

47 Allcroft Road

Camden

NW5 4NB

Planning Statement

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1.0 INTRODUCTION

1.1 This Planning Statement is submitted in support of a planning application to London Borough of Camden by Telford Homes Plc for the residential redevelopment of 47 Allcroft Road, NW5.

1.2 The submission seeks planning permission for:

“Demolition of the existing building and the erection of a new 4-storey building providing 18 new residential units; comprising of 5 x 1 bedroom, 11 x 2 bedroom and 2 x 3 bedroom together with secure cycle parking, formation of balconies, garden spaces and refuse/recycling stores.”

1.3 The proposal is to redevelop the site to provide additional new homes to create a sustainable development that will provide a meaningful contribution to the local housing supply and improvements to the local built environment. The proposals would deliver a number of key planning benefits including making optimum use of this brownfield site, design and visual improvements. This location plan shows the site.



Fig 1: Site location plan 47 Allcroft Road NW5

1.4 The proposal has been guided by the site's history, and national, regional and local planning policy and guidance and to meet the current local housing needs of the Borough. This Planning Statement demonstrates how the proposals are instrumental in delivering many of

the London Borough of Camden's wider Core Strategy objectives and how a high quality and sustainable residential development can be satisfactorily achieved on the application site within the relevant planning policy context.

1.5 This application is supported by a number of technical studies including:

Application Form, Article 12 Certificate and Certificate B.

CIL Additional Information Requirement Form;

1:1250 scale site plan (showing site area boundary edged in red and Applicant's land ownership shaded in blue).

Planning Statement **Telford Homes Plc**

Transport Statement **Stilwell Partnership**

Design and Access Statement **Matthew Lloyd Architects**

Plans and Drawings detailing the proposals **Matthew Lloyd Architects**

Energy Statement **Energy Council**

Sustainability Statement **Energy Council**

Sunlight/ Daylight Analysis **Calfordseaden**

Arboricultural Impact Assessment **James Blake Associates**

Phase 1 Habitat Survey **James Blake Associates**

Site Investigation Preliminary Assessment **Herts & Essex Site Investigation**

Employment Floorspace Statement **Lambert Smith Hampton**

Viability Statement (following under separate cover) **DTZ a UGL company**

1.6 The proposals have been informed through pre-application meeting discussions with officers of the London Borough of Camden (LBC). Section 4 of this statement responds to the comments made.

1.7 Accordingly, this Planning Statement will consider the following:

- Section 2 describes the site and surrounding area.
- Section 4 provides a brief description of the development proposal.
- Section 5 sets the current and relevant planning policy background.
- Section 6 assesses the merits of the application in relation to current planning policy.
- Section 7 draws together our conclusions.

2.0 SITE AND SURROUNDINGS

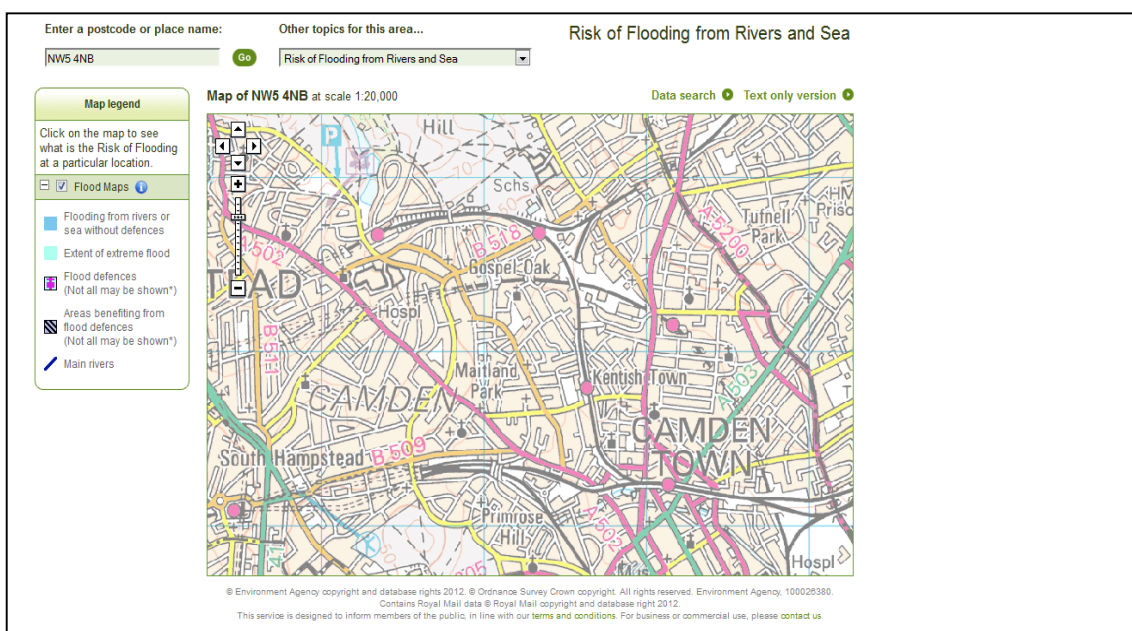
The Site

- 2.1 The site is within the Haverstock Ward and Gospel Oak area of LB Camden, located on Allcroft Road and to the south of Queens Crescent. The area is predominantly residential in character with access to local amenities within the Queens Crescent neighbourhood Centre within easy walking distance.
- 2.2 The rectangular site extends to 0.061 hectares and is currently occupied by a single storey building containing four light industrial workshops (B1c) providing 273 sqm floorspace. The existing building is separated from its neighbours to the north by a single width vehicular access point to a yard for servicing at the rear of the building. The site makes little contribution to the townscape of Allcroft Road in particular to the adjoining Conservation Area to the west. Access into the units is from within the site and therefore the building currently offers little or no activation to the street frontage.
- 2.3 The building whilst serviceable has suffered from a lack of investment and modernisation, the nature of the site and its physical constraints mean it currently restricts use for a number of B1c light industrial uses. The current workshop units are inadequate to serve current demand and requirements including the requirements of the Equality Act (which replaced the Disability Discrimination Act) for B1c employment uses and as such were identified by London Borough of Camden as a potential redevelopment site to bring to the market in July 2011 to raise capital for the Community Investment Programme (CIP).
- 2.4 The four workshops are now all vacant the last tenant departing in December 2012. The three tenants in situ when the site was purchased in May 2012 had been informed of the redevelopment intention by LB Camden when the site was first identified as part of CIP for disposal; a full review of the loss of employment floorspace is provided in the supporting report by Lambert Smith Hampton.
- 2.5 The site is well served by public transport, being within a 10 minute walking distance of Kentish Town West station (which is 720m from the site), which is on the London

Overground network. The station is served by six trains an hour in both east and west directions linking Kentish Town to Highbury and Islington, Stratford, Richmond and Clapham.

2.6 The development site is also served by six main bus services (N5, C11, 24, 46, 168 and 393), the majority of which stop along Maldon Road and Prince of Wales Road, a short walk from the site. The site also lies within a controlled parking zone with permit holder only parking bays in force Monday to Friday. The site has a Public Transport Accessibility Level of 3, on a scale of 1-6 where 6 demonstrates a very good level of accessibility. A full assessment of the transport considerations is provided in the Transport Statement by Stilwell Partnership.

2.7 As illustrated below the site falls within Flood Zone 1 which is defined as being outside the floodplain and / or an area liable to flooding (less than 1 in 1000 year risk). As such, there is a low/minimal risk of flooding and the site does not require further assessment.



The Surroundings

2.8 As previously stated the site lies within 40m Queens Crescent where there are a number of smaller convenience stores located, just to the north of the site, which include a pharmacy, a surgery, a library and other shops and local facilities. Along Malden Road to the west there are further small convenience stores and local facilities including a dentist.

- 2.9 The nearest defined Town Centres are Camden Town and Kentish Town equidistant from Allcroft Road and some 900 metres away, Queens Crescent is defined as a Neighbourhood Centre. Also within the proximity of the site is Talacre Gardens, some 400 metres to the west offering children's play facilities for a range of age groups. Hampstead Heath an area of open space of Borough and Regional significance is within 800m walk to the north of the site. In terms of geographical location, it is clear that the site is well located for pedestrian accessibility to a wide range of local amenities and facilities.
- 2.10 As the photographs show, the site is located in a mainly residential area, with a limited mix of building styles and heights, predominantly characterised by the 3 storey Victorian terraces along the west of Allcroft Road and Queens Crescent.
- 2.11 The site does not fall within any conservation area, although the West Kentish Town Conservation Area lies to the west of Allcroft Road incorporating the terrace of Victorian townhouses at 2-44 Allcroft Road (evens). It is noted in the CA Management Statement that whilst not within the area the mature trees lining the eastern aspect of Allcroft Road make a significant contribution to the setting of the terrace and streetscape.
- 2.12 There are no statutory or locally listed buildings on the site or nearby.

3.0 PLANNING HISTORY

- 3.1 The workshops were built following grant of planning permission in the 1980s and incorporated storage for the market barrows associated with the weekly Queens Crescent market.
- 3.2 Adjoining the northern boundary on Allcroft Road sits a contemporary three storey buff brick building with a set-back fourth storey in a darker metallic cladding. At ground floor this modern infill building has a substation and service access which provides the current market barrow storage. The infill development by Pocket Living was granted permission at appeal following refusal by LB Camden Planning Authority in 2006 (2006/0203/P). The appeal at site 129 Weedington Road (immediately to the rear of the application site) and 47 Allcroft Road sought permission for 'demolition of the existing taxi repair workshop and redevelopment with a part 3- part 4- storey building comprising 22 self contained flats (Class C3); a workshop (Class B1) fronting onto Weedington Road and storage units (Class B8) accessed from Allcroft Road'.
- 3.3 Subsequently in October 2008 the owners of 129 Weedington Road applied for change of use for the B1 workshop space approved to office and other business uses including A1/A2 uses (2008/5691/P). The changes were accompanied by a marketing statement which noted that due to the economic downturn and the abundance of new build commercial B1 floorspace in the Borough the majority of which are located in more accessible and attractive locations, there had been very little interest in the new build B1 floorspace in this location. Planning permission was granted in January 2009.

4.0 SUMMARY OF THE PROPOSED DEVELOPMENT

Background

- 4.1 The application is submitted on behalf of Telford Homes Plc a residential developer with a track record of successfully delivering high quality mixed-tenure developments across London. Telford Homes is a grant partner of the Greater London Authority (formerly the HCA), the partnership has delivered over 500 new affordable homes in collaboration with a number of registered providers across the Capital.
- 4.2 Telford Homes purchased 47 Allcroft Road from London Borough of Camden when the site was openly marketed with potential for redevelopment in early 2012. The site had been identified as surplus to requirements as a poorly performing investment by the Council in July 2011 in a cabinet report on the Community Investment Programme. CIP objective to sell or redevelop properties that are out of date, expensive to maintain or underused and difficult to access to generate funds that are not otherwise available to reinvest into improving other services and facilities.

The Proposal

- 4.3 A full description of the proposed development is provided in the Design and Access Statement prepared by Matthew Lloyd Architects which supports this planning application. The detailed application proposes the following,

“Demolition of the existing building and the erection of a new 4-storey building providing 18 new residential units; comprising of 5 x 1 bedroom, 11 x 2 bedroom and 2 x 3 bedroom together with secure cycle parking, formation of balconies, garden spaces and refuse/recycling stores.”

- 4.4 The application proposes the creation of a sustainable high-quality mixed-tenure residential development. The scheme will provide a net increase of affordable and market homes to accommodate 18 dwellings in total. The apartments are arranged across 4 storeys, at ground floor the four apartments have individual front doors off Allcroft Road. The apartments on the upper floors are accessed via a common entrance located centrally on the Allcroft Road façade.

4.5 The split of these 18 residential units (51 habitable rooms) would be as follows.

Ownership	Totals	
	Units	Hab Room
Private		
1 bed	4	8
2 bed	9	27
3 bed	2	8
Sub-total	15	43
Affordable Shared Ownership		
1 bed	1	2
2bed	2	6
Sub-total	3	8
Totals	18	51

4.6 Three of the units proposed (18%) would be delivered as affordable shared ownership through our Registered Provider partner, as such of the total 1,268 sqm net residential accommodation 226 sqm (18%) would be affordable housing floorspace. The proposals include a family provision of 2 units (11%) / 8 habitable rooms (16%) overall.

4.7 The scheme has been designed to optimise the redevelopment of this sustainable brownfield site and the design concept is justified within the accompanying Design & Access Statement.

4.8 The scheme has been sensitively designed to ensure that the proposed height is reflective of the surrounding building heights and would result in a significant enhancement in the appearance of this part of the area. The buildings have been designed to respect adjacent

buildings and residential windows to ensure that there will be no impacts upon the amenity of surrounding residents. Amenity space is provided through balconies to the dwellings on the upper floors and private gardens to ground floor apartments.

- 4.9 Telford Homes are committed to high quality sustainable construction and the proposal has been designed to meet the requirements of Code for Sustainable Homes Level 4 for the residential units. The proposal would increase the quantity of permeable surfaces with gardens at ground floor and a brown roof to the building, furthermore the building will maximise opportunities for biodiversity with a planted living wall to the east stair core. All apartments are dual aspect with east and west aspects optimising opportunities for natural lighting to the dwellings following the principles of passive solar design.
- 4.10 The total site CO2 saving from renewable technologies (29 photovoltaic panel arrays) and energy efficiency measures following the London plan energy hierarchy 'Be Lean, Be Clean and Be Green', would see the overall reduction over baseline regulated energy emissions by 28.5%, in line with the London Plan targets. More details are also included in the Energy Report, Sustainability and Code for Sustainable Homes pre-assessment prepared by Energy Council submitted with the application.
- 4.11 The building has been designed to be as accessible as is practical (in contrast to the existing situation) and could be constructed so all the residential units meet Lifetime Homes standards. Particular features include corridor widths and access within flats being suitable for wheelchair users. Two easily adaptable wheelchair units have been identified at ground floor equating to just over 10%, both units would have step-free access through a private front garden to a private front door.
- 4.12 The development would be car free but would provide 20 cycle parking spaces of which 15 would be within a centralised store and four would be secure stores located within the hall/front garden of each ground floor apartment. Telford Homes would be willing to work with the Council to create a disabled parking bay on-street to serve future disabled residents.
- 4.13 The site lies within a controlled parking zone and residents of the new apartments will not be able to obtain parking permits. This will be controlled via a standard S106 Agreement.

The limited parking provisions at the site will encourage the use of public transport, walking or cycling, in line with local and national policy.

4.14 In summary, the proposal comprises:

- A total of 18 housing units comprising: 5 x 1 bed, 11 x 2 bed and 2 x 3 bed units.
- 18% affordable housing proposed to be shared ownership
- Large private balconies, terraces or gardens to each new flat.
- 19 secure cycle parking spaces (min 1:1 ratio per new flat)
- All new homes are to be designed to Lifetime Home standards.
- All new homes to achieve Code for Sustainable Homes Level 4.
- 10% of new homes (two units) designed to be suitable for disabled residents.
- The total carbon saving through the implementation of the London Plan energy hierarchy, against the baseline regulated energy emissions would be 28.5%, and a total CO2 emissions reduction of 15.4%.

Stakeholder Consultation

4.15 The sale particulars of the Allcroft Road site were accompanied by a planning statement – pre-application advice by Camden Council relating to possible future redevelopment. This has informed the design development and provided guidance on appropriate land uses to include residential accommodation as a Borough and LDF priority.

4.16 In advance of the planning application being submitted Telford Homes together with Matthew Lloyd Architects engaged with Camden Council Planning Team at a pre-application meeting in May 2012. The meeting was an early design development discussion to establish the appropriate scale and massing of the proposed development and the appropriate land uses for the site. The details of the scheme including façade treatment and materials were the subject of consultation and broad agreement with Council officers has been reached regarding the overall design approach. The Case Officer then discussed the project at a major projects case review, an internal meeting within Camden Council with colleagues from policy, highways and housing.

4.17 A copy of the minutes and further correspondence from Camden’s policy team is enclosed in Appendix A – the discussion on which category defined by DP13 the site falls within is a

source of contention and this application is supported by a statement confirming the site is considered to be Category 3.

5.0 PLANNING POLICY BACKGROUND

5.1 All development proposals take place within the context of national, regional and local planning policy and recognised best practice. Within this section, the planning policy framework at national, regional and local levels against which the proposal should be considered is set out.

NATIONAL PLANNING POLICY

National Planning Policy Framework (March 2012)

5.2 In March 2012 the Government published the National Planning Policy Framework (NPPF) which forms a key part of the coalition government's reforms to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth. The Framework gives guidance to local councils in drawing up local plans and on making decisions on planning applications. The NPPF also replaces all previous Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs).

5.3 The overarching objective of the NPPF is for the planning system to contribute to the achievement of sustainable development which is defined as comprising three dimensions from which the planning system needs to perform a number of roles, namely:

- an economic role;
- a social role; and
- an environmental role

5.4 The NPPF makes it clear that these roles should not be undertaken in isolation and that in order to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

5.5 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and

- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

5.6 The NPPF then sets out core planning principles, which should underpin both plan-making and decision-taking. These principles include:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; and
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas.

5.7 In terms of housing, the NPPF states at paragraphs 49 and 50 that housing applications should be considered in the context of the presumption in favour of sustainable development and to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

5.8 With regards land use and in particular applications to for changes of use from employment sites the NPPF makes clear at paragraph 51 that Council's should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. Furthermore at paragraph 22, the guidance states that where there is no reasonable prospect of a site being used for an allocated employment use, applications for alternative uses of land or buildings should be treated on their

merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

REGIONAL POLICY

The London Plan

5.9 The London Plan, published in July 2011 forms part of the Development Plan for the area. It provides a strategic framework for the Boroughs and sets out the Mayor's policies. The London Plan contains the Mayor's objectives for the city, which includes the strategic objectives for London, the most relevant of which are ensuring London is:

1. *A city that meets the challenges of economic and population growth.*
2. *An internationally competitive and successful city.*
3. *A city of diverse, strong, secure and accessible neighbourhoods.*
4. *A city that delights the senses.*
5. *A city that becomes a world leader in improving the environment.*
6. *A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities."*

5.10 This is then brought forward in Policy 1.1, which seeks to deliver the strategic vision and objectives for London. This states,

"Growth and change in London will be managed in order to realise the Mayor's vision for London's sustainable development to 2031 set out in paragraph 1.52 and his commitment to ensuring all Londoners enjoy a good, and improving, quality of life sustainable over the life of this Plan and into the future.

Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without:

a encroaching on the Green Belt, or on London's protected open spaces

b having unacceptable impacts on the environment

The development of east London will be a particular priority to address existing need for development, regeneration and promotion of social and economic convergence with other parts of London and as the location of the largest opportunities for new homes and jobs.

...."

- 5.11 The Plan (Policy 3.3) seeks to ensure 32,210 new homes per year are delivered, offering a range of housing choices in terms of size and type. The Plan then sets targets for the provision of new homes within each London Borough at Table 3.1. For Camden it gives a figure of 6,650 homes from 2011-2021, which results in an annual monitoring target of 665 new homes.
- 5.12 Policy 3.4 (Optimising Housing Potential Table 3.2) seeks to optimise housing output by developing at an appropriate density range having account for the local context, design principles and public transport accessibility.
- 5.13 Policy 3.5 (Quality and Design of Housing Developments) emphasises the need to develop high quality accommodation internally and externally, Table 3.3 sets out the minimum space standards for new residential development.
- 5.14 Policy 3.8 Housing Choice requires housing choice for all Londoners development should ensure a genuine choice of homes that are affordable and meet the requirement for different types and sizes of dwellings in the highest quality environments. Policy 3.9 seeks mixed and balanced communities and states,

“More balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.”

- 5.15 Affordable housing is covered by Policy 3.11, which outlines that the Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 13,200 more affordable homes per year in London over the term of this Plan. It adds that in order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social rent and 40% for intermediate rent or sale and that priority should be accorded to provision of affordable family housing.

- 5.16 Policy 3.12 states negotiation of affordable housing on individual private residential and mixed use schemes should take account of the policy aims outlined as well as individual scheme circumstances including development viability, the availability of public subsidy, phasing and other scheme requirements.
- 5.17 Climate Change is covered in Section 5, Policy 5.2 outlines that development proposals should make the fullest contribution to minimising carbon dioxide emissions and are required to follow the Mayor's energy hierarchy:
- Be lean: use less energy
 - Be clean: supply energy efficiently
 - Be green: use renewable energy
- 5.18 It goes on to say the Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings, as an improvement on 2010 Building Regulations, as follows,
- 2010 – 2013 - 25% improvement (ie Code for Sustainable Homes level 4)
 - 2013 – 2016 – 40% improvement
 - 2016 – 2019 Non-domestic buildings - as per building regulations, residential buildings – zero carbon
 - 2019 – 2031 - Zero carbon
- 5.19 Policy 5.7 sets out the Mayor's requirements for renewable energy where major developments require on-site renewable energy generation with a presumption that all major developments will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible.
- 5.20 In terms of the built environment, Policy 7.1 covers Building London's Neighbourhoods and Communities and outlines 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 (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.
- 5.21 Policies 7.3, 7.4 and 7.5 outline the Mayor's design principles seeking that development should respect the local context and character, create safe and legible places for occupants and passers-by, create or enhance the public realm, be accessible to all users, be

sustainable, durable and adaptable. Policy 7.6 promotes world class architecture and design and enhancements to the quality of the public realm using the highest quality materials. The policy then sets out that they should:

- 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.
- 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.
- optimise the potential of sites.

5.22 The London Plan is supported by a number of supplementary planning guidance notes, pertinent to this application are:

- Accessible London: Achieving an Inclusive Environment (2004)
- Housing (2012)
- Sustainable Design and Construction (2006)
- Planning for Equality and Diversity in London (October 2007)
- Providing for Children and Young People's Play and Informal Recreation (2008)

C LOCAL DEVELOPMENT FRAMEWORK

In this instance the Development Plan for the area consists of the London Borough of Camden Core Strategy and Development Policies Documents (DPD) both adopted in 2010. LB Camden have also prepared a Camden Planning Guidance note on housing with specific guidance on residential space standards and Lifetime homes which was adopted on 6th April 2011. Further to this there are two additional Camden Planning Guidance notes on design and sustainability which were also adopted in April 2011

Core Strategy

5.23 The Core Strategy is the primary and strategic document in the Local Development Framework (LDF). It sets out a spatial vision and strategy for the future of the Borough for the plan period 2010-2025. The Core Strategy was adopted in 2010.

5.24 The Core Strategy is a placeshaping document and at its core is the overall vision is that Camden will be a Borough of opportunity. Beneath that vision there are four key themes, noted below that resonate within the Core Strategy objectives and policies.

1. A sustainable Camden that adapts to a growing population
2. A strong Camden economy that includes everyone
3. A connected Camden community where people lead active, healthy lives
4. A safe Camden that is a vibrant part of our world city.

Proposals Map

5.25 As this extract from the Core Strategy Proposal Map shows, the site is undesignated, although opposite a conservation area and to the south of the Queens Crescent Neighbourhood Centre.



5.26 Core Strategy Policy CS6 Providing New Homes sets out the Council's approach to the delivery of new homes as part of the growth agenda and to meet their housing delivery

targets by maximising housing supply that delivers high quality affordable housing. Residential development should reflect and respond to Camden's current and future housing needs to create mixed and inclusive communities.

- 5.27 Affordable Housing, which will be sought from residential-only developments and mixed use developments incorporating residential use, with onsite provision of affordable housing being sought in the first instance. The Policy states that new housing should seek the maximum reasonable on-site affordable housing provision based on the specific circumstances of the site, including the financial viability of the development. The policy states an affordable housing target of 50% of the total addition to housing floorspace. In line with identified need and as a borough wide guide the required tenure split of affordable housing will be 60% social rented and 40% Intermediate (by unit).
- 5.28 Core Strategy Policy CS8 covers Promoting a Successful and Inclusive Community and outlines that the Council will promote the provision of office floorspace in key growth locations and safeguard existing employment sites that meet the needs of modern industry and other employers. The policy emphasis the need to foster the creative industry concentrations and promote a mix of employment facilities.
- 5.29 Core Strategy Policy CS11 Promoting Sustainable and Efficient Travel sets out the Council's vision to support growth through the promotion of sustainable travel encouraging safe walking and cycling environments and improving facilities for cyclists, including secure parking. Furthermore the policy seeks to reduce the dependency on private vehicles through car-free developments and promoting the use of car-clubs and low emission vehicles.
- 5.30 Core Strategy Policy CS13 deals with Tackling Climate Change Through Promoting Higher Environmental Standards and outlines that Camden will address climate change at a local level through the inclusion of mitigation and adaptation measures to reduce CO2 emissions from buildings. The policy states that the Council will require all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable through:
- Promoting efficient use of land and buildings.

- Ensuring patterns of land use that minimise the need for travel by car.
- Ensuring buildings and spaces are design to cope with and minimise the effects of climate change.
- Minimising carbon emissions through implementation of the London Plan energy hierarchy.

5.31 Core Strategy Policy CS14 details Promoting High Quality Places and Conserving Our Heritage and states that in order to ensure development in Camden is attractive, safe and easy to use it is expected that development will:

- Be of the highest standard of design that respects the local context and character.
- Preserve and enhance Camden's rich and diverse heritage assets including conservation areas.
- Promote high quality landscaping and works to the streets and public spaces.
- Seek the highest standards of access in all buildings and places and be designed to be inclusive and accessible.
- Protect strategic and local views.

Policy Summary

5.32 From the above analysis of the planning policy framework there are five main issues which emerge. These are:

- The importance of making the most efficient use of land in sustainable locations;
- The need to maximise the provision of new homes throughout London.
- The need to protect and enhance the employment floorspace on offer within Camden in appropriate and accessible locations.
- The requirement for development to be environmentally sustainable through its fabric, its emissions and its ability to adapt.
- The importance of good design to ensure that development enhances the character and appearance of the area.

6.0 Assessment of proposed Development

6.1 This section provides a detailed analysis of the themes and objectives of the current proposals with reference to the policy and national planning context outlined in the previous section.

Land Use

Loss of employment floorspace

6.2 The Council's Core Strategy seeks to encourage mixed use developments where appropriate in the most accessible parts of the Borough making efficient use of land. It is acknowledged that a mix of uses on some sites may not be appropriate owing to constraints where it cannot be practically achieved. Development Management policy DP1 – Mixed Use Development outlines a number of considerations when assessing a site's appropriateness for mixed-use development these include:

- the character of the development, the site and the area
- site size, the extent of additional floorspace, and the constraints including on mix of uses
- the need for an active street frontage and natural surveillance
- the economics and financial viability of the development including any particular costs associated with it
- whether the sole or primary is proposed is housing
- whether the secondary use would be compatible with the character of the primary use
- whether an extension to the gross floorspace is needed for an existing user
- whether the development is publicly funded
- any other planning objectives considered to be a priority for the site

6.3 Allcroft Road is a small site situated within a quiet residential street outside the neighbourhood centre of Queens Crescent. The proposal is for a wholly residential development which is considered to be an appropriate response given the character of the surrounding area, the size of the site and the primary objective to deliver additional housing including affordable homes in the Borough.

6.4 It is considered that given the constraints of the site it is not practical or financially viable to deliver a mixed-use development with a secondary use of commercial floorspace such as business B1 use which is considered to be incompatible with residential floorspace on a site of this size.

- 6.5 The Council's annual monitoring report 2011/12 stated that a total of 545,176 sqm of B1 gross floorspace was under construction in the Borough with a further 62,811 sqm not yet started. There is a net additional supply of B1 floorspace across the Borough with an apparent oversupply of B1 office accommodation. Appendix B is a survey of the current supply of available B1 floorspace (including office and light industrial) within a 1km radius of the site along with an indication of pipeline B1 floorspace within the same area at planning stage or under construction. Whilst the current availability is a snap shot of the current climate and not over a sustained period it illustrates the type and quality of available B1 floorspace available locally the majority of which is located in self-contained non-residential/mixed-use developments in close proximity to public transport interchanges and with car-parking – qualities the site at Allcroft Road doesn't offer to prospective tenants.
- 6.6 A Cabinet report in July 2011 on Camden Community Investment Programme reported that 47 Allcroft Road was *'a poor performing investment and the capital value from sale exceeds the value if retained as an income generating investment. The tenants entered into their existing leases in the knowledge of the potential for redevelopment and letters have been sent to them advising of the proposal for the Council to dispose of its freehold interest. The Council's Executive in 2008 agreed that the site should be sold.'* The Cabinet agreed in 2011 that the property was surplus to requirements and the site was sold on the open market in May 2012 to Telford Homes Plc, the receipts generated from the sale were recycled into the Community Investment Programme.
- 6.7 LB Camden, through the DP13 policy resist the loss of employment floorspace where there is potential for that use to continue unless it can be shown the site is no longer suitable for continued or alternative business use. DP13 categorises light industrial floorspace based on age, facilities, accessibility, condition, location and whether there is evidence of demand. The Council may allow a change to permanent residential or community uses when it can be demonstrated that a site is not suitable for any business use other than B1(a) offices. More specifically paragraph 8.8 indicates that the Council are promoting sufficient office space to meet projected demand, and so there is a general presumption that older office spaces can be released where housing or community uses are proposed.
- 6.8 Paragraph 51 of the NPPF stipulates that local planning authorities should "normally approve planning applications for change to residential use and any associated development from

commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate”.

- 6.9 The application proposes the demolition of the existing light industrial workshops that are vacant following identification in 2008 of the sites potential for redevelopment. The current premises have assessed as category 3 in the independent assessment by Lambert Smith Hampton that accompanies this report which indicates that they provide low grade employment floorspace in a marginal location for such land uses. Council policy supported by Camden Employment Land Review (2008) and Camden Business Premises Study 2011 both by Roger Tym and Partners, the assessments recognise that category 3 sites with incompatible neighbouring uses (eg residential) and poor access may be released for redevelopment of alternative uses including residential and/or community uses may be considered.
- 6.10 The site at Allcroft Road is within a predominantly residential area on a quiet residential street. In addition the physical attributes of the site such as the lack of space for safe on-site vehicular servicing, domestic scale ceiling heights and the poor access to transport links serve to demonstrate that the site is not conducive to continued use for light industrial businesses which are typically anti-social neighbours to residential occupants.
- 6.11 Redevelopment of the site is the preferred solution and was identified by the Council in 2008 as an option for the site. The size of the site means that vertical separation of land uses would render the site impractical owing to the need for separate circulation provision therefore horizontal separation would be the only feasible way the design could practically develop.
- 6.12 Telford Homes have explored the practical and financial implications of developing a mixed-use development with residential and light industrial at Allcroft Road but there are several key reasons why this is unachievable:
- Conflict between residential development above light industrial B1c, B2 or B8 at ground floor owing to unsocial activities and servicing requirements – such a juxtaposition would render the residential marginal in terms of viability owing to difficulties in selling the properties. Compatible employment use with residential accommodation above is

B1a offices this would be considered the only practically viable employment use at Allcroft Road in a mixed use development.

- Location – the site is outside the neighbourhood centre with no neighbouring employment or commercial activities on Allcroft Road. The Council is committed to promoting 440,000 sqm of permitted office floorspace at Kings Cross and a further 70,000 sqm at Euston these areas offer more attractive modern flexible office space in highly accessible locations. Therefore in view of the requirement for town centre uses such as B1a offices, A1 or A2 to be located in town centres first it would be difficult to justify the provision of such uses or the need for at Allcroft Road over sites better located in the Borough's Town and Neighbourhood Centres and growth areas.
- Viability – The design development has evolved to take account of the local and national planning policy and always with a view to obtaining planning permission for a financially viable scheme that can be delivered to a high quality in a timely manner contributing to the local housing supply. A financial viability assessment has been prepared and will follow this report, it sets out the 'break even' position of the current proposals which include three affordable homes and significant 'green' infrastructure to achieve Code for Sustainable Homes Level 4. The scheme is unable to sustain the inclusion of a ground floor re-provision of commercial floorspace, the provision of affordable housing and the reduced saleability and value of the open market homes that would result from a mixed-use development.

6.13 The adopted Local Development Policies we believe are entirely at odds with the objectives of the NPPF and the 'golden thread' of sustainable development. Given the sale of the site to Telford Homes with vacating tenants in situ the policy requirement for a full marketing exercise is considered inappropriate. It would have the property sit vacant for a period of two years while 'sufficient' marketing evidence could be gathered while the opportunity to redevelop these sites to provide sustainable new homes is delayed or worse still missed. An Inspector examining a London Borough's Development Management Plan in December 2012 for soundness with regard to the guidance in the NPPF (including paras 22 on reasonable prospects and 173 on viability), stated that where a site is demonstrably unsuitable for continuing employment use from the outset, it should not be necessary to undertake the

marketing exercise and thereby place an unjustified burden and delay to the delivery of redevelopment or alternative use proposals.

Provision of residential floorspace

- 6.14 The overarching theme of national, regional and local policies is to secure sustainable patterns of development and the re-use of previously developed urban land. Both Government Guidance and the London Plan encourage making optimum use of valuable urban land and achieving increased levels of residential development upon brownfield sites to contribute towards urban renaissance and sustainable development.
- 6.15 A wholly residential development and therefore the loss of employment use from the site is considered appropriate given the scale of development and the location, as outlined by planning policy. The Camden LDF specifically encourages residential development as the key Borough priority delivering valuable numbers of private and affordable housing upon brownfield sites. The site is situated outside any preferred office and employment locations and is therefore appropriate in principle for wholly residential land use in accordance with LDF Policies, the London Plan and Government Guidance.

Economic Benefits

- 6.16 The CITB have estimated that to build each home requires 1.5 people in direct construction employment [CITB and HBF Report 'The Labour Needs of Extra Housing Output: Can the Housebuilding Industry Cope?', Michael Ball (September, 2005)], meaning the construction of Allcroft Road should employ 27 people full time throughout its duration.
- 6.17 Beyond the specific site and support staff directly employed, the Home Builders Federation (HBF) in their document 'Building a Recovery' (December 2010) estimates that for each new home constructed four extra jobs are created in the wider economy outside of construction (primary industries, manufacturing and services). This would mean a further 72 jobs around the development. A substantial uplift on the 4 full time employees on the existing site when it was last fully occupied in 2012.

Additional Council Tax Receipts and New Homes Bonus

- 6.18 The proposed development would provide a total of 18 new homes, which would have a beneficial impact on the Council's annual Council Tax receipts. In addition, following the introduction of the New Homes Bonus in April 2011, the Government will match fund the additional Council Tax raised for new homes with an additional amount for affordable homes, for the following six years, Allcroft Road could deliver £184,000 over 6 years which could be utilised in the Gospel Oak Regeneration plans.

Housing

Housing Need

- 6.19 Camden's Core Strategy makes clear that housing delivery is the Council's first priority an objective shared by Central Government who have put housing supply top of the national agenda. The Council are required to deliver 665 new homes a year over the London Plan period 2011-2021. The Council's 2011 Housing Strategy documents the rapid growth in population and number of households over the last 10 years which is predicted to accelerate over the next 15 years with the number of households increasing by 11%.
- 6.20 Camden is reported to be on target meet its strategic housing delivery targets for the London Plan period despite the net additional homes delivered in the last annual monitoring report period 2011/2012 being substantially below the target required. It is recognised that in addition to a number of larger regeneration schemes in the Borough windfall sites such as Allcroft Road a valuable source of housing supply.
- 6.21 The proposed scheme at Allcroft Road would deliver 18 new residential units with a mix of different sized units and high quality accommodation which will contribute towards sustainable housing delivery in Camden.

Affordable Housing

- 6.22 London Plan Policy 3.11 established a strategic target for the delivery of 13,200 new affordable homes across London for the period of the plan to 2021. In order to achieve this target local authorities are expected to maximise the provision of affordable housing in their Borough. London Plan policy 3.12 states that Local Authorities should seek the maximum reasonable amount of affordable housing on individual sites having regard to development

viability, the local housing need, the need to encourage rather than restrain development and the availability of public subsidy.

- 6.23 Camden Development Management Policy DP3 sets out the Borough's affordable housing target of 50% of the total addition to housing floorspace which is applied on the basis of a sliding scale where sites with capacity for 10 units will deliver 10% affordable, 30 units 30% and so on. The Council it states will consider the character of the development and economic viability in assessing the appropriate and supportable affordable housing provision. The overarching objective is to create a better balance of tenures and create mixed communities.
- 6.24 The proposed affordable provision at Allcroft Road would deliver three affordable units all as shared ownership units comprising 1 x 1bedroom and 2 x 2bedroom apartments equating to 18% of the proposed new residential accommodation, based on floorspace as defined in policy DP3.
- 6.25 The proposed mix reflects and responds to the existing tenure of the Haverstock ward, the 2011 census data reveals that over 49% of households are social rented properties rented from the Council or Housing Associations, less than 1% of the households were shared ownership and 27% are privately owned, the remainder are households who rent privately. A significant proportion of the local area is characterised by existing social rented accommodation particularly on the Queens Crescent Estate the proposed mix would introduce additional market and shared ownership housing and would contribute towards a more mixed and balanced community.
- 6.26 Telford Homes have a successful track record of delivering high quality affordable homes in partnership with our housing association partners across London. The three proposed units at Allcroft Road owing to the relatively small provision and the financial constraints of managing and delivering them in the absence of public subsidy will be delivered as shared ownership in partnership with our Registered Provider partner, Circle.
- 6.27 An Affordable Housing and Viability Assessment by DTZ accompanies the application. The Assessment shows that with 18% affordable housing delivered on-site as shared ownership with Section 106 contribution of £36,000 the scheme has a residual value of less than the current Alternative Use Value of the site. Therefore any increase in costs including Section

106 contributions or a requirement to provide affordable rent tenure would render the scheme unviable and furthermore would be unattractive to our RP partner.

- 6.28 The proposed affordable housing provision is considered to be in accordance with LB Camden's planning policy.

Housing Mix

- 6.29 Policy DP5 seeks to secure the creation of mixed and inclusive communities with a range of different sized homes to cater for all sections of the community. The policy requires all residential developments provide a mix of small and large homes and in particular sets out dwelling size priorities for each tenure. Camden prioritises the delivery of 2 bedroom dwellings in the market accommodation aiming for 40% two bedrooms with a reduced number of 1beds than 2-beds. Within shared ownership there is an equal priority placed on 2, 3 and 4bedroom properties with a lower priority on 1bedroom dwellings.

- 6.30 The proposed unit mix is shown in table 2 below.

Table 2 Proposed Dwelling Mix

	Shared Ownership	Market	Total
1bed	1 (33.3%)	4 (27%)	5
2bed	2 (66.67%)	9 (60%)	11
3bed	0	2 (13%)	2
Total	3 (100%)	15 (100%)	18

- 6.31 The scheme proposes 60% of the market accommodation as 2-bedroom in excess of the dwelling priority which reflects the very high priority within the tenure. The proposals include two family sized units accounting for 11% of the total number of units proposed given the overall mix of units across the tenures and the urban context of the site this is considered to be acceptable and a balanced response to the site.

- 6.32 The proposed residential units are designed to achieve good standards of accommodation and amenity for the future residents. All units meet and in some cases exceed the London Plan minimum dwelling size requirements.

Lifetime Homes

- 6.33 As set out in the Design and Access Statement all of the apartments have been designed to meet Lifetime Homes Standards. 10% of the flats have been designed so that they can easily be adapted for wheelchair accessibility. The proposed scheme therefore meets the requirements of Policy DP5 of the Development Management Policies and Policy 3.8 of the London Plan which requires that 10% of new units be wheelchair accessible or easily adaptable.

Amenity Space provision

- 6.34 Camden Planning Guidance 1 and 2 set out the Council's expectations with regards the provision of private amenity space for all proposed residential units. The London Plan (2011) and Interim Housing Design Guide (2010) take this further and detail the quantum of provision required by unit size. All units are dual aspect and will have direct access off the main living space onto their private amenity space provided as a balcony, terrace or garden, all meet or exceed the London Plan requirements and the scheme provides a total of 268 sqm private amenity space.
- 6.35 DP31 sets out the Council's framework and requirements for open space delivery as part of new developments requiring 9sqm of open space per occupier for residential schemes. Figure 5 of Camden Planning Guidance provides further detail and allocates a total area per unit based on size to include amenity area, childrens play and natural green space. The total requirement for Allcroft Road is 295.9 sqm. The site is not located within an area deficient in public open space as illustrated on Map 7 of the Core Strategy and has access to several areas of public open space within easy walking distance or 280 m.
- 6.36 The constraints of the site in terms of size and proximity to neighbouring properties means it is not considered appropriate to provide communal amenity space for residents at roof level and on balance for a scheme of this size it is considered that ground floor amenity would be more useable and beneficial allocated as private amenity space.
- 6.37 Therefore whilst the quality and level of amenity for individual units is considered to be high quality numerically the scheme falls short of the on-site open space provision not unusual for schemes of this nature. Should the Council require a contribution to an off-site facility

Telford Homes is willing to enter into a S106 Agreement with LBC and a Viability Assessment detailing the financial contributions the scheme can sustain is included with this submission.

Design, Layout and Massing

6.38 The London Plan and Camden's Core Strategy and DM Policies all seek to achieve high quality sustainable design that reflects the context and character of its surroundings. A detailed assessment of the design and appearance of the proposed scheme is set out in the Design and Access Statement. The key points are summarised below:

- The simple footprint of the building creates a well proportioned building that will sit well within the site and relates well to the surrounding residential character.
- Layout repairs the fragmented building line punctuating the ground floor with private entrances to create an active frontage overlooked by habitable accommodation.
- The palette of materials has been limited in order to contribute to the existing street scene knitting together the opposite conservation area with a contemporary high quality design.
- Building materials of predominantly brick proposed with robust details detailing around the entrances and projecting balconies.
- Integration of green sustainable features including green walls to the stair core and a biodiversity roof.

6.39 The proposed building is a 4-storey rectangular block, the fourth storey is set back from Allcroft Road to provide a terrace and to reflect the height and set back of the adjacent Pocket Living development. The upper floor units are accessed from a deck to the rear of the site with main living spaces orientated on the west elevation with balconies overlooking the street.

6.40 The proposals have been carefully considered to ensure the adopted design concept follows best practice urban design principles and to respond positively to the site's location and setting. Overall the scale and massing are considered to be appropriate and reflective of and an enhancement to the local character. Further detail including visuals and an overview of the materials palette is included within the Design and Access Statement.

Daylight and sunlight

6.41 A comprehensive assessment of the impact on surrounding neighbouring properties together with the conditions of the proposed scheme has been carried out by Calfordseaden

in accordance with the BRE Report 209 'Site Layout Planning for Dyalight and Sunlight – a Guide to Good Practice'. The assessment concludes owing the current site condition being occupied by a single storey building an increase in height from a reasonable development will result in some impact on surrounding residential properties. The level of impact in the overwhelming majority of rooms tested will satisfy the BRE guidance and is therefore considered to be acceptable in this urban context.

- 6.42 The impact on the proposed development is such that 86% of the rooms tested achieve in excess of the BRE guidance with a number falling marginally below owing to the deep plan layout of the open plan kitchen living dining area where the small kitchen elements at the rear could be considered to be a non-habitable room.
- 6.43 An overshadowing impact of neighbouring gardens and open spaces shows that over 90% will receive more than 2 hours sunlight in excess of the BRE guidance. In the proposed situation the ground floor gardens were also assessed and the study demonstrates that approximately 70% of the area will receive more than 2 hours sunlight.

Energy and Sustainability

- 6.44 Sustainability is the 'golden thread' running through national planning policy as detailed in the NPPF.
- 6.45 The proposed development with reference to the London Plan energy hierarchy; Be Lean, Be Clean, Be Green; seeks to reduce the demand for energy and reduce the resulting carbon emissions produced by the development.
- 6.46 An Energy Statement has been prepared by Energy Council which outlines how the proposed development will meet the sustainability objectives set out in the London Plan and LBC adopted planning policies as well as Code for Sustainable Homes (CSH) requirements.
- 6.47 Telford Homes is committed to delivering the 18 residential units at Allcroft Road to achieve a CSH Level 4. A CSH pre-assessment has been undertaken by Energy Council to demonstrate this.
- 6.48 The Energy Statement demonstrates the proposed development will create an efficient and 'lean' building achieving a reduction of 3.2% in emissions compared to a Part L compliant

development through the incorporation of passive design. The integration of 'clean' heating system for the units provides a further reduction of 10.3% regulated energy savings. The scheme then seeks to further offset carbon emissions through the introduction of 'green' LZCT, an additional reduction of 17.6% from the baseline regulated energy emissions can be achieved through an approximate provision of 29 PV arrays installed on the roof (7.25 kWp). The overall reduction in Carbon emissions as a result of the holistic approach taken is 15.4%.

- 6.49 Renewable technologies have been incorporated into the development which further reduced the CO₂ emissions of the development meeting the objective of London Plan Policy 5.7. The most viable technology is photovoltaic panels.
- 6.50 The proposed development therefore complies with relevant sustainability and renewable energy policies.

Waste and recycling

- 6.51 The Design and Access Statement details the refuse disposal strategy for the proposed development and this has been assessed in the Transport Statement. The Servicing Strategy and the overall servicing requirements for the development are expected to be an improvement to the local highway network than the former commercial uses on the site.
- 6.52 In summary a single refuse store would be provided, accessed off Allcroft road adjacent to the residential entrance to provide communal refuse and recycling to the upper floor apartments. Individual refuse and recycling bins will be provided within an enclosure in the front garden of each ground floor unit. Refuse and recycling bins would be provided in accordance with LBC standards (residential refuse and recycling provision) as detailed in the Design and Access Statement.

Trees and Ecology

- 6.53 A Phase 1 Habitat Survey and separate Arboricultural Impact Assessment have been carried out by James Black Associates and submitted with this report in support of the application.
- 6.54 The habitat survey concluded that the existing site is of low ecological value with the all of the site covered in hardstanding or the building. The survey found no sign of bat or bird nesting within the site or the current workshops. The proposal includes the introduction of

a biodiversity roof, a mix of hard and soft landscaping at ground floor and a green wall with climbing plants up the eastern stair core elevation. The ecological value of the site post-construction will be a significant improvement on the state of the existing condition.

- 6.55 The tree survey assessed the impact of the development on trees outside of the site boundary owing to there being none on site. The assessment concludes that subject to implementation of the protection measures advised the development will have no material impact on the health or quality of the trees in proximity to the site.

Transport, Accessibility and Parking

- 6.56 Core Strategy Policy CS11 supports the delivery of transport infrastructure and sustainable transport choices to reduce the environmental and physical burdens on the Borough's transport network. DP16 of the Development Policies document seeks to ensure that new development does not have an adverse impact on the safety and capacity of the road network. It states that development should address the need for appropriate connections to highways and street spaces and provide information to indicate likely impacts of the development through a transport assessment.
- 6.57 In accordance with Policy DP16 Transport Statement and Draft Travel Plan has been prepared by Stilwell Partnership and is submitted in support of this application.
- 6.58 Parking Standards are set out in Appendix 2 of the Development Policies document and sets out a maximum car parking standard of 0.5 spaces per residential unit, with 1 space per wheelchair dwelling for disabled parking and a minimum cycle parking standard of 1 space per 1 secure space space per unit.
- 6.59 In summary the Transport Statement advises that:
- The additional 18 units proposed will have no material impact on public transport capacity.
 - The proposed scheme will be a car free scheme which can be secured through the S106 agreement. There is sufficient capacity on street on Allcroft Road to allocate a disabled bay should a future resident require a space.
 - The proposal provides 20 cycle parking spaces, 15 of which are located within a secure store off the common core the remainder are located within the front gardens of the ground floor units and will be provided as secure lockers. This accords with TfL's cycle parking standards which give a minimum requirement of 20 cycle parking spaces and exceeds LB Camden's minimum cycle parking standard of 18 spaces for the proposed development.

6.60 In concluding the Transport Statement advises that the planning application is consistent with national, London Plan and local transport policy and is acceptable in traffic and transport terms.

Designing Out Crime/ Secure By Design

6.61 The Design and Access Statement sets out the overarching strategy for ensuring that the proposed development will provide a safe and secure environment for occupants and visitors, and thereby accord with the relevant development plan policy.

6.62 In summary the following on-site securing measures adopted includes:

- Both public and private spaces will be well surveyed by apartments at ground and upper floor levels with entrances and habitable rooms overlooking the street;
- Well designed boundary treatment will be used to define the public and private areas of the ground floor and omit hidden areas that could lead to antisocial behaviour;
- “Target Hardening” measures will be incorporated including robust locks, entrance systems and gates to the cycle storage; and
- Windows and doors on the ground floor and those accessed from terraces will be designed to Secure by Design Standards with laminated glass and multi point dead locking systems.

Ground Conditions

6.63 A site investigation report has been produced by Herts and Essex Site Investigations and is submitted in support of this planning application.

6.64 In summary the report advises that the site was until 1960s in residential use when it became a private garages site and in the 1980s the site made way for the current commercial structure. The report indicates there is a low to moderate risk of contaminants associated with the light industrial and former garages use which can be assessed in further detail through a Phase II site investigation secured by planning condition.

S106 matters

6.65 Telford Homes is willing to enter into a S106 Agreement with London Borough of Camden. The wording of the Planning Agreement to be agreed during the course of the application.

6.66 Draft Heads of Terms are set out below which are based on Camden's Planning Obligations CPG 8. The Viability Assessment demonstrates that the scheme can support a total of £36,000 in s106 contributions, £62,640 in Mayoral CIL contributions in addition to an on-site provision of 18% affordable housing (based on floorspace).

6.67 The proposed initial heads of terms are as follows:

- affordable housing 18% of the proposed floorspace secured as shared ownership units.
- Car free agreement – No residents parking permits meaning no resident of the proposed development will be entitled to a resident or visitors parking permit (with the exception of disabled residents).
- Employment and training – use of local labour on-site during construction including contribution towards the Borough's training programmes.
- Section 278 agreement under the highways Act to secure the works to reinstate the footway adjacent to the boundary and remove the existing crossover.
- All residential units to be built to Lifetime Homes and Code for Sustainable Homes Level 4.
- Considerate Constructors Scheme

6.68 These are put forward without prejudice and will be the subject of detailed discussion with the London Borough of Camden and other stakeholders.

7.0 Conclusion

- 7.1 The proposed Development is considered to be well aligned with guidance in the NPPF, the policy objectives set out within the London Plan and the policies in the LBC Core Strategy and Development Policies.
- 7.2 The overarching objective for the proposed development is to deliver a high quality contemporary designed residential development on an underused and poorly performing commercial site. The development will repair a gap in the urban fabric and will link the residential development to the north of the site with the residential housing estate to the south adding to the local character and providing a more appropriate and compatible land use on the site in relation to the existing residential communities.
- 7.3 It is considered that the proposed development will deliver a number of key planning benefits as outline below:
- Deliver a high density residential-led development in an area of housing need;
 - Provide 18 new residential apartments (including 18% affordable housing) in an accessible location, thereby assisting the Borough in meeting both strategic housing targets and the housing delivery targets for Gospel Oak and Haverstock areas.
 - Provide a range and mix of high-quality residential accommodation – including 11% family sized and 60% private two-beds;
 - Adopt a contemporary design approach that will optimise the development potential of the site and integrate well with its surroundings and contribute to local distinctiveness;
 - Resolve the transport and amenity issues associated with business use in this residential area; improving the wider environment and the amenities of neighbouring residential land-uses;
 - Incorporate measures to maximise the use of sustainable modes of transport; and Incorporate measures to deliver a sustainable development including energy efficiency and the use of energy from renewable sources in order to reduce carbon emissions. The scheme will achieve Code for Sustainable Homes 4.
- 7.4 Telford Homes has also been in discussion with Registered Provider Circle with regards to appropriate tenure and internal accommodation standards. Circle is supportive of the scheme and considers the shared ownership provision to be wholly appropriate and affordable for their clients.
- 7.5 At the heart of the NPPF is a presumption in favour of sustainable development, sustainability can be broken down into three core elements, economics, social and

environmental. Economics, the site is a poorly performing low grade commercial site within a residential area the site was deemed surplus to the Council's requirements and sold to Telford Homes on the open market. The NPPF urges Council's to make the default answer 'yes' in favour of converting employment uses to residential to tackle the nation's housing supply deficit unless there are strong economic reasons why not – there is an oversupply of B1 space in the Borough and the future pipeline will deliver better quality employment space in more appropriate and accessible locations there are no strong enough reasons why Allcroft Road should reprovide employment floorspace rather than delivering new homes. The scheme would generate jobs during construction and during its lifetime.

- 7.6 Social, the scheme proposes new homes of which three (18%) are proposed to be affordable shared ownership to meet the needs of current and future generations. Environmental it has been demonstrated that the proposed scheme would be an efficient use of the site and that its sustainable credentials meet with the national aspirations and policy targets. The proposals at Allcroft Road should therefore fall under the presumption in favour of development banner.
- 7.7 The scheme is financially viable and deliverable and the applicant is committed to commence development as soon as is practicable should consent be granted.
- 7.8 For the above reasons, the proposal accords with relevant Development Plan policies and other material considerations and should be granted planning permission.

A. Pre-application notes

Sophie Hoskin

From: Cleary, Neil <Neil.Cleary@camden.gov.uk>
Sent: 12 October 2012 15:41
To: Sophie Hoskin
Cc: Tulloch, Rob
Subject: RE: Council-owned Employment Land Roger Tym May 2012

Follow Up Flag: Follow up
Flag Status: Completed

Hi Sophie,

No problem, happy to try and help. As this Study relates to Council owned employment land Allcroft Road is not included. However, the basis for the appraisal of any employment site is outlined in the relevant LDF policies (CS8 and DP13) and further advice is contained within our Camden Planning Guidance (CPG 5), and also the Roger Tym Study from 2011. This categorises sites by the quality of the employment offer provided. Links to those docs are below;

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/core-strategy/evidence-and-supporting-documents.en> (see 'Camden Business Premises Study 2011')

For Allcroft Road, and going on the categories outlined in the CPG, we would categorise it as a Category 1 site, as it is of a type that is difficult to replace in Camden - its a purpose built light industrial building, with no restriction on hours of use.

I hope this is helpful, if you need anything further please let me know.

Regards
Neil

Neil Cleary
Senior Planner

Telephone: 020 7974 1341

From: Sophie Hoskin [<mailto:sophie.hoskin@telfordhomes.plc.uk>]
Sent: 12 October 2012 14:33
To: Cleary, Neil
Subject: Council-owned Employment Land Roger Tym May 2012

Dear Neil,

I hope you don't mind me getting in touch with you directly I've been unable to get hold of Rob Tulloch.

We are working on proposals for Allcroft Road as I'm sure you're aware. Rob's pre-application note make consistent reference to the above report on Council owned Employment Land and we're keen to understand its contents with specific regard to the Allcroft Road site (which we now own).

In order to make sure we're all on the same page I wonder if it is possible to see a copy of the report or perhaps those pages pertinent to Allcroft Road.

I look forward to hearing from you.

Best regards

Sophie Hoskin
Land & Planning Manager

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47 Allcroft Road Key Issues

Land use

Loss of B1 floorspace

An appraisal was prepared in October 2011 for Property Services prior to the disposal of the site which concluded that the Council would seek to retain any viable employment floorspace on site, but stated that there may be scope for a mixed use development on the site incorporating retained employment uses alongside new, preferably residential, uses.

Since then a Council commissioned report on employment land has been published (internally) which identifies the site as being Category 1 “prime stock, providing ideal industrial accommodation. They are more often found in more peripheral locations, but where present in Camden are very much in demand. Their distinguishing features include unencumbered access for commercial vehicles, 24-hour operation, minimal risk of causing nuisance to nearby residents and prime quality buildings.”. (The Strategic Appraisal of Council-Owned Employment Land Roger Tym & Partners May 2012)

The Economic Development team would resist the loss of employment floorspace as the Council’s policies seek to protect light industrial floorspace. Development Policy DP13 states that:

The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

- a) it can be demonstrated to the Council’s satisfaction that a site or building is no longer suitable for its existing business use.
- and**
- b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.

The Economic Development team consider that the applicant has not justified that the site is **not** suitable for continued business use. Nor has the applicant complied with point (b) above. This site has been identified as good quality light industrial space with existing tenants – implying that there is clear demand. The applicant has provided some information stating that the tenants are proposing to vacate but additional information is required setting out clearly their reasons for leaving. The Tym report has identified this site as category 1 (high quality light industrial space) with potential for mixed use re-development and not solely for residential. The consultants have clearly considered the issue of change of use to residential in detail before arriving at their recommendation. The Economic Development team would therefore not support a change of use to solely residential.

The Economic Development team referred to Gospel Oak as having output areas amongst the 10% most deprived in the country and expressed further objection to a loss of employment floorspace.

The Sites officer noted the problems arising when the Council sells commercial sites to development companies, but still expects them to remain in commercial or mixed use. He also noted the difficulty of mixed use schemes, particularly their impact on residential amenity and the letability of commercial floorspace within mixed use schemes. The Lambert Smith Hampton report was acknowledged, but contradicts the Council's own report by Roger Tym.

The Development Management Team Manager advised that due to the above, particularly in light of the Tym report, the Council should be looking for a mixed use scheme retaining some B1 floorspace.

Housing

The change in the mix of units to include family sized units is welcomed, as is the provision of two affordable flats.

The Housing Partnership Manager looked at the issue of shared ownership. The Council would normally require a viability assessment to accompany any application and is usually advised by BPS Surveyors on whether the toolkit indicates the social rented option as being feasible. The Council would prefer the rented option and would only agree to shared ownership if it is recommended by BPS. It is worth noting that the Planning Committee has disagreed with BPS/officers on this question before and may still request rented units. As there is no lift, the Service charges should be affordable for all units and the Council would prefer flats 1 and 2 as offering a 2B wheelchair units- if the flats were rented.

If the Council can only achieve shared ownership units, it is unlikely to obtain any wheelchair user occupiers and would not require the w/c units to be fitted out.

Design

Notwithstanding the issue with regard to loss or re-provision of employment use on the site the proposed site is considered to positively respond to the character and appearance of the area. A contemporary response to the prevailing brick built terraced dwellings in the area is considered to be an appropriate response to the site.

In terms of height and footprint the overall height and parapet datum has been respected as well as the front building line.

Care needs to be taken to retain the vertical emphasis, proportions and rhythm, of the adjacent 'townhouses' within the design. Particular consideration should be given to the projecting balconies to the front elevation which could unduly have affect the reinterpretation of the Victorian terrace if not designed and sized with thought to the surroundings character. However

we would still encourage the balconies to be useable for the occupants of the new apartments.

The level of detail and use of simple palette of high quality materials is essential. The success of the development is considered to depend on the appropriate use of high quality materials, detailed design and finished appearance. This includes, brick bond, window reveals, balcony soffits and front boundary treatment as well as window and door details.

The Council would welcome further consultation on the design once it has progressed with a view to having officer's agreement on any proposal prior to submission

Transport

The applicant has indicated that they are content for all of the residential units to be designated as car free, i.e. no off-street parking will be provided and the occupants will be prevented from obtaining on-street parking permits from the Council. This arrangement would be secured by means of the Section 106 Agreement.

Cycle parking should be provided in accordance with Transport for London's standards, i.e. 1 space per 1 or 2 bedroom unit, 2 space per 3 bedroom unit.

The proposed development will be served from the street. Given the number of units proposed this arrangement is considered to be acceptable. It is considered that a Servicing Management Plan will not be necessary for this development. Given the number of units proposed this arrangement is considered to be acceptable. It is considered that a Servicing Management Plan will not be necessary for this development.

The proposed development will require the demolition of the existing building and the construction of a 4 storey building which covers the width of the plot. Allcroft Road is predominantly residential in nature with the exception of the development site. The northern end of the road is closed off using a barrier on market days, which restricts access to the site. The applicant would be required to provide a draft Construction Management Plan (CMP) in support of a planning application. The implementation of a full CMP will be secured by means of the Section 106 Agreement.

The applicant will be required to provide a Section 106 contribution for repaving the footway adjacent to the site on Allcroft Road and for reinstating the footway across the redundant crossover.

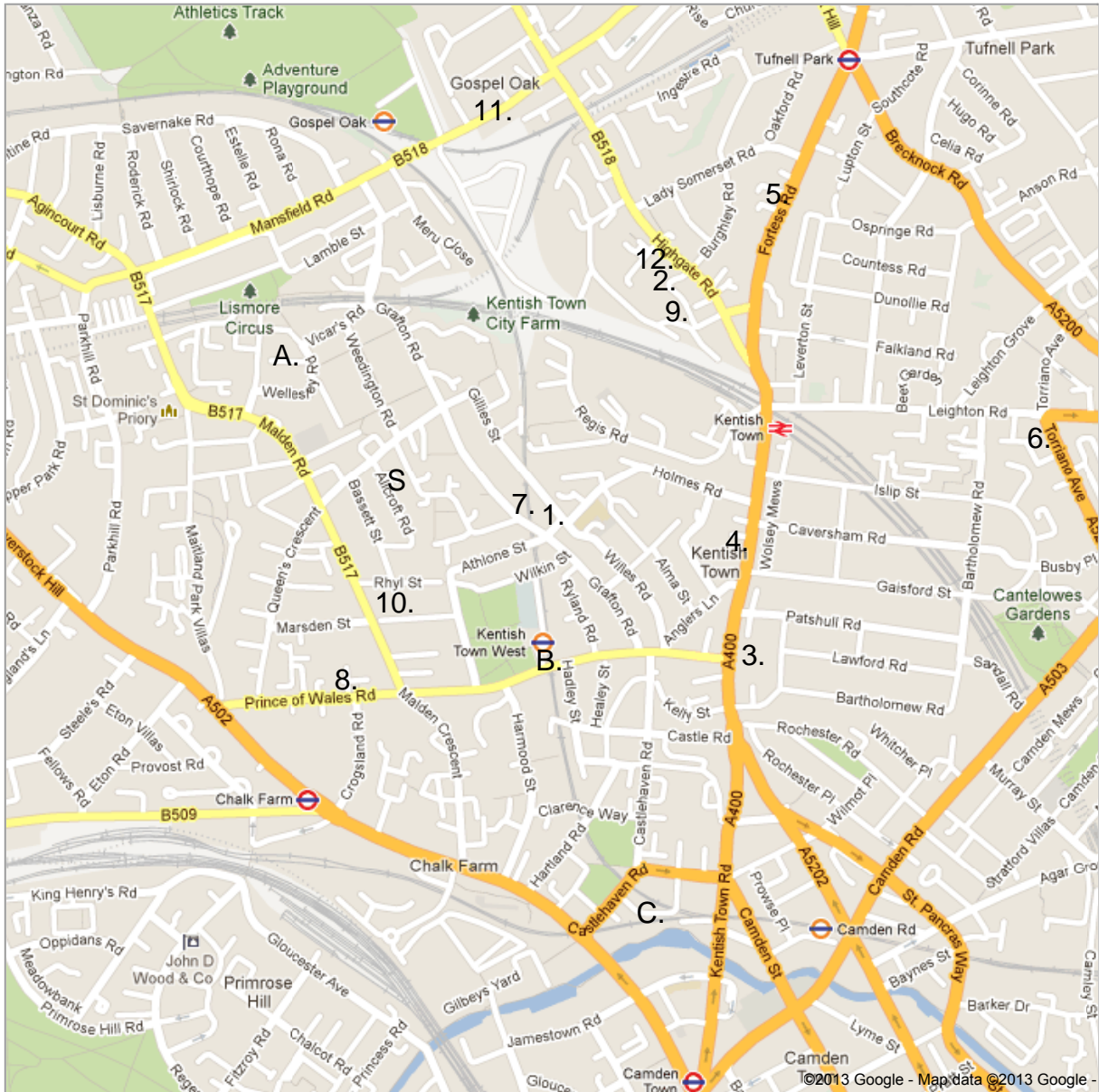
Sustainability

In line with Development Policy DP22 the Council will promote and measure sustainable design and construction by expecting new build housing to meet Code for Sustainable Homes Level 3 by 2010 and Code Level 4 by 2013 and encouraging Code Level 6 (zero carbon) by 2016.

B. Survey of current B1 floorspace availability and pipeline provision



Employment floorspace B1 existing and future provision
(non-exhaustive search within 1km radius of Allcroft Road)



Existing employment (B1) stock for let

1. Spring Place
2. Highgate Business Centre
3. Kentish Town Road
4. Kentish Town Road
5. Fortress Road
6. Torriano Mews
7. Star House Grafton Road
8. Prince of Wales Road
9. Deane House Studios
10. Malden Road
11. Spectrum House Mansfield Road
12. Highgate Studios Greenfield Place

Future B1 supply

- A. Bacton Low Rise 2-16 Vicars Road
- B. Prince of Wales Road
- C. Hawley Wharf