

Planning Statement

Demolition of Parking Structure, Hadley Street Site within the Castle Road Estate

5811.02, 29.08.23

1. Introduction

- 1.1 This Planning Statement has been prepared by Tibbalds Planning and Urban Design on behalf of London Borough of Camden (the 'Applicant') in support of a full planning application for the demolition of the unused parking structure and associated works at the Hadley Street Site within the Castle Road Estate, London Borough of Camden.
- 1.2 The proposed description of development is:
"Demolition of unused parking structure and associated works"
- 1.3 The application to demolish the structure is part of preparatory works for the Hadley Street Site within Castle Road Estate site as part of the Applicant's 'New Homes for Small Sites' programme. In due course, the application site is anticipated to facilitate new homes as part of the programme.
- 1.4 This application follows pre-application engagement with London Borough of Camden as Local Planning Authority (LPA) and engagement with local residents (including a drop-in event on 18 July 2023). An summary of the community engagement has been prepared by the Applicant and is included at Appendix 1 to this Statement.
- 1.5 The purpose of this Planning Statement is to set out how the proposed development accords with relevant development plan policies and material considerations. This Statement therefore:
 - Describes the site and its surroundings.
 - Describes the proposed development.
 - Identifies and addresses the key planning considerations.
 - Provides conclusions.
- 1.6 This Statement should be read in the context of the National Planning Policy Framework (NPPF, 2021) which states (para. 11) that planning decisions should apply a presumption in favour of sustainable development and approve development proposals that accord with an up-to-date development plan.
- 1.7 This Statement draws upon and should be read in conjunction with plans and documents forming this full planning application, as identified in the application cover letter. The format and scope of this application has been agreed with LPA.

2. The Application Site and Surroundings

- 2.1 The application site (the site) comprises a decked structure previously used for parking to the immediate west of Heybridge residential block within the Castle Road Estate. It also includes the vehicular access from Castle Road and a small triangle of land between the structure and Hadley Street to the west. In total, the site extends to 1,350 sqm.

- 2.2 The immediate site boundaries comprise residential properties on Castle Road to the north, Heybridge residential block to the east, Lewis Street to the south and Hadley Street to the west. The site is located within a predominantly residential area in the Camden Town Ward positioned centrally with the London Borough of Camden.
- 2.3 The site is within PTAL Zone 6a. The nearest station is Kentish Town West, located approximately 150m to the north-west of the site.
- 2.4 The parking structure itself adjoins the main Heybridge block and comprises a one storey concreted slab structure. The structure has a dilapidated appearance and, whilst the date of its last use is unknown, has not been in use for some time and this was known to be the case in 2015.
- 2.5 There is limited relevant site planning history to the proposals and no online records for the parking structure. Planning permission 2011/0509/P was granted on 9 February 2011 for various works on the Castle Road estate including the erection of a fence, vehicular and pedestrian gate at the Castle Road entrance.

3. Proposed Development

- 3.1 The site has been identified as an opportunity site under Camden's New Homes for Small Sites programme, approved by the Council's Cabinet in February 2023. The programme is intended to contribute to Council and Greater London Authority objectives by delivering new homes on underused Council-owned sites currently in non-residential use, such as car parks. Important key principles are that no demolition of existing homes will take place, there will be no net loss of green space and there will be no loss of play space.
- 3.2 The currently unused parking structure at the Castle Road Estate is to be demolished. As identified above, the site is vacant and has no current use. Entry to the site is not permitted and there are some concerns in relation to a rise in antisocial behaviour and fire safety.
- 3.3 The proposed description of development is:
"Demolition of unused parking structure and associated works"
- 3.4 The application seeks the removal of the single storey parking structure immediately west of the Heybridge block and making good of the ground floor west elevation and area currently occupied by the structure, including drainage infrastructure.
- 3.5 A summary of the required works is provided below, although it is important to note that not all of these works require planning permission:
 - Strip-out and clearing of internal structure.
 - Securing the structure including temporary propping (as required) to the Heybridge block and temporary support deck inside the parking structure.
 - Separating the parking structure from the Heybridge block.
 - Breaking down the slab.
 - Taking down the podium, sorting and removing materials.
 - Securing and sealing the lower ground-level wall of the Heybridge block.

- 3.6 During the works, temporary hoarding will be erected to Hadley Street, Lewis Street and the Castle Road entrance to secure the site. Temporary site accommodation will be provided on site.

4. Planning Assessment

Planning Policy Context

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Development Plan for the site comprises the London Plan (LP, 2021) and Camden Local Plan (CLP, 2017).
- 4.2 Other documents that are material considerations include the National Planning Policy Framework (NPPF, 2021), supporting guidance in the National Planning Practice Guidance (NPPG) and other relevant national, London and local guidance.

Planning Considerations

- 4.3 With due regard to the proposed works, pre-application discussion and planning policy and guidance, the following planning considerations are addressed in this Statement:
- Principle of development.
 - Residential amenity (including noise and air quality).
 - Ecology and arboriculture.
 - Sustainability and waste.
 - Flood risk, drainage and contamination.
 - Transport and parking.
 - Anti-social behaviour.

Principle of Development

- 4.4 The proposed demolition and associated works are the first stage of development at the site in preparation for the delivery of new homes as part of the Council's New Homes for Small Sites programme. They will help clear and prepare the site for future development whilst at the same time removing an unsightly structure.
- 4.5 The structure has not been used for parking in any form for a significant number of years. As such, there will be no loss of parking from the current situation. In any event, CLP Policies T1 Prioritising Walking, Cycling and Public Transport and T2 Parking and Car-free Development and LP Policies T1 Strategic Approach to Transport and T6 Car Parking promote sustainable transport modes and car free development.
- 4.6 The proposed future residential intensification of the site will come forward as a separate planning application in due course. Notwithstanding, the development proposed in this application will facilitate that future housing delivery, recognised as a key planning priority in the NPPF (Section 5 Delivering a Sufficient Supply of Homes), LP (Policies H1 Increasing Housing Supply and H2 Small Sites) and CLP (Policy H1 Maximising Housing Supply).
- 4.7 Accordingly, the principle of the proposed development will support national and local planning policy objectives.

Residential Amenity

- 4.8 The proposed works will inevitably result in some temporary impacts to residential amenity, particular those residents on the west side of the Heybridge residential block.
- 4.9 A Demolition Management Plan (DMP) has been prepared and submitted as part of this application and sets out a range of measures that will be undertaken to minimise disruption. Existing residents have also been kept informed of the proposed development and temporary impacts on residential amenity (see Appendix 1 to this Statement).
- 4.10 Air Quality and Noise and Vibration Technical Notes submitted as part of this application confirm that monitoring will be undertaken in line with current guidance and best practice.
- 4.11 In summary, whilst there will be some temporary noise, vibration and air quality impacts, these will be minimised, controlled, monitored and mitigated as far as possible in accordance with CLP Policies A4 Noise and Vibration and CC4 Air Quality.

Ecology and Arboriculture

- 4.12 The site consists primarily of a disused concrete parking structure and hardstanding. It therefore has minimal ecological value.
- 4.13 A Preliminary Ecological Appraisal (PEA) and Tree Survey have been undertaken and form part of this planning application. The PEA confirms that there is some dense and scattered scrub on the site and scattered trees close to the site boundary. The Tree Survey identifies seven Category C young individual trees on the pavements of Lewis Street and Hadley Street to the south and west of the site boundary respectively.
- 4.14 No existing plants on the site are protected and measures to protect existing street trees close to the site boundary will be undertaken, as required, during the proposed works.
- 4.15 The PEA has not identified any protected species on the site. Opportunities for ecological enhancements are very limited for the demolition works proposed. However, the works are to facilitate the future development of the site which will provide an opportunity for enhancement as sought in planning policy and guidance.
- 4.16 In summary, existing street trees will be protected as required and the proposed demolition and associated works will avoid disturbance to habitats, species and ecology as required by CLP Policy A3 Biodiversity and in line with the objectives of LP Policies G6 Biodiversity and Access to Nature and G7 Trees and Woodlands.

Sustainability and Waste

- 4.17 As identified elsewhere in this Statement, the proposed works are to prepare the site for future residential development. This will strongly support all levels of planning policy and guidance by re-using existing 'brownfield' land in a sustainable location for much needed housing.
- 4.18 The demolition of the concrete parking structure will result in some waste being generating. The DMP confirms that this will be disposed of in line with the waste hierarchy. This is in line with the principles of CLP Policy CC5 Waste and LP Policy SI7 Reducing Waste and Supporting the Circular Economy.

Flood Risk, Drainage and Contamination

- 4.19 The site consists of the parking structure and hardstanding and, following demolition, will be left as hardstanding pending future development. There will be no increase in the risk of flooding and the submitted Flood Risk Technical Note confirms:

“The temporary drainage solution for this area involves multiple filter drains falling towards the north-east corner of the site, where these connect to the existing private combined sewer and outflow into the wider Heybridge drainage network. This mimics the existing surface water system which is understood to discharge to the same combined sewer.”

- 4.20 The submitted Geotechnical and Geo-Environmental Preliminary Risk Assessment has not identified any contamination risks relating to the proposed works. It is recognised that further investigation may be required as part of planned future residential development of the site.
- 4.21 Accordingly, there is no conflict with CLP Policy CC3 Water and Flooding or LP Policies.

Access, Transport and Parking

- 4.22 Site set up for the proposed works will include hoarding the site on the Hadley Street (south) and Lewis Street (west) pavements parallel with the existing boundary walls. The existing pavement is approximately 2m wide and the face of the hoarding will sit approximately 0.6m from the boundary wall, with supporting structure between the hoarding and the wall. A combination of the trees and the hoarding will restrict the width of the pavement and an application to temporarily close the pavement may be required, although this falls outside of the planning regime.
- 4.23 A new gated hoarding will be placed in the hoarding across the existing ramped access onto Castle Road.
- 4.24 Temporary site accommodation is to be located inside the application boundary. Site operatives will arrive by public transport or vehicles. Vehicles are to comply with local traffic regulations and parking restrictions at all times. Plant and materials being delivered to, or leaving site, are to use the vehicle access onto Castle Road.
- 4.25 Demolition waste will be sorted and loaded into skips/tipper trucks located on site or inside the entrance onto Castle Road. If required, large vehicles will arrive and leave site under control of a banksman to direct the vehicle and temporarily stop pedestrians/vehicles. Trucks will move to/from Kentish Town Road along Castle Road and will avoid popular times (for example school drop-off/pick-up). The demolition phase could expect to be in the order of eight vehicles per day. No road closures are anticipated.
- 4.26 In summary, there will be limited temporary transport impacts associated with the proposed works. These are typical of such demolition projects, will be controlled by planning conditions as appropriate and do not conflict with planning policy.
- 4.27 As identified in the ‘Principle of Development’ section of this Statement, there is no net loss of parking as the existing structure has remained unused for a significant period of time.

Anti-social Behaviour

- 4.28 Although general public access to the site and parking structure is prohibited, LBC as applicant is aware that the unused parking structure has been used for illicit activities and anti-social behaviour in the past.

- 4.29 The car park ramp area has seen further anti-social behaviour including fly tipping and possible prohibited substance consumption.
- 4.30 Demolishing the parking structure will help to prevent this unwanted behaviour from taking place on the site by removing areas of refuge and increasing passive surveillance. The removal of dilapidated structure will also improve the appearance of the site, thereby reducing the perception that it is a place where antisocial could take place.
- 4.31 The site will be properly secured by hoardings during and following demolition (until the site is brought forward for development). Hoardings will be routinely, checked and maintained for safety.
- 4.32 Accordingly, the development seeks to reduce anti-social behaviour and, as far as possible incorporated design principles which contribute to community safety and security and promote safer streets and public areas as sought by CLP Policy C5 Safety and Security.

5. Conclusion

- 5.1 The proposed development at Castle Road Estate involves the demolition of an unused parking structure and associated works to prepare the site for future residential development. The site forms part of the wider London Borough of Camden 'New Homes for Small Sites' programme which will deliver much needed housing by re-using and optimising Council owned sites.
- 5.2 The submission of this application follows pre-application engagement with Planning Officers and the local community and the scope of this application reflects these discussions.
- 5.3 Whilst there will be some temporary impacts as a result of the development, these will be minimised and managed, as set out in the documents forming this application.
- 5.4 This Planning Statement has assessed the proposed development against the key development plan policies and material considerations and identified how it meets their requirements.
- 5.5 Overall, the proposed development has been carefully considered to minimise impacts to existing residents, will remove an unsightly unused structure and facilitate the site to deliver new homes in the future.

Appendix 1

Summary of Community Engagement

Background and context:

On the 22 February 2023 Camden Council's Cabinet agreed to move forward and prepare a planning application for 14 - 20 council and/or Camden Living Rent homes on the disused parking structure site on Castle Road Estate. Camden Council's New Homes for Small Sites team are now working alongside residents to develop a design for approximately 14-20 council and/or Camden Living Rent homes.

A recommendation to move forward with exploring new homes on Castle Road Estate was made based on the following considerations:

- If the site is suitable to build new homes on
- The current use of the space
- The Council's commitment to addressing housing need in the borough
- Resident feedback through Local Conversations

Summary of 2023 engagement activities

Following the 22 February cabinet meeting we have:

- Delivered 2 newsletters to residents & neighbours
- Held an evening drop in event for residents and neighbours
- Door knocked the estate
- Launched a project website
- Set up a project mailing list
- Held an evening demolition pre planning drop in for residents and neighbours

Reach (Dated July 2023)

Through these activities we have reached:

55% of households on the estate

25 neighbours have participated to date

Demolition drop in summary:

In July we presented an outline of the demolition planning application and what people could expect during the demolition works to be as transparent as possible. We shared:

- Summary of the planning application documents
- Location of demolition and site set up
- A timeline of the demolition works and identified particularly noisy works
- The types of machinery and vehicles people can expect to see
- Mitigating approaches for dust and noise
- Respite space for residents

Post cabinet project feedback summary (Dated July 2023)

Across the estate the majority of residents were supportive of new homes and wanted to see something happen with the space as it is currently disused. Construction disruption was a concern, particularly for those living in Heybridge and neighbours immediately opposite the site. The further away from the site the less concerns people had and the more positive people were about bringing the site back into use, particularly as the focus is on affordable homes and potentially additional green space for the whole estate, a TRA hall as well as improved bin and bicycle storage.

Demolition works feedback summary (Dated July 2023)

Demolition drop in feedback

Residents and neighbours want to provide timely notification for the times of particularly noisy works so that they can prepare themselves and make alternative arrangements if necessary.

Residents

Residents of Heybridge were particularly concerned about the immediate impact of dust, noise and vibration during the demolition. Providing support for more vulnerable residents to access any respite provision will be important.

Neighbours

Neighbours, particularly those on Hadley Street immediately opposite the parking structure, expressed concern about dust, noise and safety concerns regarding traffic management to and from the site were raised as well as the impact of potentially narrowing and/ or closing the pavement due to the proposed installation line of the hoarding.

Approaches to mitigating construction disruption

The Council are aware that residents and neighbours are concerned about the impact of the demolition works and therefore the following mitigating provisions have been put in place in response to feedback:

- A commitment to notify residents and neighbours in writing (print and digital) prior to the commencement of noisy works
- Providing respite space on the estate in collaboration with the Tenants and Residents Association
- Working with Camden's Social Services Team to support residents with care packages in place
- Providing a dedicated contact for residents and neighbours to raise concerns and issues before and during the works.