

## 03 Planning Policy Context



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## Introduction

3.1 This chapter of the ES is written by GVA and provides a summary of the planning policy considerations for the Proposed Development at Fisher Street (the application site). Reference is made to national, regional and local policies as well as other material considerations. Specific policies are also dealt with in each of the Technical Chapters of the ES, where relevant.

## Consultation

3.2 The Proposed Development has evolved in form and appearance following consultation with public authorities and key stakeholders in order to respond to townscape, sustainability and environmental considerations.

3.3 The consultation process has included close liaison with planning, design, environmental and transport officers at LBC. The design has also evolved in consultation with other stakeholders and interest groups including:

- LBC Officers;
- English Heritage (EH); and
- The Bloomsbury Conservation Area Advisory Committee.

3.4 In addition, the Proposed Development was also presented at a public exhibition, held on the 12<sup>th</sup> and 14<sup>th</sup> of February 2013. These events were hosted at the Crossrail Visitor Centre (16-18 St Giles High Street). Further details of the consultation can be found within the Planning Statement submitted in support of the planning application.

## Planning Policy Framework

3.5 The Proposed Development has been developed in accordance with both adopted and emerging policy and guidance at the national, regional and local level.

### Adopted Planning Policy

3.6 The adopted development plan for the application site comprises LBC's Core Strategy (2010) (Ref. 3-1) and Development Policies (2010) (Ref. 3-2), and the Greater London Authority's (GLA's) London Plan (2011) (Ref. 3-3). Following adoption of the Core Strategy and Development Policies in November 2010 the saved policies in the UDP were superseded and no longer form part of the development plan, with the exception of the 'Schedule of Land Use Proposals,' which will eventually be replaced by the Site Allocations DPD.

3.7 Key material considerations of relevance to the determination of the planning application also include:

- The National Planning Policy Framework (NPPF), published 27 March 2012 (Ref. 3-4). This replaces the suite of Government guidance which existed previously as Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs) with a consolidated document. The NPPF provides an overarching framework within which Local Planning Authorities are to prepare their policy documents. It also seeks to provide further definition of sustainable development. As such, it is an essential decision-making tool for local authorities.
- At the regional level, the (GLA) has published a range of Supplementary Planning Guidance notes (SPGs). These include the Revised London View Management Framework SPG (2012) (Ref. 3-5), GLA's SPG's on "Accessible London: Achieving an Inclusive Environment" (2004) (Ref. 3-6), Housing (2012) (Ref. 3-7), Shaping Neighbourhoods: Play and Informal Recreation (2012) (Ref. 3-8) and "Sustainable Design and Construction" (2006) (Ref. 3-9), as well as the Mayor's Air Quality Strategy (2010) (Ref. 3-10).

- Locally, LBC have adopted a suite of guidance known as Camden Planning Guidance (2011) to provide a greater level of detail on policies set out in the Core Strategy and Development Policies.

### Emerging Planning Policy

3.8 In December 2012 LBC consulted on amendments to the Camden Planning Guidance which primarily affected CPG 2 (Housing). The amendments, which will be reported on to Cabinet in April 2013, have been proposed to bring the guidance in line with national changes to affordable housing.

3.9 Consultation on the draft objectives for the Euston Area Plan ran in December 2012 and the draft Fitzrovia Area Action Plan was consulted on in January 2013.

3.10 The Site Allocations Development Plan was subject to an examined in public in January 2013. A report on the soundness of the Plan will be published in due course.

3.11 Work on a new North London Waste Plan will begin shortly. The plan will identify a range of suitable sites and set out policies and guidance for determining planning applications for waste developments.

3.12 A number of neighbourhood forums are emerging within Camden. Once approved by the Council they will begin to write Neighbourhood Plans.

### Site Specific Allocations

3.13 The principle of a residential-led development at the application site is supported by adopted planning policy and guidance at regional level. The application site lies within the Central Activities Zone (CAZ) where the Mayor of London seeks to identify and bring forward capacity through redevelopment (London Plan Policy 5G.2), and the Holborn Area for Intensification, where the Mayor states that higher density redevelopment should be promoted at key transport nodes with good accessibility and capacity (London Plan Policy 5B.3).

3.14 At the local level, the application site is located within LBC's Central London Area (CLA) and Holborn Growth Area which the Core Strategy identifies as an appropriate location for a high density of development (Policy CS1 and CS2). Holborn is identified as an Area for Intensification, as such there is significant potential for housing, employment and other uses. Development within this location will be expected to maximise opportunities.

### Overview of the Principle of Development

3.15 Growth is a Government policy priority, from the Plan for Growth (2011) (Ref. 3-11) to the NPPF. The NPPF encourages the effective re-use of land that has been previously developed (Paragraph 111). This carries forward the emphasis of PPS1 (Ref. 3-12), which previously noted Government commitment to promoting a strong, stable and productive economy which aims to bring jobs and prosperity to all. It also replaces PPS4 (Ref. 3-13), which required local authorities to "positively and proactively" encourage sustainable economic growth. To this end the NPPF seeks that significant weight should be placed on the need to support economic growth through the planning system and identifies a presumption in favour of sustainable development, expressing that development that is sustainable should go ahead without delay.

3.16 Sustainable development is defined at Paragraph 7 of the NPPF, which sets out three roles, being:

- "An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

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- *A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and*
- *An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”*

- 3.17** The London Plan emphasises economic growth at a regional level and sets the spatial development strategy for Greater London for the next 20-25 years. This is intended to guide the delivery of economic, environmental, transport and social development in the capital over this period. Its vision embraces two objectives; retaining London’s ‘World City’ status as one of three business centres of global reach and ensuring the capital remains one of the best cities in which to live. This is predicated on growth and opportunity; setting a clear framework to give developers the confidence to invest and communities / decision-makers confidence to ensure this is delivered.
- 3.18** There are 6 overarching objectives within the London Plan, of which the Proposed Development contributes to four. These include:
- Objective 1 - to ensure London is a city that meets the challenges of economic and population growth;
  - Objective 2 - to provide an internationally competitive and successful city;
  - Objective 5 - to ensure London is a city that becomes a world leader in improving the environment, and;
  - Objective 6 - to ensure that the city is easy, safe and convenient for everyone to access jobs, opportunities and facilities.
- 3.19** In keeping with the national emphasis on the re-use of land, Policy 1.1 of the London Plan seeks to accommodate London’s anticipated growth within its boundaries, without encroaching into open spaces and having unacceptable environmental impacts, making the most sustainable and efficient use of space in the city.
- 3.20** The application site falls within the Holborn growth area, which has been identified in the London Plan as suitable for large scale redevelopment or significant increase in jobs and homes. Capacity for development has been identified due to the significant improvements at nearby transport interchanges. This will provide opportunities to bring benefits to the Borough and local area. The Core Strategy Policy CS 2 expects site opportunities to be maximised in line with the Council’s aspirations and objectives for the area, as set out below.
- 3.21** The Proposed Development fully accords with the general principles of national, regional and local planning policy, comprising a highly efficient use of a previously-developed site that optimises the potential for development, delivering new jobs and providing growth.

## Land Use: Residential

- 3.22** The NPPF notes 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”* (Paragraph 23).
- 3.23** The need for additional homes is a key priority of the London Plan and its policies seek to achieve and exceed the target for additional homes in London. Policy 3.3 of the London Plan refers to increasing the

supply of new homes and states that the Mayor will seek to ensure housing need is met. Policy 3.7 states that boroughs should encourage proposals for large residential developments where they involve complementary non-residential uses and have high levels of public transport accessibility.

- 3.24** The Mayor’s Housing SPG (2012) supports the London Plan in seeking to provide new homes, of both quality and good design, to ensure the creation of good liveable neighbourhoods.
- 3.25** LBC’s Core Strategy Policy CS6 states that the Council will maximise the supply of additional housing to meet Camden’s target of 5,950 homes from 2007-2017 and they therefore regard housing as the priority land-use of Camden’s LDF. This is reflected in Development Policy DP2 which states that the Council will seek to maximise the supply of additional homes in the borough by ensuring developments provide the maximum appropriate contribution to a site and by resisting alternative uses on sites particularly suitable for housing.
- 3.26** Policy DP5 of the Development Policies requires that residential developments provide a mix of units in line with the Dwelling Size Priority Table. For market housing there is a high priority for 2 bed units and medium priority for 3 and 4 bed units.
- 3.27** In light of the above, the use of the application site for residential is supported by all levels of planning policy.

## Townscape and Design

- 3.28** The Government attaches great importance to the design of the built environment, to which extent the NPPF notes that *“good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”* (Paragraph 56).
- 3.29** The NPPF promotes high quality and inclusive design for all development, including individual buildings, public and private spaces. It recognises that developments should aim to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit to help achieve sustainable development (Paragraphs 56-57).
- 3.30** The CABE report, ‘By design: Urban Design in the Planning System - Towards Better Practice’ (2000) (Ref. 3-15) lists seven criteria by which to assess urban design principles. These include: character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and diversity.
- 3.31** Policy 2.10 of the London Plan identifies that the Mayor seeks to sustain and enhance the distinctive environment and heritage of the CAZ through high quality design and urban management. Likewise, Policy 7.1 identifies that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 3.32** The London Plan requires all new development to achieve the highest standards of accessible and inclusive design, and supports the principles of inclusive design (Policy 7.2). It also states that Local Planning Authorities must ensure developments:
- a) *“can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances;*
  - b) *are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;*
  - c) *are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways;*

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d) *are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.*"

**3.33** Policy 7.4 of the London Plan states that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It also notes that buildings should provide contemporary architectural responses which:

- *"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."*

**3.34** Policy 7.6 of the Plan further states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to its context.

**3.35** At the local level, Core Strategy Policy CS14 states that the Council will ensure that Camden's places and buildings are attractive, safe and easy to use:

- i. *"requiring development of the highest standard of design that respects local context and character;*
- ii. *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;*
- iii. *promoting high quality landscaping and works to streets and public spaces;*
- iv. *seeking the highest standards of access in all buildings and places and requiring schemes to have to be designed to be inclusive and accessible;*
- v. *protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views."*

**3.36** In keeping with this approach, Policy DP24 of the Development Policies requires that developments are to be of the highest standards of design and will expect developments to consider:

- i. *"character, setting, context and the form and scale of neighbourhood buildings;*
- ii. *the character and proportions of the existing building, where alterations and extensions are proposed;*
- iii. *the quality of the materials to be used;*
- iv. *the provision of visually interesting frontages at street level;*
- v. *the appropriate location for building services equipment;*
- vi. *existing natural features, such as topography and trees;*
- vii. *the provision of appropriate hard and soft landscaping including boundary treatments;*
- viii. *the provision of appropriate amenity space; and*
- ix. *accessibility."*

**3.37** The impacts of the proposed development in key views and on the adjacent heritage assets, including 8-10 Southampton Row and the Kingsway and Bloomsbury Conservation Area have been carefully considered and assessed within the Townscape, Heritage and Visual Impact Assessment (THVIA). In summary, the

THVIA demonstrates that the development will only be visible in certain views from Southampton Row and Sicilian Avenue. When visible (including from the east from Red Lion Square), the THVIA concludes that the Proposed Development will have a largely beneficial impact on the local townscape, especially when considered against the baseline position, with only the Crossrail head house on the application site.

## Heritage and Conservation

**3.38** The NPPF states new developments should make a positive contribution to local character and the distinctiveness of an area (Paragraph 131). Substantial harm to designated heritage assets of the highest significance, notably Grade I and II\* listed buildings should be wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal, including securing its optimum viable use (Paragraph 134).

**3.39** In addition to their protection, the NPPF seeks that opportunities to enhance the setting of heritage assets are taken. To this end, Paragraph 137 states that *"proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably"*.

**3.40** Regionally, the London Plan notes that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate and that development affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail (Policy 7.8).

**3.41** Policy CS14 of the Core Strategy states that development will be attractive, safe and easy to use by preserving and enhancing Camden's rich and diverse heritage and their settings.

**3.42** The application site is not listed nor situated in a Conservation Area. The nearest Conservation Area to the Proposed Development is the Bloomsbury Conservation Area, which adjoins the application site's western boundary.

**3.43** **ES Volume II: Townscape, Built Heritage and Visual Impact Assessment** and the **Design and Access Statement** shows that the design has been prepared to respect its heritage context and respond to this. In doing so, it will result in no adverse impacts to local built heritage, including the adjacent Grade II Listed building at 8-10 Southampton Row. The impact on all listed buildings in the vicinity of the application site will be either neutral or beneficial. Furthermore, the impact on conservation areas in the vicinity, registered parks and gardens and the protected London squares will all be non-significant.

## Public Realm and Amenity Space

**3.44** The NPPF recognises that the provision of accessible and high quality open space contributes towards the health and well-being of communities. It also outlines the importance of incorporating green and other public space to support local facilities (Paragraphs 73-74).

**3.45** At the regional tier, the London Plan 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. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate (Policy 7.5).

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- 3.46** London Plan Policy 5.10 seeks that proposals integrate urban greening and green infrastructure from the beginning of the design process to contribute to improve the public realm through tree planting and other measures. Policy 2.18 also requires that proposals incorporate appropriate elements of open space that are integrated into the wider network of green infrastructure and improve public realm.
- 3.47** Locally, LBC's Core Strategy Policy CS15 states that the Council will protect and improve Camden's parks and open spaces. Where opportunities arise, new developments should make improvements to the provision of open space, including access arrangements, the facilities provided, and the connections between spaces. Deficiencies of open space should be tackled and under-provision met especially in growth areas which include Holborn. Where the provision of on-site public open space is not practical on a particular site in these areas, the Council will require a contribution to the provision of additional public open space on identified sites in the vicinity. If it can be demonstrated to the Council's satisfaction that no such suitable sites are available, they will require improvements to other open spaces in the area.
- 3.48** Policy DP 29 of the Development Policies states that permission will only be given to developments that are likely to result in an increased use of public open space, where an appropriate contribution to the supply of open space is made. A scheme of 5 or more dwellings will be considered to place additional demands on open space. Furthermore, priority will be given to the provision of publicly accessible open space.
- 3.49** The Proposed Development provides sufficient private amenity space in the form of balconies and roof terraces. Due to the application site constraints, there is no opportunity to provide on-site public open space. The Proposed Development will however improve the streetscape and therefore the public realm.

## Transport Accessibility

- 3.50** NPPF policy directs new development to locations that are highly accessible by public transport, walking and cycling, recognising that an integrated transport system is necessary to support a strong and prosperous economy (Paragraphs 31-35). It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion (Paragraph 30).
- 3.51** The NPPF requires developments that generate significant amounts of movement should be supported by a Transport Statement and should take account of safe and suitable access to the site for all people. Consideration should also be given to the location, scale, density, design and mix of land uses and how these can help to reduce the need to travel, reduce the length of journeys, and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking and cycling (Paragraph 32).
- 3.52** At the regional level, a strategic objective of the London Plan is to ensure that London is a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities. In seeking to achieve this objective, Policy 6.1 states that the Mayor will encourage patterns and nodes of development that reduce the need to travel, especially by car. It also states that the Mayor will support development that generates higher levels of trips at locations with high public transport accessibility and / or capacity.
- 3.53** The London Plan further seeks to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand (Policy 6.1).
- 3.54** The Greater London Authority's SPG 'Accessible London: Achieving an Inclusive Environment' (2004) provides detailed advice and guidance on the policies contained in the London Plan which promote an inclusive environment in London.

- 3.55** Policy CS11 of LBC's Core Strategy promotes 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. To achieve this the Council aims to:
- expand the availability of car clubs and pool cars as an alternative to the private car;*
  - minimise provision for private parking in new developments, in particular through:*
    - *car free developments in the borough's most accessible locations and*
    - *car capped developments;*
  - restrict new public parking and promote the re-use of existing car parks, where appropriate;*
  - promote the use of low emission vehicles, including through the provision of electric charging points; and,*
  - ensure that growth and development has regard to Camden's road hierarchy and does not cause harm to the management of the road network."*
- 3.56** Furthermore, Development Policy DP16 seeks to ensure that any development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. Proposals that do not adequately assess the impact on local transport networks, the movements to and from the site, and the impact on existing transport capacity will be resisted.
- 3.57** The Transport Statement concludes that given the location and accessibility of the application site, it is considered suitable for residential development and is consistent with local and national policy guidance in relation to pedestrians, cyclists, public transport accessibility and highways. The principle of a car free development at the application site is also supported by policy CS11.

## Parking and Servicing

- 3.58** As set out in the preceding section, the NPPF states an overarching need to reduce the use of high-emission vehicles and impacts of traffic congestion.
- 3.59** This is reflected at the regional level where Policy 6.13 of the London Plan which seeks to ensure that on-site car parking at new developments is the minimum necessary and that there is no over-provision that could undermine the use of more sustainable non-car modes. The only exception to this approach will be to ensure that developments are accessible for disabled people. For residential development in Central London, the London Plan therefore sets a maximum parking standard of less than one space per 1-2 bedroom residential unit and 1.5-1 space per 3 bedroom residential unit. However the plan also notes that all developments in areas of good transport accessibility should aim for significantly less than one space per unit.
- 3.60** The Mayor's Housing SPG confirms this level of provision and also states that in areas of good public transport accessibility and/or town centres the aim should be to provide no more than one space per dwelling. Each designated wheelchair accessible dwelling should have a car parking space 2400mm wide with clear access to one side of 1200mm.
- 3.61** The London Plan also requires that 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.
- 3.62** The London Plan also requires that cycle parking is provided at the level of 1 space per 1 or 2 bed unit and 2 spaces per 3 or more bed unit.

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- 3.63** In line with regional policy, LBC's Core Strategy policy CS11 states that the provision of parking in new developments should be minimised through car free or car capped development, in order to minimise congestion and address the environmental impacts of travel. CS11 also seeks to improve facilities for cyclists, including increasing the availability of cycle parking.
- 3.64** Due to the constraints at ground floor of the Crossrail head house, it is not possible to provide any basement car parking at the application site. In any event this is supported by LBC planning policy. The development will provide for a maximum of 48 cycle spaces (if double stacked) within a dedicated cycle store with access from Fisher Street. This exceeds LBC's cycle parking standards, which would require 25 cycle spaces. The maximum of 48 spaces clearly exceeds this.

### Sustainability and Energy

- 3.65** At the national level, the NPPF supports the Government's stated intention to deliver sustainable development. This is most evident through the delivery of renewable and low carbon energy and associated infrastructure which is considered central to each of the economic, social and environmental dimensions. As such, development proposals will be expected to comply with local requirements and should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and to increase the use and supply of renewable and low carbon energy (Paragraphs 93-97).
- 3.66** In keeping with the NPPF, achieving sustainable development is a key objective of the London Plan. This is guided by Policy 5.2 which states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- *“Be Lean: use less energy*
  - *Be Clean: supply energy efficiency*
  - *Be Green: use renewable energy.”*
- 3.67** The above policy goes on to set out a target reduction in carbon dioxide emissions for residential buildings of 40% between 2013–2016 and zero carbon between 2016-2031. The Carbon dioxide reduction targets should be met on-site. However, where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a payment in lieu contribution. It is also stated that Boroughs should require all developments to demonstrate how the targets for Carbon dioxide emissions reduction are to be met by including detailed energy assessments.
- 3.68** At the local level, CS13 of the Core Strategy states that development must take measures to minimise the impacts of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation. New developments will be expected to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation (which can include sources of site-related decentralised renewable energy) unless it can be demonstrated that such provision is not feasible.
- 3.69** Policy DP 22 of the Development Policies reflects this with requirements that all development must incorporate sustainable design and construction methods. They will expect all new build housing to meet the Code for Sustainable Homes Level 4 by 2013. The Council will also expect the development to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures.
- 3.70** The use of ground source heat pumps are proposed as the most appropriate Low or Zero Carbon (LZC) technology, as set out in the accompanying Sustainability Statement, which also provides greater detail on how the Proposed Development addressed these policies and targets.

### Daylight / Sunlight, Overshadowing, Light Pollution and Solar Glare

- 3.71** Guidelines relating to daylight and sunlight are contained within the Building Research Establishment's (BREs) 'Practice Guidance Report – Site Layout Planning for Daylight and Sunlight' (2011) (Ref. 3-16). This guidance includes discussion on how to protect the daylighting and sunlighting of existing buildings when new developments are proposed. Details are also included on rights to light and indicators to calculate access to skylight, sunlight and solar radiation.
- 3.72** The Mayor's Housing SPG provides Good Practice Guidelines on daylight/sunlight issues, which include a recommendation that glazing to all habitable rooms should not be less than 20% of the internal floor area of the room. Also, all homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight (Standard 5.5.1 and Standard 5.5.2).
- 3.73** Locally, Policy DP26 of the Development Policies, states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors they will consider include visual privacy and overlooking, overshadowing and outlook, and sunlight, daylight and artificial light levels. Developments will be expected to include appropriate mitigation measures where necessary.
- 3.74** The proposal accords with the emphasis of national, regional and local guidance and policy. This is identified in greater detail in **Chapter 10: Daylight and Sunlight**, which concludes that the future occupants of all of those dwellings will enjoy a good level of internal daylight and sunlight amenity.

### Air Quality

- 3.75** At a national level, the stated Government aim is to minimise pollution and other adverse impacts on the local and natural environment (NPPF, Paragraph 110). To this end, the NPPF states that it is essential to ensure new development is appropriate for its location. The impacts (including cumulative impacts) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or Proposed Development to adverse impacts from pollution, should be taken into account (Paragraph 120).
- 3.76** Further guidance on air quality is issued at the regional level, where the London Plan and the Mayor's Air Quality Strategy (2010) seeks to minimise the emissions of key pollutants and reduce concentrations to levels at which no, or minimal impacts on human health are likely to occur. Policy 7.14 of the London Plan intends to achieve this by:
- *“Promoting sustainable design and construction;*
  - *Minimising increased exposure to poor air quality. Where there are situations where those vulnerable to poor air quality, design solutions such as buffer zones or promotion of sustainable transport modes should be used;*
  - *Be 'air quality neutral' and not contribute to further deterioration of air quality; and*
  - *If emissions are needed to be reduced from a development, this should preferably be done on site.”*
- 3.77** This is translated at the local level by Policy DP26 of the Development Policy which states that permission will only be granted when the development does not harm the amenity of occupiers and neighbours. When assessing this, odours, fumes and dust will be taken into account. This impact can arise during both construction and operational stages of a development as a result of the increased NO<sub>x</sub> and PM<sub>10</sub> emissions (Camden Planning Guidance 6: Amenity).

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- 3.78** Policy DP32 gives further information on Air Quality, stating that the Council will require Air Quality Assessments where development could cause significant harm to air quality and mitigation measures will be used if the development is located within an area of poor air quality. Where developments are located in the Clear Zone, developments that significantly increase travel demand will be required to provide mitigation measures to minimise the impact on the air quality in Central London.
- 3.79** Policy CS9 of the Core Strategy states that the parts of Camden in Central London will continue to be designated as a Clear Zone Region in order to reduce congestion, promote walking and cycling and improve air quality. The application site will therefore have to abide by the measures above.
- 3.80** **Chapter 7: Air Quality** of this ES provides further information on air pollution and concludes that the impacts of the construction will be localised, temporary and not significant.
- 3.81** The impact of the heating/power plant associated with the operation of the Proposed Development is considered to be significant using the Crossrail methodology, which corresponds with a Slight adverse impact when using the terminology provided in the original EPUK guidance. Paragraph 7.89 and 7.90 of the Air Quality Assessment discusses mitigation measures relating to the heating / power plant which includes the appropriate design of the louvres, the incorporation of low-NO<sub>x</sub> optimisation of the gas boilers and the regular inspection of machinery.
- 3.82** It is anticipated that the pollutant concentrations will exceed the annual and short term NO<sub>2</sub> Air Quality Strategy objectives in 2013 and up to and including 2018, across the application site and surrounding area. However, this is the case with and without the Proposed Development due to the application site's location within the AQMA and hence the Proposed Development would not introduce new residents into a location where air quality is significantly worse than other parts of the borough. The Proposed Development is not expected to extend the AQMA, either geographically or temporally and will be a similar situation to most of the Borough in 2018, when the Proposed Development is anticipated to be completed and occupied.

## Noise and Vibration

- 3.83** Government guidance within the NPPF recognises that development will often create some noise. However, it also makes clear that existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established (Paragraph 123).
- 3.84** The NPPF also recognises that permitted operations should not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise (Paragraph 143). It is therefore considered important to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development (Paragraph 123).
- 3.85** In keeping with this, Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, a development and promoting new technologies and improved practices to reduce noise.
- 3.86** At the local level, Policy DP28 of the Development Policies will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:
- a) *“development likely to generate noise pollution; or*
  - b) *development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.”*

- 3.87** Development that exceeds Camden's Noise and Vibration Thresholds will not be permitted. The Council will only grant permission for plant or machinery if it can be operated without cause harm to amenity and does not exceed noise thresholds. The Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, conditions and planning obligations may be used to minimise the impact.
- 3.88** The proposal accords with the emphasis of national, regional and local guidance and policy. This is identified in greater detail in **Chapter 8: Noise and Vibration**, which concludes that with appropriate mitigation measures, the application site is suitable for residential development.

## Waste and Recycling

- 3.89** National waste planning policy will be published as part of the National Waste Management Plan for England, for which reason no specific reference is included within the NPPF. PPS 10 'Planning for Sustainable Waste Management' (2011) (Ref. 3-17) seeks to deliver sustainable development through increasing the importance of waste management within the waste hierarchy, addressing waste as a resource and looking to disposal as the last option.
- 3.90** The London Plan is committed to a policy framework for waste management which starts from the position that the best approach is to reduce the amount of waste that arises in the first place. Where this is not possible, the Mayor supports an approach based on the waste hierarchy that emphasises re-use, and then recycling and composting, before energy recovery and disposal.
- 3.91** Policy 5.17 of the London Plan states proposals for waste management should be evaluated against the following criteria:
- *“locational suitability*
  - *proximity to the source of waste*
  - *the nature of activity proposed and its scale*
  - *a positive carbon outcome of waste treatment methods and technologies resulting in greenhouse gas savings, particularly from treatment of waste derived products to generate energy*
  - *the environmental impact on surrounding areas, particularly noise emissions, odour and visual impact and impact on water resources*
  - *the full transport and environmental impact of all collection, transfer and disposal movements and, in particular, the scope to maximise the use of rail and water transport using the Blue Ribbon Network.”*
- 3.92** At a local level, Core Strategy Policy CS18 requires the minimisation of waste and an increase in the reuse and recycling of waste materials to meet targets of 45% of household waste recycled by 2015 and 50% by 2010. To achieve this, developments must include facilities for storage and the collection of waste and recycling.
- 3.93** Further information on the management of waste for the Proposed Development is contained within **Chapter 9: Waste and Recycling** of this ES. This section concludes that the Proposed Development will be in line with LBC's Waste Storage Requirements for Developers of Commercial and Residential Properties and provide a high standard of environmental performance.

## Conclusions

- 3.94** In summary, the Proposed Development makes the best use of the application site above and around the Crossrail infrastructure. The principle of residential development is supported; the design has been developed to respond to the application site's local and heritage context; and the building satisfies other technical policy requirements.



# 03 Planning Policy Context

## References

- Ref. 3-1 London Borough of Camden, Core Strategy (2010),
- Ref. 3-2 London Borough of Camden, Development Policies (2010)
- Ref. 3-3 Greater London Authority, Revised London Plan – Spatial Strategy for Greater London (2011)
- Ref. 3-4 Department for Communities and Local Government, National Planning Policy Framework (2012)
- Ref. 3-5 Greater London Authority, London View Management Framework SPG (2012)
- Ref. 3-6 Greater London Authority, Accessible London: Achieving an Inclusive Environment (2004)
- Ref. 3-7 Greater London Authority, Housing SPG (2012)
- Ref. 3-8 Greater London Authority, Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- Ref. 3-9 Greater London Authority, Sustainable Design and Construction (2006)
- Ref. 3-10 Greater London Authority, Mayor's Air Quality Strategy (2010)
- Ref. 3-11 Plan for Growth, HM Treasury (2011)
- Ref. 3-12 Department for Communities and Local Government, Planning Policy Statement (PPS) 1: Delivering Sustainable Development (2005/7)
- Ref. 3-13 Department for Communities and Local Government, Planning Policy Statement (PPS) 4: Planning for Economic Growth (2009)
- Ref. 3-14 Commission for Architecture and the Built Environment / English Heritage, Guidance on Tall Buildings (2007)
- Ref. 3-15 CABE, By Design: Urban Design in the Planning System - Towards Better Practice (2000)
- Ref. 3-16 Building Research Establishment, Practice Guidance Report – Site Layout Planning for Daylight and Sunlight (2011)
- Ref. 3-17 Department for Communities and Local Government, Planning Policy Statement (PPS) 10: Planning for Sustainable Waste Management (2011).