Land at Abbey Road and Belsize Road known as Abbey Road car park, Emminster and Hinstock, Snowman House and Casterbridge, St John’s Wood in the London Borough of Camden

planning application no. 2012/0096/P

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral (new powers)</th>
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<tr>
<th>The proposal</th>
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<tbody>
<tr>
<td>Outline application for phased redevelopment of site to provide up to 299 residential (Class C3) units (including up to 133 affordable units), up to 1,300 sq.m. of commercial floor space (Class A1-A5), up to 1,000 sq.m. of business floorspace (Class B1), up to 2,250 sq.m. community and health floorspace (Class D1) and associated space for parking, plant, servicing, ancillary storage and energy centre, all in five buildings as follows: Block C (up to 2 and 3 storeys of community and health uses), Blocks A, B, D and E (predominantly up to 6 and 7 storeys of residential and commercial uses) and Block A (up to 6 to 12 storeys of residential and commercial uses); provision of open space and landscaping; alterations to existing highway layout and creation of new vehicular and pedestrian access routes; all following demolition of Belsize car park building, Abbey Coop Community Centre and Hinstock and Emminster blocks (including Belsize Priory Health centre, residential and commercial units), site-wide walkways and pedestrian railway bridge. Application provides detail for approval of layout and access only and not scale, appearance or landscaping.</td>
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<table>
<thead>
<tr>
<th>The applicant</th>
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<tr>
<td>The applicant is London Borough of Camden- Estate and Regeneration and the architect is Levitt Bernstein.</td>
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<table>
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<tr>
<th>Strategic issues</th>
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<tr>
<td>The principle of this residential led mixed use estate renewal scheme is supported. Further discussions are needed around tenure mix, unit size and viability. Further information and commitments are needed in relation to appearance and design quality. Further information is needed on climate change, transport and noise.</td>
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<tr>
<th>Recommendation</th>
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<tr>
<td>That Camden Council be advised that while the application is generally acceptable in strategic planning terms application does not comply with the London Plan, for the reasons set out in paragraph 92 of this report; but that the possible remedies set out in paragraph 94 of this report</td>
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</table>
could address these deficiencies.

Context

1 On 12 January 2012 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 22 February 2012 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 and 1C of the Schedule to the Order 2008:

   Category 1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats;

   Category 1C: Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.

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 development site is located at the junction of the B507 Abbey Road and the B509 Belsize Road, which are both borough highways. The site is bounded to the north, east and west by residential houses and to the south by mainline and suburban train lines in a cutting. South of Belsize Road is the multi-story car park building. Whilst this is no longer used as a car park a range of car-related and other businesses are accommodated within it. North of Belsize Road, the site is currently occupied by two housing blocks, consisting of 74 flats. Small retail units are available on the ground floor of these housing blocks, in addition to an existing local Health Centre and Community Centre. To the north-east of the Abbey Road/Belsize Road junction, the site contains two residential towers, containing 204 residential units. These elements are currently part of the Abbey Co-op estate. The site is part of a wider area comprising the Abbey Estate, Alexandra and Ainsworth Estates, Langtry Walk and Alexandra Place for which the preparation of a separate masterplan is underway.

6 The nearest section of the Transport for London Road Network (TLRN) is the A41 Finchley Road, 500m to the east. The nearest section of the Strategic Road Network (SRN) is the A5 Kilburn High Road, 300m to the west.

7 The site records an excellent PTAL level of 6a (where 1 is very low and 6b is the highest, most accessible). The site is within reasonable walking distance of Kilburn High Road and South Hampstead Overground stations (providing services on London Overground between Watford and Euston) and 500 metres from Kilburn Park London Underground station (Bakerloo Line). Bus routes 139, 189, 31 and 328 operate within a 400m walking distance of the site.
Details of the proposal

8 Redevelopment to provide a residential led mixed use scheme comprising up to 299 residential units, retail, flexible workspace and community uses along with associated landscaping and car parking. The building heights proposed are between 4 and 12 stories with heights rising towards the junction of Abbey Road and Belsize Road. A 12 story landmark building is sited on the site of the car park. New buildings are proposed around the base of the retained tower blocks to form a plinth to these blocks to help define the new public space. The proposal has been the subject of extensive public consultation.

9 The proposed phasing is not submitted as part of the planning application however it is envisaged that phase 1 would be the redevelopment of the car park building when its lease expires in 2013 with phase 2 being the development around the plinths of the tower blocks that will remain. This will allow for the redevelopment of the remaining areas of the site decanting residents into the new properties that have been built on the car park site.

Case history

10 Pre-application meetings were held with the GLA in November 2010 and May 2011.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Housing London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG, Housing Strategy; draft Revised Housing Strategy; Interim Housing SPG; draft Housing SPG
- Affordable housing London Plan; PPS3; Housing SPG, Housing Strategy; draft Revised Housing Strategy; Interim Housing SPG; draft Housing SPG; Affordable Rent draft SPG; draft Early Minor Alteration to the London Plan
- Density London Plan; PPS3; Housing SPG; Interim Housing SPG; draft Housing SPG
- Urban design London Plan; PPS1
- Mix of uses London Plan
- Transport London Plan; the Mayor’s Transport Strategy; PPG13;
- Parking London Plan; Assembly draft Early Minor Alteration to the London Plan; the Mayor’s Transport Strategy; PPG13
- Retail/town centre uses London Plan; PPG13, PPS4
- Access London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Tall buildings/views London Plan; RPG3A, Revised View Management Framework SPG; revised draft View Management Framework
- Historic Environment London Plan; draft World Heritage Sites SPG; PP55; Circular 07/09
- Ambient noise London Plan; the Mayor’s Ambient Noise Strategy; PPG24
- Sustainable development London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; Mayor’s Climate Change Mitigation Strategy; Mayor’s Climate
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 Camden Core Strategy with Development Control Policies, the saved policies of the Camden Unitary Development Plan and the 2011 London Plan.

The following are also relevant material considerations:

- The Camden Site Allocations Document which will shortly be at pre-submission stage
- The Early Minor Alteration to the London Plan

**Land use principle**

The principle of a residential led mixed use scheme in this location is supported as is the principle of the public realm improvements proposed.

The car park site is a site in the Council’s Site Allocations Document which will shortly be consulted on at pre-submission stage. The submission document which has been to the Council’s Cabinet set out the following for this site: ‘A predominantly residential development along with associated retail, community floorspace and/or employment uses. Development will be expected to:

- Make more effective use of the site to provide new housing, including affordable housing;
- Replace the existing unsightly car park structure with well designed building(s);
- Make better use of the prominent corner site and ensure that buildings engage better with adjoining streets and ensure an improved relationship with residential properties to the west on Belsize Road;
- Consider how development of the site could be integrated with wider improvements which may emerge as part of the Council’s estate regeneration programme;
- Incorporate alternative employment generating uses such as shops, workspace, and/or community uses;
- Provide new or extended open space.

The car park is no longer used as a car park but does contain some car related and other employment uses. With regard to the loss of these employment uses and the demolition of the community centre and health centre further information is needed on the relocation of these uses. With regard to the loss of employment space Camden Council should ensure that any net loss of employment space is acceptable in this area in line with its employment policies.

The retail statement submitted with the application sets out the retail to be provided will serve the local catchment area and will have a negligible impact on other local centres. This approach is supported.

The proposal is broadly in line with the site allocations document.

**Housing**
The blocks that are to be demolished as part of this application currently comprise 70 social rented flats of which 60 are 1 bed units and 10 are studios. This amounts to 5,378 sq.m. of social rented housing. The applicant has submitted the following indicative schedule with the application:

<table>
<thead>
<tr>
<th>Residential Units</th>
<th>Total Units</th>
<th>%</th>
<th>Total GEA</th>
<th>Total NIA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private Units</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 bed</td>
<td>78</td>
<td>52%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 bed</td>
<td>67</td>
<td>45%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 bed</td>
<td>4</td>
<td>3%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>149</td>
<td></td>
<td>11,855</td>
<td>9,011</td>
</tr>
<tr>
<td>Social Rent Units</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>1 bed</td>
<td>27</td>
<td>30%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 bed</td>
<td>30</td>
<td>33%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 bed</td>
<td>27</td>
<td>30%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 bed</td>
<td>7</td>
<td>8%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>91</td>
<td></td>
<td>9,013</td>
<td>6,849</td>
</tr>
<tr>
<td>Intermediate Units</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 bed</td>
<td>12</td>
<td>46%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 bed</td>
<td>10</td>
<td>38%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 bed</td>
<td>4</td>
<td>15%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>26</td>
<td></td>
<td>2,195</td>
<td>1,668</td>
</tr>
<tr>
<td>Total Units</td>
<td>266</td>
<td></td>
<td>23,063</td>
<td>17,528</td>
</tr>
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</table>

**Estate renewal**

Policy 3.14 of the London Plan resists the loss of housing, including affordable housing, unless it is replaced at existing or higher density with equivalent floorspace. Paragraph 3.82 of the London Plan gives further advice on the Mayor’s approach to estate renewal. More detailed guidance is set out in Section 20 of the Housing SPG. This clarifies that there should be no net loss of affordable housing, which can be calculated on a habitable room basis and should exclude right to buy properties. Replacement affordable housing can be of a different tenure mix where this achieves a better mix of provision.

Private housing that forms part of estate renewal schemes need not provide the normal level of additional affordable provision, where this is necessary to cross subsidise redevelopment. This would need to be justified through a financial appraisal.

In this instance there is a net gain of 21 social rented units with an overall gain of 57 affordable units when taking account of the intermediate units. Given that the units that are currently provided on site are small units the increase in floorspace of affordable provision on the site is more significant being an increase of 6,730 sq.m. GEA.

The applicant has set out that profits from this development will be used to fund Decent Homes works on other estates in Camden. In this instance the viability appraisal and supporting information sets out that Camden Council, as applicant, is accepting a lower profit than a private developer would and has not accounted for a land receipt. As such the Council is providing more than a private developer would be able to on this site in terms of affordable housing and profits that would usually go back to the developer are being recycled into the Council’s Decent Homes programme.

A financial appraisal has been provided with the application and this is currently being independently assessed by consultants appointed by the Council. The results of this are awaited. As such it is not possible to say whether the affordable housing provision has been maximised is acceptable at this stage.
25 Following receipt of the independent appraisal of the viability assessment this level should be the subject of further discussion between the Council and the GLA. A minimum level of affordable housing should be conditioned by the Council.

Tenure mix

26 London Plan Policy 3.11 sets a strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale. The Mayor has published an early minor alteration to the London Plan to address the introduction of affordable rent, with further guidance set out in a draft Affordable Rent SPG. With regard to tenure split the Mayor’s position is that both social rent and affordable rent should be included within the 60%.

27 While the Mayor has set a strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

28 The indicative mix submitted is split 78% social rented to 24% intermediate. The applicant should submit justification for this mix based on local need.

29 The indicative mix that has been submitted suggests that no affordable rent is proposed. Whilst this is appropriate for tenants that are being decanted from the current blocks further discussion is needed regarding whether any affordable rent should be included in the mix.

Housing choice

30 London Plan Policy 3.8 sets out that the provision of affordable family housing is a strategic priority. The London Housing Strategy sets out strategic housing requirements and Policy 1.1C of the Strategy includes a target for 42% of social rented homes to have three or more bedrooms. The revised London Housing Strategy, currently out for consultation, sets out that 36% of affordable rented homes allocated funding in 2011-15 will have three or more bedrooms.

31 38% of the indicative mix proposed are 3 bed plus and this is welcomed. The planning statement indicates a range for unit sizes and in this table 33%-50% of social rented units could be 3 bed plus. A minimum level of 3 bed plus homes should be secured as part of the application. This level should not be below 36%.

Housing quality

32 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. The Mayor will produce a new Housing SPG (a draft of which was put before the London Plan EIP), on the implementation of Policy 3.5 for all housing tenures, drawing on his London Housing Design Guide, paragraphs 3.37 –3.39 provides further guidance on indicators of quality that the proposed SPG will cover.

33 The indicative design guide, submitted with the application, demonstrates that the development would be able to comply with both the space standards as required by the London Plan, and the design guidelines set out within the draft replacement Housing SPG. Although detailed design is yet to occur, the indicative layouts and parameter plans demonstrate that internal layouts, active frontages and the frequency of residential cores, and the overall percentage of dual-aspect units would be appropriate.
The application should be conditioned such that all units will meet the London Plan space standards and will meet the other London Housing Design Guide Standards as far as is practicable.

**Density**

London Plan Policy 3.4 seeks to optimise the potential of sites having regard to local context, design principles and public transport accessibility. The site has a public transport accessibility level of 6a, and its immediate setting is urban in character. The London Plan density matrix therefore suggests a residential density of between 450 and 700 habitable rooms per hectare.

The applicant sets out that the density of the proposal is in the region of 605 habitable rooms per hectare. However the density of the proposal should be calculated using the net residential site area in accordance with paragraph 3.34 of the interim Housing SPG which states that any non-residential floorspace should be deducted from the total floorspace for the purposes of calculating density.

**Children’s play space**

Policy 3.6 of the London Plan sets out that “development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ and calculated using the indicative mix in the planning statement the applicant sets out that it is anticipated that there will be approximately 73 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 730 sq.m. of playspace.

The planning statement sets out that it is possible to provide 730 sq.m. of playspace and provision of playspace on-site and the the provision of 650 sq.m. on-site is illustrated in the design and access statement including the upgrade of the existing play area for the tower blocks which is outside of the red line boundary. The design and access statement also sets out that youth provision would be provided on the adjacent estates. A play strategy should be submitted which sets out the quality and capacity of the current provision which is intended to be upgraded. A minimum level of playspace on-site should be committed to as well as commitments made to off-site upgrades.

**Tall Buildings/views**

London Plan (2011) policy 7.7, which relates to the specific design issues associated with tall and large-scale buildings, is of particular relevance to the proposed scheme. This policy sets out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

A tall building is proposed. The site is not within any strategic viewing corridors, and therefore the general tall building advice offered within the London Plan and the replacement London View Management Framework supplementary planning guidance prevails. Although the applicant’s design guide provides indicative information on the scale and impact of the proposed tall building from locally important viewpoints, there is no information within these views on proposed materiality or appearance to assist the Mayor in making a balanced judgement on the
From the information that has been provided (see illustrations above), it is apparent that in terms of scale, the new tall building would be appropriately located in order to signify the local centre and create a tall building cluster in conjunction with the two existing tall buildings, while avoiding an overbearing cumulative impact. Importantly, the building would appear as an independent element within the main approaches to the site.

**Urban design**

Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design
The applicant engaged in detailed pre-application discussions with GLA and Council officers and the scheme has evolved to take account of concerns and comments raised during the process. As a result the design is generally satisfactory, and the principles of the outline application are appropriate. The parameter plans submitted in conjunction with a design guide are generally tight and there is some, but not excessive, flexibility in terms of building footprints, while uses and heights are firmly set. The greatest opportunity for variation and further development is with regards to landscaping and the appearance of the proposed buildings.

The development forms part of a larger masterplan for the area, which has been developed by the applicant and incorporates the listed and other estates to the south of the railway. The removal of existing unsympathetic buildings will improve the area and is supported. The new buildings would enhance the local centre, and provide better definition and character to the local street scenes.

It is acknowledged that the current layout does not promote a sense of place, and that the proposals seek to remedy this. The proposal has been designed in recognition of local residents’ wishes for the development to provide new homes rather than refurbishment of existing stock, and the applicant’s aspirations to upgrade the public realm are welcomed. The proposal would intensify the current focus at the road intersection and potentially improve the sense of place at the base of the existing towers and renewed shopping parade. While earlier proposals focussed on the creation of a square, the application proposals rely more on the relationship between the uses and the architecture to achieve this. The parameter plans allow for the potential increase of this space on the eastern side of the square to allow for a more civic scale of entrance adjacent to the health and community uses, and the design at the detailed stage should ensure that both the scale of this space, and the treatment of the entrance, would provide an appropriate response.

The concept of a single, controlled entrance to the ground level public uses is welcomed. However as discussed at the pre-application meeting, there are concerns regarding the attractiveness of the park to visitors. Although the design of the lobby space would seek to maximise the visual connection from the street entrance, through the space to the park beyond, the fact that visitors would need to cross a controlled threshold to access the park may affect its attractiveness to these users. The design code should be refined to specify legibility measures to ensure that this space maximises the intended open access design, which could include facade/glazing proportions and integrated signage requirements.

The reintroduction of a clear route hierarchy around the junction is supported, as is the introduction of strong building edges. Throughout the scheme, there would be a clear division between public and the private spaces. GLA officers are aware that the redesign of the park at the rear of the two towers is a potentially controversial issue among residents of the existing tower blocks, but the enclosure of the space between the park and the new square will help to resolve issues of ownership, while providing a direct route and visibility between public spaces. The relocation of the car park to the north of the towers is also supported given the opportunity to create a park threshold that will better relate to the new uses at ground and first floor levels.
48 The proposed layout of the smaller courtyard spaces in the Emminster/Hinstock blocks, and the deletion of the previously proposed parking spaces is supported in design terms. This deletion will assist in ensuring that the ground floor of the building has a clear street-facing function, rather than sharing the active commercial frontages between the front and the rear of the building.

Scale and massing

49 The proposed scale of buildings is appropriate, although as discussed elsewhere in this report, additional information is required for the Mayor to be able to judge the appropriateness of the tall building. Heights would be subject to some variation within parameter plans, with tolerances of one or two storeys, which is normal in a scheme of this nature.

50 The buildings around the Abbey Road centre are appropriately scaled to provide a setting for the new open space in front of the retail parade, and provide a marker for the parade itself. Likewise, the new buildings along Belsize Road provide an appropriate scale for the width of the street, and replicate historical building frontage lines and heights/enclosure found nearby. At the same time the proposal would ‘lead up’ to the corner, helping to define it as a place with an appropriate scale that is complementary to the existing towers. The heights around other parts of the proposed scheme are appropriate, including the ‘stepping down’ of the edges of the new Emminster/Hinstock replacement blocks and the new podium blocks underneath the existing towers.

Appearance

52 Instead of providing a design code, the applicant has provided a set of guidelines intended to influence the form of development at the detailed design stages. While the content of the guide is welcomed, there is some concern regarding the ‘weight’ offered by the guide at the detailed stage, especially given the lack of detailing of the taller elements of the scheme. The information offered within the guide is indicative only, and unlike a code, is not adoptable. The applicant should clarify the role of the guide within the approval process, and provide assurance to the Mayor that the high standard of design advocated by the guide would be applied within the detailed design stage. Given the visibility of the tall building element and its potential to be viewed from areas close to heritage assets, a design code should be set for at least this element, in order to provide the level of assurance set out in London Plan policies 7.6 and 7.7.

53 Elsewhere within the design guide and the design and access statement, the indicative information suggests that the materials and form of elevations could be appropriate within the local context, using brick as the primary material.

Summary

54 The design approach is generally supported however further information is needed on materials and appearance, particularly in relation to the tall building. Indicative elevations of the tall building should be provided and design quality for this element and ideally the entire development should be secured within a design code.

Inclusive design

55 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).
The design and access statement sets out that all units will be designed to comply with Lifetime Homes Standards and 10% will be wheelchair accessible or designed to be wheelchair accessible. This should be conditioned and typical flat layouts should be submitted in order to demonstrate this. In addition further information should be provided in the form of a gradient plan which demonstrates that all the public realm will be accessible.

Noise

Policy 7.15 (Reducing noise and enhancing soundscapes) of the London Plan states that development proposals should seek to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals as well as separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening or internal layout in preference to sole reliance on sound insulation. The Mayor will also support new technologies and improved practices to reduce noise at source, especially in road, rail and air transport. In addition standard 5.2.1 of the Mayor’s Draft Housing SPG states that developments should avoid single aspect dwellings that are north facing, exposed to NEC C or D or contain three or more bedrooms.

There are a number of noise sources that may have an impact on this development and these include the adjacent railway line. The noise assessment submitted with the planning applications sets out that all of the site is in NEC C and the blocks adjacent to the railway line will be likely to be in NEC D on the lower levels. PPG24 advises that permission should be normally be refused for residential development that falls within NEC D and not normally granted for residential development in NEC C unless there are no alternative quieter sites, in which case permission could be given with suitable conditions. Residents could be adequately protected within the dwellings by suitable sound attenuation measures (to be specified by condition). In addition standard 5.2.1 of the Mayor’s Draft Housing SPG states that developments should avoid single aspect dwellings that are north facing, exposed to NEC C or D or contain three or more bedrooms. Given the high need for housing in the area development in NEC C with appropriate mitigation measures is acceptable. Further discussion is needed over the suitability of the lower floors of the site adjacent to the railway line and the mitigation proposed.

GLA noise consultants have identified that in any case further work and information is needed regarding the maximum noise levels arising from the railway line, the ground borne noise levels and the effects of vibration caused by passing trains. In addition the application should be conditioned such that there are no single aspect units in NEC C or D.

Climate change

The London Plan climate change policies set out in Chapter 5 collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. London Plan Policy 5.2 ‘minimising carbon dioxide emissions’ sets out an energy hierarchy for assessing applications, London Plan Policy 5.3 ‘Sustainable design and construction’ ensures future developments meet the highest standards of sustainable design and construction, and London Plan Policies 5.9-5.15 promote and support effective adaptation to climate change. Further detailed policies on climate change mitigation and adaptation are found throughout Chapter 5 and supplementary guidance is also given in the London Plan sustainable design and construction SPG.
Climate change mitigation

Energy efficiency standards

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 maximising natural lighting and the use of mechanical ventilation with heat recovery. The demand for cooling will be minimised through the use of high performance glazing and free cooling.

The development is estimated to achieve a reduction of 109 tonnes per annum (8%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development.

District heating

No information on district heating networks has been provided. The applicant should investigate if there are any existing or planned district heating networks within the vicinity of the proposed development. Where none exist, the applicant should provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

The site heat network will be supplied from a single energy centre. This will be 500 sq.m. in size and located in the basement. The applicant should confirm that all uses will be connected to the heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided.

Combined Heat and Power (CHP)

Gas fired CHP is proposed to provide the domestic hot water load, as well as a proportion of the space heating. However no further details on the proposed CHP sizing have been provided. This should be submitted as well as details of the load profiles to support the proposed CHP sizing. Based on the information provided, a reduction in carbon dioxide emissions of 228 tonnes per annum (21%) will be achieved through this second part of the energy hierarchy. It is unclear whether or not these are regulated or unregulated savings. This should be clarified.

Renewable energy technologies

The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 2,500 sq.m. of photovoltaic panels on most of the larger buildings. The applicant states that there is the potential to add another 750 sq.m. on the south facing vertical side of block A or B. This would result in a reduction in carbon dioxide emissions of 160 tonnes per annum (13%) will be achieved through this third element of the energy hierarchy.

Summary

Taking into account the comments above, details of regulated savings at each tier of the energy hierarchy (as per Table 1 and 2 in the GLA energy assessment guidance, September 2011) should be provided before this level of carbon savings can be verified. In addition further detail is needed of the CHP sizing proposed and load profiles as well as details of investigations into proposed district heating networks and confirmation that all uses will be linked into a site wide network.
Climate change adaptation

68 London Plan policy 4A.3 seeks to ensure future developments meet the highest standards of sustainable design and construction, and policy 4A.9 identifies five principles to promote and support the most effective adaptation to climate change. These are to minimise overheating and urban heat island effects; minimise solar gain in summer; incorporate sustainable drainage systems; minimise water use; and protect and enhance green infrastructure. Specific policies relate to overheating (4A.10), living roofs and walls (4A.11) and sustainable drainage (4A.14). Further guidance is provided in the London Plan Sustainable Design and Construction SPG. Policies 5.3, 5.9 to 5.13, 5.15 of the draft replacement London Plan are also relevant.

69 The applicant should set out whether rainwater harvesting or greywater recycling is proposed and if a commitment has been made to limit the use of water to 105 litres of water per person per day through the use of water efficient fittings. Green roofs are proposed and this is welcomed. The applicant should confirm which buildings are proposed to have green roofs and commit to a minimum area.

Transport

Car Parking

70 100 car parking spaces are proposed for the residential part of the development; 34 off-street permit parking bays and 66 additional spaces. This equates to a car parking ratio of 0.33 spaces per dwelling. TfL acknowledge the overall level of car parking will be reduced, as a result of the proposals, but considering the excellent PTAL, TfL recommends this development is car free, apart from disabled provision. London Plan policy 6.13 ‘parking’ clearly states that on-site car parking at new developments should be the minimum necessary and that there should be no-overprovision that could undermine use of more sustainable non-car modes. Furthermore, TfL recommends that future residents of the development be excluded from eligibility for parking permits through an obligation in the s106 agreement.

71 For any car parking that is ultimately provided, 20% (13 spaces) of all spaces (creation of 66 off-street spaces) must be for electric vehicles with an additional 20% (16 spaces) passive provision for electric vehicles in the future, notwithstanding the suggestion of car free development.

72 2 car club bays are proposed, which TfL supports. 13 disabled parking spaces are proposed for the residential element, which is also acceptable.

Highway alterations

73 TfL notes that several highway alterations are proposed for the local area. In order to assess the impact of traffic capacity at the junction of Abbey Road with Belsize Road, detailed highway layout drawings are requested. Items include the installation of a flush median strip, reduction of crossing widths and adjustments to the radii.

74 The methodology used to calculate the trip rates and modal splits are accepted.

Cycling
A total of 338 covered and secure cycle parking spaces will be provided for the residential units and a further 30 visitor spaces. Six covered and secure cycle parking spaces will be provided for the office development and 2 visitor spaces. This provision is in accordance with London Plan policy 6.9 ‘cycling’. Cycle parking for the remaining land uses will be outlined in the detailed planning application, but is also expected to accord with London Plan standards.

As requested by TfL, land has been safeguarded for the installation of a 20 space cycle hire docking station on the north-east corner of the Belsize Road/ Abbey Road junction. If this area of land is not already part of the highway, it will need to be adopted by the local highway authority, via a section 38 agreement.

**Pedestrians**

The proposals include several improvements to pedestrian routes which are welcomed in accordance with London Plan policy 6.10 ‘walking’. TfL therefore recommends that these improvements are secured by the local planning authority via the section 106 agreement or a section 278 agreement.

In addition, TfL considers the developer should make a contribution of £15,000 for a pair of Legible London signs to enhance the way finding capability for pedestrians in this area.

**Buses**

The development is forecast to generate 36 and 37 net additional two-way bus trips in the morning and evening peak hours respectively, which is expected to be accommodated by the local bus network. Therefore TfL is not seeking mitigation for additional bus trips.

Surrounding bus stops should nevertheless be reviewed for compliance with TfL accessibility standards and where alterations to bus stops are proposed these should be agreed with TfL and secured through section 278 agreements. In addition the opportunity to relocate or add new stops closer to the development should be considered in consultation with TfL. If there is a desire to implement ‘Countdown’ signs at shelters they should be fully funded by the developer. Provision of associated bus infrastructure and real time information near to the development site should be considered. In addition, the costs associated with securing further advertisement consent for any relocated bus shelter will also need to be borne by the developer.

**Travel Plan**

The travel plan has been reviewed and is considered acceptable. It could be improved nevertheless by the inclusion of a table with a modal split for the baseline and 1, 3 and 5 year targets.

**Freight**

TfL welcomes the submission of a framework construction logistics plan (CLP). A detailed CLP should be secured by planning condition, which should seek to minimise highway and traffic impact during construction.

A delivery and servicing plan (DSP) should also be secured by planning condition, which should demonstrate how to reduce the number of trips, particularly during peak hours and identify where safe and legal loading can take place.

**Traffic Management Act**
Should this application be granted planning permission, the developer and its representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

Summary

To summarise, in order to ensure that the proposed development complies with the transport policies in the London Plan, contributions towards bus infrastructure and Legible London should be secured. In addition, travel plans and the safeguarding of land for the cycle hire docking station should be secured within the section 106 agreement. Electric vehicle charging points, a DSP and a CLP should be secured by condition.

Community Infrastructure Levy

In accordance with London Plan policy 8.3, the Mayor of London proposes to introduce a London-wide Community Infrastructure Levy (CIL) that will be paid by most new development in Greater London. The Inspector’s report following the EiP has been received by the GLA. The Mayor intends to start charging on 1 April 2012. Any development that receives planning permission after that date will have to pay, including:

- Cases where a planning application was submitted before 1 April 2012, but not approved by then.
- Cases where a borough makes a resolution to grant planning permission before 1 April 2012 but does not formally issue the decision notice until after that date (to allow a section 106 agreement to be signed or referral to the Secretary of State or the Mayor, for example).

The Mayor is proposing to arrange boroughs into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floor space respectively (see table, below). The proposed development is within the London Borough of Camden where the proposed Mayoral charge is £50 per square metre. More details are available via the GLA website http://london.gov.uk/.

Within London both the Mayor and boroughs are able to introduce CIL charges and therefore two distinct CIL charges may be applied to development in future. At the present time, borough CIL charges for Redbridge and Wandsworth are the most advanced. The Mayor’s CIL will contribute towards the funding of Crossrail.

<table>
<thead>
<tr>
<th>Mayoral CIL charging zones</th>
<th>London boroughs</th>
<th>Rates (£/sq. m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Zone</td>
<td>Area</td>
<td>Charge</td>
</tr>
<tr>
<td>------</td>
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</tr>
<tr>
<td>1</td>
<td>Camden, City of London, City of Westminster, Hammersmith and Fulham, Islington, Kensington and Chelsea, Richmond-upon-Thames, Wandsworth</td>
<td>£50</td>
</tr>
<tr>
<td>2</td>
<td>Barnet, Brent, Bromley, Ealing, Greenwich, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets</td>
<td>£35</td>
</tr>
<tr>
<td>3</td>
<td>Barking and Dagenham, Bexley, Croydon, Enfield, Havering, Newham, Sutton, Waltham Forest</td>
<td>£20</td>
</tr>
</tbody>
</table>

**Local planning authority’s position**

89 The local planning authority is yet to come to a view on this application.

**Legal considerations**

90 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**

91 There are no financial considerations at this stage.

**Conclusion**

92 London Plan policies on land use, housing, estate renewal, affordable housing, housing choice, density, child playspace, tall buildings, design, inclusive access, noise, climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Land use**: The principle of this residential led estate renewal scheme is supported
- **Housing, estate renewal, affordable housing and housing choice**: Further discussion is needed on viability, tenure mix and minimum levels of affordable family housing
- **Density**: the density should be calculated using the indicative scheme and in line with London plan guidance.
- **Child playspace**: a playspace strategy should be submitted and off-site improvements committed to
- **Tall buildings and design:** the design principles are generally supported however further discussions is needed on materials and the appearance of the tall building in particular.

- **Inclusive access:** Further information and commitments are needed.

- **Noise:** Further information and commitments are needed.

- **Climate change:** Further information and commitments are needed.

- **Transport:** Further information and commitments are needed.

93 Whilst the application is broadly acceptable in strategic planning terms. On balance, the application does not comply with the London Plan.

94 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Housing, estate renewal, affordable housing and housing choice:** The results of the independent viability assessment are awaited. Further discussion is needed on tenure mix and minimum levels of affordable family housing.

- **Tall buildings and design:** the design principles are generally supported however further discussions is needed on materials and the appearance of the tall building in particular.

- **Density:** The density should be calculated using the net residential area and the indicative residential mix.

- **Child playspace:** a play strategy should be submitted and commitments made to improving the off-site playspaces.

- **Inclusive access:** A gradient plan should be submitted and indicative plans of the units and wheelchair units should be provided.

- **Noise:** Further noise assessment work is needed and further discussion is needed of the quality of the units which would be located in NEC D.

- **Climate change:** Details of regulated savings at each tier of the energy hierarchy should be provided. Further detail is needed of the CHP sizing proposed and load profiles as well as details of investigations into proposed district heating networks and confirmation that all uses will be linked into a site wide network. The applicant should set out whether rainwater harvesting or greywater recycling is proposed and if a commitment has been made to limit the use of water to 105 litres of water per person per day through the use of water efficient fittings. The applicant should confirm which buildings are proposed to have green roofs and commit to a minimum area.

- **Transport:** contributions towards bus infrastructure and Legible London should be secured. In addition, travel plans and the safeguarding of land for the cycle hire docking station should be secured within the section 106 agreement. Electric vehicle charging points, a DSP and a CLP should be secured by condition.
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