are often misused.
- The bicycle store in the rear courtyard could be climbed on to access neighbouring properties and there could be access from Old Dairy Mews.
- The proposed bin store could provide potential concealment and would interrupt views from Raglan Street.
- The location of the new storage to the northeast of the estate could make its visibility limited and open to attack.
- Development should be full or in part gated off.

Officer response:

- *It is noted that the existing layout of the estate and buildings on site create areas of hotspots with limited visibility. The existing buildings are outside the red line boundary and beyond the scope of the application. The proposed landscaping would create additional usage to help reduce anti-*

social behaviour. Play spaces would be located close to Monmouth House and Alpha Court to provide natural surveillance over these spaces.

- *The existing garages currently back onto the boundary with neighbouring properties. The courtyard space would be overlooked by the rear elevation of the new building and would have secure access from within the building. There is no access from Old Dairy Mews into the estate. There would be no public access to the courtyard area, which is an improvement on the existing condition.*
- *The bin store needs to be located in an accessible location for residents and for refuse collection. The new building would in any case overlook the bin store and areas around it, so although views from Raglan Street would be reduced, new views would be introduced around it.*
- *The new storage needs to be re-provided on the estate and the existing structure next to Monmouth House would be removed, creating better sight lines. The north-east corner of the estate is overlooked by the rear elevations of properties on Old Dairy Mews and Kentish Town Road and there would be sightline from Raglan Street. It would also be located near to children's play space which would encourage more use and activation.*
- *Secure lines are proposed around the landscaping to reduce access into this area to non-residents. The secure line to the south of the estate is beyond the scope of the application and is outside the red line boundary.*

Local groups

Kentish Town Neighbourhood Forum

5.1 Objection covering the following issue(s):

- Design, in terms of the proposed bays on Raglan Street detracting from the appearance of the building, concerns over the colour of the brickwork, and the use of render on the rear elevation.
- The bays on Raglan Street may lead to anti-social behaviour, by not improving the sight lines, and a lack of defensible space in the front gardens.
- Location and design of the ball court is inappropriate.
- Unit sizes focus too much on smaller homes, and a condition should be added to assess whether in future units could be combined or reconfigured.

Officer response:

- *Design is discussed in section 12 of the report. The scheme has been through extensive pre-application discussions, including the independent Design Review Panel, and its design has been influenced by an assessment of the surrounding context.*

- *Safety and security are discussed in section 19. The scheme would provide additional natural surveillance along Raglan Street to create more activation.*
- *Landscaping is discussed in section 16. The ball court to be provided is designed to be a flexible activity space.*
- *Housing mix is discussed in section 9. The mix is based upon a site-specific housing needs assessment that the Council's Housing Team undertook in 2024.*

Adjoining occupiers

- 5.2 Nine sites notice were displayed, along Raglan Street, Holmes Road, Inkerman Road, Kentish Town Road and within the estate. The notices were displayed on 17/12/2025 until 10/01/2026 and the application was advertised in the local paper on 24/12/2025 (expiring 17/01/2026).
- 5.3 Objections were received from at least 47 local households. The objections received by the Council are on the Council's website. The key issues raised are.

Impact on neighbouring occupiers

- Loss of daylight and sunlight to neighbours, including homes on Raglan Street, Holmes Road and Old Dairy Mews.
- Overlooking into neighbouring windows garden spaces.
- Overbearing design.
- Concerns over noise and the noise impact assessment submitted.

Officer response:

- *Amenity is discussed in section 11. A daylight/sunlight report has been submitted and assessed. The impact in terms of daylight/sunlight on neighbouring occupiers is deemed acceptable for an urban development site.*
- *The south elevation of the building would face the north elevation of Monmouth House. The windows on the north elevation largely serve a stair core and single windows into kitchens. The distance would be approx. 11m although this effectively would be over a street. The deck access on the north elevation of the building at second floor would be located approx. 13m away from No. 51 Raglan Street and 7m from 7-8 Old Dairy Mews. The deck is to access properties and is not a dwell or amenity space and views from the deck into neighbouring windows would be at oblique angles. The garden spaces to the rear of Holmes Road, 51 Raglan Street and 7-8 Old Dairy Mews already experience a degree of mutual overlooking from neighbouring properties as is common in built up urban areas.*

- *Given the separation distance, and the presence of other taller buildings in the area such as Monmouth House, the building wouldn't create an undue sense of enclosure to neighbouring properties.*
- *The noise impact assessment submitted has been reviewed by the Council's Environmental Health team who deem it to be sufficient.*

Design, heritage and principle of development

- Height of the building.
- Colour of the bricks.
- Change from pitched roof to flat roof.
- Courtyard space to the rear would be dark.
- Impact on Inkerman Conservation Area and nearby listed buildings.
- Overdevelopment of the site.
- Existing estate issues should be fixed before building new homes.

Officer response:

- *The proposed building would be marginally taller than No. 51 Raglan Street and the properties on the south side of Holmes Road. The top storey would be set back from the party wall with No. 51 to alleviate the massing here. The south elevation would have a pitched roof with dormers which reduces the impact of the massing especially next to 1-6 Old Dairy Mews which is three storeys. The scheme would also be viewed in the context of Monmouth House which is 13 storeys. The height is therefore considered appropriate for the area.*
- *The materials have been influenced by an assessment of the surrounding context.*
- *Although initial schemes included a pitched roof on both the south and west elevations, this resulted in an awkward junction on corner. The proposal still retains a pitched roof on the south elevation. The proposed form and massing now feel more resolved.*
- *It is noted that the courtyard space to the rear would be overshadowed, however this is not the only amenity space for new residents given the balconies and front garden areas and new residents would have the opportunity to access the estate spaces.*
- *Detailed design is addressed in section 12.*
- *Heritage, including the impact on nearby heritage assets is discussed in section 12.*
- *There is strong policy support for building new housing on underused brownfield sites. The development would provide 100% affordable housing and would seek to optimise the site capacity. The height and massing are considered appropriate.*
- *Ongoing issues with estate management and repairs are beyond the scope of the application and are not material planning considerations. The application is assessed in its own planning merits.*

Safety and security

- Current anti-social behaviour on the estate would be worsened and desire for estate to be gated off.
- Location of bin store and new storage.
- Access to the new play space from people outside of the estate.
- Lack of CCTV.

Officer response:

- *The proposal involves new secure lines (measuring 1.8m high) around the relandscaped areas of the estate. This is discussed in section 19. Residents have aspirations for the perimeter of the estate to be gated off, however this falls outside of the red line boundary of the planning application. The redesigned landscaping, secure lines, removal of storage structures and introduction of natural surveillance would help create more sight lines and usage which would help reduce anti-social behaviour.*

Construction management

- Route of construction vehicles.
- Displacement of parking.
- Removal of asbestos.
- Impact on those with protected characteristics and the equality impact assessment submitted.
- Concerns over the air quality impact assessment submitted.

Officer response:

- *A construction management plan, and creation a construction working group to include residents and local stakeholders, would be secured via shadow section 106 agreement.*
- *The Council has had due regard to the Public Sector Equality Duty when assessing the impacts of the development.*
- *The air quality assessment has been reviewed by the Council's Air Quality team who deem it to be acceptable.*

Landscaping, trees and biodiversity

- Impact on trees and root protection areas.
- Location of new ball court.
- Maintenance of landscaping and facilities and who would pay for this.
- Concerns the scheme doesn't meet BNG requirements.
- Loss of play space.

Officer response:

- *An arboricultural report, assessing the impact on trees and roots has been submitted and reviewed by the Council's Tree team who deem it to be acceptable.*
- *The landscaping would involve a new flexible activity space which could be used as a ball court. This would be located near to Alpha Court and Monmouth House to provide easy access for children, but to also offer natural surveillance over this space.*
- *A landscaping maintenance plan would be secured via condition XX to ensure its long-term viability. The specific details of the management, in terms of fees and payments, is outside the scope of the application and not a material planning consideration.*
- *The requirements for BNG have been assessed by the Council's Nature Conservation Officer. The scheme would require the submission of a Biodiversity Gain Plan.*
- *Although the existing play space would be lost, this would be re-provided in the proposal.*

Energy and sustainability

- Lack PV panels on the roof.
- Overheating concerns if windows can't be opened.
- Doesn't meet energy targets.

Officer response:

- *The provision of PV panels on the roof has been optimised given the need for other plant equipment, lift overrun and access hatch to be located on the roof.*
- *For acoustic reasons at nighttime, windows on the Raglan Street elevation would need to be closed, as they would not comply with Part O. As such, the exhaust air heat pumps can provide some cooling if needed. This is discussed further in section 13.*
- *Energy and sustainability, including overheating, is discussed in section 13 of the report.*

Loss of garages

- Garages have community value and would be lost.

Officer response:

- *It is noted that some residents of the estate use the garages and are of some community value. However, there is strong national and local planning policy for the development of underused brownfield sites such as this for housing, and in particular, affordable housing. Storage space would be provided to the north-east of the estate.*

Transport

- Loss of parking during construction and insufficient disabled parking proposed

Officer response:

- *As discussed above, a construction management plan would be secured via shadow section 106 agreement. The proposed disabled parking is in line with London Plan and Camden Local Plan policies.*

Drainage and Water

- Impact on water mains and sewers.
- Insufficient attenuation.

Officer response:

- *Thames Water have responded raising no objection to the application subject to a condition requiring details of piling which would be attached to the decision notice.*
- *SuDS and flooding are discussed in section 17 of the report.*

Housing mix and tenure mix

- Too many smaller units and not enough family sized units.
- Proposal goes against the policy tenure split for social affordable rent and intermediate homes.

Officer response:

- *The mix of housing is based on site-specific housing needs assessment undertaken by the Council in 2024. This has also informed the tenure mix to provide more intermediate rent homes, as well as smaller homes. The scheme is also part of Package A of the New Homes for Small Programme and the mix is discussed in section 9 of the report.*

6. POLICY

National and regional policy and guidance

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

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

Draft National Planning Policy Framework 2025

London Plan 2021 (LP)

[GG1 Building strong and inclusive communities](#)

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

[GG3 Creating a healthy city](#)

[GG4 Delivering the homes Londoners need](#)

[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 H8 Loss of existing housing and estate redevelopment](#)
[Policy H9 Ensuring the best use of stock](#)
[Policy H10 Housing size mix](#)
[Policy S4 Play and informal recreation](#)
[Policy HC1 Heritage conservation and growth](#)
[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 T1 Strategic approach to transport](#)
[Policy T2 Healthy Streets](#)
[Policy T3 Transport capacity, connectivity and safeguarding](#)
[Policy T4 Assessing and mitigating transport impacts](#)
[Policy T5 Cycling](#)
[Policy T6 Car parking](#)
[Policy T7 Deliveries, servicing and construction](#)
[Policy T9 Funding transport infrastructure through planning](#)
[Policy DF1 Delivery of the Plan and Planning Obligations](#)
[Policy M1 Monitoring](#)

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

[Accessible London SPG](#)
[Planning for Equality and Diversity in London SPG](#)
[Characterisation and Growth Strategy LPG](#)
[Optimising Site Capacity: A Design-led Approach LPG](#)
[Small Site Design Codes LPG](#)
[Housing Design Standards LPG](#)
[Affordable Housing and Viability SPG](#)
[Housing SPG](#)

[Play and Informal Recreation SPG](#)
[Preparing Borough Tree and Woodland Strategies SPG](#)
[Urban greening factor LPG \(February 2023\)](#)
[Air quality neutral LPG](#)
[Be Seen energy monitoring LPG](#)
[Circular economy statements LPG](#)
[Energy Planning Guidance](#)
[The control of dust and emissions in construction SPG](#)
[Whole life carbon LPG](#)
[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)
[Policy H1 Maximising housing supply](#)
[Policy H2 Maximising the supply of self-contained housing from mixed-use schemes](#)
[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](#)

Kentish Town Neighbourhood Plan (2016) (NP)

[Policy D3: Design Principles](#)
[Policy D4: Non-Designated Heritage Assets](#)
[Policy GO2: Open Spaces on Estates](#)
[Policy GO3: Biodiverse Habitats](#)
[Policy CC1: Pre-Application Consultation](#)
[Policy CC2: Community Consultation and Neighbour Involvement](#)
[Policy SSP7: Small Sites and Infill Development](#)

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:

[Planning Statement - Intermediate Housing Strategy and First Homes \(2022\)](#)

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

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	Public open space
16	Trees, greening and biodiversity
17	Water and flooding
18	Air quality
19	Safety and security
20	Land contamination
21	Health and wellbeing
22	Employment and training opportunities

8. PRINCIPLE OF DEVELOPMENT

8.1 The development site consists of single-storey garage structures and an existing playground for the estate. It is considered to be brownfield land that can be developed for housing and was identified as a delivery site in the approved 2023 Cabinet report. The site is well connected, close to nearby transport connections and close to Kentish Town Road, one of the borough's key town centres.

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 (as amended in 2025) 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 SSP7 of the Kentish Town Neighbourhood Plan 2016 seeks to encourage infill proposals for making use of small urban sites, and identifies the Raglan Street garages between 51 Raglan Street and Monmouth House as one of these sites appropriate for infill development.

9. HOUSING MIX

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

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

Table 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. More than half the Social Affordable Rented homes proposed in the scheme are 3-bed homes with one 2-bed home which can still accommodate a family. Together, 2 and 3-bed homes make up around 72% of the overall homes and 71% of the social affordable rent homes. This is set out in the table below, showing a balanced mix that contributes to the LP priorities.

Home size	Number proposed	Proportion of homes
1-bed	2	11%
2-bed	1	6%
3-bed	4	22%
Total	7	39%

Table 3 - Dwelling mix summary for Social Affordable Rented homes

9.3 The CLP priorities table above shows the priorities for **Intermediate Affordable homes** are for 1-bed homes, with medium demand for 2-bed.

Three of the intermediate homes would be 1-bed, and the rest would be 2-bed which have medium demand. This is set out in the table below, showing a balanced mix that contributes to the LP priorities.

Home size	Number proposed	Proportion of homes
1-bed	3	16.5%
2-bed	8	44.5%
3-bed	0	0%
Total	11	61%

Table 4 - Dwelling mix summary for Intermediate Rented homes

- 9.4 Generally, the proposal seeks to accord with the dwelling size priorities, with the majority of social affordable rent homes being 2-bed and 3-bed (high priority), and the majority of intermediate homes being 2-bed (medium priority) and the rest being 1-bed (high priority). The proposed mix is considered acceptable.

Tenure Mix

- 9.5 Policy H4 of the local plan states that the guideline mix of affordable housing types is 60% social-affordable housing and 40% intermediate housing. The proposed tenure mix for this application is 39% social-affordable housing and 61% intermediate. The policy states that this is a guideline and supporting paragraph 3.105 of the local plan states that these guidelines will be applied flexibly, taking into account criteria in policy H4. The proposed tenure mix is based on a site-specific housing needs assessment that was undertaken in 2024. A local lettings plan would seek to prioritise estate residents in housing need where possible. It is also noted that this application forms part of the Package A of the NHSS programme, submitted alongside the proposal for 10 new 100% social-affordable rented homes at the Highgate Road estate under planning application 2025/5314/P (Item 1 on this agenda). Although 2-bedroom intermediate rent homes are not the highest priority, Camden’s Intermediate Housing Register currently has around 300 people who have registered an interest in 2-bedroom 3-person homes for intermediate rent so there is nevertheless some demand for this type. The intermediate rent levels are in line with Camden’s Intermediate Housing Strategy and the GLA guidance on ‘affordable rent’. The focus on larger family homes for social rent and the 1-bedroom wheelchair accessible homes on the ground floor with their own front doors are welcomed.
- 9.6 Overall, the scheme provides a balanced mix of homes, suitable to the location and making a contribution to the identified needs in the development plan, in accordance with CLP policy H7.

10. QUALITY OF PROPOSED HOUSING

- 10.1 CLP policy H6 is about housing choice and mix, and it aims to minimise social polarisation and create mixed, inclusive, and sustainable communities, by seeking high quality accessible homes and a variety of housing suitable for Camden’s existing and future households.
- 10.2 In line with LP policy D6 and CLP policies H6 and D1, housing should be high quality and provide adequately sized homes and rooms, and maximise the provision of dual aspect dwellings. CLP policy A2 encourages opportunities to provide private amenity space which is reflected in a requirement to provide amenity space in LP policy D6. CLP policy A1 seeks to protect the amenity of occupiers in relation to several factors, including privacy, outlook, light, and noise. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise sensitive development.
- 10.3 LP policy D5 says development should provide the highest standard of accessible and inclusive design, which allows them to be to be used safely, easily and with dignity by all, also reflected in CLP policies D1, H6, and C6.

Design and layout

- 10.4 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 5 - 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 ceiling floor to heights (around 2.6 metres) and good room sizes. They are well laid out with a simple and rational plan form. All flats either have a balcony or access to private and communal amenity spaces.
- 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 8sqm, depending on the unit size, and ensure a good depth and width of 1.5m or more, with all units meeting the LP policy requirements.
- 10.8 The units all have their own secure front door. The ground floor units facing Raglan Street have a front door that leads to the street. Flats are served by residential cores with a staircase and a lift. The core provide access to secure lobbies leading to street and communal amenity space. The core would also provide access to the deck on the rear elevation at second floor which provides access to homes 12.C, 13.C, 14.C 15.C and 16.D, which are duplexes spread across the second and third floors.
- 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 and close to a busy town centre, so there would be an expected level of noise and disturbance. In particular are the homes facing Raglan Street, which have noise levels exceeding the Part O (overheating building regulations) requirements for windows to be kept closed at night. As such, a degree of mechanical cooling is proposed which is discussed further in the sustainability and energy section.
- 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 20 and 21).
- 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 homes, including all the social-affordable rent and intermediate rent homes would be dual aspect. This is welcomed and would ensure all homes have good access to natural light and good outlook. This would also provide chances for cross ventilation and passive cooling measures.

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

Assessment

- 10.20 The results show the majority (80%) of the 61 habitable residential rooms will satisfy the target illuminance levels. It is noted that many of the rooms that don't meet the target are located at lower floors, and generally on the south elevation facing the 13 storey Monmouth House which inevitably will impact on daylight levels for any proposed scheme here. At ground floor, some of the north facing rooms would not meet the targets, however this is also to be expected from north facing windows. The ground floor rooms are also part of duplexes that have rooms on the first floor where the daylight is improved. It is also noted that larger windows have implications for thermal efficiency and overheating concerns, and the scheme is aiming to be as efficient as possible aiming to achieve Passivhaus building standard.
- 10.21 The sunlight results show that all the homes would meet the targets for sunlight exposure.
- 10.22 The SoG for overshadowing demonstrates that the proposed courtyard space to the north of the development would not meet the target when assessed on the 21st March. However, over 50% of the space would receive 2 hours of direct sunlight when assessed on 10th May. The space will therefore receive direct sunlight in later spring. It is accepted that this space won't meet the targets, however it is located north of the proposed development and north of Monmouth House, and so inevitably it will be overshadowed. It is noted that all homes would either have front and rear gardens at ground floor, or balconies at upper floors (facing south and west), thus providing private external amenity space. In addition, residents will have access to the re-landscaped areas on the estate, which will include play spaces and areas of greening. Residents of the new homes will therefore overall have access to a range of external amenity spaces that would be well lit. The rear courtyard space would be available for amenity purposes but is also a space for bike storage and new trees. The alternative option would have been to push the massing closer back towards No. 51 Raglan Street

and Holmes Road, however this would have resulted in amenity concerns in terms of privacy and light impacts on those properties to the north.

- 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 On the proposed south elevation, the distance between the new building and Monmouth House is approx. 12.2m. The windows on the north elevation of Monmouth House largely serve the stair core and circulation spaces rather than dwell spaces, and some smaller secondary kitchen windows that serve smaller kitchen spaces rather than larger living spaces. The separation distance in any case is not uncommon in dense urban environments. The proposed rooms on the south elevation therefore are unlikely to feel overlooked. On the proposed north elevation, the lower floors units would be screened by the rear boundary treatment. At upper levels, the distance to existing windows at No. 51 Raglan Street and 7-8 Old Dairy Mews is at least approx. 13m and many of the windows at upper floors of these buildings would be at oblique angles to the proposed windows. On the proposed east elevation, the distance to the rear windows of 7-8 Old Dairy Mews is around 18m, and views from the windows on the rear projection at No. 51 Raglan Street would be at oblique angles. Planting, including trees, are also proposed in the rear courtyard space which would help with screening in any case. All homes therefore would benefit from good levels of outlook, and would unlikely feel overlooked by existing neighbours.

- 10.25 This proposal would ensure a reasonable sense of outlook and privacy can be maintained, even in a denser environment.

Accessible homes

- 10.26 The flats have been designed to a high standard of accessible and inclusive design, and CLP policy H6 requires 90% of new-build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair units). There would be level access into the new building from the street, and all homes would be accessed via a lift.

- 10.27 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).

- 10.28 2 of the 1-bed homes located at ground floor would be M4(3) complaint, which equates to around 11%. This is therefore complaint with the policy target. The delivery of accessible homes will have a notable positive impact on disabled residents and those with protected characteristics is line with the Public Sector Equality Duty.
- 10.29 A condition would be attached to secure the provision of the accessible and wheelchair dwellings (condition 25).

Conclusion

- 10.30 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:

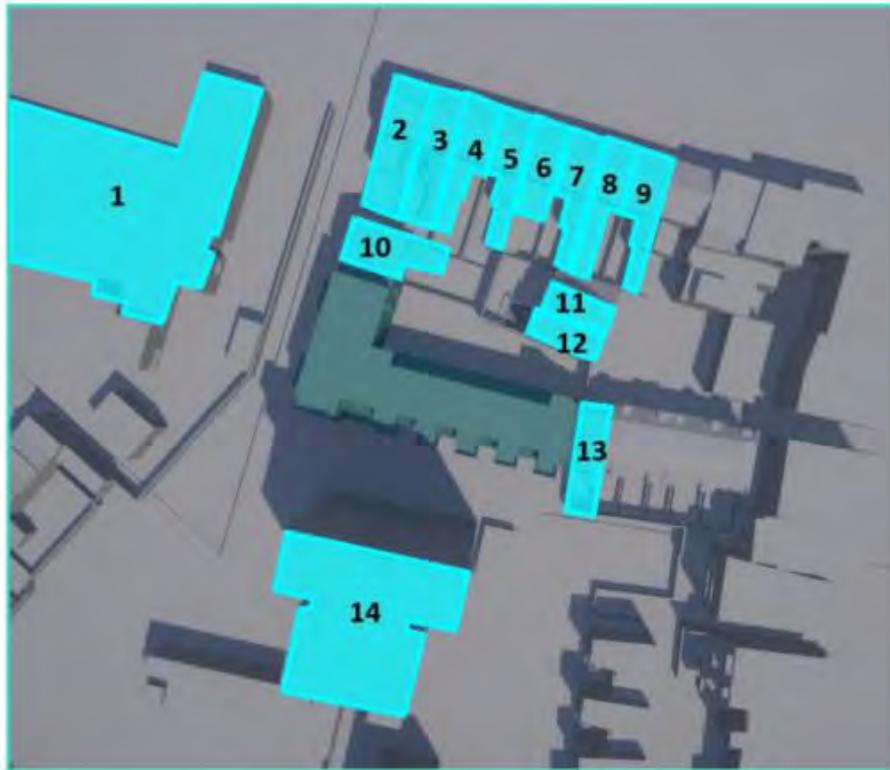
The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly

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 The following properties were assessed in terms of daylight, sunlight and overshadowing impacts: St Patrick's Catholic Primary School, 23, 21, 19, 17, 15, 13, 11 and 9 Holmes Road, 51 Raglan Street, 8,7 and 6 Old Dairy Mews, and Monmouth House. These are shown on the image below:



1. St Patrick's Catholic Primary School
2. 23 Holmes Road
3. 21 Holmes Road
4. 19 Holmes Road
5. 17 Holmes Road
6. 15 Holmes Road
7. 13 Holmes Road
8. 11 Holmes Road
9. 9 Holmes Road
10. 51 Raglan Street
11. 8 Old Dairy Mews
12. 7 Old Dairy Mews
13. 6 Old Dairy Mews
14. Monmouth House

Fig 4. Map showing the nearby properties assessed for daylight, sunlight and overshadowing impacts

11.11 In terms of impacts, St Patrick's Catholic Primary School, 23, 21, 19, 17, 15, 13, 11 and 9 Holmes Road, and 9, 8, 7 and 6 Old Dairy Mews all meet the target values for daylight (when tested using the VSC and NSL methodologies) and sunlight when tested using the APSH methodology. The impact at Monmouth House and 51 Raglan Street is discussed as follows:

Monmouth House

11.12 With regards to daylight impacts, 39 out of 47 windows will retain at least 20% of their existing levels of VSC and will therefore not experience significant or noticeable loss. 5 of the 8 windows serve the building's core,

and these are non-habitable spaces so therefore the impact is acceptable. The 3 remaining windows serve kitchens and living, diner, kitchen spaces. The percentage losses at these windows are 26.71%, 27.82% and 38.6%. However, the retained VSC at these same windows would be 27.49%, 26.85% and 21.68%. As outlined above, in dense urban environments like Camden, retained VSC levels between 15-20% are common and can be tolerated. One of the windows retains a VSC of around 27% in any case. In terms of NSL, all rooms would retain at 20% of the existing levels. The impact in daylight terms is therefore considered acceptable in this context, and the flats would still benefit from adequate levels of daylight. Given the new building would be located to the north of Monmouth House, a sunlight assessment is not required.

51 Raglan Street

- 11.13 This property is a single-family dwelling house located to the north of the development site. The windows on the rear elevation at lower floors, including the windows on the rear projection which face the development site, have been tested. All the remaining windows at this property do not fail the 45-degree or 25-degree tests and as such are unlikely to be affected.
- 11.14 4 out of the 7 windows tested on the rear would retain VSC of at least 20% of their existing levels. The three windows that exceed losses of 20% serve a ground floor kitchen in the rear projection and face south towards the development site. The losses are 26%, 40.4% and 37.9% and the retained VSC levels are 9.9%, 13% and 11.5% respectively. As mentioned above, retained levels of VSC between 15% to 20% in dense urban areas can be tolerated and it is not uncommon for windows at lower floors to have a VSC of 10%. The windows all serve the same room, as does a fourth window which retains 25.4% VSC with a loss of 5.5% which complies and faces to the east. The weighted VSC for the whole room when assessed as a whole is 15%, with a loss of 33%. As above, a retained VSC of 15% is not uncommon in dense urban locations and can be tolerated. In any case, this is one room within a larger single property, and is understood to be a small kitchen space, rather than a living room or other habitable space. The remaining rooms in the property will be unaffected in daylight terms. In terms of NSL, 3 out of the 4 rooms would experience no change, with the only noticeable change being in this kitchen area which would see a loss of 27%. The property will still therefore on the whole receive an adequate level of daylight especially for a dense urban area.
- 11.15 In terms of sunlight, all tested windows would comply with regards to APSH.

Overshadowing

- 11.16 The following rear gardens were assessed in terms of the impact on external amenity spaces: 13, 15, 17, 19, 21 and 23 Holmes Road, 51 Raglan Street, and 1 to 8 Old Dairy Mews.

11.17 All external amenity spaces except for 2 would meet the targets when assessed using the Sun on Ground method. These are the amenity spaces at 17 Holmes Road and 51 Raglan Street. For 17 Holmes Road, the garden would receive 2 hours of sunlight to 46% of the area on 21st March, which is 4% below the target of 50%. This is only marginally below the target value and can be accepted. With regards to 51 Raglan Street, 39.2% of the garden currently receives 2 hours of sunlight on 21st March, which is below the target of 50%. Although the proposed area would be reduced to 25.9%, this is still considered to be reasonable for a dense urban environment. This garden is already overshadowed by Monmouth House, and any development at the garages would likely have an impact here. The development would provide 100% affordable housing and would make best use of an underutilised brownfield site. As per para 130 of the NPPF, Council's should take a flexible approach to daylight/sunlight impacts and supports making efficient use of land. Overall, the impact of overshadowing is acceptable in this instance, and the occupiers of neighbouring properties will receive adequate living standards.

Overlooking

11.18 The proposed development site faces onto blank elevations on the west and south at Old Dairy Mews, and the windows on the north elevation of Monmouth House largely serve the building core, or small, secondary kitchen windows. This distance between the new building and these windows at Monmouth House is approx. 12m, although this would also be effectively over a street given the area in between would be accessed for refuse collection. To the north, the distance between windows on the new building and 51 Raglan Street would be approx. 14m. The windows at upper floors at 51 Raglan Street do not directly face the new development and views would be oblique. There are windows at ground floor in the rear projection at 51 Raglan Street that face south towards the development, however views from these windows would be obscured by the boundary treatment as shown on the below section drawing:

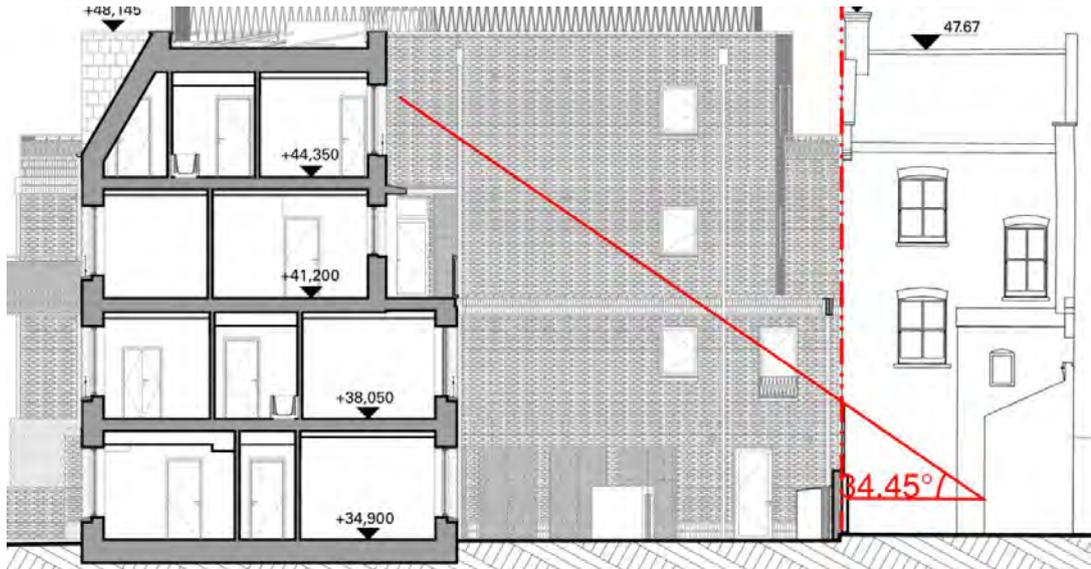


Fig. 5. Showing the views from the windows on the new building to the ground floor windows at 51 Raglan Street, obscured by the boundary wall.

11.19 A deck access is also proposed at second floor, and as shown above, given the angle and the height of the boundary wall, it would not be possible to view down into the ground floor windows at 51 Raglan Street. This also applies to view into the rear garden and 51 Raglan Street, with the angle and the height of the boundary treatment reducing visibility into most of the rear garden. Although the third-floor windows may have some visibility of the rear garden, this would only be within the most northern part of the garden, and in any case, the rear garden at 51 Raglan is already overlooked by multiple properties, including the properties on the south side of Holmes Road and 7-8 Old Dairy Mews. This is shown on the aerial image below, and the proposal would therefore not significantly worsen this existing situation which is common across dense urban locations.



Fig. 6. Image showing the existing mutual overlooking between gardens in the area

Sense of enclosure and outlook

- 11.20 The new building would marginally project beyond the front building line of 51 Raglan Street by virtue of the proposed bay windows, however these bays would be set back from the neighbour sufficiently so as not to impact on outlook from the front elevation. The rear building line would align with the principle rear elevation of 51 Raglan Street and so would not impact on the windows on the rear. The new building also generally aligns with the building lines of 1-6 Old Dairy Mews, with only a slight projection beyond no. 6 Old Dairy Mews. There is a sufficient distance between the new building and the existing surrounding buildings so that outlook wouldn't be affected. The massing from the new building is similar to the surrounding buildings and set back sufficiently from nearby garden areas so that it wouldn't result in feeling overbearing or dominant.

Noise

- 11.21 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. As such, a noise impact assessment has been submitted to assess the impact on nearby residential occupiers. Conditions 20 and 21 are attached to ensure that noise and vibration do not 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.

Inkerman Conservation Area – No Harm

- 12.2 The Inkerman Conservation Area is located on the west side of Kentish Town Road and consists of Inkerman Road, Willes Road, Alma Street, Ryland Road, and sections of Holmes Road, Grafton Road and Anglers Lane. It was designated in 2001.
- 12.3 The significance of the conservation area is the fact that it is a homogenous, dense residential area, documenting the Victorian expansion of London. Most of the properties are two to three storey terraced houses built in the

mid-1800s, although each street has displays of different characteristics despite the relatively cohesive identity.

- 12.4 The application site is not located within the conservation area, however, it is located approx. 32m to the north-east of it. The existing estate, including the garages to be removed, doesn't contribute to the setting of the conservation area, given the very different typology and architecture of the estate when compared to the conservation area. Given the distance from the site, and the cranked road layout of the street, when looking at the development site south down Raglan Street the conservation area is visible in the background in glimpses. The proposed buildings would be in keeping with the scale of existing buildings in this view, reaching the same height as the roof ridge of No. 51 Raglan Street. It would be a significant improvement in townscape terms when compared to the existing garages. The proposal would therefore not detract from the views of the nearby conservation area and its setting would be preserved.

No. 12A Police Station and attached railings and lamp – No Harm

- 12.5 The Kentish Town Police Station was built between 1894-6 and restored in 1984. It was constructed with yellow stock brick and stone bands and is three storeys. Its significance is based on it being a strong example of late 19th century architecture by Norman Shaw, who was closely associated with the Met Police. The building highlights the expansion and professionalisation of the Met Police during the Victorian times which is reflected in its strong and simple composition relating to its civic use.
- 12.6 From the development site, looking north up Raglan Street, the Police Station is visible in the background although only around half of it (the west portion) can be read. The removal of the garages and the erection of the new building would represent an improvement in townscape terms when viewing the listed building. The proposed scale and massing are in keeping with surrounding context and the new building would not alter existing views of the Police Station. As such, the proposal would preserve the setting of the listed Police Station and no harm is identified.

Urban Design

Surrounding townscape and context

- 12.7 The terraces immediately adjacent to the site along Raglan Street are two storey houses with small forecourts set behind modern low brick walls and railings; their appearance is fairly consistent, with a yellow brick top and rusticated stucco ground floors; they generally have a flat elevation. The properties at 34-42 Raglan Street sustained bomb damage and were replaced in the 1950s, largely replicating the appearance of the original terraces, though much of the original detailing was omitted and the brick used much flatter and tonally different to the yellow stock brick. The back gardens

for the terraced properties at 11-17 Inkerman Road, which used to be adjoined by properties facing onto Raglan Street that were also demolished, now create a stretch of wide pavement but is an inactive frontage known to attract anti-social behaviour. The street trees across both sides of Raglan Street create a green corridor, softening the pedestrian experience.

- 12.8 Just outside the Conservation Area, the St Patrick's Catholic Primary School was built in the 1960s. It is a part one, part two storey building that has had various extensions throughout the years. Its main entrance for the students and the vehicular access are both off Raglan Street across the site, though some distance apart. The school's perimeter along Raglan Street is defined by a relatively tall brick boundary wall and metal gates, which make for an inactive frontage along the street.
- 12.9 The Victorian terraced houses on the south side of Holmes Road and 51 Raglan Street - the only terrace house remaining of the historically longer row of terraces demolished after the Second World War – are three storeys tall, built of yellow London stock brick with red brick detailing, including the square bay windows and decorating string courses between lintels and window cills. The bay at 51 Raglan Street is a traditional bay window, unlike the ones found on Holmes Road. The north side of the street is a mis-match of various building types without any prevailing character or height.
- 12.10 To the east of the site, the three-storey yellow stock brick buildings, which are accessed from Kentish Town Road, were built in the late 1990s to replace the dairy farm that used to occupy the site. The part two, part three storey Crown Place Mews houses, facing the site to the west and the properties along Kentish Town Road to the east, were built in in the early 2000s to replace garages. While they use yellow stock brick, they are much more contemporary additions to the area, with significantly more glazing.
- 12.11 Despite the well-established character of the properties in the Inkerman Conservation Area to the south, the site itself sits at the confluence of varying architectural characters, scale, massing and materiality.

Site appraisal and opportunity

- 12.12 The site is home to a car park, and two rows of one storey garages, some of which are used for storage by existing residents. The bin store, often victim of fly-tipping, sits between the second row of garages and Monmouth House, making for an unwelcoming, unsafe arrival point into the estate for the tower's residents. Together with the lack of surveillance, blank and inactive frontages, and dead corners, these issues contribute to anti-social behaviour, security and safety concerns. Further back towards the Old Dairy Mews is the estate's playground, an underwhelming provision of play equipment for the estate. The properties part of the Old Dairy Mews and 51

Raglan Street all have blank gables facing the site, offering a clear opportunity for development.

Design response

- 12.13 The scheme is a 4-storey block adjoining 51 Raglan Street to the north and the Old Dairy Mews terraces to the east, comprised of 18 units which are a mix of flats and duplexes, arranged around a shared courtyard to the north. The existing garages and car park are proposed to be removed, while the bin store and playground will be re-provided and consolidated as part of the estate-wide landscaping works, which also include biodiversity enhancements, better quality play spaces, enhanced amenity and storage.
- 12.14 It is acknowledged that positive steps and changes have been made throughout the pre-application process to address concerns and feedback from officers, stakeholders, the Design Review Panel and the local community. This had led to an accomplished scheme that is considered to be an appropriate and successful neighbour for estate, with architectural principles directly driven by those found in the immediate area, offering high-quality accommodation and a significantly improved arrival point into the estate which will help mitigate some of the safety and security concerns raised by the local community. It is therefore deemed to be an appropriate design response for the site, in compliance with Policy D1 and D2 of the Local Plan.

Layout and ground floor

- 12.15 The layout of the block has largely been dictated by orientation, fire and maintenance access strategies, the building lines of the neighbouring buildings, minimising overlooking and daylight impact on the neighbouring properties while maximising amenity space for the new residents.
- 12.16 The block's main entrance is opposite the Monmouth House entrance, leading to the shared courtyard at the rear; additional access points along Raglan Street and the newly created mews will significantly increase ground floor activation, passive surveillance, activity and general sense of welcome on the estate, enhancing safety and security, which is very positive.
- 12.17 The entrances on Raglan Street form part of chamfered bays that replicate those found at 51 Raglan Street and the terraces at 5-23 Holmes Road, creating covered access for the wheelchair users, and pockets of planted, defensible green space. Low garden brick walls separate the duplexes' front gardens and planted areas to create a more attractive, welcoming environment.
- 12.18 Much consideration has been given to the location and appearance of the block's entrance and the arrival space into the estate, and how prominent, intuitive and welcoming it is. To increase visibility further, the consolidated

shared bin store – which in previous iterations was located at the entrance on the mews from Raglan Street – has been pushed back further into the site, its most western wall used for signage to help with wayfinding on the estate.

- 12.19 The waste strategy was the subject of much discussion and tests in the pre-application process. The challenges of identifying the right approach to providing bin stores on the estate are well documented and the reasons for the bin store's current location understood. It is acknowledged that many steps have been taken to mitigate any potential ASB issues as much as possible and it is expected that the introduction of the high-quality new development, activated ground floors and landscaping works will alleviate many of the concerns raised by the local community.
- 12.20 The proposed layout makes good use of space and will ensure high-quality homes that are dual aspect which is welcome. Flats are contained in the Raglan Street block, with deck accessed duplexes located east of the main entrance, placed around the shared courtyard.
- 12.21 The chosen layout with the deck access at the rear - which also enables balconies to be placed on the south facade for an increase in passive surveillance, placing them away from habitable or gardens of neighbouring properties – is deemed to be an acceptable approach that minimises impact by increasing distances between habitable rooms. The units are well-sized, with good natural light and ventilation, level access, both private and communal amenity space which is commendable for a small infill site.

Scale and massing

- 12.22 The proposed building is 4 storeys high, which is considered appropriate for the context and prominent corner position. Many options were tested throughout the pre-application process, including a 5-storey option across the Raglan Street elevation, which was ultimately discarded as it was considered too imposing on the street and neighbouring properties.
- 12.23 The roofline of the building varies between the Raglan Street and the mews elevations, the latter having a pitched roof with front dormers. Internal layout changes to increase efficiency have led to the Raglan Street elevation, which previously shared the same roof approach, to have a flat roof instead which is understood. The removal of the dormers here helps create a characterful corner without being too overbearing on 51 Raglan Street – indeed, a step back from the party wall ensures minimal impact, while the overall height does not exceed that of the party wall's highest point.
- 12.24 An additional break down of the massing on the corner to allow for a balcony helps increase passive surveillance; other step backs have also been incorporated on the top floor of the mews block. Much consideration has

therefore been given to the overall massing across the scheme to ensure sensitivity to neighbours.

Appearance, detailing and materiality

- 12.25 The building has been designed with attention to composition and detail across all elevations, with a series of key design principles shaped by use, street condition, orientation, articulation related to context as well as Passivhaus principles. While the proposal is simple in composition, its richness is derived from the careful detailing, where texture is added via soldier course and hit and miss brickwork bandings, cast stone lintels and cills and other detailing, such as the balconies, metal balustrades, and entrance canopies.
- 12.26 The elevation treatments draw from and interpret common architectural features found in the immediate environment. The Raglan Street elevation is treated as a single facade, its articulation derived from the bay windows referencing those on Holmes Road and Raglan Street, and balconies above. In contrast, the mews elevation reflects the prevailing urban grain of terraced properties through the elevation created via the repeated rhythm of narrow single dwellings. The roof dormers set against the clay roof tile are a direct nod to a common condition found in residential properties across the area, a contemporary interpretation in the proposal.
- 12.27 Despite the different approaches to composition, which create interest and emphasise the mews character of the stacked duplexes, the proposal reads as one, with a coherent identity and shared visual language. The articulation of the facades will create a balanced rhythm along the streetscape, adding interest in the same manner as the surrounding buildings, both the immediately adjacent Victorian terraces and those found in the Inkerman Conservation Area. This high-quality design responds creatively to the site and its context, which is welcome.
- 12.28 At the rear, the appearance is largely dictated by the layout where the deck access creates a step back in the block's massing. The facing brickwork found on the south and west facades continues across the rear elevations, except for the top duplexes where the materiality changes to render creating distinction between the units and making them appear more recessive.
- 12.29 Interest is added across all elevations through the soldier course and hit and miss bandings, reflecting brick soldier courses between lintels and cills of windows, and above window heads in the Victorian terraced houses on Holmes Road and 51 Raglan Street. The cast stone canopies for the individual entrances are a nod to the ground floor rusticated stucco intending to stimulate stone blocks found in the terraces further south on Raglan Street.
- 12.30 The material palette, while contextual in their composition, differs in their specified colours. Much consideration has been given as to whether the

proposal should read as part of the estate, an extension of the Victorian character, or be a transition between the two, which the DRP panel also picked up on. The submitted proposal leans towards the third approach in its materiality which includes white-grey brickwork and pink brick for the detailing, its colour matched for the render at the rear and cast stone entrances. There is enhanced clarity in the contrast, and a confidence in creating a scheme that has its own character that is rooted in its immediate context, without trying to replicate it.

- 12.31 The design relies on the quality and subtlety of materials and detailing to deliver a texturally rich, and robust building that will enhance the streetscape and sit comfortably and confidently in its context. These would therefore be conditioned (4) to ensure a building of the highest quality with a durable finish that weathers gracefully and stands the test of time.

Design Review Panel

- 12.32 The scheme was seen by the Design Review Panel (DRP) in February 2025. The panel supported the principle behind the scheme, including height and massing, and considered the developing designs presented were progressing very well, with many of the proposal's elements applauded – for example, the Passivhaus principles. Suggestions were given to the articulation of the Raglan Street bays, the design of the external elevations to introduce detail and personality. Highlighting the communal entrance was a key point of feedback to ensure it has greater prominence.
- 12.33 The panel suggested that secure, gated spaces should be avoided, and security enhanced through activation, increased use of public space achieved via improved, greener and more welcoming spaces. The panel considered the bin store location could impact on personal safety and security and recommended alternative approaches be sought.
- 12.34 It was considered that the feedback from the DRP panel and the subsequent discussions with officers led to changes that sufficiently addressed the comments made by the panel, therefore needing no further review.
- 12.35 Overall, the scheme is a high-quality design response, showing sensitivity to optimising affordable housing development within a town centre location on an underutilised site that causes safety and security issues. This is achieved through thoughtful analysis and understanding of the local context that is applied in the architectural language, composition and detailing which have been well considered. The proposal significantly improves the relationship with the street, existing estate and wider context, introducing active ground floor frontages and attractive green spaces.
- 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 estate for the benefit of existing and new residents alike.

Archaeology

- 12.37 Policy D2 of the Local Plan states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset.
- 12.38 The site partly lies within an Archaeological Priority Area; however it is set back from the former medieval street and has been extensively impacted by previous development. As such, it is unlikely that archaeology of significance has survived on this site. No conditions or further assessment are therefore required.

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.

Redevelopment strategy

- 13.3 The proposal does involve demolition of existing structures, in particular, the garages, hard standing and playground equipment. The garages are of poor-quality construction, are of little architectural merit, and do not make best use of the site. Their removal, to make way for 18 new affordable homes, is therefore supported and the demolition is considered justified without the need for a condition and feasibility study or Whole Life Carbon assessment.
- 13.4 To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use (condition 18). Opportunities have been identified to promote circular economy principles, such as to conserve resources and source ethically, for example by reusing of brick pavers that are currently at the hardstanding area between Monmouth House and Alpha Court for the front and back residential thresholds, designing to eliminate waste – by using same type of window type across scheme allows for future opportunities to add external shutters to windows on east and north facades (if required), and using mostly flexible rather than rigid insulation to reduce offcuts.

Energy and carbon reductions

- 13.5 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).
- 13.6 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

- 13.7 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%	36.5 %
Be green stage (renewables): CLP policy CC1	20%	69.4 %
Total carbon reduction: LP policy SI2 and LP CC1	35%	80.6 %

Table 6 - Carbon saving targets (for majors) and the scheme results

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

Total carbon reductions

- 13.9 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.
- 13.10 This is charged at £95/tonne CO₂/yr (over a 30-year period) which is 3.22 tonnes x £95 x 30 years = £9,183. This amount will be spent on delivery of carbon reduction measures in the borough.

- 13.11 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.
- 13.12 In this case, the development significantly exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 80.6% below Part L requirements as shown in Table 6 above, and also exceeds the aspirational target of 50% reductions. The **carbon offset of £9,183 will be secured by Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 13.13 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.
- 13.14 In this case, the development exceeds the policy target of 10%, reducing emissions by 36.5% at this stage through energy efficient design, in compliance with the development plan. The proposals would have high thermal performance from triple glazing, good airtightness and a well-insulated thermal envelope, insulated ductwork, the reduction of thermal bridging, with a glazing ratio of 4-18%, which is the less than the Part L max value of 25%. Wastewater Heat Recovery is proposed as well as Mechanical Ventilation with Heat Recovery. Passivhaus planning package methodology has been used to optimise the building and reduce energy demand. The building is capable of meeting the Passivhaus building standard. The scheme would 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 utilise the waste heat extracted from the apartment ventilation system to contribute towards the space heating and domestic hot water requirements of the dwellings. As such, they are acceptable in this instance given the Passivhaus capabilities of the scheme and the limited demand for space heating. Due to acoustic and security constraints, the exhaust air heat pumps have been designed with limited air-tempering ability to achieve thermal comfort.
- 13.15 In terms of cooling, the cooling hierarchy has been used in order to reduce the need for active cooling, including dual aspect homes with cross ventilation, fixed shading from balconies, external shading from fabric roller blinds, window recesses, and good G-value windows. The ground floor bedrooms have louvres to provide secure nighttime ventilation, however, due to noise concerns, some active cooling is required for the homes facing Raglan Street as the background noise levels exceed the part O threshold for windows to be kept closed at night, however this is accepted in this instance and has been kept to a minimum.

Be clean stage (decentralised energy supply)

- 13.16 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.
- 13.17 EAHPs are an individual system, that are not able to connect to District Heat Networks, and policy CC1 of the Local Plan requires all major development to assess the feasibility of connecting to an existing decentralised energy network. EAHPs are 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. In addition, the cost to residents is lower than for ASHPs and it is noted that this is a scheme providing 100% affordable housing. Nonetheless, the shadow section 106 agreement would secure details of how the scheme would be future proofed to allow for future connections to a local district heat network especially when the EAHPs come to the end of their working life. It is noted that the refrigerant of EAHP uses R134a with Global Warming Potential (GWP) of 1,430 which is considered high, but accepted as 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 green stage (renewables)

- 13.18 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.
- 13.19 In this case, the development significantly exceeds the policy target of 20%, reducing emissions by 69.4% at this stage through renewables, in compliance with the development plan. The proposal includes PV panels on the roof covering 23% of the roof area with full details secured by condition 7. A condition will be added to secure a meter to monitor the energy output from the approved renewable energy systems (conditions 7 and 10). The proposal includes low carbon heating like Exhaust Air Heat Pumps, which are proposed internally within cupboards in the homes, and exchange heat

with the outside air via ducts. Options for a green roof or bio-solar roof on the building were discussed, however this would require significant additional structure, increasing embodied carbon and raising the building height. The benefit would be limited, as the available roof area is small and would reduce space for PV panels. The remaining roof space is given over to the lift overrun, an access hatch and backup safety equipment. The scheme already exceeds greening and biodiversity requirements in other areas of the development and 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.

Be seen (energy monitoring)

- 13.20 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. The proposal includes energy monitoring of the renewable energy systems which would be secured via conditions 7 and 10.
- 13.21 The **Energy and Sustainability Strategy secured by the shadow Section 106 legal agreement** will secure reporting to the GLA in line with their published guidance.

Climate change adaption and sustainable design

- 13.22 Local Plan policy CC2 encourages new build residential development to use the Home Quality Mark and Passivhaus design standards.
- 13.23 The building is capable of meeting Passivhaus building standards. The solid and glazing ratio would ensure that overheating for the building is limited while also providing an acceptable standard of accommodation. Internal opening windows would maximise natural ventilation and balconies and movable external solar roller blinds, solar-control (low g-value) glass and ventilation louvres in ground floor bedrooms would help minimise overheating.
- 13.24 Sustainable drainage measures are proposed, as well as green roofs on the refuse storage and the re-provided storage structure within the open space. Raingardens are proposed in the new courtyard space, and permeable paving would be introduced around the new building. 2 below ground attenuation tanks would be proposed too. Drainage, flooding and SuDS are discussed section 17. Details of this system will be secured by condition 13. Condition 26 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.

Whole Life Carbon

13.25 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	730
B-C (excl B6 & B7)	<350	<300	746
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1460

Table 7. Whole Life Carbon Results

13.26 The project performs within the expected range for Modules A1–A5 meeting the benchmark as set out from the GLA guidance; however, Modules B–C exceed benchmark levels. The higher impacts in Module B are driven primarily by replacement and maintenance cycles associated with internal finishes and MEP systems, in addition to refrigerant related emissions. 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.

13.27 Overall, the proposal would comply with policies CC1 and CC2 of the Local Plan, with significant carbon reductions that exceed targets, and it would also be capable of Passivhaus certification. The building would perform well in terms of energy and thermal efficiency.

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 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 location and access to public transport

- 14.4 The site is located in Kentish Town to the east of Raglan Street opposite St Patrick's Catholic Primary School. Kentish Town Road located approximately 130m east of the site, forms part of the Strategic Road Network (SRN).
- 14.5 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6a (excellent).
- 14.6 The closest London Underground station is Kentish Town, which also provides National Rail services, approximately 270m north the site. The closest London Overground station is Kentish Town West, located approximately 550m south-west of the site.
- 14.7 The closest bus stop is located on Kentish Town Road, approximately 170m east of the site.
- 14.8 The development site is not well served by the Santander cycle hire scheme, with the nearest docking station located on Bonny Street outside Camden Road Overground Station, approximately 1.5km south of the site. However, proposals which include the installation of a new Santander cycle hire docking station on Castlehaven Road, approximately 400m southwest of the site, were approved by the Director of Environment and Sustainability on 22nd

August 2025. This new docking station is likely to be installed in Summer 2026 subject to statutory processes.

- 14.9 The nearest dedicated parking bays for dockless rental e-bikes and rental e-scooters are located on Inkerman Road and Gaisford Street, approximately 230m south-west and 280m south-east of the site. However, these bays are already showing signs of overcapacity and increasing demand.
- 14.10 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows a grade of 5 in the vicinity of the site, which indicates opportunities for improvement, considering it is our aspiration (and target) for the STAL scores to be 5. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.
- 14.11 Access to the site for all modes will be retained from Raglan Street. Pedestrian and cycle access will also be achievable from the Raglan Street estate. The northernmost vehicle access from Raglan Street into the former garage area will be removed and the footway reinstated with a full height kerb. The southernmost dropped kerb vehicle access point that provides access into an area of hard-standing adjacent to Monmouth House will be retained for fire brigade and refuse collection access.

Cycle Parking

- 14.12 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for D1 and D2 land use (other).
- 14.13 42 cycle parking spaces will be provided, which is in line with the London Plan and CPG Transport. Ground floor homes will benefit from individual secure and covered bike stores in the front and back gardens. For upper floor homes, cycle storage will be provided in the covered external two-tier cycle store located in the secure rear courtyard. Two cargo bike storage units will be provided for non-standard cycle storage in line with Planning Policy. Visitor cycle parking will be provided via a Sheffield Stand located between Alpha Court and Monmouth House. Provision of the cycle parking will be secured by condition 27.

Car parking and vehicle access

- 14.14 The site is located in controlled parking zone CA-F(n) Camden Town Area, with controlled hours 08:30-23:00 Monday to Friday, 09:30-23:00 Saturday

and 09:30-23:00 Sunday, with Resident Permit Holder Only bays in force at all times on Saturday and Sunday.

- 14.15 The development will be car-free, which would be secured by shadow section 106 legal agreement.
- 14.16 Two new on-street disabled parking bays are proposed on Raglan Street by converting existing standard parking spaces. A parking stress survey demonstrates sufficient availability. A financial contribution of £8,000 for the provision of two disabled parking bays on Raglan Street would be secured via the shadow section 106 legal agreement.

Construction Management

- 14.17 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). An outline Construction/Demolition Management Plan using the Council's CMP pro-forma is provided in support of the planning application. However, in absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.
- 14.18 The site is located within Kentish Town, one of our town centres, and adjacent to St Patrick's Catholic Primary School. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. More detailed Construction Management Plan (CMP) documents will therefore be secured by shadow section 106 legal agreement in accordance with Local Plan Policy A1. Considering the proximity of St Patrick's Catholic Primary School to the site, it will be necessary to restrict construction traffic to the hours of 9.30am and 3.00pm on weekdays during school term time.
- 14.19 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network.
- 14.20 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction.

14.21 Implementation support contributions of £12,000 and impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by shadow section 106 legal agreement in accordance with Local Plan Policy A1.

14.22 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by shadow section 106 legal agreement.

Deliveries and servicing

14.23 Servicing is proposed to continue from Raglan Street in line with the existing arrangements.

Highways works

14.24 The applicant would be financially responsible for any works relating to changes or repairs to the borough highway. Whilst it is expected that significant damage to the public highway is unlikely to be caused during demolition and construction, it is suggested that a highways contribution of £50,000 be secured by shadow section 106 legal agreement if planning permission is granted. The highway works will include the removal of a crossover and repaving of the footway directly adjacent to the site on Raglan Street.

14.25 The applicant has indicated that some temporary changes will need to be made to the public highway on Raglan Street to facilitate construction works at the site. This may include the temporary removal of the small rain garden and traffic restriction on the east side of Raglan Street. The highway works will also include any temporary removal and reinstatement once the development is complete.

Pedestrian, cycling and environmental improvements

14.26 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 the Council are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on the Council's ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.

14.27 In line with the increase in walking and cycle trips generated by the proposed development we will seek a contribution of £50,000 towards:

- segregated cycle route on Kentish Town Road;
- segregated cycle route on Prince of Wales Road between Grafton Road and Kentish Town Road; and
- the upgrade of in-flight Healthy School Street scheme to wider Safe & Healthy Streets intervention with potential further traffic restriction measures and Healthy Streets initiatives (cycle hangars, EVCPs etc), in the Holmes Road Area/Kentish Town West area.

14.28 This contribution would be secured by shadow section 106 legal agreement if planning permission were granted.

Micro and shared mobility improvements

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

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

14.31 A cycle/e-scooter hire improvements contribution of £2,000 would therefore be secured as a shadow section 106 planning obligation if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate residents and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

Loss of garages

14.32 The site comprises 20 existing garages, although it is understood that due to their limited dimensions, they are unable to accommodate modern cars and are used for storage purposes mainly. New storage would be provided elsewhere in the estate as part of the scheme to offset the loss of the garages.

15. PUBLIC OPEN SPACE

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

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

- 11 or more self-contained homes
 - 11 or more student rooms, units, or occupiers
 - 1,000sqm GIA of new commercial (or higher education where appropriate)
- 15.3 CPG expects developments with 11 or more dwellings to provide 9sqm of POS for every occupant. With 18 new homes, this development triggers the requirement. The residential requirement for the POS is 9sqm x 18 (the number of additional dwellings) x 2.29 (the average dwelling occupancy for the ward) = **370.98sqm**.
- 15.4 The total POS requirement is therefore **370.98sqm**.
- 15.5 The proposal would make enhancements to the estate land, providing improved play space and landscaping. It is anticipated that this will help to mitigate against the increase of housing on local public spaces nearby. The total amount of enhanced estate land would amount to 185sqm, which leaves a shortfall of 185.98sqm (370.98 - 185sqm).
- 15.6 Where it is not feasible to deliver the full amount of public open space required, the CPG accepts a financial payment in lieu (PIL). The PIL is used for provision, maintenance, and improvement of open space.
- 15.7 The PIL is made up of a capital costs contribution (£37,196, which is calculated at a rate of £200/sqm), and a maintenance costs contribution which covers 10years (£13,018.60, which is calculated at a rate of £70/sqm). Therefore, the total POS contribution is £50,214.60. The **Public Open Space PIL of £50,214.60 would be secured by s106 agreement**, accordance with CLP policy C2.
- 15.8 As such, the scheme would make an adequate contribution to POS in line with the development plan.

16. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 16.1 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.
- 16.2 Policy GO2 of the Kentish Town Neighbourhood Plan recognises the value of the existing green and open spaces on Council estates in the plan area. In specific reference to the Raglan Street Estate, it says the KTNF will

support the protection of these spaces to be retained, improved and cultivated by the Council for the benefit of the tenants.

- 16.3 As part of the scheme, 2 existing trees would be removed however these are category U (i.e. trees of curtailed life expectancy of less than 10 years). These would need to be removed as part of health and safety tree risk management. Their removal is therefore accepted. In addition, 47 new trees would be provided across the development which is a significant increase, and this is welcome.
- 16.4 The impact of the scheme on the trees to be retained will be of an acceptable level. A tree impact assessment report has been submitted and reviewed by the Council's Tree Team who deem it to be acceptable. Tree protection details are considered sufficient to demonstrate that the retained trees will be adequately protected in line with British standards. A compliance condition 28 is attached to ensure these details are complied with during construction.

Proposed landscaping and estate improvements

- 16.5 The proposal includes an integrated landscape design for the estate to benefit both existing and new residents, which is welcome. The scheme introduces enhanced planting, creating additional green spaces between the existing blocks to help maximise urban greening and create noise buffers between the proposed activity areas. The creation of a new play trail that is distributed along the east green space between the existing blocks and Crown Place, amongst an area of increased biodiversity with significant new trees planted will help enhance the estate and significantly improved play provision.
- 16.6 The rich and diverse planting palette has been carefully selected to create colourful, greener spaces that are dry-tolerant and attract pollinators. The areas of hardscape have been limited as much as possible, and where needed, reclaimed and locally sourced materials will be used where possible, helping create more playful, inviting spaces.
- 16.7 These carefully designed landscape elements across the existing estate and within the new proposal will help enhance safety, sense of place and ownership, creating a more welcoming, attractive, greener environment. The success of the proposal therefore relies not only on the architecture, but also on the quality of the materials, richness of the planting palette and thoughtful design of entrance sequences and the way people move through those spaces. The landscaping scheme and materials are secured via condition 5 along with a maintenance plan to ensure a holistic scheme that delivers for the users.

Urban Greening Factor

- 16.8 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 0.4 which is welcomed, and this requirement is secured via condition 17.
- 16.9 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

Statutory Biodiversity Net Gain

- 16.10 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 16.11 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 16.12 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits.
- 16.13 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 1.29 habitat units, and consists of urban trees, modified grassland, developed lands and shrubs.
- 16.14 The proposal would meet the 10% gain requirement on site, providing a 13.5% gain with 1.47 habitat units.
- 16.15 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 would be secured via condition 14.

17. WATER AND FLOODING

- 17.1 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.

17.2 The site is not located within a local flood zone and is not shown to be at risk of flooding from surface water in the 1 in 30-year or 1 in 100-year events. The surrounding road network to the east of the site is shown to have flooded during recorded the flood events of August 1975, August 2002 and July 2021, the surrounding road network was subject to flooding. It is not known whether the site itself flooding during any of these events, but this is deemed unlikely.

17.3 In terms of the SuDS strategy, a number of interventions are proposed. This includes the provision of raingardens within the new courtyard area to the north of the building, permeable paving around the building to the north and south, including around the bin store next to Monmouth House, the installation of 2 below-ground attenuation tanks, and green roofs on the new bin store and the re-provided storage structure as shown on the below image.

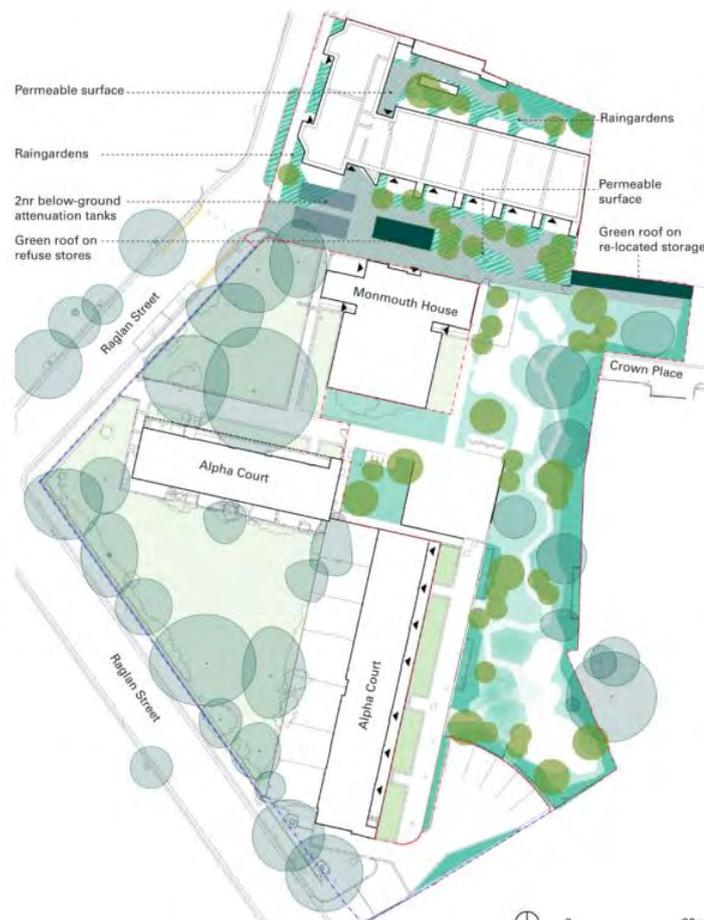


Fig. 7 Image showing the proposed SuDS and drainage measures

17.4 Details of the SuDS would be secured via condition 13, and details of the green roofs would also be secured via condition 13 to ensure they have sufficient substrate depth and will be appropriately maintained.

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 local area

- 18.2 The proposal would be car free and as such it is considered to be air quality neutral. Emergency back up generators are proposed, and details of these would be secured via condition.

Operational impact on occupants

- 18.3 The air pollution recorded is considered suitable for the proposed development of a residential development. Diffusion tube measures of NO₂ as well as DEFRA background concentrations indicate the NO₂ levels are well below the legal limit.

- 18.4 Confirmation of the air inlets for the MVHR system would be secured via condition 8 to ensure these are away from polluting sources including but not limited to generator flues, exhaust air outlets and smoke extract fans.

Construction impacts risk assessment

- 18.5 The dust risk from the demolition of the garages and the construction is considered to be medium. As such, condition 3 will require 2 air quality monitors to be in place 3 months before construction to determine the background/baseline air quality. Appropriate measures would also be secured via the construction management plan in the section 106 legal agreement.

- 18.6 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. Camden Planning Guidance on Design states that gating will only be considered as a reasonable response to crime and anti-social behaviour in exceptional circumstances and encourages more passive interventions. It also requires evidence of anti-social behaviour to be submitted.

- 19.2 The proposal would involve the removal of the garages which currently attract anti-social behaviour. The Design Out Crime Officer (DOCO) has raised concerns about the new bike storage in the courtyard along the boundary with 51 Raglan Street, however this courtyard area would only be accessible to residents in the new flats and would be overlooked by windows in the building. The current garages can be climbed on and are publicly

accessible so the proposal would have a clear improvement over the existing situation. The new building would introduce much more natural surveillance and activity around this part of the estate, with new visibility over the entrance area to Monmouth House and the new bin store. Although the new bin store would lessen visibility from Raglan Street, this would be offset by increased visibility from the new building's south elevation and there would be plenty of space and clear sightlines around the bin store.

- 19.3 An existing storage structure, located directly the east of Monmouth House, would be removed and re-provided further to the east in the estate. This would improve sightlines in and around Monmouth House and would remove the existing pinch point between the two buildings which currently attracts anti-social behaviour. The new storage structure would be located in the easternmost part of the estate, which has a clear sightline from Raglan Street. In any case, this would be located in the landscaped area which would be gated off and only accessible to estate residents with fob access. The landscaping scheme, as discussed in section 16 of the report, includes new and enhanced children's play equipment and this would help to increase activity and use in this area which should help to deter anti-social behaviour.
- 19.4 As mentioned, this area would be fenced off with secure lines introduced. Three pedestrian gates would be provided, one immediately to the east of Monmouth House, one next to the new storage area, and one between Monmouth House and Alpha Court. These are circled in red on the plan below:



Fig. 8. Plan showing the wider estate landscaping proposal and the secure lines

19.5 The secure enclosure line that is shown in grey on the above plan at the south of the estate is beyond the red line boundary and is therefore outside the scope of this application. It is anticipated that the applicant will explore ways of providing gates and fences in this location, which could be done under Permitted Development Rights which allow the installation of gates, fences and boundary treatments without the need for formal planning permission (so long as they do not breach height restrictions). Although the Council does not generally seek to support gating off estates, the anti-social behaviour that exists on the estate is noted and has featured heavily in consultation responses at pre-application and application stages. It is also

noted that gating off this part of the estate wouldn't result in long alternative routes for people, as there is no access to the estate from the east on Kentish Town Road. In addition, only some of the open space would be gated with other areas facing Raglan Street remaining open. As such, in this instance, the introduction of gates is accepted in this location. Further details of the fencing and gates within the application red line are secured via condition 4. Overall, the proposed scheme and measures would help to alleviate existing issues on the estate.

20. LAND CONTAMINATION

20.1 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.

20.2 The records suggest that potentially contaminative historic land uses mapped on site and or in close proximity include oil and colour manufacturers/storage, printers, hatter, coal and coke merchants, piano works, blacking works and unknown industrial land uses. As such, given the proposal includes sensitive receptors (residential) with proposed soft landscaped areas (plausible pathway for contaminants of concern). As such, a condition is attached (12) 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.

21. HEALTH AND WELLBEING

21.1 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.

21.2 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 wellbeing 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.

21.3 The re-provided, age-appropriate play space with better natural surveillance (plus ball court and "play-on-the-way") directly supports healthy child development, physical activity, and safer play, aligning with the "young people have great opportunities" mission. Car-free design in a PTAL 6a location, enhanced pedestrian routes, SuDS, and significant energy performance improvements contribute to cleaner air, active travel, climate

resilience, and greener public realm, consistent with “sustainable neighbourhoods. Delivery of 100% affordable homes (including social-affordable rent) responds to local housing need and overcrowding pressures highlighted across Camden, supporting mixed, inclusive communities. Secured-by-Design principles, lighting, sightlines, and natural surveillance address anti-social behaviour concerns and foster social cohesion, aligned with community safety ambitions. While the scheme is residential, the HIA references construction-phase jobs and recommends local procurement/apprenticeships, contributing to Good Work Camden ambitions when secured through the shadow Section 106. No direct healthy food environment interventions (e.g., community food growing or food retail commitments); however, private amenity space may enable small-scale growing.

- 21.4 The proposal demonstrates good alignment with Camden’s strategic frameworks, including We Make Camden, the Camden Health and Wellbeing Strategy (2022–2030), and the Annual Public Health Report (2025). The development integrates key health-promoting features such as affordable housing, inclusive design, active travel infrastructure, green and biodiverse public spaces, and sustainable energy systems. The scheme has the potential to deliver lasting health benefits, reduce inequalities, and contribute to Camden’s ambition to create healthier, fairer, and more connected communities.

22. **EMPLOYMENT AND TRAINING OPPORTUNITIES**

- 22.1 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 £6.3 million this would mean 2 construction apprentices and a £3,400 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.
- 22.2 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.

23. COMMUNITY INFRASTRUCTURE LEVY (CIL)

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

24. CONCLUSION

- 24.1 Overall, the scheme would seek to make the best of use of an existing underutilised piece of brownfield land, providing 18 high quality and well-designed affordable homes that would contribute to the Council's housing supply which should be given significant weight given the current housing delivery position.
- 24.2 The proposal would sit comfortably within the wider townscape and would not impact on nearby heritage assets. The impact on neighbouring occupiers is accepted, especially within the context of a dense urban location. The proposal would also seek to improve safety and security on the estate, through improved sightlines, natural surveillance and limiting access to some open areas to estate residents. The scheme would also enhance biodiversity through planting and would exceed the requirements of Biodiversity Net Gain and meets Urban Greening Factor targets. New and improved play equipment for children of different ages is proposed which would benefit both existing and new estate residents.
- 24.3 Construction impacts would be carefully managed through a Construction Management Plan and Construction Working Group that would be secured via a shadow section 106 legal agreement.

Public benefits

- 24.4 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.

- Delivery of 100% affordable housing helping to meet the Council's housing needs.
- Wider estate improvements, including landscaping and child play equipment.
- Improved safety and security across the estate.
- Contribution to improved biodiversity, greening and drainage.
- Contribution to local transport network, including cycling and pedestrian infrastructure.

25. RECOMMENDATION

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

- 18 affordable homes
- Construction management plan (CMP)
- CMP implementation support contribution of £12,000
- CMP Impact Bond of £16,000
- Construction Working Group
- Car free
- Highways Works Contribution of £50,000
- Pedestrian, Cycling and Environmental Contribution of £50,000
- Micromobility Contribution of £2,000
- Accessible car parking contribution of £8,000
- Energy and Sustainability Plan
- Future proofing connections to district heat network
- Public Open Space Contribution of £50,214.60
- Construction Apprenticeship contribution of £3,400
- Local recruitment 20%
- Local procurement 10%
- Carbon Offset Payment of £9,183

26. LEGAL COMMENTS

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

27. 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 CSS-MR-XX-00-DR-A-00101 01, CSS-MR-XX-00-DR-A-00100 01, 0113-PR-ZZ-ZZ-DR-L-2080 002, 0113-PR-ZZ-ZZ-DR-L-2081 001,

Proposed Drawings:

CSS-MR-XX-00-DR-A-00102 01, CSS-MR-XX-ZZ-DR-A-00300 01, CSS-MR-XX-04-DR-A-01104 01, CSS-MR-XX-00-DR-A-01100 01, CSS-MR-XX-04-DR-A-01114 01, CSS-MR-XX-03-DR-A-01113 01, CSS-MR-XX-02-DR-A-01112 01, CSS-MR-XX-01-DR-A-01111 01, CSS-MR-XX-00-DR-A-01110 01, CSS-MR-XX-ZZ-DR-A-01210 01, CSS-MR-XX-ZZ-DR-A-01310 01, CSS-MR-XX-ZZ-DR-A-01300 01, 0113-PR-ZZ-ZZ-DR-L-0001 09, 0113-PR-ZZ-ZZ-DR-L-0004 003, 0113-PR-ZZ-ZZ-DR-L-1001 004, 0113-PR-ZZ-ZZ-DR-L-1002 002, 0113-PR-ZZ-ZZ-DR-L-1201 004, 0113-PR-ZZ-ZZ-DR-L-1202 003, 0113-PR-ZZ-ZZ-DR-L-2000 003, 0113-PR-ZZ-ZZ-DR-L-2001 002, 0113-PR-ZZ-ZZ-DR-L-6041 001, 0113-PR-ZZ-ZZ-DR-L-6042 001, 0113-PR-ZZ-ZZ-DR-L-6100 001, 0113-PR-ZZ-ZZ-DR-L-6110, 0113-PR-ZZ-ZZ-DR-L-6000 001, 0113-PR-ZZ-ZZ-DR-L-6010 001, 0113-PR-ZZ-ZZ-DR-L-6020 004, 0113-PR-ZZ-ZZ-DR-L-6021 002, 0113-PR-ZZ-ZZ-DR-L-6030 001, 0113-PR-ZZ-ZZ-DR-L-6040 001

Documents:

Tree Survey, Arboricultural Impact Assessment & Method Statement (Nov 2025), Air Quality

Assessment (Dec 2025), Biodiversity Net Gain Summary (Dec 2025), Daylight and Sunlight Report (Nov 2025), Construction Management Plan pro-forma, Energy Strategy (Nov 2025), Equality Impact Assessment Form, London Plan Fire Statement and Planning Fire Safety Strategy, Heritage Statement (Dec 2025), Plant Noise Impact Assessment Report (June 2025), Rapid Health Impact Assessment (Dec 2025), Transport Statement (Dec 2025), Planning and Affordable Housing Statement (Dec 2025), Design and

Access Statement, Landscape Details rev 05 (Dec 2025), Drainage Management Statement and Maintenance Schedule (Dec 2025), Sustainability Statement (Dec 2025), Flood Risk Assessment, Sustainable Drainage Management Statement and Maintenance Schedule (Jan 2025), Landscape Management Plan (May 2025), Landscape Risk Assessment (June 2025), Landscape Pictorial Specification (Dec 2025), Tree Schedule, Soft Landscape Planting Schedule

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

Pre-start conditions (any works)

3 Air Quality Monitoring

No demolition or development shall commence until all the following have been complied with:

- a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
- b) A confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and
- c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

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

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

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

4 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 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) Detail drawings, including plans, elevations and sections at 1:20 of the refuse store.
- f) Detail drawings, including plans, elevations and sections at 1:20 of the fences and gates

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 Policy D1 and D2 of the Camden Local Plan 2017.

5 Hard and soft landscaping

No development shall take place until full details of hard and soft landscaping (including 47 trees) and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. Such details shall include details of any proposed earthworks including grading, mounding and other changes in ground levels. Such details shall include a comprehensive landscape management plan including irrigation requirements that covers at least the first 3 years following planting. 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 and D1 of the Camden Local Plan 2017.

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

6 Details of green or living roof

Prior to commencement above ground works (other than demolition and site clearance), full details of the living roofs in the areas indicated on the approved roof plan shall be submitted to and approved in writing by the local planning authority. The details shall include:

- a) a detailed scheme of maintenance
- b) sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used
- c) full details of planting species and density.

The living roofs shall be fully provided in accordance with the approved details prior to first occupation of the new homes and thereafter retained and maintained in accordance with the approved scheme.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the Camden Local Plan 2017.

7 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. The cells shall be installed in full accordance with the details approved by the Local Planning Authority prior to first occupation of the new homes 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.

8 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. The development shall be constructed in accordance with the approved details and permanently retained and maintained as such thereafter.

Reason: To protect the amenity of residents in accordance with Policy CC4 of the Camden Local Plan 2017 and policy SI 1 London Plan 2021.

9 Piling Method Statement

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) 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.

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 by the Local Planning Authority prior to first occupation and permanently retained and maintained thereafter.

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

11 Emergency backup power

Prior to commencement on the relevant works 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 Land contamination

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.

13 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, and 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.

14 Biodiversity Net Gain

Prior to commencement of above ground works (other than demolition and site clearance) a Biodiversity Gain Plan and Habitat Management and

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

15 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 thereafter.

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

16 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 policies CC1, CC2, CC3 and CC4 of Camden Local Plan 2017 and policies, SI1, SI2, SI3, SI4, SI5 and SI7 of the London Plan 2021.

17 Urban Greening Factor

Prior to first occupation of the development, evidence shall be submitted to and approved in writing 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.

18 Reuse and recycling of demolition waste

The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of

Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.

Compliance conditions

19 Non-road mobile machinery (NRMM)

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

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

20 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.

21 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

22 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.

23 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 Camden Local Plan 2017.

24 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.

25 Wheelchair and accessible homes

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:

01.E and 02.F

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.

26 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.

27 Cycle Parking

The cycle parking as shown on the approved plans 0113-PR-ZZ-ZZ-DR-L-1002 002 and CSS-MR-XX-00-DR-A-01110 01 shall be provided in full prior

to the commencement of the use hereby permitted, 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.

28 Tree Protection Measures

Prior to the commencement of works on site, tree protection measures shall be installed and working practices adopted in accordance with the document entitled "Tree Survey, Arboricultural Impact Assessment & Method Statement" dated Nov 2025 by Indigo ref. 241437/A1_AIA. All trees on the site, or parts of trees grow from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with BS5837:2012 and with the approved protection details. The development shall be monitored by the project arboriculturalist in accordance with the approved report.

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

29 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 or any phase 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 of the London Borough of Camden Local Plan 2017.

30 **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 London Borough of Camden Local Plan 2017.

31 **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 London Borough of Camden Local Plan 2017.

32 **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 London Borough of Camden Local Plan 2017.

33 **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 London Borough of Camden Local Plan 2017.

34 **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.

35 **Pedestrian, Cycling and Environmental 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.

36 **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.

37 **Accessible car parking

On or prior to Implementation, confirmation that the necessary measures for the provision of the accessible parking 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 accessible parking is provided in accordance with policy T2 of the Camden Local Plan 2017.

38 **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.

39 **Sustainability and Energy

Prior to commencement of above ground works (excluding demolition), 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 sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors 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 80.6% CO2 reductions beyond Part L 2013 (using SAP 10 factors); minimum 36.5% Be Lean stage reduction through building efficiency using SAP 2012 factors); minimum 69.4% 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 London Borough of Camden Local Plan 2017.

40 **Energy Monitoring

In order to demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan, the legal Owner shall at all times and all in all respects comply with the energy monitoring requirements set out in points a, b and c below. In the case of non-compliance the legal Owner shall upon written notice from the Local Planning Authority immediately take all steps reasonably required to remedy non-compliance.

a. Within four weeks of planning permission being issued by the Local Planning Authority, the Owner is required to submit to the GLA accurate and verified estimates of the 'be seen' energy performance indicators, as outlined in Chapter 3 'Planning stage' of the GLA 'Be seen' energy monitoring guidance document, for the consented development. This should be submitted to the GLA's monitoring portal in accordance with the 'Be seen' energy monitoring guidance.

b. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new legal owner, if applicable), the legal Owner is required to provide updated accurate and verified estimates of the 'be seen' energy performance indicators for each reportable unit of the development, as per the methodology outlined in Chapter 4 'As-built stage' of the GLA 'Be seen' energy monitoring guidance. All data and supporting evidence should be uploaded to the GLA's monitoring portal. The owner should also confirm that

suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document.

c. Upon completion of the first year of occupation following the end of the defects liability period (DLP) and for the following four years, the legal Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each reportable unit of the development as per the methodology outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document. All data and supporting evidence should be uploaded to the GLA's monitoring portal. This condition will be satisfied after the legal Owner has reported on all relevant indicators included in Chapter 5 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document for at least five years.

Reason: In order to ensure that actual operational energy performance is minimised and demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan 2021.

41 **Employment and training opportunities

Prior to commencement of the development hereby approved, including the extraction or foundations but excluding demolition and other enabling works 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 2 construction industry apprenticeships to Camden residents using a range of options tailored to the build requirements 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

The placements would be delivered throughout the course of the development.

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.

42 **Public Open Space contribution

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

Reason: To ensure that public open space is provided in accordance with policy A2 of the Camden Local Plan 2017.

43 **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.

44 **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.

28. INFORMATIVES

1	Conditions marked with ** The matters covered by conditions marked with an ** are matters which would usually be incorporated into a Section 106 Agreement. On Council
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	<p>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>
	<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>
	<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:</p>

	<p>(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 exemptions or transitional arrangements summarised below are considered to apply.</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>Biodiversity Net Gain (BNG) Informative (3/3): + Irreplaceable habitat: If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about</p>

	<p>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 arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>
	<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>
	<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</p>

	<p>agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
	<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

2025/5601/P

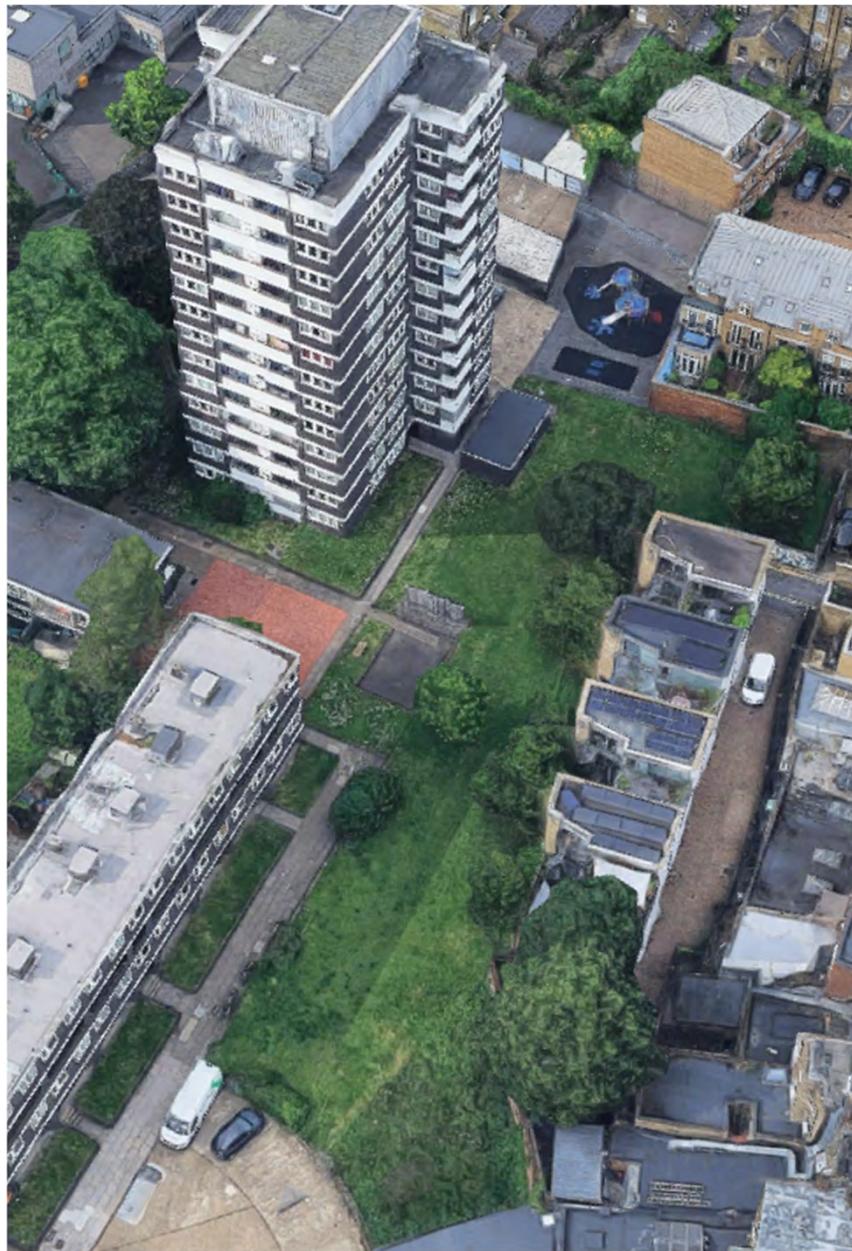
Land at Raglan Street Estate
Raglan Street
London
NW5 3BX

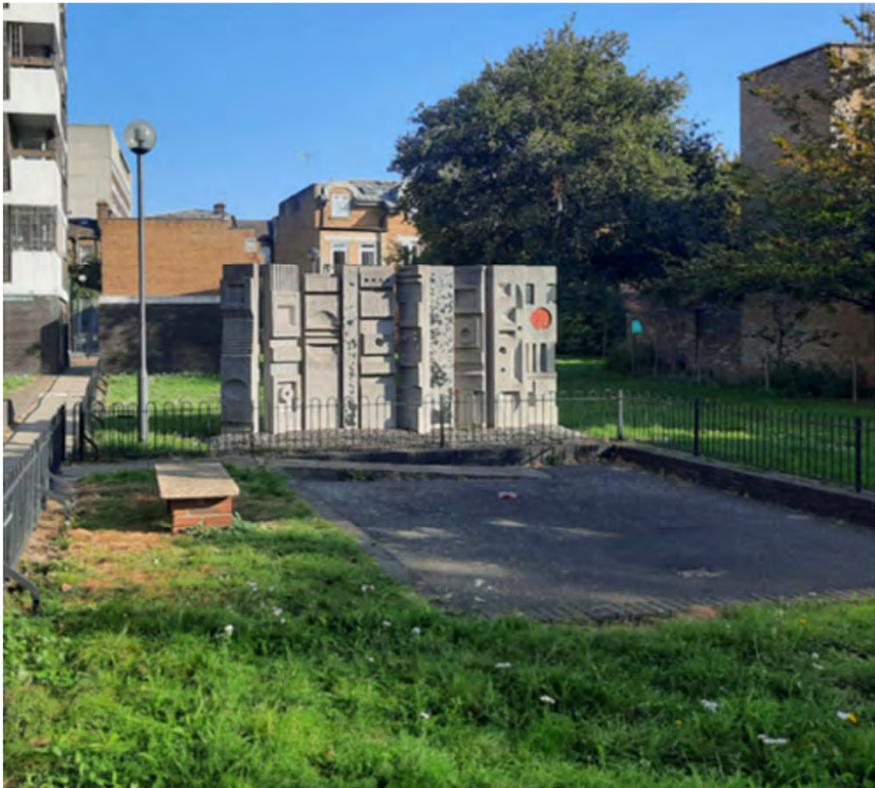


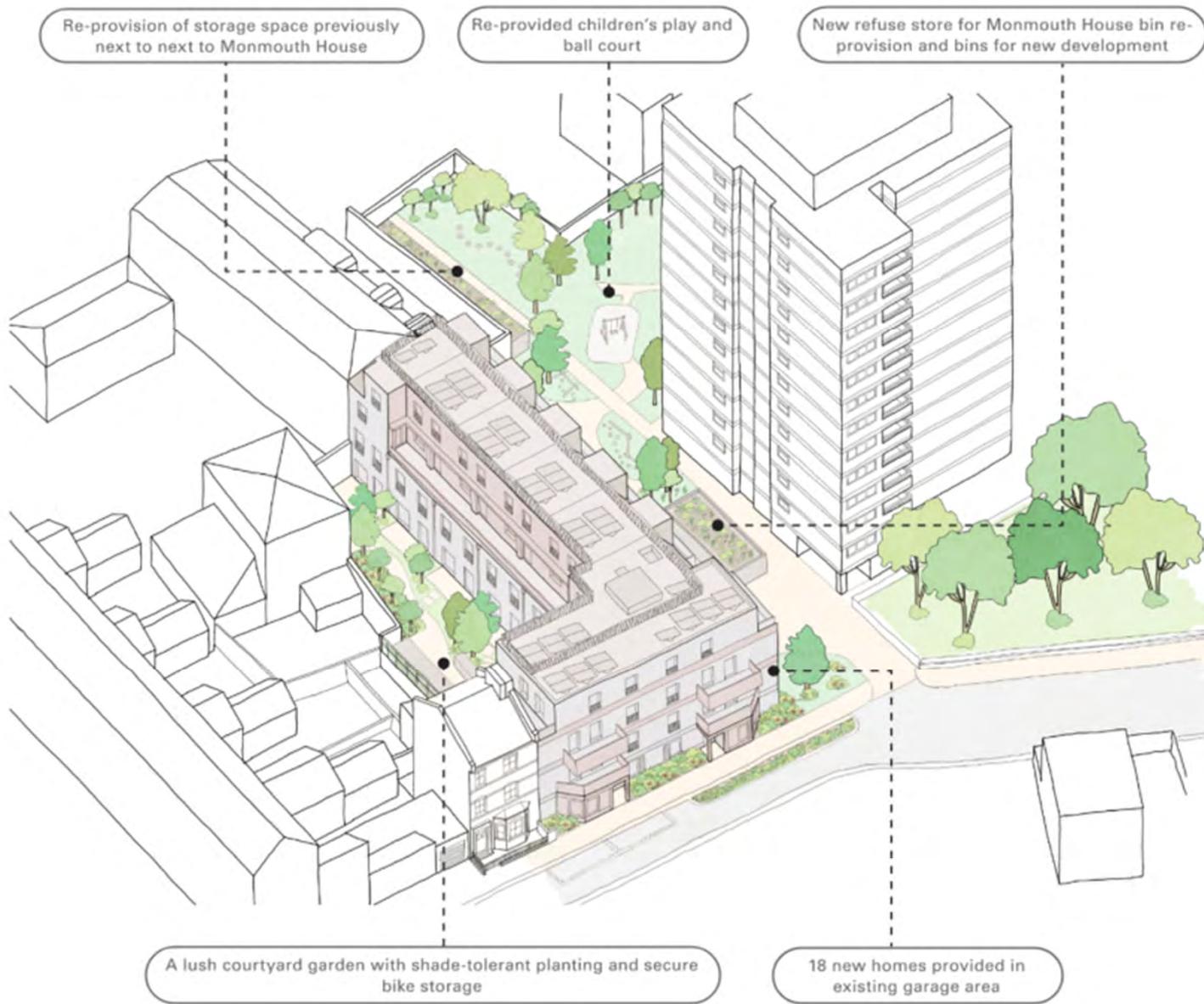


















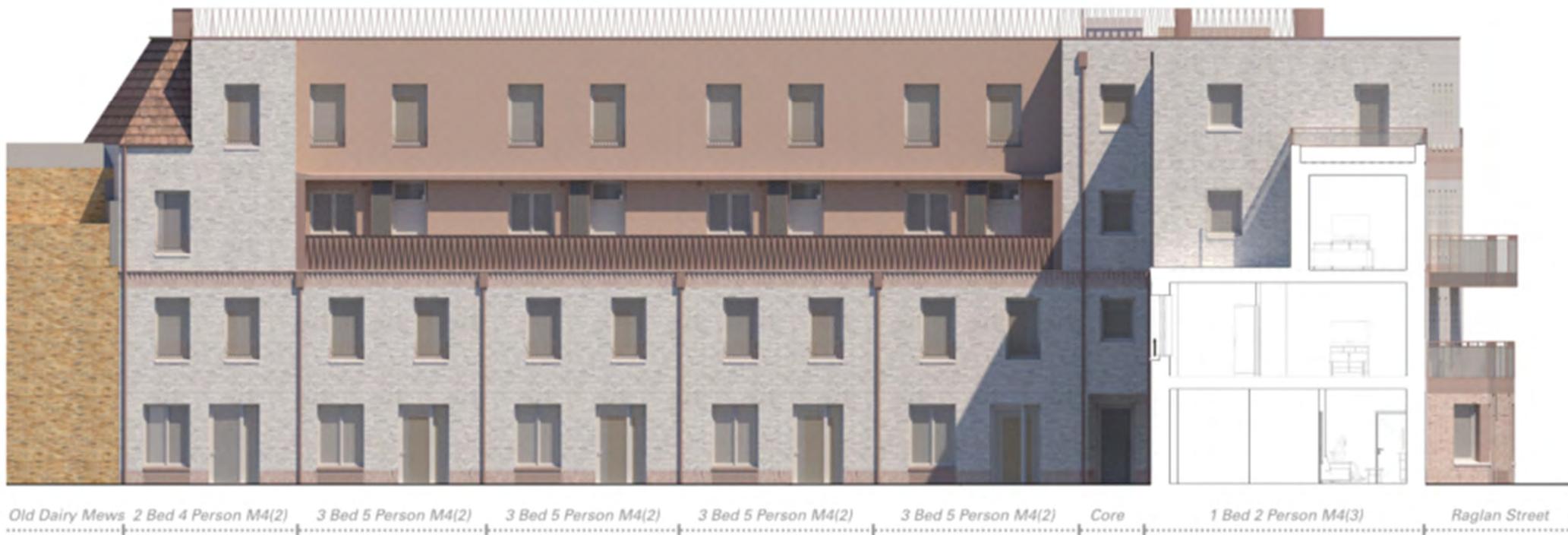


1 Bed 2 Person M4(3)

Main Entrance

3 Bed 5 Person M4(2)

Old Dairy
Mews











Seamless pathway/
access between main
entrance and bike
sheds

Integrated Healthy
Streets Scheme
(SuDS)

Proposed refuse store

Bollards

Double yellow lines

2nr DDA parking bays

Secure line with
pedestrian gate

Reprovided cycle
stands

Gravel strip for
service access

Green amenity with
buffer planting and
ecology objects

Potential biodiversity
enhancement

Secure line with 2nr gates
not part of this planning
application. To be progressed
separately outside of this
planning application.

Key

--- Site Development Boundary

--- Wider Estate Improvements Boundary



Bike sheds

Low fence and gate

Shrub buffer/higher
vegetation

Shade-tolerant garden with
buffered amenity

Buffer planting

Informal play features along
the public realm

Secure line with 2nr
pedestrian gates

Re-provided Monmouth
House Storage

Play area primarily for 0-5
years old incl. slide and
climbing frame re-provision

Swing re-provision

Existing structure retained/
integrated into the flexible
area

Flexible activity space (ball
court re-provision)

Shrub buffer/higher
vegetation

Play area primarily for 5-11
years old incl. climbing
frame and slide

Green threshold with
colourful planting

Retained fence

Enhanced planters

Secure line with pedestrian
gate and vehicular gate to
access car park