

December 2013

# **Planning Statement**

## **32 Jamestown Road**

### **London Borough of Camden**

**Prepared for:**  
London and Regional Properties

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# 1. Introduction

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- 1.1. This Planning Statement has been prepared by Savills in support of a planning application submitted to the London Borough of Camden (LBC) on behalf of London and Regional Properties.
- 1.2. The planning application seeks planning permission for:
- 1.3. *Change of use from offices (Class B1) to mixed use comprising offices (Class B1) and 9 residential units (Class C3 - 4x1, 3x2, 2x3 bed), including erection of new fourth and fifth floors, provision of central atrium, installation and relocation of plant, and alterations to Jamestown Road and Canal Side facades.*
- 1.4. This planning application relates to Bewlay House, 32 Jamestown Road which lies in the Regents Canal Conservation Area.
- 1.5. Prior to the submission of this planning application, the applicant has been involved in pre-application discussions with officers at LBC and has engaged in public consultation. Full details can be found at Section 3 of this statement. Details of public consultation activities undertaken are explained in the Statement of Community Involvement.
- 1.6. This Planning Statement outlines the application proposals in detail, and relates them to national, regional and local planning policies. The statement should be read in conjunction with the drawings and Design and Access Statement prepared by Ben Adams Architects in support of the application, as well as the specialist reports that have been prepared to address specific issues. The following specialist reports are provided in support of this application (to include this Planning Statement):
  - Acoustic Report- White Young Green;
  - Daylight and Sunlight Report- Delva Patman Redler;
  - Stage C Report and Drawings – Norman Disney Young;
  - Statement of Community Involvement – George Cochrane;
  - Structural Engineering Statement for Planning - Expedition;
  - Sustainability and Energy Report including BREEAM Pre-Assessment and Code for Sustainable Homes Pre-Assessment – Norman Disney Young and ECiBE.
  - Addendum to Transport Statement and Framework Travel Plan– Jacobs.



## 2. Site & Surroundings

### The Site

- 2.1. The application site comprises a broadly rectangular site at Bewlay House, 32 Jamestown Road, in the London Borough of Camden. A red line site plan is provided as part of this planning application.
- 2.2. The site is currently occupied by a 5 storey building comprising of basement, ground plus three storeys of office floorspace and a 4<sup>th</sup> floor of plant in enclosed buildings rising to c.4.5m. The existing building comprises 6726 sq m (GIA) and a height of 52.06 sq m A.O.D. Constructed in 1989 as a laboratory and office space for Elseviar, the property has been in continuous occupation since its construction, but is due to be vacated at the end of 2013.
- 2.3. The existing building has a concrete frame with concrete floor slabs, with a predominantly glazed elevation to Jamestown Road and a masonry elevation with large glazed areas to the Regents Canal. The building's appearance has a dated nautical theme and offers a minimal contribution to the street scene and the context of the canal.
- 2.4. Vehicular and pedestrian access is from Jamestown Road to the south of the site. The north of the site is bound by the Regents Canal (designated open space) and the east and west are bound by commercial/residential buildings and a hotel. Jamestown Road is connected to Oval Road to the west and Arlington Road to the East.
- 2.5. The site is located within the Regents Canal Conservation Area and the Canalside Industrial Archaeological Area as designated on the proposals map, below:



Local Development Framework (2010) Proposals Map, Key:

	Conservation Area Regents Canal		Regent's Canal
	Archaeological Priority Area		Open Space Regent's Canal
	Canalside Industry		
	Town Centre		

## Surrounding Area

- 2.6. Jamestown Road is relatively mixed in character with a blend of town centre land uses. The surrounding buildings are occupied by a mix of uses including residential (3-7 storey) and commercial uses (3-6 storeys).
- 2.7. There are listed buildings and items of historic fabric within close proximity of the site:
- *24, 26 & 28 Oval Road/38-46, Jamestown Road:* Grade II Listed. The building was a factory, office and store for gin distillers Gilbey's since 1894, and extended in 1937, and 1960. The buildings range from 4 to 7 storeys in height. In 1997 an appeal was allowed for a single storey extension at roof level.
  - *The Interchange building (including horse tunnel and stairs, vaults and canal basin):* Grade II Listed. Built between 1901-5 but incorporating the existing 1850s dock basin, vaults and horse tunnel. The property was converted from a warehouse into offices in 1989.
  - *The Interchange canal towpath bridge over private canal entrance:* Grade II Listed. Constructed between 1848-56. Single span of cast-iron with stone capped abutments. The towpath has many tow rope grooves on the handrail, iron strapping and stone capping.
  - *Roving Bridge over Grand Union Canal west of Hampstead Lock Road:* Grade II Listed. Bridge to the north east of the site. The cast iron bridge was constructed early/mid C19, restored late C20.
- 2.8. The site is located adjacent to Camden Town Centre which provides an abundance of facilities comprising a mix of town centre uses including retail outlets, restaurants, public houses, leisure uses and a transport hub.
- 2.9. Further details of the application site and surrounding environs are included in the Design and Access Statement.

## Transport Connections

- 2.10. The site provides good access to the A502 (Camden High Street) to the east, which to the north leads to the A1 and M1, to the south the A502 leads to A4200 leading to central London.
- 2.11. The site is located in close proximity to public transport links as indicated by its excellent level of PTAL (rating of 6a). Camden Town Underground station is located approximately 350m to the south east of the site, providing access to northern line services, giving access to Central London (Euston – 3 minutes; Tottenham Court Road – 8 minutes; Charing Cross – 10 minutes; Waterloo – 13 minutes) and south and north London destinations.
- 2.12. A number of bus routes run along Camden High Street providing the following services:
- Number 24 – Hampstead to Pimlico
  - Number 27 – Chiswick Business Park to Chalk Farm Morrisons.
  - Number 29 – Wood Green to Charing Cross Station
  - Number 31 – Camden Town to Shepherds Bush Road

- Number 88 – Camden Gardens to Clapham Common Old Town
- Number 134 – North Finchley to Tottenham Court Road
- Number 168 – Hampstead to Burgess Park
- Number 214 – Highgate to Finsbury Circus
- Number 253 – Hackney to Euston Bus Station
- Number N5 – Edgware Bus Station to Whitehall
- Number N20 – Barnet High Street to Whitehall
- Number N28 – Camden Town to Wandsworth
- Number N29 – Enfield Town to Charing Cross Station
- Number N31 – Camden Town to Clapham Junction
- Number N253 – Aldgate Bus Station to Tottenham Court Road

2.13. For further details on local transport provision please refer to the Transport Statement prepared by Jacobs.

## 3. Planning History

3.1. A summary of planning history for the application site is included below.

Application Number	Proposal	Decision Date	Decision
TPBR27861/20719	The execution of alterations to a one-storey building at the premises known as Bewley Cliff Wharf, 32, Jamestown Road	19 April 1940	Approved
TP27861/12593	The erection of a two-storey building for use as offices and laboratory accommodation on the ground floor and caretaker's flat on the first floor	1 December 1956	Approved
8770096	Demolition of the existing structure (unlisted building in a Conservation Area) as revised on 24th December 1987	2 February 1988	Approved
8700553	The redevelopment of 32 (and 32A) Jamestown Road by the erection of a ground and part-four part-five storey building for light industrial studio workshop and other uses under B1 of the Use Classes Order 1987 as shown on drawing nos.349 1001C 1002C 1003C 1004C 1005C 1007C 1008C and 1009C and as revised on 24th December 1987	18 February 1988	Approved
8802673	Provision of new pathology laboratories and associated administrative facilities B1 use (plans submitted) Duplicate Application.	22 November 1988	Withdrawn
8802609	Redevelopment of the site by the erection of a four storey plus lower ground floor building for pathology laboratories with ancillary offices for use within Class B1 of the Town and Country Planning (Use Classes) Order 1987 as shown on drawing No.s 3772/LO/01 02 03 04 05 07 08A 08B and 09 as revised 21st December 1988.	23 February 1989	Approved
9401204	Construction of new doorway in front elevation with steps and gate to existing access ramp as shown on drawing no(s) 1004/SK4A /SK5D /SK10 /SK11 and letter dated 1st September 1994	9 September 1994	Approved
PE9800095	The removal of condition 6 (which restricts use of the building to a pathology laboratory), of the planning permission PL8802609R2 to allow future use as general offices (B1(a)).	30 March 1998	Approved
PE9900712	Alterations to front elevation including a disabled ramp and landscape planting.	16 November 2000	Withdrawn
2013/4867/P	Change of use from offices (Class B1) to mixed use comprising offices (Class B1) and 9 residential units (Class C3 - 4x1, 3x2, 2x3 bed), including erection of new fourth and fifth floors, provision of central atrium, installation and relocation of plant, and alterations to Jamestown Road and Canal Side facades.	12 November 2013	Withdrawn

3.2. A summary of relevant planning history for properties in the proximity of the site, is set out below:

Application Number	Site	Proposal	Decision Date	Decision
PE9606145	24-28 Oval Road	Erection of a single storey extension at roof level to provide additional office space.	16 January 1997	Withdrawn
PE9700021	33-35 Oval Road and 38-46, Jamestown Road	Erection of a single storey extension at roof level to provide additional office space.	10 December 1997	Appeal Allowed
03/2379/P	33-35 Oval Street and 38-46, Jamestown Road	Redevelopment of the site to provide a part four, part five, part six, and part seven storey building, with a basement, to accommodate office use (class B1a) on the ground floor, and 61 private residential flats on the upper floors (class C3) comprising 13x1 bed, 34x2 bed and 14x3 bed flats, and 40 affordable residential flats for rent (class C3) comprising 12x1 bed, 14x2 bed, 8x3 bed, and 6x4bed flats, with associated basement car parking and landscaping, and the erection of 3x4 storey plus basement 3 bed houses.	26 July 2005	Approved
2003/2386/C	33-35 Oval Road	Complete demolition of 2-storey office block with basement and covered parking area	27 July 2005	Approved
2009/0066/P	30 Oval Road	The substantial redevelopment to create a part-4, part-5, part-6 storey building plus basement to provide office space (Class B1) at ground and basement levels and residential use (Class C3) providing a total of 70 self-contained flats (27 x 1-bedroom; 35 x 2-bedroom; 6 x 3-bedroom and 2 x 4 bedroom, including 24 affordable units) with ancillary landscaping, together with alterations to the retained elevations, including rebuilding of facades on the Gilbeys Yard elevation. (Following the substantial demolition of the existing buildings see associated Conservation Area consent 2009/0069/C and listed building consent 2009/0068/L)	9 April 2009	Approved

3.3. The review of the planning history above highlights that roof top extensions and the redevelopment of sites for office and residential uses have been granted planning permission within the locality.



## 4. Pre-Application Discussions and Public Consultation

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- 4.1. The section below provides a summary of pre-application activities undertaken by the applicant which have assisted in informing the proposed design.

### **Pre Application Discussions**

- 4.2. Prior to the withdrawal of the previous application, broadly positive formal pre-application meetings have taken place with Planning and Design Officers from LBC on and 7th February 2013 and 20<sup>th</sup> March 2013 to discuss the emerging proposals.
- 4.3. Pertinent points arising from the meetings, were set out in formal written pre-application advice, dated 20<sup>th</sup> June 2013, and include:

#### Commercial

- The re-use of the building is considered acceptable and additional B1 floorspace is welcomed. LBC supports the increase in employment floorspace as it will aid the local economy and contribute towards meeting the demands for office floorspace. LBC highlighted that there is a particular demand for facilities for small and medium size enterprises.
- LBC considered the proposed commercial area to have a good layout and the following proposed features are welcomed: the number of lifts and stair wells; every floor having toilet facilities; the size of the B1 floor plates offering flexibility to end users.

#### Residential

- LBC set out that the principle of providing residential accommodation at the site is supported by local policy. The advice set out that the proposed unit mix, including the provision of 40% 2 bed units is considered acceptable and compliant with local policy. The inclusion of family units is welcomed. LBC confirmed that policy seeks a range of unit sizes.
- The access to the residential area is proposed by stairs and a lift via a separate ground floor entrance. LBC welcomed this and the approach is policy compliant.
- LBC highlighted that their space standards and tenure guidance should be reviewed and that Lifetime Homes standards should be met in accordance with policy.
- LBC confirmed that natural light is required for all habitable rooms.
- The proposed outdoor amenity space, in the form of balconies and terraces is accepted and was well received. In addition the inclusion of large terraces for the family units was welcomed.
- LBC highlighted affordable housing policy and set out that if the number or the size of the units increased then it would be likely that a contribution towards affordable housing would be required.

### Additional Height

- The principle of additional height was discussed at considerable length during pre-application meetings. LBC noted that efforts have been made to reduce the prominence of a roof extension, by pushing the extensions building line back from the Canal Side, however concerns were raised regarding the concept of additional height.
- LBC confirmed that there is scope for a roof extension, albeit at one additional storey rather than two. This approach would accord with the adjacent building as well as formalising the existing bulk created by the plant/services on the roof. However, concern was raised regarding the impact that the height of the second storey would have, due to this being greater than the prevailing building height line of the buildings immediate grouping.
- The advice sets out that the site is visible in long distant views and the proposed will be visible from the Grade II Interchange Buildings opposite and elevated views.
- LBC recommended exploring the option of a single storey roof extension as this would be capable of being “absorbed” on to the existing building and offer consistency amongst the adjacent roof extensions and will reduce the appearance of dominance in closer views.
- LBC confirmed that it is unlikely that the proposals will have an impact upon the nearest residential units at the upper floors of 36 Jamestown Road, in terms of privacy, overlooking, overshadowing and outlook, daylight and sunlight, noise and vibrations, odour, dust, fumes and microclimate.

### Design

- The building is not identified as making a positive contribution to the character and appearance of the Regents Canal Conservation Area.
- LBC acknowledged the depth of the building and noted that the proposed central light well is considered acceptable as it offers natural daylight to all floors, both residential and commercial.

### Elevational Detail

- LBC confirmed that the demolition would be substantial in nature and therefore Conservation Area Consent would be required.
- The proposed remodelling of the building’s elevations was well received and the design is considered acceptable as it refers to the historic and architectural characteristics of traditional Canal Side buildings. LBC set out that the proposal is more solid and substantial than proposals previously provided to the Council.
- LBC confirmed that the proposed brick work and the introduction of more solidity reinforces the character of the canal. The removal of the void at ground floor level on the Canal Side is welcomed as it helps to reinforce the canal’s character.
- LBC considered the use of brick as an appropriate material for the elevations and highlighted that the glazing would need to be sub-divided or “layered” to avoid large expanses of glazing.

### Transport

- It was confirmed that proposing a car free development was acceptable and that a S.106 Agreement would secure this.
- Advice confirmed that bicycle spaces should be provided at 1 bicycle space per 250sqm minimum for the offices, with associated facilities and for the residential units, Local Plan cycle parking requirements shall be complied with.

### Sustainability

- The feedback highlights that LBC requires development to incorporate sustainable design measures, in a bid to reduce carbon dioxide emissions and energy consumption. LBC confirmed that energy efficient design, inline with guidance set out in the Core Strategy should be integrated into the design of the scheme.
- LBC confirmed that the proposed dwellings will need to achieve Code for Sustainable Homes Level 4 and the commercial floorspace will need to meet BREEAM 2011 'very good'.
- It was discussed that proposing a green or brown roof as part of water run off and attenuation measures was encouraged by LBC.

### Other

- LBC highlighted that a S.106 Agreement seeks Heads of Terms for the following: car free; construction management plan; sustainability plan; energy plan; public open space contribution; education contributions; environmental improvements/public realm; highways contributions; construction workers training and recruitment packages.
- LBC confirmed that the Mayoral CIL is set at £50sqm of new net floorspace uplift.

4.4. Prior to withdrawing the previous application, a further meeting with LBC was held on the 6<sup>th</sup> November 2013, to discuss the way forward, design amendments, further consultation with neighbours and the overall height of the proposal. Following the meeting it was agreed that the previous application be withdrawn and the set-backs, the height and the design of the scheme be reviewed. Key points arising from the meeting were:

- LBC welcomed changes to the ratio of solid to void and welcomed the revised proportions.
- LBC confirmed support for the use of red brick, instead of grey brick.
- LBC recommended that the size of the roof terraces were to be reviewed to protect the amenity of the adjoining hotel. LBC welcomed the use of privacy screens subject to appropriate materials,
- LBC confirmed that a 5<sup>th</sup> floor would be suitable subject to appropriate set-backs from the Canal side and height reductions, as this view is considered important.

### **Community Involvement**

4.5. London and Regional Properties appointed George Cochrane as a specialist consultant to undertake a programme of public consultation to understand the views of local residents/stakeholders. This is detailed in the Statement of Community Involvement which forms part of this planning application.

- 4.6. As part of the previous application, a three phase consultation strategy was developed which included:
- Presenting to the Regents Canal Conservation Area Advisory Committee on the 27<sup>th</sup> June 2013;
  - Meeting with a Ward Councillor on 15<sup>th</sup> July 2013;
  - Distribution of letters to local residents and businesses outlining the emerging proposals and providing details of how to comment.
- 4.7. As part of the previous application the additional height was brought to the attention of the RCCAAC and the Ward Councillor and the project team relayed that pre-application discussions had been had with the Council regarding the proposals. Neither the RCCAAC or the Ward Councillor raised any objection to the scheme in terms of bulk and content and the feedback from these consultation comments was generally very positive. On going discussions have been held with RCCAAC as part of the revised submission, who have since confirmed that they are satisfied with the revised scheme.
- 4.8. During the course of the previous application process, discussions were held with the Manager of the neighbouring hotel.
- 4.9. A copy of relevant correspondence and details of the community engagement undertaken is included within the Statement of Community Involvement.

## 5. Overview of the Application Proposals

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- 5.1. The development proposals have evolved following feedback from pre-application advice, taking into account officer's comments, a programme of consultation and following the withdrawal of the previous planning application several changes have been made to the proposed scheme. The scheme to which this application applies provides a well thought out, carefully designed response to the site, taking account of the key constraints and the Council's advice. Further details of the design evolution of the scheme can be found in the accompanying Design and Access Statement, produced by Ben Adams Architects.
- 5.2. The development will enlarge and refurbish an existing building of limited architectural quality, with well designed sustainable homes and commercial floorspace that will respond to the surrounding buildings and enhance the streetscape. The existing floorspace of the building at 6726 sq m (GIA) will increase to 8040 sq m (GIA) resulting in a total uplift of 1314 sq m (GIA). The proposals involve in a net gain of 383 sq m (GIA) of office floorspace and 926 sq m (GIA) of residential. The existing frame will benefit from being strengthened to accommodate its proposed usage and due to the roof extension. There are also significant sustainability benefits in re-using the existing frame and the Structural Engineering Statement for Planning highlights that "The decision to reuse the existing frame therefore results in a reduction in the embodied carbon of approximately 40% compared to a new-build. This far out-weights (sic) all other conventional methods to improve the sustainability of the structure."
- 5.3. The existing facades are to be dismantled and will be re-clad in new red bricks with steel balconies/balustrades and glazing fronting Regents Canal, which will reflect the historical, industrial Canal Side context. In addition concrete spandrel panels will define floor edges on the Jamestown Road and Canals Side elevations and louvers to plant access and the bin store on will feature on Jamestown Road elevation.
- 5.4. It is proposed to increase the quantum of office accommodation at the site through converting the basement into additional B1 space along with bin and bike storage for offices and residential uses and plant space, which will be removed from the roof. The ramped vehicular access from Jamestown Road into the existing underground car park will be removed to allow level access and therefore allowing a gain in utilisable floorspace at basement level and to extend the building line along Jamestown Road. In addition the basement will house the building managers office.
- 5.5. At ground floor, the development will benefit from an office reception and atrium with access to the lift lobby and a separate residential reception to create defined and welcoming entrances into the building. This floor will also offer office floorspace.
- 5.6. The first, second and third floors will be solely for B1 office accommodation.
- 5.7. At fourth floor, the massing of the existing extensive roof plant will be removed and replaced with the proposed set back two storey roof extension. The fourth floor will be part B1 office (575 sqm GIA) on the Jamestown Road elevation and two residential on the Canal Side. The fifth floor will be part office (plant and roof access) and predominantly residential accommodation (7 units). At these levels the atrium is open to the elements and open sided balconies facilitate access to apartments.
- 5.8. Details of the unit sizes are detailed at Section 7 of this statement. The proposed unit mix is as follows:
  - 1 Bed: 4 units equating to 44.4%
  - 2 Bed: 3 units equating to 33.3%

- 3 Bed: 2 units equating to 22.2%
- 5.9. All residential units will be for private sale.
- 5.10. All units are provided to Lifetime Homes Standards. A lift allows disabled access to apartments.
- 5.11. The design of the proposal ensures that the additional mass of the development is of comparable scale to the surrounding buildings, maintaining the established character of the area and respecting the principles of planning policy. The roof level extension is discussed further at Section 7 of this statement.
- 5.12. Attractive and well designed external amenity space is incorporated into the design proposals comprising terraces and balconies. The commercial units will benefit from use of amenity space, comprising of a terrace at ground floor fronting the canal, Canal Side balconies on the first and second floors and a roof terrace at fourth floor overlooking Jamestown Road. All residential units benefit from private amenity space extending from between 6 sq m and 88 sq m. Further details are discussed at Section 7 of this Planning Statement and within the Design and Access Statement.
- 5.13. In the basement, 63 cycle parking spaces are proposed, 11 for residential use and 52 for commercial use. The existing car parking spaces will be removed and the development is proposed as 'car free' in recognition of its excellent PTAL level. It is intended to offer two on site car parking bays for Blue Badge Holders.
- 5.14. In terms of servicing and delivery arrangements, this will remain as per the existing situation and will take place on-street on single yellow lines outside the building.
- 5.15. High sustainability credentials have been considered throughout the design evolution. Further details are provided at Section 7 of this Planning Statement and the Energy Statement. A Code for Sustainable Homes Preliminary Assessment also forms part of this planning application and demonstrates how a Code for Sustainable Homes Level 4 rating can be achieved for the residential area and how BREEAM 'very good' will be achieved in the commercial areas.
- 5.16. Full details of the proposed layout are illustrated on the application drawings and discussed further in the submitted Design and Access Statement.

## 6. Planning Policy Review

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- 6.1. All development proposals take place within the context of national, regional and local planning policy. The Local Planning Authority (LPA) will be required by statute to determine the application in accordance with relevant development plan policies unless material considerations indicate otherwise.
- 6.2. For the purposes of this planning application, the statutory development plan comprises the London Plan (2011), the Core Strategy (2010) and the Camden Development Policies (2010).
- 6.3. Within the following section the application proposals are assessed against national policy before considering the relevant development plan policies as set out in the London Plan, Core Strategy and Camden Development Policies prior to discussing relevant local planning guidance.

### National Planning Policy Framework

- 6.4. The NPPF was published on 27<sup>th</sup> March 2012.

***The National Planning Policy Framework is a major step forward. It has been widely welcomed by business, and as a result of its positive influence we are already seeing accelerated plan-making and more positive decision-taking.***

*Eric Pickles (September 2012)*

- 6.5. The key relevant points arising from the adopted NPPF are as follows:
  - An overriding presumption in favour of sustainable development.
  - Promotion of development growth both in terms of new economic development and in providing for new homes.
  - Encouraging the effective use of 'brownfield' land.
  - Plans should have proper regard to development viability, which includes providing acceptable returns to a willing land owner and developer.
- 6.6. The presumption in favour of sustainable development is the "golden thread" which runs through a local plan. The approach to a local plan, its vision and proposals should be expressed in policies which are justified and effective in accordance with the NPPF. The plan needs to be positively prepared.
- 6.7. The NPPF sets out the Government's current and future requirements for boosting significantly the supply of housing (in the drive for economic growth). This includes the identification of a supply of specific, developable sites sufficient to provide five years worth of housing against local housing requirements and of specific, deliverable sites or broad locations for growth for years 6-10 and if possible for years 11-15.
- 6.8. Paragraph 7 indicates priority towards "providing the supply of housing required to meet the needs of present and future generations." Emphasis on "widening the choice of high quality homes" is discussed under Paragraph 9.

- 6.9. There are various references to housing needs throughout the document. Importantly, Paragraph 159 indicates that SHMAs should cater for housing demand, as well as need.
- 6.10. The NPPF indicates that local authorities are required to have a “clear understanding” of housing needs in their areas (Paragraph 159 and 160).

### **London Plan**

- 6.11. The London Plan, published in July 2011, forms part of the statutory development plan for the area. It provides the strategic framework for the Borough and sets out the Mayor’s policies for the capital.
- 6.12. The London Plan identifies six objectives upon which it is based:
- A city that meets the challenges of economic and population growth
  - An internationally competitive and successful city
  - A city of diverse, strong, secure and accessible neighbourhoods
  - A city that delights the senses
  - A city that becomes a world leader in improving the environment
  - A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

### **Employment**

- 6.13. Policy 4.1 is concerned with developing London’s economy which is a key theme of the Plan and focuses on the enabling and promotion of a strong, sustainable and increasingly diverse economy across all parts of London.
- 6.14. Policy 4.2 states that the Mayor of London will seek a range of premises of different sizes including small and medium sized enterprises and costs to be provided to meet the needs of different sectors of the economy. The policy encourages the renewal and modernisation of existing office stock in viable locations to improve quality and flexibility.

### **Housing**

- 6.15. Policy 3.3 states that development plan document policies should seek to exceed housing targets. The Plan outlines that Camden has a 10 year target of 6,650 new homes, 665 on an annual basis. The importance of quality and design in new housing is outlined at Policy 3.5. A range of housing types is sought through Policy 3.8, which requires Boroughs to ensure that new developments provide a range of housing types and sizes. Minimum space standards have been introduced in the Plan at Table 3.3.
- 6.16. Policy 3.11 guides Councils to seek a maximum amount of affordable housing to ensure the completion of at least 13,200 more affordable homes per year in London over the term of the plan, with a view to providing a 60:40 ratio for social rented to intermediate housing.
- 6.17. Policy 3.4 seeks to optimise housing potential, considering design principles and public transport. Table 3.2 sets out relevant density ranges for development.



## Transport

- 6.18. The Mayor's overall strategic vision is to encourage development to reduce car borne travel, improving accessibility to public transport, promotion of walking and cycling, improving transport interchanges and supporting development that generates high levels of trips at locations with good public transport accessibility levels.
- 6.19. Policy 6.1 sets out the Mayor's parking strategy and states that Boroughs should encourage access by sustainable means of transport, assist in limiting the use of the car and contribute to minimising road traffic.
- 6.20. Policy 6.9 relates to cycling and states that Mayor will work with strategic partners to bring about a significant increase in cycling.
- 6.21. Policy 6.13 relates to parking and considers that on-site car parking at new developments should be the minimum necessary and that there is no over-provision that could undermine the use of more sustainable non-car modes.

## Design

- 6.22. Policy 7.1 considers building London's neighbourhoods and communities. It states that development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure. Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods. The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 6.23. Policy 7.2 states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:
- can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances
  - are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment
  - are flexible and responsive taking account of what different people say they need and want, so people can use them in different way
  - are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.
- 6.24. Policy 7.4 states that buildings, streets and open spaces should provide a high quality design response that:
- has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
  - contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area

- is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
  - allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area is informed by the surrounding historic environment.
- 6.25. Policy 7.5 states that development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space.
- 6.26. Policy 7.6 relates to architecture and seeks the highest quality of urban design which positively contributes to the public realm and states that buildings and structures should:
- be of the highest architectural quality;
  - be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
  - comprise details and materials that complement, not necessarily replicate, the local architectural character;
  - not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings;
  - incorporate best practice in resource management and climate change mitigation and adaptation;
  - provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
  - be adaptable to different activities and land uses, particularly at ground level;
  - meet the principles of inclusive design; and
  - optimise the potential of sites.
- 6.27. Policy 7.8 considers heritage assets and archaeology stating “Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology”.
- 6.28. Policy 7.18 protects local open space and states that the Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.
- 6.29. Policy 7.19 relates to biodiversity and outlines that the Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity.

## **Sustainability**

- 6.30. A general thrust of the Plan is to promote sustainable development. Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy set out at Policy 5.2:
- Be lean: use less energy;
  - Be clean: supply energy efficiently;
  - Be green: use renewable energy.
- 6.31. Policy 5.3 seeks to ensure that future developments meet the highest standards of sustainable design and construction.
- 6.32. Policy 5.7 encourages energy efficiency and the use of renewable energy technologies in order to help meet the Mayoral carbon emission reduction targets. Specifically, London Plan Policy 5.7 now requires developments to achieve a reduction in carbon emissions from onsite renewable energy generation (following the incorporation of low carbon building practises and techniques).
- 6.33. The section below explores the Core Strategy setting out the general approach for the Borough before considering the Camden Development Policies Document which details specific policy.

## **Camden Core Strategy**

### **Growth Areas**

- 6.34. Policy CS1 relates to the distribution of growth and development and states that the Council will promote concentration of development in the Growth Areas. Policy CS2 states that the Growth Areas set out in the plan are expected to provide significant business floorspace in the period to 2024/25. Whilst the site is not a designated Growth Area, it falls adjacent to Camden's defined town centre area. Given that the site does not fall within the designated Growth Areas, Policy CS3 on 'Other highly accessible areas' is more applicable. CS3 promotes development in Camden Town and appropriate edge of centre locations, and considers residential and offices suitable uses in accessible areas.
- 6.35. Given the site is situated immediately adjacent to the town centre boundary, Policy CS4 should be considered. Policy CS4 (Areas of Limited Change) seeks development across most of the Borough, which "respects the character of its surroundings, conserves the heritage and other important features and provides environmental improvements and other local benefits where appropriate."

### **Employment**

- 6.36. Policy CS8 relates to Camden's economy and seeks to ensure that no one is excluded from its success. The Council outline that they will safeguard and maximise the potential of existing employment sites to ensure future needs are met within Camden Town. Policy CS8 states that facilities must be suitable for small and medium enterprises, such as managed, affordable workspaces. The Council outline that they will (amongst others):
- Support Camden's industries by:
    - safeguarding existing employment sites and premises in the Borough that meet the needs of modern industry and other employers;

- safeguarding the Borough’s main Industry Area;
- Expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace;
- Support local enterprise development, employment and training schemes for Camden residents;
- Recognise and encourage the concentrations of creative and cultural businesses in the Borough as well as supporting the development of Camden’s tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy...

### **Housing**

- 6.37. Policy CS6 seeks to address Camden’s Community Strategy by ensuring that the Borough is sustainable in growth which adapts to an increasing population. LBC seeks new high quality homes, which maximises the Borough’s capacity for housing. Policy CS6 strives to exceed housing growth targets. The Core Strategy sets a housing growth target of 8,925 between 2010-2025, including 6,550 additional self contained dwellings. Policy CS6 considers housing as a priority land-use within their Local Development Framework.
- 6.38. Policy CS6 sets out that the Council seeks to secure high quality affordable housing, at a target rate of 50% of the Borough wide target of additional self contained units. However, the target is negotiable, subject to the financial viability of the scheme.
- 6.39. Policy CS6 seeks housing types which are suitable for different users (amongst others), including, families and people with mobility difficulties.

### **Transport**

- 6.40. Under Policy CS11 “The Council will promote the delivery of transport infrastructure and the availability of sustainable transport choices in order to support Camden’s growth, reduce the environmental impact of travel, and relieve pressure on the Borough’s transport network”. Policy CS11 seeks the promotion of cycling, walking and use of the public transport network.

### **Sustainability**

- 6.41. Policy CS13 relates to tackling climate change through promoting higher environmental standards and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation (amongst others):
- Promoting the efficient use of land and buildings;
  - Minimising carbon emissions from the development, construction and occupation of buildings by implementing, in order, all of the elements of the following energy hierarchy:
    - Ensuring developments use less energy;
    - Making use of energy from efficient sources, such as Kings Cross, Gower Street, Bloomsbury and proposed Euston Road decentralised energy networks; and
    - Generating renewable energy on site.

- Ensuring buildings and spaces are designed to cope with and minimise the effects of climate change.
- 6.42. Paragraph 13.9 expects development or alterations to existing buildings to include “proportionate measures to be taken to improve their environmental sustainability, where possible”.
- 6.43. Paragraphs 13.16 – 13.20 conclude that the most cost-effective way to meet carbon reduction targets is through a local energy generation and distribution system. Developments should try to connect to ‘decentralised energy networks’ as their source of power where feasible or viable.

### **Design**

- 6.44. Under Policy CS14 “the Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by”:
- a) Requiring development of the highest standard of design that respects local context and character;
  - b) Preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including Conservation Areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
  - c) Promoting high quality landscaping and works to streets and public spaces;
  - d) Seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
  - e) Protecting important views of St Paul’s Cathedral and the Palace of Westminster from site inside and outside the Borough and protecting important local views.
- 6.45. The site is designated within the Proposals Map as being located in the Regents Canal Conservation Area and an Archaeological Priority Area. Paragraph 14.11 seeks to preserve and enhance where possible heritage areas and buildings within LBC.
- 6.46. Core Strategy Policy CS15 seeks to protect and improve open spaces, including the Regents Canal. The policy sets out that the canal will be protected and enhanced by (amongst others) the application of guidance set out in the Conservation Area Management Plan and by balancing the differing demands on the Canal and adjoining land. The sub text to the policy sets out that “the Canal is an important historical feature and it is important that development near the Canal reflects its unique character” (paragraph 15.26).
- 6.47. Policy CS17 aims to prevent crime, which will: “c) require developments to demonstrate that they have incorporated design principles which contribute to community safety and security...”; d) reduce opportunities for crime through effective management and design.

## **Camden Development Policies**

### **Mixed Use Development**

- 6.48. Policy DP1 relates to mixed use development and highlights that the Council “will require a mix of uses in development where appropriate in all parts of the Borough, including a contribution towards the supply of housing”. Furthermore, “in considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing

and other secondary uses, the Council will take into account”: the character of the development, the site and the area; site size, extent of the additional floorspace, and constraints on including a mix of uses; and whether the secondary uses are incompatible with the character of the primary use, amongst others.

### **Employment**

- 6.49. Policy DP13 seeks to “retain land and buildings that are suitable for continued business use and will resist the change to non-business uses.”
- 6.50. Where premises are still suitable for continued use, Policy DP13 sets out that the following will be considered in redevelopment proposals for mixed use schemes, provided that (amongst others):
- c) the level of employment floorspace is maintained or increased;
  - d) they include other priority uses, such as housing and affordable housing;
  - e) premises suitable for new, small or medium enterprises are provided.
- 6.51. Paragraph 13.6 of the supporting policy text highlights that “Where premises or sites are suitable for continued business use, the Council will consider redevelopment schemes which maintain the employment floorspace and provide other priority uses... The re-provision of employment floorspace should be able to accommodate a range of business types and sizes (e.g. new businesses, small and medium sized enterprises (SMEs) and creative businesses). Applicants must demonstrate to the Council’s satisfaction that the commercial element is appropriate to meet the likely needs of the end user. The provision of inappropriate business space (e.g. inappropriate floor to ceiling height or poor access arrangements) will not be acceptable as this often fails to attract an occupier, which can lead to vacancy... effective management of the business space will also be important”.

### **Housing**

- 6.52. Policy DP2 seeks to ensure that Camden’s capacity for housing contribution is maximised. Paragraph 2.8 notes that the need does not automatically override existing non-residential uses.
- 6.53. Paragraph 2.9 notes that developments should be proposed at densities which make maximum use of sites, whilst ensuring that new housing is accessible, responsive to the character and built form of the surroundings, and protects the amenity of neighbours and future occupiers. LBC considers the London Plan density matrix as guidance.
- 6.54. Policy DP3 sets out that the Council will expect all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. Supporting text paragraph 3.8 sets out that “the Council considers that a floorspace of 1,000sqm (gross) is capable of accommodating 10 family dwellings, and will expect all residential developments that would provide additional built residential floorspace of 1,000sqm (gross) to make a contribution to the supply of affordable housing.”
- 6.55. Policy DP5 sets out that homes of different sizes are required throughout the Borough. The policy sets out that market housing should aim to be 40% x 2 bed units to meet very high demands. Policy DP6 requires all new housing to meet Lifetime Homes standards and that 10% should meet wheelchair standards, or be easily adaptable to wheelchair standards.

## **Transport**

- 6.56. Policy DP16 seeks to ensure that development is supported by adequate transport infrastructure, including walking, cycling and public transport networks. Supporting paragraph 16.9 requires a Transport Assessment to be undertaken for significant proposals.
- 6.57. Walking, cycling and public transport provision is further covered in Policy DP17, which aims to promote safe pedestrian and cycle links.
- 6.58. LBC seeks to ensure that developments provide the minimum necessary car parking, in a bid to reduce the Borough's congestion and to encourage people to use sustainable modes of transport; supporting parking criteria is set out within with, Policy DP18. Policy DP18 also sets out that developments are expected to meet the Council's minimum car parking standards for cycle parking. Appendix 2 to the Development Policies sets out cycle parking standards; the most relevant is the requirement for Use Class B1 premises to provide 1 cycle parking space per 250sqm of floorspace for staff. Use Class C3 units are required to provide 1 space per unit.
- 6.59. Policy DP20 seeks to minimise the movement of goods and materials by road, both during construction and occupation.

## **Sustainability**

- 6.60. Policy DP22 encourages developments to conserve energy and resources through the use of recycled and renewable buildings materials.
- 6.61. The Council "will require development to incorporate sustainable design and construction measures. Schemes must":
- a) demonstrate how sustainable development principles have been incorporated into the design and proposed implementation; and
  - b) incorporate green or brown roofs and green walls wherever suitable.
- 6.62. Paragraph 22.5 states that all schemes must consider: "the accessibility of the building's location; its density and mix of uses; its detailed design taking into account the orientation of the site; and the mechanical services and materials chosen can all have a major impact on its energy efficiency". Developments of 5 or more dwellings or over 500sq m of any floorspace should address these principles in their Design and Access Statement or in an Energy Efficiency Statement.
- 6.63. The Council will promote and measure sustainable design and construction by: expecting non-domestic developments of 500sqm of floorspace or above to achieve "very good" in BREEAM assessments and "excellent" from 2016 and encouraging zero carbon from 2019. Policy DP22 expects new build housing to meet Code for Sustainable Homes Level 4 by 2013.

## **Design**

- 6.64. Policy DP24 relates to high quality design and states that the Council "will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider":
- a) character, setting, context and the form and scale of neighbouring buildings;
  - b) the character and proportions of the existing building, where alterations and extensions are proposed;

- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.

### **Heritage**

- 6.65. Policy DP25 considers the conservation of the Borough's heritage and states that in relation to Conservation Areas, the Council will:
- a) take account of Conservation Area statements, appraisals and management plans when assessing applications within Conservation Areas;
  - b) only permit development within Conservation Areas that preserves and enhances the character and appearance of the area;
  - c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a Conservation Area where this harms the character or appearance of the Conservation Area, unless exceptional circumstances are shown that outweigh the case for retention;
  - d) not permit development outside of a Conservation Area that causes harm to the character and appearance of that Conservation Area; and
  - e) preserve trees and garden spaces which contribute to the character of a Conservation Area and which provide a setting for Camden's architectural heritage.

### **Amenity**

- 6.66. Policy DP26 considers the impact of development with regards to occupiers and neighbours and will ensure that development is not detrimental to amenity and the following factors will be considered:
- a) visual privacy and overlooking;
  - b) overshadowing and outlook;
  - c) sunlight, daylight and artificial light levels;
  - d) noise and vibration levels;
  - e) odour, fumes and dust;
  - f) microclimate;
  - g) the inclusion of appropriate attenuation measures.



- 6.67. In particular, paragraph 26.4 gives special attention to light pollution created by excessive artificial lighting levels created by large glazed areas.
- 6.68. Furthermore, Policy DP28 ensures that noise and vibration is controlled and managed to minimise the impact on local amenity during the construction phase.

### **Conservation Area Appraisal and Management Strategy (2008)**

- 6.69. A Regents Canal Conservation Area Appraisal and Management Strategy was adopted in September 2008. Jamestown Road has been part of the Conservation Area designation since March 1984. The appraisal notes that numbers 26-34 Jamestown Road “are buildings which are considered to neither preserve nor enhance the character of the Conservation Area and therefore there may be scope for redevelopment, subject to acceptable replacement”. The appraisal proceeds to note that sites identified for redevelopment will raise issues “about the future use of the canal and the types of Canal Side design which would reflect those uses whilst preserving its unique historic character. Much of the special character of the area is derived from its industrial past, which has produced an historic Canal Side building typology that tends to turn its back on the canal. The design of new buildings should positively address the Canal Side, whilst striking a balance with its established historic character. New uses are likely to be located on the canal to exploit the waterway and reconciling new development with the established character of the old will take skill and imagination”.

### **Camden Planning Guidance (CPG1- Design)**

- 6.70. CPG1 sets out key messages for design excellence, response to heritage issues, extensions, roofs, terraces and balconies.

### **Camden Planning Guidance (CPG2- Housing)**

- 6.71. Camden’s Housing Planning Guidance seeks development which provides high quality housing which provides secure, well-lit accommodation that has well-designed layouts and rooms.
- 6.72. CPG 2 sets out requirements for internal and external space standards.

### **Camden Planning Guidance (CPG 3) – Sustainability**

- 6.73. Further to Core Strategy Policy CS13, the Council “expects development or alterations to existing buildings to include proportionate measures to be taken to improve their environmental sustainability” in order to reduce their carbon emissions. Chapter 4 of the guidance provides information on how existing buildings can be more energy efficient, listing potential measures that can be implemented whilst updating, refurbishing and retro-fitting an existing building. These measures will be bespoke to each property.

## 7. Planning Assessment

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- 7.1. The preceding sections of this statement have assessed the character and context of the site and surroundings, the nature of the proposed development and the planning policy framework against which the proposals should be considered. This section seeks to assess the proposal against the contextual and policy background in relation to its acceptability and potential impacts raised.

### **Principle of Development**

- 7.2. In light of the redevelopment objectives of the project and in the context of the planning policy framework set out above, the following section considers the key themes associated with the development proposals and assesses the scheme against them.
- 7.3. The general thrust of national, regional and local policies is to secure sustainable patterns of development and re-use previously developed ('brownfield') urban land. A presumption in favour of development and promoting economic growth accords with the core themes in the NPPF which reflects the latest Government thinking in relation to the determination of planning applications.
- 7.4. The pro-growth approach of the NPPF has been amplified in a Ministerial Statement from Eric Pickles. The Ministerial Statement (September 2012) states that Local Authorities should take "a responsibility to meet their needs for development and growth, and to deal quickly and effectively with proposals that will deliver homes, jobs and facilities".
- 7.5. This intensification of uses on a site with the benefit of an excellent PTAL rating fully accords with planning policy. It is considered that the proposals will meet this aim by providing a genuinely mixed use development which will make better use of this currently under-utilised site. Mixed use development is encouraged under Camden Development Policies DP1 and it is considered that maximising office provision whilst providing attractive residential units fully accords with the provisions of national, regional and local planning policy. The intensification of employment uses was welcomed by LBC at pre-application stage and no objection was raised to the principle of introducing residential use.
- 7.6. Whilst the applicant acknowledges that the site does not fall in a growth area where growth is predominantly focused, the site lies adjacent to a town centre boundary and Core Strategy Policy CC4 is relevant which states "Parts of the Borough outside of the growth areas and other highly accessible areas set out in policy CS1 will experience more limited development and change, although some development is expected to take place in most parts of Camden over the timescale of the Core Strategy."
- 7.7. It is considered for the reasons as outlined in this Planning Statement that the proposed development for residential and additional and enhanced employment floorspace will bring many benefits which are considered to outweigh the impact of increasing the height of the existing building which is discussed in this Planning Statement.

### **Employment Provision**

- 7.8. Local businesses provide employment and income for local people contributing towards the economic well-being of the borough. Accordingly, it is important to ensure that suitable premises exist in the right locations in order to accommodate businesses and to sustain jobs.
- 7.9. London Plan Policy 4.1 seeks the promotion of strong, sustainable and increasingly diverse economy across all parts of London. London Plan Policy 4.2 also encourages the renewal and

modernisation of existing office stock which is considered to accord with the refurbishment objectives of the project.

- 7.10. The general thrust of the Council's adopted policies is to protect sites and buildings which provide employment opportunities. In particular, local planning policies Core Strategy Policy CS8 and Camden Development Policies Policy DP13 seeks to retain existing employment uses. Policy DP13 also highlights that redevelopment of employment sites will be considered if the level of employment is maintained/increased and other priority uses such as housing are included.
- 7.11. The refurbishment of the existing floorspace and erection of a roof extension will ensure that there is no net loss of office floorspace, an approach which is considered inline with London Plan Policy 4.2, Core Strategy Policy CS8 and Camden Development Policies Policy DP13 which seeks to safeguard existing employment accommodation. The proposals in fact seek to increase the existing office accommodation resulting in a net gain of 383 sq m (GIA) which is considered to maximise the efficiency of the site. This increase was considered favourably at pre-application stage and the Council's formal feedback stated "This increase in employment floorspace is welcomed and will aid the Council in supporting the local economy and meeting the demand for office floorspace."
- 7.12. The refurbished floorspace will be of a high quality which is envisaged to be more commercially attractive than the existing office floorspace and supported by an attractive atrium, bicycle storage facilities etc. The enhancements to the quality of the existing office stock was welcomed by officers at the pre-application stage of the previous application. Feedback highlighted "The building has a substantial depth of 53 sqm (maximum). The proposal includes creating a central lightwell in order to ensure all floors would have good levels of natural daylight. This is welcomed. The office floorspace would be served by 3 lifts and two stair cases and would have toilet facilities on all floors. This is welcomed."
- 7.13. Utilising the Employment Density Guidelines (2010) the 383 sq m (NIA) created by refurbishment or extension could potentially support an additional 32 jobs which is considered a significant uplift.
- 7.14. Whilst the building is currently let to December 2013, the proposals will ensure that the building will be attractive to potential occupiers seeking modern office space and to enhance the prospects of the building being re-let and to minimise any vacancy periods in the future. The proposals provide separate access points for both the residential and office floorspace and it is also considered that the adjacency of such uses is appropriate in maintaining business activity and residential amenity.

### **Introduction of Residential Use**

- 7.15. The need for new housing in London is well-documented and the provision of new residential accommodation is supported by national, regional and local planning policy.
- 7.16. National and regional planning policies encourage the efficient utilisation of urban land. The NPPF states that Local Planning Authorities should "recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites...".
- 7.17. The NPPF sets out a number of measures to "boost significantly the supply of housing" and in accordance with paragraph 49 of the NPPF, housing applications should be considered in the context of the presumption in favour of sustainable development.
- 7.18. The applicant considers that the potential of the site could be further maximised and provides a good opportunity to introduce residential development in accordance with the NPPF. The introduction of residential is supported at Officer level with formal pre-application feedback

highlighting “The principle of providing residential accommodation at the site would be supported by policies CS6 and DP2.”

- 7.19. The proposed scheme will provide 9 new dwellings assisting in the delivery of housing targets set out at both a local and regional level. Core Strategy Policy H1 outlines the Council’s aspirations to exceed London Plan targets of an additional 665 dwellings per year.
- 7.20. All units are proposed to be Lifetime Homes and wheelchair standard compliant in line with Core Strategy Policy CS6.
- 7.21. Relevant standards and policies in respect of residential amenity, including residential space standards, layout, access to daylight and sunlight, privacy, noise and ventilation have been carefully considered throughout the scheme design to ensure that the development will create a high quality living environment for future residents.
- 7.22. In summary, the proposed development provides an excellent opportunity to maximise the use of this site, within a sustainable location. LBC have confirmed in the formal pre-application response that the principle of including residential units at the site accords with local policy and the inclusion was therefore welcomed.

### **Residential Mix**

- 7.23. Paragraph 50 of the NPPF sets out guidance for local planning authorities with the objective of delivering a wide choice of homes. This states that local planning authorities should (amongst others):
  - plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
  - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
- 7.24. London Plan Policy 3.8 states that “Londoners should have a genuine choice of homes that they can afford and which meets their requirements for different sizes and types of dwellings in the highest quality environments”. Policy 3.9 further seeks a more balanced mix of tenures in all parts of London.
- 7.25. The Council’s Development Policy DP5 outlines that a mix of housing units should be provided to increase the proportion of 2 and 3 bedroom units in LBC. However, when considering proposed unit mixes, LBC will consider the character of the development, the site and the area. The proposed scheme offers 4 x 1 bed units, 3 x 2 bed units and 2 x 3 bed units, which is broadly inline with LBC’s dwelling size priorities as set out in Development Policy DP5 and represents a range across unit sizes. Considering the urban setting of the site in close proximity to transport links, it is considered that the site is more suited to 1 and 2 bed units, however a proportion of family units are provided (assumed as 3 bed units) resulting in 22.2% of the unit mix proposed.
- 7.26. The unit mix was considered appropriate at pre-application stage with feedback highlighting “The proposed mix is considered acceptable and will include just over 40% 2 bed units which is compliant with policy. Family units are also proposed, this is welcomed.”
- 7.27. Overall it is considered that the proposed housing mix responds to the specific circumstances of the site and is appropriate from a planning policy perspective in relation to the NPPF, relevant London Plan Policies and local planning policies.

## Affordable Housing

- 7.28. The applicant has considered the criteria set out in Core Strategy Policy CP6 and Camden Development Policies Policy DP3 which seek affordable housing in schemes with a capacity of 10 or more additional units.
- 7.29. The scheme proposes 9 residential units and provides below 1000 sq m of gross residential floorspace and therefore the requirement for affordable housing does not apply, as per the detailed criteria set out Development Policy DP3. This was confirmed at the pre-application stage.
- 7.30. Due to the current use of the site as office and policy which seeks to protect employment floorspace, the constrained urban nature of the site restricts the floor area available for residential. Therefore so as not to prejudice the delivery of office floorspace in line with policy the applicant has considered flexible employment space as a greater priority than affordable housing.
- 7.31. Accommodating a greater number of units within the proposed layout to allow an element of affordable housing would result in smaller and tighter units.
- 7.32. Notwithstanding the above, it is unlikely that a Registered Provider would take up such a small number of units in terms of the management issues etc.
- 7.33. The proposals are therefore considered to comply with Core Strategy Policy CP6 and Camden Development Policies Policy DP3.

## Minimum Space Standards

- 7.34. The importance of quality and design in new housing is outlined at London Plan Policy 3.5.
- 7.35. Both the London Plan (2011) and Camden Planning Guidance 2 (2011) comprise minimum space standards for new residential development which are set out as follows. At the meeting with LBC held on the 7<sup>th</sup> June 2013, the Council outlined that the unit sizes should accord with Camden's internal standards. These are set out as follows:

Number of Persons	1	2	3	4	5	6
Minimum floorspace	32 sq m	48 sq m	61 sq m	75 sq m	84 sq m	93 sq m

Camden Planning Guidance 2 (2011) Internal floorspace standards

1 Bed 1 Person	37 sq m
1 Bed 2 Person	50 sq m
2 Bed 3 Person	61 sq m
2 Bed 4 Person	70 sq m
3 Bed 4 Person	74 sq m
3 Bed 5 Person	86 sq m
3 Bed 6 Person	95 sq m

London Plan Table 3.3 (2011) Minimum space standards for new development (GIA)

- 7.36. The unit sizes for the development proposals comprise 1 bed apartments ranging from 45 sq m to 50 sq m, 2 bed apartments ranging from 83 sq m to 95 sq m and 3 bed apartments ranging from 130 sq m to 179 sq m. It is therefore evidenced that the proposed units comply and in many instances significantly exceed local minimum size standards and in the majority of cases exceed minimum London Plan Standards. The majority of the units are very

spacious and are envisaged to be for owner occupiers to put down roots and become part of the local community rather than buy to let investors.

- 7.37. It is therefore considered that the proposals comply with the ethos of the London Plan and Camden Planning Guidance in relation to minimum unit sizes.

### **Refurbishment of the Existing Building**

- 7.38. The applicant has taken the decision to retain the existing frame which is considered to represent a sustainable solution. Further details are enclosed within the Structural Engineering Statement for Planning prepared by Expedition. The dismantling and refurbishment of the existing building is considered to have many advantages over demolition and re-build including:
- Seeking to retain an existing structure in a Conservation Area whilst providing a high quality and sensitive design approach;
  - Attaining relevant environmental and building standards;
  - Allow internal reconfigurations including an attractive atrium to improve the commercial attractiveness of the office floorspace and provide enhanced facilities desired by potential tenants;
  - Minimising construction impacts;
  - Obviate the need for below ground foundation works which is considered of benefit due to the site's location in an Archaeological Priority Area.

### **Design Approach**

- 7.39. Design development of the scheme has been the result of pre-application considerations and the feedback received during officers' consideration of the previous application, which has led to the submitted proposal. It is considered that the proposals sit comfortably within the context of the Canal area and Jamestown Road, which accords with local, regional and national policy and guidance. Ben Adams Architects have prepared the Design and Access Statement, which forms part of this planning application, which addresses all design considerations in relation to the scheme.
- 7.40. The applicant acknowledges the supporting text of the Core Strategy which states that "Camden Town is characterised by a great richness and variety in its built and natural environment, with a valuable heritage of local, national and international significance, stemming from the historical routes into London." Throughout the design process the proposals have sought to respond to the unique character of Camden and the Regents Canal and the differing townscapes at Jamestown Road and the canal. To ensure that the proposals compliment the setting, an overall reduction in height from the previous application is proposed.
- 7.41. Core Strategy Policy CC4 seeks development proposals which give consideration to the surrounding context when proposing use and scales. The office floorspace seeks to maximise internal efficiencies as well as in the roof extension which is set back from the building line and the applicant would make note that there is a significant quantum of plant already at fourth floor roof level which effectively appears as an additional roof storey.
- 7.42. It is the applicant's view that the height, bulk, scale of the proposed development carefully considers the urban grain of the surrounding area. The proposed development will be 6 storeys (ground plus 5) but with the two top storeys set back, the proposed height is 0.6m

lower than the height proposed in the withdrawn application. The set back from the Canal is 12.6 metres at 4<sup>th</sup> floor level and a further 4.5 metres at 5<sup>th</sup> floor and to Jamestown Road it is a setback of 2.8 metres at 4<sup>th</sup> floor level and a further 2 metres at 5<sup>th</sup> floor.

- 7.43. This is considered to be of appropriate scale, bulk and massing in relation to the surrounding streetscene due to the varied nature of surrounding building heights and an appropriate response to Officer feedback during the determination period of the withdrawn application. Please refer to the CGIs comprised within the planning application documentation.
- 7.44. Notwithstanding, the above, this is an urban London location with a vibrant and diverse streetscape of differing architectural styles and building heights.
- 7.45. The Council's formal pre-application advice acknowledges scope for an additional storey of height but raises concern with regards to a two storey roof top extension. Following this advice, the applicant has considered this element very carefully and has discussed this with a Ward Councillor and the Regents Canal Conservation Area Advisory Committee and there was no objection raised to the scale, mass and height of the proposals of the previous application. Discussions with officers during the determination period, have led to the height of the proposed to be reduced by 0.6m. CGI's form part of this application which the applicant considers clearly and visually demonstrates that the impact from this additional storey is minimal and is 'lost' in several views.
- 7.46. In accordance with London Plan Policies 7.1, 7.2 and 7.6 the proposed building relates well to the adjacent Holiday Inn at 30 Jamestown Road and the neighbouring Iceworks building at 34 Jamestown Road. Beyond the immediate adjacent buildings on Jamestown Road, the bulk, scale and massing of the proposed ensures the small vertical extension of 0.95 metres (52.06 metres A.O.D to 53.01 metres A.O.D) does not have a significant impact upon the streetscape of Jamestown Road.
- 7.47. The roof extension will be primarily glazed which is considered a sympathetic material to mitigate any potential obstacles of overlooking and to further reduce the perceived impact of this element. The majority of the existing plant will be relocated to the basement, with some remaining internally at the 5th floor. Reducing the bulk at the upper floors allows for the inclusion of significant areas of external residential amenity space, which accords with the aspirations of London Plan Policy 7.18 which seeks the creation of new open space to address deficiencies. The design of the upper floors reflect both settings and considers the criteria set out in Camden Development Policies Policy DP24.
- 7.48. With only the floor comprising part office and part residential, this would only allow for the introduction of 2 residential units as proposed for fourth floor as part of the development proposals, which would make minimal contribution to the Borough's housing stock.
- 7.49. Views submitted as part of the application demonstrate the minimal visual impact of this element from the streetscene and compliance with London Plan Policy 7.4, Core Strategy CS14 and Camden Development Policies Policy DP24. The proposed reduction of 0.6m in height, from the withdrawn application further reduces the visual impact,
- 7.50. The existing and proposed elevations included within this planning application demonstrate this new relationship in terms of building heights in relation to the existing situation. The design offers a significant improvement on the withdrawn application, in terms of height, scale and massing. In addition, the Design and Access Statement details the architectural ambition of the site.

## **Design Treatment and Façade Materials**

- 7.51. The proposals will provide a high quality designed building, in line with local, regional and national policy, whilst maximising the potential of the site with consideration to the key constraints and in the context of the surrounding area.
- 7.52. The Design and Access Statement sets out the key approaches of the design which includes the following elements:
- Strong vertical masonry piers running into the canal echo the fenestration patterns of neighbouring Canal Side buildings and Interchange building.
  - Concrete spandrel panels at lower levels compliments the local historical industrial palette.
  - Vertical masonry emphasis is enhanced by deep, recessed window opening separated by concrete spandrel panels and elegant projecting steel balconies.
  - The upper levels and terraces are a lightweight foil, with minimal sliding glass walls and generous planting to provide green amenity space for the residential accommodation at roof level.
- 7.53. Formal feedback from LBC supports the proposed elevational expression stating “The proposed remodelling of the building’s elevations is welcomed and the current design is considered acceptable as it refers to the historic and architectural characteristics of traditional canal side buildings, being more solid and substantial than the previous proposals.” This application seeks to build on comments received during officers’ consideration of the withdrawn application and it is considered that the amendments are wholly appropriate.
- 7.54. Full details of how the scheme has evolved following comments throughout the public engagement process are detailed in the Design and Access Statement and Statement of Community Involvement.
- 7.55. As per the requirements of London Plan Policy 7.6 and 7.8, Core Strategy CS14 and CS15 and Camden Development Policies DP24, the design palette is formulated from a simple and elegant set of high quality materials consisting of red brick and concrete with modern glazing and balustrades. Pre-application advice confirmed that LBC support the use of red brick and glazing on the elevations as this reinforced the solidity of the building amongst the surroundings. In addition, LBC confirmed that the proposed Canal Side facade refers to the historic and architectural characteristics of the traditional buildings fronting the canal and welcomed the infilling of the ground floor void along the Canal Side elevation.

## **Impact on Heritage Assets**

- 7.56. A ‘heritage asset’ is defined as any building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest, and includes conservation areas.
- 7.57. The NPPF requires proposals to “conserve heritage assets in a manner appropriate to their significance”.
- 7.58. The applicant acknowledges that the site comes within a Conservation Area and considers that the current building does not contribute positively to the area, a view which was echoed by LBC in the pre-application advice which stated that “The building is located within the Regent’s Canal Conservation Area however it is not identified as making a positive contribution to its character and appearance.” In light of this assessment, the proposals will seek to retain the existing building frame and improve and enhance the appearance of the



building and formulate a design approach which preserves and enhances the Conservation Area as required under Development Policies DP25.

- 7.59. This policy also takes account of Conservation Area Appraisals when assessing development proposals. As set out at Section 5, there is an adopted Regents Canal Conservation Area Appraisal and Management Strategy which notes that 26-34 Jamestown Road “are buildings which are considered to neither preserve nor enhance the character of the Conservation Area and therefore there may be scope for redevelopment, subject to acceptable replacement.” The appraisal proceeds to note that sites identified for redevelopment will raise issues “about the future use of the canal and the types of Canal Side design which would reflect those uses whilst preserving its unique historic character. Much of the special character of the area is derived from its industrial past, which has produced an historic Canal Side building typology that tends to turn its back on the canal. The design of new buildings should positively address the Canal Side, whilst striking a balance with its established historic character. New uses are likely to be located on the canal to exploit the waterway and reconciling new development with the established character of the old will take skill and imagination”.
- 7.60. It is therefore considered that subject to a suitable replacement design, there is scope for replacement as the subject property is recognised as not preserving or enhancing the Conservation Area’s character. This Planning Statement explains why the proposals are considered a suitable replacement in relation to the existing situation.
- 7.61. Camden Development Policies Policy DP25 states that total or substantial demolition of unlisted buildings in Conservation Areas will be resisted unless exceptional circumstances are demonstrated. On the basis of the text within the Conservation Area and Management Appraisal it is not considered that the existing building makes a positive contribution to the Conservation Area but in any event the proposals seek to retain the existing frame; albeit the existing facades will be dismantled and replaced with new high quality elevations.

#### **Impact on Crime**

- 7.62. Improving the commercial floorspace and potentially the number of jobs that could be supported, increasing amenity space and delivering residential accommodation to increase natural surveillance from the site exhibits how the scheme has been designed in accordance with the principles and objectives of minimising opportunities for crime. In addition, the removal of the underground car park entrance, brings the building line forward inline with the existing building and removes hidden space from the streetscape. Thus, it is considered that the scheme is in accordance with London Plan Policy 7.3 and Camden Development Policies Policy DP6.

#### **Conclusion to the Design Section**

- 7.63. The existing building at 32 Jamestown Road is recognised by LBC to be of limited architectural value and the proposed refurbishment and roof extension is considered acceptable within the Conservation Area, in terms of bulk, scale, massing and impact on heritage assets. It is considered that the proposals will enhance the architectural quality of the area as a whole and enrich the Conservation Area, in line with Core Strategy Policy CS14 and Camden Development Policies Policy DP24.
- 7.64. In summary, the proposed building will remain sympathetic to the surrounding area whilst providing an extension to the existing building for residential uses; a use which is appropriate in the context of the surroundings and sits comfortably adjacent to B1 use. The development therefore complies with local, regional and national policy on the appropriateness of development within its surroundings.

## Amenity Provision and Landscaping

- 7.65. London Plan Policy 3.5 seeks to enhance the quality of local places by ensuring that new housing developments take into account the provision of public, communal and open spaces. Policy 3.6 sets strategic guidance stating that the “Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery”.
- 7.66. Policy 7.5 seeks to ensure that London’s public spaces are secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces and the development proposals will accord with the objectives of this policy.
- 7.67. Policy 7.18 protects local open space and states that the Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.
- 7.68. The proposals include a significant proportion of attractive and usable private residential amenity space for every dwelling with the 2 x 3 bed family units benefiting from 60 sq m and 88 sq m per unit respectively which is considered to be appropriate for families with children to enjoy.
- 7.69. Due to the urban and constrained nature of the site, provision for residential communal space cannot be included into the scheme proposals; however Camden Planning Guidance 2 states that “Outdoor residential amenity space can be provided in the form of private garden space, balconies, terraces, roof gardens or as communal amenity space.” The guidance goes on to state that child play space should be provided where the scheme provides a large proportion of family units. Given that 22% family accommodation is proposed and the size of the private space for the 3 bed units proposed, it is considered that not providing a dedicated area of communal child play space is appropriate.
- 7.70. The revised application, has sought to respond to feedback received from the neighbouring hotel, who raised concern in relation to the location of the private amenity space and the impact this could have on the amenity of the hotel and guests. The size of the fourth and fifth floor amenity space has been reduced in size and areas of inaccessible green roof space are proposed. Furthermore the privacy and amenity of the hotel guests will be protected with the installation of appropriate privacy screening to the balconies and terraces at roof level.
- 7.71. Furthermore, as the development is for only 9 apartments, it is considered that it would be more appropriate to provide private outside space in place of residential communal space, which occupiers / residents would value and enjoy more from an amenity perspective as it is directly accessible from their flat.
- 7.72. Additionally, the development is situated close to numerous parks and public gardens with children’s facilities that future residents of the development will have easy access to including:
- **Chalcot Square Gardens Childrens Play Area**– Play area with toddler swings and spring animals. 900m distant from the site.
  - **Cumberland Market Childrens Play Area** -Playground for young children and multi-use games area for over 8s, for football, basketball and tennis. 1.5km distant from the site.
  - **Elm Village Open Space** – Barker Drive – Play area with toddler and junior swings, spring animals, slide, see saw and climbing frame. 1.1km distant from the site.

- **Rochester Terrace Gardens Childrens Play Area** - Playground with play equipment for 0-6s, 6-8s and 8-14s. 900m distant from the site.
- **St Martins Gardens Childrens Play Area** - Play area in park with swings, multi-activity play structure, spring animals and climbing frame. 750m distant from the site.
- In addition the site is in close proximity of **Regents Park** (800-850m) and **Primrose Hill** (900m). Both parks have designated equipped children's playground's.
- Distances are approximate to location and based on walking routes.

7.73. The scheme also provides balconies and a terrace for the office occupiers.

7.74. The contribution is considered inline with the principle of regional planning policies and Camden Planning Guidance 2. Further details of the landscaping strategy is explored in the Design and Access Statement.

### **Daylight and Sunlight**

7.75. A Daylight and Sunlight Study prepared by Delva Patman Redler accompanies this planning application which assesses potential impacts in relation to BRE Guidance (Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice).

7.76. The conclusion section of the assessment sets out the summary in terms of daylight and sunlight levels to surrounding properties and it is understood the impact of the proposed development is considered acceptable in daylight, and sunlight terms on the surrounding amenity in this location. It is therefore considered the proposals comply with Camden Development Policies Policy DP26 which relates to amenity.

### **Transport**

7.77. In accordance with the NPPF, all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should be made on the basis of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

7.78. In line with national, regional and local planning policy requirements a full Transport Statement has been prepared and submitted as part of this planning application.

### **Car and Cycle Parking**

7.79. The NPPF states that in setting local parking standards for residential and non-residential development, local planning authorities should take account of the following:

- the accessibility of the development;

- the type, mix and use of development;
  - the availability of and opportunities for public transport;
  - local car ownership levels; and an overall need to reduce the use of high-emission vehicles
- 7.80. The NPPF and Policy 6.1 of the London Plan both seek to promote public transport usage and minimise the use of private vehicle, thus promoting developments in areas with high public transport accessibility. The supporting text to Table 6.2 in the London Plan notes “All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit”.
- 7.81. The site benefits from excellent access to public transport and which minimises the necessity of private vehicles, thus, falling in line with both national and local policy and objectives. The site is located within an area of excellent public transport (PTAL score of 6a), situated within close proximity to Camden Town Underground and various bus stops and therefore a car free development is considered acceptable, albeit it is envisaged that Blue Badge holders will be able to utilise 2 on-street car parking spaces outside the building. Pre-application advice does not raise any objection to a car free development at this location.
- 7.82. It is anticipated that the office accommodation will be taken up by local occupiers, again negating the need for car parking.
- 7.83. The Transport Statement highlights that LBC advised that cycle parking provision should be based on the London Plan Revised Early Minor Alterations document (2012) standards as follows:
- • B1 Office – 1 space per 150 sqm of Gross Floorspace for staff/visitors
  - • C3 Dwellings (all) - 1 space per 1 or 2 bedroom dwellings + 1 space per 40 visitors, and 2 spaces per 3 + bedroom dwellings + 1 space per 40 visitors.
- 7.84. The site benefits from 11 cycle parking spaces for the residential and 53 spaces for the B1 office accommodation; in total 63 cycle parking spaces will be provided which is inline with the above. In addition the provision exceeds the recommended number of spaces within the pre-application advice.

### **Servicing and Access**

- 7.85. All servicing takes place from Jamestown Road. This will remain as per the existing situation.
- 7.86. In terms of a change in vehicle numbers, the Transport Statement highlights that the “net increase in servicing and delivery vehicles generated by the development is anticipated to be minimal with an additional 3 trips daily. It is proposed that delivering and servicing will occur on Jamestown Road on single yellow lines, as is currently the case, with wheelie bins wheeled into the road for unloading.”
- 7.87. Refuse storage will be located at ground floor for the residents which will allow level access to the street and within the basement for the B1 office accommodation. LBC confirmed that this approach was acceptable within the pre-application advice.

### **Trip Generation and Impact Assessment**

- 7.88. The Transport Statement has considered the trip generation from the scheme which outlines that “A trip rate-based approach, using information for comparative sites extracted from TRAVL, has been adopted to determine the AM (08:30-09:30) and PM (17:00-18:00) peak

hour multi-modal trip generation associated with the existing building, the completed development and the resultant net increase (each based on full occupancy). The modal-splits applied from TRAVL are based on the main mode of transport to the site. The net impact of the proposed development will be small with an additional 26 total trips in the AM peak (08:30 – 09:30), an additional 25 trips in the PM peak (17:00 –18:00) and an additional 223 trips daily. When broken down by mode the impact is even smaller, with the highest net change being for Underground and Rail trips, with a net increase of 8 trips in the AM peak and 7 trips in the PM peak for both modes. As the trip generation modal splits for the existing development and proposed development have been based on the ‘main mode’ of travel to the site from comparable TRAVL site data the end mode of travel to the site for the majority of public transport trips such as London Underground, Bus and Rail will be walking. It is, however, anticipated that the existing pedestrian network will easily be able to accommodate the net increase in ‘main mode’ and ‘end mode’ walking trips.”

- 7.89. The Transport Statement concludes highlighting “In conclusion, the overall multi-modal traffic impact of the Bewlay House Development will be minimal. Nevertheless, the scheme includes the provision of on-site facilities and other improvements to minimise the highway impact of the development and encourage travel by sustainable modes.”

#### **Framework Travel Plan**

- 7.90. A Framework Travel Plan prepared by Jacobs accompanies this planning application which provides a range of measures to encourage walking, cycling, use of public transport and discouraging private car use.
- 7.91. It is therefore considered that the proposals accord with the provisions of national, regional and local planning policy as detailed within the Transport Statement.

#### **Sustainability**

- 7.92. Sustainability is considered within planning policy at national, regional and local levels.
- 7.93. The NPPF encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change. To adhere to the NPPF’s requirement to adapt to climate change it is proposed that all existing building engineering services and plant shall be removed and replaced with new energy efficient services.
- 7.94. The London Plan (2011) seeks to promote sustainable development. Policy 5.2 requires developments to make the fullest contribution to the mitigation of and adaptation to climate change. Policy 5.3 seeks to ensure that future developments meet the highest standards of sustainable design and construction.
- 7.95. Policy 5.7 encourages energy efficiency and the use of renewable energy technologies in order to help meet the Mayoral carbon emission reduction targets. Specifically, London Plan Policy 5.7 now requires developments to achieve a reduction in carbon emissions from onsite renewable energy generation (following the incorporation of low carbon building practises and techniques).
- 7.96. An Energy Statement prepared by Norman Disney Young forms part of this planning application submission. The Statement has been drafted in accordance with the London Plan Energy Hierarchy. The report goes onto consider energy and carbon dioxide reduction, baseline energy demand, the building design prior to considering the advantages and disadvantages of various renewable options.
- 7.97. A Code for Sustainable Homes Preliminary Assessment is submitted as part of this planning application. The results of this report indicate how a Code for Sustainable Homes Level 4 rating could be achieved.

- 7.98. A BREEAM Preliminary Assessment prepared by Norman Disney Young is submitted as part of this planning application. The results set out how BREEAM 'very good' can be achieved. The current assessment highlights that the scheme has the potential to achieve a BREEAM score of 62.26% which exceeds the 55% score to achieve 'very good'.
- 7.99. It is considered that the proposals comply with the ethos of national, regional and local planning policy in respect of sustainable development.

### **Acoustic Issues**

- 7.100. A detailed Noise Assessment has been prepared by White Young Green to assess noise impacts on the basis of NPPF guidance. The report highlights that the residential premises at 34-36 Jamestown Road are the closest existing sensitive receptors.
- 7.101. The report states that "In considering the NPPF test in section 123, points A & B, the proposed development is not expected to have an 'adverse impact' on health or quality of life. Similarly, with regard to NPPF (123) point B, it is considered that all 'adverse impacts on health and quality of life' (relating to noise) are mitigated by the use of the following mitigation." These include a glazing and ventilation strategy and a plant noise assessment. The report goes on to state in relation to the NPPF 123 C & D that "Given that nearby the site is surrounded by similarly sensitive residential and commercial properties to the east and west, it is not considered that existing businesses wanting to develop would be particularly restricted by the introduction of the new sensitive use of the proposed development. The development is situated in a CPRE Zone 1 area of tranquillity (Zone 10 being the most tranquil and Zone 1 being the least tranquil), as such NPPF 123 point D is not considered to apply to this site.
- 7.102. The report concludes that "In considering the NPPF test in section 123, points A & B, the proposed development is not expected to have an 'adverse impact' on health or quality of life."
- 7.103. It is therefore considered that the proposals comply with the principle of Camden Development Policies DP26 and DP28.

## 8. Conclusions

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- 8.1. This Planning Statement has been prepared by Savills in support of a planning application submitted to the London Borough of Camden (LBC) on behalf of London and Regional Properties.
- 8.2. The planning application seeks planning permission for:
- 8.3. *Change of use from offices (Class B1) to mixed use comprising offices (Class B1) and 9 residential units (Class C3 - 4x1, 3x2, 2x3 bed), including erection of new fourth and fifth floors, provision of central atrium, installation and relocation of plant, and alterations to Jamestown Road and Canal Side facades.*
- 8.4. This planning application relates to Bewlay House, 32 Jamestown Road which lies in the Regents Canal Conservation Area.
- 8.5. The proposed development has been the subject of extensive consultation with LBC, RCCAAC and community engagement. The scheme has evolved significantly throughout the pre-application period and during officers' consideration of the withdrawn application in order to address the issues and impacts raised. It is considered that the proposals fully respond to comments received from Officers at LBC.
- 8.6. It is considered that the redevelopment of this site for a sustainable development will meet a number of the Council's key objectives. This will be achieved through delivering new housing, and increasing and revitalising the existing office accommodation whilst improving the external appearance of the building.
- 8.7. The office accommodation is currently of limited quality and the proposals would bring the standard of the floorspace up to date and attractive to future occupiers whilst also providing a net gain in office floorspace. The existing floorspace is not conducive to floor by floor lettings and the proposals increase flexibility in terms of unit size and the ability to let small units to attract local businesses. This Planning Statement outlines that a significant number of new jobs could be created as a result of the proposals. It is considered that if a proposal for redevelopment did not come forward, the property would require significant capital investment in order to secure a letting once vacant which may deter potential commercial occupiers.
- 8.8. The scheme also proposes 9 residential units, which is considered an appropriate use adjacent to office accommodation. The shortfall in housing across the UK and in London in particular is well-documented, and the creation of additional residential units will respond to this need in a mixed use well designed development. The residential units meet Camden minimum space standards and benefit from attractive private amenity space. In support of the proposed mix, LBC set out within the pre-application response their support for the inclusion of 2 bed and family units within the scheme.
- 8.9. The design of the scheme has been developed with full appreciation of the neighbouring properties, the Conservation Area and relatively unique Canal Side setting. The design has been carefully considered to respect and compliment the surrounding area, whilst providing a new building of exemplary sustainable design and it is considered that the glazed set back at fourth and fifth floor levels is acceptable in its surrounding context and will reduce the existing bulk on the Canal side. Overall the proposals increase the GEA from 7141 sq m to 8697 sq m equating to a 21.8% increase which is not considered contentious and involves an increase in height of only 0.95 metres.
- 8.10. The modern and traditional mix of materials used will provide a contemporary building that remains sympathetic to, and enhances the character of the streetscape and the Conservation Area. As discussed, the top two levels of the six storey element will be stepped back in order

to mitigate any potential obstacles of overlooking and will be constructed in glazing to reduce the perceived impact of this element.

- 8.11. The proposals seek to re-use the existing frame which is considered positive in sustainability terms. Sustainability considerations have been an important part of the design evolution. The application documentation also details how a Code for Sustainable Homes Level 4 and BREEAM 'very good' rating could be achieved.
- 8.12. This Planning Statement has also summarised the conclusions of supporting reports in relation to the areas of daylight and sunlight, transport and acoustic issues.
- 8.13. The development is an appropriate design response to a site which currently comprises a building that is of a poor quality in its current form. The proposed development will unlock and maximise the potential of the site, by providing both additional office floorspace and residential units. Both uses are appropriate uses in the context of the area. The proposal accords with national, regional and local planning policy and would provide many positive benefits to the local area and the Borough. Accordingly, we respectfully request that planning permission is granted.