

156 West End Lane, London, NW6 1SD**in the London Borough of Camden****planning application no. 2015/6455/P****Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Comprehensive redevelopment following demolition of all existing buildings to provide 164 self-contained residential dwellings (Class C3), 891 sq.m. of flexible non-residential use (Class A-A3, D1, D2), 889 sq.m. of employment floorspace (Class B1) and 63 sq.m. of community meeting space (Class D1) in buildings ranging from 3 to 7 storeys. New vehicular access from West End Lane and provision of 16 accessible car parking spaces. Provision of new public open space and enhancement of Potteries Path. Associated cycle parking and landscaping.

The applicant

The applicant is **A2Dominion Developments Limited**, the agent is **John Rowan and Partners** and the architect is **Child Graddon Lewis**.

Strategic issues

The principle of **residential led mixed use redevelopment** is acceptable in land use terms, however the loss of employment uses should be addressed and where appropriate, satisfactory building relocation measures provided. The **height and appearance** is considered generally in accordance with the London Plan.

Affordable housing and shared ownership proposed on site meets London Plan requirements however a viability appraisal subject to independent assessment is still required in order to confirm that it is the maximum reasonable amount. The overall **design, residential quality and access** arrangements are generally in accordance with the Mayor's standards; however some further information and consideration is still required regarding child play space, active frontages, connectivity, size and layouts of units and balconies, access to daylight and sunlight, ventilation, and townscape and visual impacts. The **density** of the scheme is acceptable in principle, subject to further information. The scheme proposes a mix of unit sizes, but it still needs to be demonstrated that the Council's local housing needs are met.

Further discussion regarding **design, energy, parking and transport** impact, is required to ensure that the scheme fully accords with London Plan policies.

Recommendation

That Camden Council be advised that while the application is generally acceptable in strategic planning terms, on balance, the application does not comply with the London Plan, with the reasons and remedies set out in paragraph 78 of this report.

Context

1 On 3 December 2015 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 21 January 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A of the Schedule to the Order 2008:

"1. Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site has an area of 0.64 ha and currently comprises a five-storey building, arranged as office at upper floor levels and a retail showroom and builders merchant, Travis Perkins at ground floor fronting West End Lane, with an open builders yard/storage area to the rear. The office space is vacant and has been vacant for four years. The office floorspace at upper floor levels extends to approximately 2,401 sq.m. gross internal area (GIA), with the retail showroom/builders merchant at ground floor extending to approximately 1,618 sq.m. (GIA).

6 The applicant argues the site is an underutilised brownfield site in a highly accessible location. The site is located within an Area of Intensification as identified in the London Plan and a Growth Area (i.e. the West Hampstead Interchange Growth Area) as identified in the Council's adopted Core Strategy.

7 The site is not located within a conservation area, and there are no designated buildings or structures within it and the architectural quality of the site is considered neutral. The West End Green Conservation Area is located directly to the north of the site. Within this conservation area is the Canterbury Mansions building adjoining the site to the north. The existing office building on the subject site rises approximately two storeys above Canterbury Mansions at the point the two buildings meet.

8 In terms of transport, access to the site is from its West End Lane frontage adjacent to the railways line/bridge. West End Lane, which is a local road, managed by the Council, forms the western boundary for the site, with the Thameslink railway line to the south, the rear gardens of Lymington Road residential properties to the north and Multi-Use Games Area to the east. The short access road and surface car parking area adjacent to West End Lane is located in front of, and substantially obscures, a public right of way – Potteries Path – which runs parallel to the railway line. Potteries Path, as existing, is approximately 3m wide and is bounded by 2.5m high plain brick walls to both the existing builders merchant yard and railway line.

9 The Transport for London Road Network (TLRN) and Strategic Road Network are both approximately 0.5km from the site.

10 The site is well served by buses with five services stopping nearby. Local rail stations within walking distance to the site include West Hampstead Thameslink Rail Station and West Hampstead Rail station (London Overground). Measured on a scale of 1a – 6b where 6b is the highest, the site has a PTAL of 6a, which is considered excellent.

Details of the proposal

11 The proposal comprises the following:

- Comprehensive redevelopment following demolition of all existing buildings to provide 164 self-contained residential dwellings (Class C3), 891sq.m. of flexible non-residential use (Class A-A3, D1, D2), 889 sq.m. of employment floorspace (Class B1) and 63 sq.m. of community meeting space (Class D1) in buildings ranging from 3 to 7 storeys. New vehicular access from West End Lane and provision of 16 accessible car parking spaces. Provision of new public open space and enhancement of Potteries Path. Associated cycle parking and landscaping.

Case history

12 There has been no GLA pre-planning application meeting held for this particular scheme.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

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|---------------------------|--|
| • Land use principles | <i>London Plan</i> |
| • Housing | <i>London Plan; Draft Interim Housing Supplementary Planning Guidance (SPG); Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Mix of uses | <i>London Plan</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy</i> |
| • Parking | <i>London Plan; the Mayor's Transport Strategy</i> |
| • Employment | <i>London Plan</i> |
| • Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i> |
| • Air quality | <i>London Plan; the Mayor's Air Quality Strategy; Control of dust and emissions during construction and demolition SPG</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Camden Core Strategy, 2010 Camden Development Management Policies DPD, the Camden Site Allocations: Local Development Document (2013), West Hampstead: Shaping the Future – A plan for the wider West Hampstead Area (2012) and the 2015 London Plan (Consolidated with Alterations since 2011). The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework, the Further Alterations to the London Plan (2015) and Draft Interim Housing SPG (2015) are also relevant material considerations.

Principle of development

15 The site falls in an area known as West Hampstead Interchange. Annex 1 of the London Plan identifies West Hampstead Interchange as an Intensification Area. The Plan identifies a minimum of 100 new jobs and 800 new homes noting the interchange as “A significant inner London transport interchange with potential to improve connections between rail, underground and bus and to secure an uplift in development capacity through intensification.”

16 London Plan Policy 2.13 ‘Opportunity Areas and Intensification Areas’, further underpins the need to promote the policy direction set out in Annex 1 and that development proposals in such areas should optimise residential and non-residential output and densities, and provide necessary social and other infrastructure to sustain growth and where appropriate contain a mix of uses.

17 At a local level the area the site is siting within is the West Hampstead Town Centre and West Hampstead Growth Area and is identified in the Camden Site Allocations: Local Development Document. In short, this document, and the similarly the Camden Core Strategy state that “The site is considered to be appropriate for a residential led scheme, but also including other appropriate town centre, employment and community uses”. The Camden Site Allocations: Local Development Document More also categorizes the site as ‘Site 28: 156 West End Lane’ and highlights the following site allocation guidance and preferred approach:

“A mixed use development to include residential alongside retail and employment uses. Other appropriate town centre uses could include community and cultural uses (including education).

Development will be expected to:

- Provide appropriate town centre uses along the frontage with residential including affordable housing above and to the rear of site
- Provide flexible employment floorspace (subject to relevant criteria)
- Maintain or enhance the existing building line to retain adequate pavement widths to assist pedestrian movement and interchange between stations
- Provide an improved design relationship to adjoining Canterbury Mansions and West End Green Conservation Area to protect and enhance the character and appearance of this area
- Provide a legible and improved pedestrian / cycle link from West End Lane towards Crown Close through new landscaping and good design
- Incorporate new publicly accessible open space (potentially suitable for temporary market use) and enhance the function of the adjacent open space
- Ensure an acceptable relationship to the adjacent residential properties on Lymington Road

- Incorporate public realm improvements that positively contribute to and integrate with streetscape and interchange improvements along West End Lane
- Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible”.

18 West Hampstead: Shaping the Future – A plan for the wider West Hampstead Area likewise states the site “could accommodate a new mixed-use development” offering “a significant opportunity for the provision of new retail and business space and both affordable and private homes”.

19 London Plan Policy 3.3 ‘Increasing Housing Supply’ also recognises the pressing need for new homes in London and Table 3.1 ‘Annual average housing supply monitoring targets 2015 – 2025’ gives an annual monitoring target of 8,892 new homes per year in Camden between 2015 and 2025. The provision of residential use on the site is therefore supported.

20 The overarching policy direction suggests that the site is appropriate for residential led redevelopment (Class C3) including a mix of uses comprising flexible non-residential (Class A-A3, D1, D2), employment (Class B1) and community uses (Class D1) as is proposed in this scheme. However, there is a loss of some Class B1 office space and builder merchants retail showroom, trade counter, warehouse and open store at ground floor with rear open space area for parking/storage occupied by Travis Perkins. The site is not within a strategic industrial location, as set out in the London Plan, and is not specifically protected for industrial uses; however it is acknowledged that builder merchants provide a valuable local service and employment. It is also recognised that the Council policies seek to protect employment land. As such, the Council should confirm the proposed mix of uses reflects its own requirements and its understanding of local demand, and consider whether any loss of existing uses can be re-provided elsewhere in the Borough. The applicant is also asked to provide a viability report confirming the maximum reasonable amount of replacement employment space has been included in the scheme, which is to be submitted to the GLA prior to Stage II.

Housing

21 This scheme is proposing the following housing mix:

Tenure	No. of units	% of scheme
Affordable rent	38	23
Shared ownership	40	24
Private sale	86	53
Total	164	100

Unit size	No. of units	% of scheme
One bed	58	35
Two bed	86	52
Three bed	16	10
Four bed	4	3
Total	164	100

22 The provision of 164 units would make a contribution towards Camden Council's housing targets as set out in the London Plan, and is welcomed in principle.

Affordable housing

23 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income and Policy 3.12 'Negotiating Affordable Housing' seeks the maximum reasonable amount of affordable housing. London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale, with priority given to affordable family housing. The scheme provides 47% affordable housing as defined in London Plan Policy 3.10 'Definition of Affordable Housing', with 23% of the scheme being affordable rent and another 24% being shared ownership units. The provision of 47% affordable housing is welcomed and is good when compared to other strategic schemes. However, it falls marginally short of the Council's 50% strategic targets. Therefore, in accordance with Policy 3.9, the applicant should provide a viability report on how the affordable housing offer has been calculated, and this is to be independently assessed on behalf of the Council. The results of the viability review, independent assessment and any Section 106 (s106) agreement regarding affordable housing should be shared in full with GLA officers prior to Stage II.

Housing choice

24 London Plan Policy 3.8 'Housing Choice' requires different sizes and types of dwellings to meet different needs. London Plan Policy 3.11 sets out that priority should be given to family affordable accommodation. The scheme is made of a range of unit sizes, from one bed through to four bed flats. The overall provision of family units (of three or more bedrooms, as defined in the London Plan), is 13%, with these being affordable rented housing. The Council should confirm that the proposed mix reflects its own housing requirements and its understanding of local demand.

Density

25 The site has a PTAL of 6a and is in an urban setting. In accordance with Table 3.2 'Sustainable residential quality (SRQ) density matrix in the London Plan', a density of 200-700 habitable rooms per hectare (hr/ha) is recommended for sites with a PTAL of 6a within an urban setting. Based on an approximate site area of 0.64 ha, the density of the development would be slightly over the London Plan density matrix guidelines at approximately 714 habitable rooms per hectare and 256 dwellings per hectare. The applicant is asked to provide a density calculation by habitable rooms using a net residential density (that discounts the commercial uses) as set out in the Draft Interim Housing SPG, in order to usefully compare the density of the scheme with surrounding developments. This should be provided to the GLA prior to Stage II.

26 The density may be acceptable, subject to satisfying other policy requirements such as residential quality, amenity, and place making, for instance. The residential quality of the proposal would need to be exemplary in all regards to justify a higher density proposal. However, as set out below, GLA officers have concerns over the residential quality, as well as public realm and play space provision within this scheme. These concerns must be addressed in order to justify the density of the proposal.

Children's play space

27 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals provide access to inclusive, accessible and

safe spaces, offering high-quality play and informal recreation opportunities. Further detail is provided in the Mayor's SPG 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-five child play space provided on-site as a minimum.

28 Further information is required on children's play space proposed as part of the development. The applicant should meet the minimum requirements of the play space SPG, based on the child yield. GLA officers require this information prior to Stage II. To rely on existing provision, the applicant will need to set out details of distance, access and quality. The applicant should discuss and agree on the proposed approach to open space and play space with the Council, the details of which should be provided to the GLA prior to Stage II. Furthermore, depending on the outcomes of these discussions, the Council will need to confirm any contributions that the scheme will need to make towards these spaces, if necessary.

Design

29 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter 7, which address both general design principles and specific design issues. London Plan Policy 7.1 'Lifetime Neighbourhoods' sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings and the public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

Layout

30 The inclusion of start-up units, community meeting room and lower-ground and ground floor duplexes, each with front doors onto courtyards, and streets and paths to the north, east and south of the site is welcomed and will encourage street-based activity through passive surveillance whilst also providing residents with a sense of ownership. Any fencing and hedges around the ground floor private open spaces should remain transparent to further encourage visual connectivity with the street and passive surveillance. The frontage of the flexible non-residential space along West End Lane and the northern edge of the site should be further activated too, such as through the inclusion of entries to the space from West End Lane and windows along the northern frontage, which is currently shown as a predominately blank and inactive wall. Plans showing further activated frontages for the flexible non-residential space should be provided to the GLA prior to Stage II.

Open space

31 The landscaped courtyard and green roofs on the upper floors of the scheme are a welcomed addition to the scheme. Consideration should be given to whether the green roofs can be made accessible open spaces for residents and evidence of this should be provided to the GLA prior to Stage II. The incorporation of a vehicle access laneway along the northern boundary, enhancement of Potteries Path along the southern boundary of the site, and paths and courtyards with landscaping throughout the site at ground level improve the amenity across the site and have the potential to allow for movement throughout and across the site. However, the proposed gates between the open spaces as currently proposed will restrict movement, and plans should be amended and resubmitted to the GLA prior to Stage II, showing these gates removed to allow for permeability throughout the site. As mentioned above under 'Child play space' further consideration of provision of child play space in the open spaces should be made as part of this

scheme prior to Stage II. Additionally, further information on the impact of the development on access to daylight and sunlight in the open spaces should be provided to the GLA prior to Stage II.

Residential Quality

32 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, with further guidance provided by the Mayor's Draft Interim Housing SPG. Any planning submission for schemes should demonstrate they have been designed to positively respond to the requirements within the Mayor's Draft Interim Housing SPG, with particular reference to the 'baseline' and 'good practice' standards contained there-in.

33 All of the proposed units meet the minimum space requirements set out the Draft Interim Housing SPG and Table 3.3 'Minimum space standards for new development' of the London Plan. However, further information should be provided on the size of the balconies of the units in the scheme, showing that these meet the minimum private open space requirements set out the Draft Interim Housing SPG. This information should be provided to the GLA prior to Stage II.

34 The orientation of the two blocks results in a number of single aspect facing units. Some of the units face onto the open space, which will provide a good quality of outlook. However, single aspect dwellings should be avoided as are more difficult to ventilate naturally and more likely to overheat. Whilst the daylight and sunlight study for the scheme suggests a high level of compliance with guidelines, the single-aspect nature and depth of many of the proposed units, raises concern regarding adequate access to daylight and sunlight. The design of single aspect flats will also need to demonstrate that all habitable rooms and the kitchen are provided with adequate ventilation, privacy and that the orientation enhances amenity, including views, in accordance with Paragraph 2.3.43 of the Draft Interim Housing SPG. These details should be submitted to the GLA prior to Stage II.

35 Notwithstanding this, it is noted that the units in question have been designed to include full floor to ceiling glazing, which is welcomed; however floor to ceiling heights should be a minimum of 2.6 metres to ensure that all units receive acceptable levels of daylight/sunlight penetration, in line with ADF guidelines. Confirmation of floor to ceiling heights in line with these guidelines should be provided to the GLA prior to Stage II.

36 Notwithstanding the above, residential quality across other areas of the scheme appears high, with less than eight units per core.

Height and massing

37 The height of the building is considered appropriate for the site, given the surrounding context. The building rises from its lowest point along the boundary with the row of dwellings in West End Green Conservation Area to the frontage with West End Lane and the railway. The current massing proposal however is heavy and bulky. Inclusion of more architectural detail and interest through the facade and setting back of the upper storeys may aid in addressing this issue.

Materials

38 The applicant notes that the proposed elevations reflect the Canterbury Mansions in relation to the materials, overall roofline, rhythm of vertical bays, window opening sizes and proportions, base height of flexible non-residential space, dormers and textured detailing to the top band. White banding is also to be taken through visually linking both elevations when viewed from the north and south. These materials and the use of brickwork in the building, given it is the predominant material historically on site and in the surrounding area is supported.

Historic environment

39 To the south of the site is the South Hampstead Conservation Area. This is remote from the area and thus has not been examined in detail as part of the planning application for the subject site.

40 Whilst the development site has no heritage value, it adjoins the West End Green Conservation Area located to the north. There is no loss or change to the historic features within this area as part of the proposed scheme; however access to daylight and sunlight, and views out and into the conservation area will be altered. The impact on views out, is in that the profile of the new development will be visible in the distance and above existing dwellings. However, many of these views are currently not without other buildings outside the conservation area impacting upon them. The view of the rear of the 19th century Lymington Road houses from the railway bridge to the west would be altered as part of the proposed development. The roofscape and rear of these buildings within the conservation area have been somewhat altered from their original form. Furthermore, this view across the southern part of the conservation area does not define the character or appearance of the conservation area and includes only a small part of the conservation area in the view.

41 Though a Townscape and Visual Impact Assessment has been submitted, some of the views show only the outline of the proposed buildings. Further views of the proposed buildings in full and particularly from the streets in the conservation area and those directly adjoining the site should be provided before the application is referred back to the Mayor at Stage II. Furthermore, a more detailed assessment of the impact on access to daylight and sunlight within the West End Green Conservation Area and surrounding area as a result of the development is also required prior to Stage II. This should show the effect of the development on all windows facing the development, and public and private open space within properties adjoining the subject site.

42 The impact of the proposal on the character of the conservation area as a whole is very limited; however access to daylight and sunlight on sites within the West End Green Conservation Area should not be detrimentally affected as a result of the proposed development.

Inclusive design

43 London Plan Policy 3.8 'Housing Choice' currently requires all new housing to be built to 'Lifetime Homes' standards, and expects at least 10% of units to be wheelchair accessible or easily adaptable. However, in order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan propose to replace this with a requirement that 90% of units meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and the remaining 10% of units meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. These requirements should be secured via condition or legal agreement and the Council and the applicant should be mindful of this when drafting any related planning conditions and/or obligations.

44 The accommodation schedule notes that 10% (16) of the homes will be wheelchair adaptable. These are distributed across the buildings and are units of different sizes. However, all the wheelchair user dwellings are within the affordable and shared ownership units, with none being private sale units. In the design and access statement for the scheme it is stated that housing officers have advised the applicant that affordable wheelchair housing need is most acute, and in particular, for family housing. The Council should confirm that this proposed mix reflects its own housing requirements and its understanding of local demand or alternatively plans should be amended so that there are also private sale wheelchair user dwellings, covering all tenure types giving all people similar choice. Furthermore, plans should illustrate wheelchair circulation across the wheelchair adaptable units and this information is to be provided to the GLA prior to Stage II.

45 In terms of the external environment, London Plan Policy 7.5 'Public Realm' requires that public spaces should be secure, accessible, inclusive, connected, and easy to understand. The design of landscaping and the public realm is crucial to inclusive design. As presented, the layout of the buildings and the surrounding areas of public realm do not raise any inclusive design concerns. Entrances, circulation routes and other common areas are designed to be fully accessible and there appears to be step free access afforded across the application site.

46 Points regarding wheelchair accessible parking bays are made in the transport section of the report below.

Sustainability

Energy efficiency

47 In relation to energy efficiency measures, a range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery, low energy lighting and variable speed drives. The applicant is targeting high performance with regards to thermal bridging. It is recommended that modelling is carried out early on in the design process to confirm that such high targets are achievable in practice.

48 The applicant has stated that private dwellings and non-domestic building uses will be provided with active cooling. This is not acceptable unless it is clearly demonstrated that, in line with London Plan Policy 5.9 'Overheating and cooling', all passive measures have been considered first, in order to minimise cooling demands. The applicant should also provide evidence to demonstrate that the affordable dwellings (which do not have active cooling) are not at risk of overheating. Dynamic thermal modelling in line with CIBSE guides TM52 and TM49 is recommended to assess and address overheating risk.

49 The development is estimated to achieve a reduction of 8 tonnes per annum (4%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. The carbon emissions should be revised assuming a more realistic boiler efficiency of 89.5% for residential and 91% for non-residential as explained in the GLA Guidance on preparing energy assessments (found here: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>). If this change shows that the development does not meet Part L 2013 by efficiency measures alone, additional fabric or services improvements should be included.

50 Sample DER and TER sheets, and BRUKL sheets including efficiency measures alone (i.e. excluding CHP and PV) should be provided to support the savings claimed.

51 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

52 The applicant is proposing to install a site heat network and has confirmed that all apartments and non-domestic building uses will be connected to the site heat network.

53 The site heat network will be supplied from a single energy centre. This will be 225 sq.m. in size and located in the basement.

54 The applicant is proposing to install a 40 kW_e gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO₂ emissions of 58 tonnes per annum (27%) is claimed through this second part of the energy hierarchy.

55 The applicant states that the system will be designed to run for more than 5000 hours a year however no information is provided to demonstrate how this will be achieved. Further information should be provided, including monthly load profiles and proportion to be met by the CHP, to demonstrate that CHP is a feasible solution for this relatively small development (see GLA Guidance on preparing energy assessments for details on information requirements).

56 The applicant has stated that the electricity generated will be used on site for landlord supply uses as far as possible, with any excess exported to the grid. Management arrangements are not in place yet. It is recommended that discussions with possible operators of the system start as soon as possible as the onerous management and billing arrangements could make CHP at this scale financially unviable in the long term, meaning that an alternative approach may be preferable to demonstrate compliance with the 35% carbon reduction target.

57 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 29kWp of solar PV to serve the non-domestic elements of the development. A roof plan showing the proposed installation should be provided.

58 A reduction in regulated CO₂ emissions of 12 tonnes per annum (6%) will be achieved through this third element of the energy hierarchy.

59 In summary, a reduction of 78 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%.

60 The carbon dioxide savings exceed the target set within Policy 5.2 'Mitigating carbon dioxide emissions' of the London Plan however the comments above should be addressed before the carbon savings can be verified.

Flood risk and sustainable drainage

61 The Flood Risk Assessment prepared by iesis Special Structures confirms that the <1ha site is located in Flood Zone 1 and is at low risk of significant surface water flooding. However, the railway adjacent to the southern boundary of the site (6m lower in elevation than the site) is at risk of significant surface water flooding.

62 The development is acceptable in terms of London Plan policy 5:12 'Flood risk management'.

63 Given the potential for the site's surface water to contribute to surface water flooding of the railway, the application of London Plan Policy 5.13 'Sustainable drainage' will be important.

64 The planning statement suggests that green roofs will be included as part of the development.

65 The FRA does not provide a drainage strategy, but suggests that a 50% reduction in flows could be achieved through cellular storage within the landscaped areas.

66 In principle a 50% reduction in surface water discharge would be the minimum reduction necessary for the proposals to meet London Plan Policy 5.13. Prior to any Stage II referral the applicant should provide a strategy/statement as to how this will be achieved.

Transport for London's comments

Network impact

67 While TfL is satisfied that the development proposals are unlikely to have a negative impact on the capacity of either public transport, the SRN/TLRN, there are however, a few issues which need to be addressed, as further detailed below.

Road network

68 TfL would expect a Delivery and Service Plan and a Construction Logistics Plan to be secured by condition to appropriately manage any potential adverse effects on the local road network.

Walking and cycling

69 The level of cycle parking proposed complies with London Plan (2015) standards. Cyclist facilities (showers, lockers and changing areas) should be provided for staff of the non-residential uses.

70 Due to the high pedestrian footfall in the area generally, it is noted that the existing footway fronting the site on West End Lane will be widened which is supported TfL. There is also a proposal to enhance Potteries Path (an existing pedestrian connection) which connects West End Lane to Lymington Road. TfL is supportive of this connection provided it safely facilitates cyclists and pedestrians. The connection should be compliant with the London Cycle Design Guidance (2015) and TfL's preference is that it is open for use 24/7 secured via the s106 agreement.

Public Transport

71 To better accommodate passengers generated by the development TfL requests that £15,000 is secured for the installation of a bus shelter at Bus Stop N, which is located directly opposite the site (bay London Landmark model). The funds should be secured as part of a s106 agreement and should be payable to the Council.

Car parking

72 The proposed development is car free (except for 16 disabled car parks) which is supported by TfL. Provision for electric vehicle charging points must be in accordance with London Plan standards. To accompany the car free scheme residents should be exempt from applying for parking permits (except for blue badge holders). In addition, the applicant and the Council should consider how drop off/pick up by taxi, private hire vehicle and private car can be accommodated.

Travel planning

73 The travel plan should be secured through the s106 agreement. It should contain ambitious targets particularly relating to the uptake of cycling and should be secured, enforced, monitored and reviewed as part of the s106 agreement.

Community Infrastructure Levy (CIL)

74 In accordance with London Plan Policy 8.3 'Community infrastructure levy' the Mayor commenced CIL charging for developments on 1st April 2012. Within the London Borough of Camden the charge is £50 per square metre. Trip generation analysis has been provided on request, which is satisfactory. TfL accepts that the local highway and public transport networks could accommodate the proposed development.

Local planning authority's position

75 Camden Council's position regarding this scheme aligns to that of the GLA at this stage.

Legal considerations

76 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

77 There are no financial considerations at this stage.

Conclusion

78 London Plan policies on land use, housing, design, heritage, access, climate change and transport are relevant to this application. The application broadly complies with the London Plan however further information and/or confirmation, as detailed below is required to comply fully:

- **Land use principles:** The principle of a residential led redevelopment with a mix of other uses including flexible non-residential, employment and community uses is acceptable in strategic planning terms, however the loss of employment uses in particular the builders merchants which provides an important local service, should be addressed and where appropriate satisfactory business relocation measures provided.
- **Housing:** The provision of affordable and shared ownership housing is acceptable, though a viability assessment together with a copy of the Council's independent report to demonstrate that the maximum amount of affordable housing has been achieved are still required. The Council should also confirm that the proposed scheme is appropriate for the local needs of the Borough. In regard to density, the applicant is asked to provide a density calculation by habitable rooms using a net residential density (that discounts the commercial uses) as set out in the Draft Interim Housing SPG, in order to usefully compare the density of the scheme with surrounding developments. Information is required on proposed child play space which should be designed to positively to respond to and meet the minimum requirements of the child play space SPG, based on the child yield.
- **Design:** The design of the scheme has appropriate heights and materials. In regard to residential quality further consideration and information is required regarding massing, balcony size, access to daylight and sunlight, and ventilation prior to Stage II. In regard to

the public realm further consideration should be given to active frontages along the flexible non-residential space and permeability throughout the site. Further information regarding the townscape and visual impact of the development is required too.

- **Inclusive design:** The inclusive design provisions are welcomed. 90% of units should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and the remaining 10% of units meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. These requirements should be secured via condition or legal agreement and the Council and the applicant should be mindful of this when drafting any related planning conditions and/or obligations. The Council should confirm that the proposed mix of wheelchair tenures reflects its own housing requirements and its understanding of local demand. Further plans showing wheelchair circulation across the wheelchair adaptable units are required by the applicant prior to Stage II.
- **Climate change:** Further information is required concerning the energy strategy for the site, and energy saving measures should be secured by way of condition. The carbon dioxide savings (36%) meet Policy 5.2 of the London Plan, however further information and issues are to be addressed before the carbon savings can be verified. The approach to flooding surface water drainage is generally acceptable, and appropriate sustainability measures should be secured by way of condition.
- **Transport:** The application is generally acceptable in principle and in accordance with the transport policies of the London Plan subject to appropriate conditions and s106 obligations which should be secured in relation to cycle parking and facilities, parking permits, deliveries and servicing, car park management, construction logistics, public transport and a travel plan. Mayoral and local CIL payments will also need to be secured.

79 On balance, the application does not yet comply with the London Plan, for the reasons set out above; however the possible remedies set out above could address these deficiencies.

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