

163 Iverson Road, West Hampstead
Planning Statement

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December 2011



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Appendix 4

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1. Introduction

- 1.1. This Planning Statement has been prepared by Indigo Planning, on behalf of Winbush Properties Ltd, in support of a planning application for development at 163 Iverson Road, West Hampstead.
- 1.2. The proposal comprises the redevelopment of this vacant, previously developed site to provide residential accommodation, made up of a mix of houses and flats, as follows:
 - 33 flats (made up of a mix of one, two and three bed units); and
 - 3 two-bed houses.
- 1.3. Further details on the proposed development are set out in Section 3.
- 1.4. A site location plan is enclosed in Appendix 1. Some photographs of the application site are enclosed at Appendix 2.
- 1.5. This Planning Statement sets out the planning justification in support of the proposed development.
- 1.6. The application is also supported by the following additional documents:
 - Design and Access Statement (including Floorspace Schedule), produced by Dexter Moren Associate (DMA);
 - Package of Application Drawings, produced by DMA;
 - Planning Statement, produced by Indigo Planning;
 - Noise Assessment, produced by Aulos Acoustics;
 - Daylight/Sunlight Assessment, produced by Richard Hodgkinson Consultancy;
 - Energy Statement, produced by Richard Hodgkinson Consultancy;
 - Sustainability Statement, produced by Richard Hodgkinson Consultancy;
 - Ecological Survey, produced by The Ecology Consultancy;
 - Tree Survey/Arboricultural Statement, produced by A.P Arboriculture; and
 - Affordable Housing Toolkit Assessment, produced by Savills.

Scope of Report

- 1.7. This Statement comprises the following sections:
 - a description of the application sites and surroundings and planning history is provided in Section 2
 - a description of the development proposals is provided in Section 3;
 - an outline of relevant national, regional and local planning policy and other relevant documents is set out in Section 4;
 - an outline of the consultation process is set out in Section 5;
 - an assessment of key planning considerations is set out in Section 6; and
 - our conclusions are set out in Section 7.

2. Background

Site and surroundings

- 2.1. The application site is on Iverson Road, West Hampstead. The application site is Y-shaped and is approximately 0.138 hectares in size. The site was previously in use as a garden centre but has been vacant since 1 August 2011, when the garden centre closed. The site currently comprises a single storey warehouse building and a yard area (see enclosed site photographs at Appendix 2).
- 2.2. To the north of the site is the railway embankment, which includes a number of mature trees. This land is identified as a 'Site of Nature Conservation Importance'. Beyond the railway embankment is the existing West Hampstead Thameslink Rail Station.
- 2.3. Adjoining the site to the east is the recently constructed new rail station building for West Hampstead Rail Station.
- 2.4. To the south of the site, on the opposite side of Iverson Road, there is a mix of uses including residential properties (both flats and terrace houses) and employment/community uses. These buildings are red brick and range in height from single storey to four storeys.
- 2.5. Opposite the application site, at No.200 Iverson Road, is a modern residential development which is of poor design quality and quite tall relative to its surroundings, being elevated as a result of an undercroft car park. Further along Iverson Road are three and half storey residential properties.
- 2.6. To the west of the site is an existing tyre fitting centre. The tyre centre site benefits from planning consent for a light industrial use (Use Class B1(c)) (ref. PL/910107) and therefore is appropriate adjacent to residential accommodation in principle.
- 2.7. The application site is highly accessible with West Hampstead tube and rail stations and town centre in the immediate vicinity. The site benefits from a PTAL of 6a (as confirmed by Camden Council).
- 2.8. The site is within the Kilburn Controlled Parking Zone.
- 2.9. The site is well served by local amenities, with a range of retail units, restaurants and other amenity location in the nearby West Hampstead town centre.
- 2.10. The site is adjacent to the West Hampstead Growth Area. This is one of five Growth Areas identified under the Council's LDF Core Strategy Policy SC1. These areas are identified as having opportunities for significant development of new homes jobs and families.

Site Planning History

- 2.11. In July 1986, planning consent was approved for the redevelopment of the site and the erection of a two storey building to be used as a warehouse, with ancillary servicing and access (ref. 8601266).
- 2.12. In December 1986, planning consent was approved for the use of the existing buildings for the purpose of the retailing of wine with ancillary storage and distribution (ref. 8602310).
- 2.13. It is not clear if either of the above planning consents were implemented.

3. The Proposed Development

- 3.1. The proposed development comprises the redevelopment of the vacant, previously developed application site to provide a high quality residential scheme comprising 36 residential units (33 flats and 3 houses), with associated cycle parking, refuse/recycling storage area, amenity space, landscaping and associated works.
- 3.2. The proposal will provide a sustainable, high quality development, providing much needed new homes and making the best use of this previously developed, highly accessible site.
- 3.3. The proposed building respects the scale, rhythm and massing of the existing buildings along Iverson Road, whilst providing a contemporary style design, in keeping with the adjoining new railway station.
- 3.4. The proposed scheme is part 3, part 4 and part 5 storeys in height (above basement level), and reflects the height of the surrounding buildings and the character of the local area.
- 3.5. The scheme provides a mix of one, two and three bed units to provide a range of unit sizes to meet local requirements. The breakdown of accommodation is set out in the table below:

Proposed Unit Mix:	
No. of Bedrooms	No. of Units
Studio	3
1 bed	1
2 bed	23
3 bed	9
Total:	36

- 3.6. The proposed development comprises a mix of market and affordable units. The scheme currently proposes 7 affordable units and 29 market units based on the scheme's viability.
- 3.7. The residential units will maximise daylight and sunlight and all units will be built to Lifetime Homes Standards, with 10% of the flats provided adaptable for disabled use (four units in total). In addition, the proposed development has been designed to meet 'Level 4' rating within the Code for Sustainable Homes standards.
- 3.8. Due to the site's close proximity to the West Hampstead town centre and public transport facilities, the site achieves a PTAL rating of 6a allowing the proposed development to be a car free scheme (in accordance with Council policy requirements). The scheme does provide secure cycle parking spaces for residents and visitors. These are located in secure cycle storage areas adjacent to the two main entrances. Cycle parking is provided at one cycle parking space per unit for the smaller 1 and 2-bed units, and two spaces for each of the 3-bed units. One space is also provided per 10 units for visitors.
- 3.9. With regard to disabled car parking, it has been agreed with the Council's planning team that dedicated spaces can be provided on-street to the front of the development to comply with the 10% required by the London Plan.
- 3.10. Refuse and recycling storage are sited at ground level in storage areas adjacent to the main entrances.

- 3.11. The Design and Access Statement which accompanies this application provides more in depth presentation of the details of the proposed development and reasoning behind the chosen approach.

4. Planning Policy Context

- 4.1. This section provides a summary of the planning policy context, including national, regional and local planning policy documents and other relevant publications.

Presumption in Favour of Development - Ministerial Statement (June 2011)

- 4.2. The Minister of State for Decentralisation issued a Written Ministerial Statement on 16 June setting out the proposed definition of the 'presumption in favour of sustainable development' which underpins the National Planning Policy Framework (NPPF). It states:

'There is a presumption in favour of sustainable development at the heart of the planning system, which should be central to the approach taken to both plan-making and decision-taking. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible.'

- 4.3. This document is to be regarded as a material planning consideration.

Draft National Planning Policy Framework

- 4.4. The draft National Planning Policy Framework sets out the Government's current thinking on planning. This is a key part of the Government's reforms to make the planning system less complex and more accessible, and to promote sustainable growth.

- 4.5. The Ministerial Foreword to the current consultation draft, by Planning Minister Greg Clark, states:

'Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision.'

- 4.5. Paragraph 14 states:

'At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible.'

- 4.6. In relation to development management, paragraph 53 states:

'The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development'

- 4.7. Paragraph 54 directs local planning authorities to approach development management decisions by looking for solutions rather than problems so that application can be approved wherever possible.

- 4.8. Local authorities are required to attach significant weight to the benefits of economic and housing growth. The draft NPPF states that one of the Government's key objectives is to significantly increase the delivery of new homes.

National Planning Policy Statements

PPS1 - Delivering Sustainable Development (2005)

- 4.9. PPS1 sets out the overarching policies on the delivery of sustainable development through the planning system and sets sustainable development as *'the core principle underpinning planning'*.

- 4.10. Paragraph 23 states that planning authorities should:

'ensure the provision of sufficient, good quality, new homes (including an appropriate mix of housing and adequate levels of affordable housing) in suitable locations, whether through new development or the conversion of existing buildings. The aim should be to ensure that everyone has the opportunity of a decent home, in locations that reduce the need to travel'

- 4.11. At paragraph 27, PPS1 directs local planning authorities to:

'Promote the more efficient use of land through...the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use...'

- 4.12. PPS1 also encourages, at paragraph 21, the prudent use of natural resources, including the redevelopment of previously developed land.

PPS3 - Housing (2011)

- 4.13. PPS3 sets out the Government's strategic housing planning policy and housing objectives.

- 4.14. The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking:

'to achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community;

to widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need;

to improve affordability across the housing market, including by increasing the supply of housing; and

to create sustainable, inclusive, mixed communities in all areas...'

- 4.15. In relation to the location of new housing development, paragraph 36 of PPS3 seeks:

'to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. This should be achieved by making effective use of land, existing infrastructure and available public and private investment...to create mixed use developments. The priority for development should be previously developed land, in particular vacant and derelict sites and buildings.'

- 4.16. In determining planning applications, PPS3 advises that local planning authorities should have regard to achieving high quality housing, ensuring developments achieve a good mix of housing, the suitability of a site for housing, including its environmental sustainability, and using land effectively and efficiently.

PPG13 – Transport (2011)

- 4.17. PPG13 seeks to encourage sustainable development, with higher density development on sites which are easily accessible by public transport. At paragraph 6, PPG13 directs local authorities to:

‘accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling’

The Development Plan

- 4.18. The site is located within the London Borough of Camden. The key planning documents comprise the London Plan and Camden’s various local planning documents, particularly the LDF Core Strategy Development Plan Document (DPD) and LDF Development Policies DPD, which were both adopted in November 2010. These documents set out the Council’s approach to development within the Borough and the various residential development standards (in accordance with the higher level policies set out in the London Plan).

The London Plan

- 4.19. The London Plan encourages the re-use of previously developed land. It also encourages residential development in areas of good public transport accessibility. Policy 3.3 of the adopted London Plan (2011) seeks to increase housing supply. Table 3.2 provides density matrix which sets out appropriate density ranges based on site location / setting and public transport accessibility (PTAL). For an urban setting with a PTAL of 4-6, the table suggest a density range of 200-700 hr/ha.
- 4.20. Policy 3.5 requires that new housing development be of high quality design internally, externally and in relation to their context and the wider environment. Table 3.3 sets out minimum space standards for new residential development.
- 4.21. Policy 3.8 requires that new housing developments provide a range of housing choices in terms of mix of housing sizes and types, including affordable housing provision; and that all new housing is built to ‘Lifetime Homes’ standards. It also requires that 10% of new housing is designed to be wheelchair accessible or easily converted for residents who are wheelchair users.
- 4.22. Policy 3.11 of the London Plan requires the provision of affordable housing on schemes of 10 units or more, based on 60% for social rent and 40% for intermediate rent or sale. It states that priority should be given to affordable family housing.

Camden Planning Policy

- 4.23. Below is an outline of the key relevant local planning policies.

Need for Housing

- 4.24. Policy CS6 of the Core Strategy seeks to maximise the supply of additional housing over the entire plan period to meet or exceed a target of 8,925 homes from 2010-2025, including 6,550 additional self-contained homes.

Growth Area

- 4.25. The site is adjacent to West Hampstead Growth Area. This is one of five Growth Areas identified under Core Strategy Policy CS1. Policy CS2 seeks to concentrate development in these growth areas as they are identified as having opportunities for significant development of new homes, jobs and other facilities.

Affordable Housing

- 4.26. Policy DP3 of Camden's Development Policies DPD requires developments with a capacity for 10 or more units to make a contribution towards the supply of affordable housing. This seeks the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development, on the basis of an affordable housing target of 50%. The policy applies this target on a sliding scale from 10% for developments with capacity for 10 units to 50% for developments with capacity for 50 units.

Mix of Units

- 4.27. Policy DP5 of the Development Policies DPD seeks to encourage the provision of mix of housing sizes in new residential developments. The Council have produced a Dwelling Size Priorities Table and all new residential developments are required to contribute towards meeting the priorities set out in this table. For market housing, this table sets a 'very high' need for 2-bed units and seeks to achieve 40% 2-bed units in new development. Larger 3-bed and 4-bed units are given as the priority for affordable housing.

Design

- 4.28. Policy DP24 of the Development Policies DPD requires all developments to be of the highest standard of design and will expect developments to consider:
- character, setting, context and the form and scale of neighboring buildings;
 - the quality of materials to be used;
 - the provision of visually interesting frontages at street level;
 - the appropriate location for building services equipment;
 - existing natural features, such as topography and trees;
 - the provision of appropriate hard and soft landscaping including boundary treatments;
 - the provision of appropriate amenity space; and
 - accessibility.

Residential Amenity

- 4.29. Policy DP26 of the Development Policies DPD seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.
- 4.30. Policy DP28 states that the Council will not grant planning permission for development sensitive to noise (such as residential) in locations with noise pollution, unless appropriate attenuation measures are provided.

Lifetime Homes and Wheelchair Accessibility

- 4.31. Policy DP6 of the Development Policies DPD requires that all housing developments meet lifetime home standards, and that 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them.

Sustainability

- 4.32. Policy DP22 of the Development Policies DPD requires development to incorporate sustainable design and construction measures, and that the scheme must:
- demonstrate how sustainable development principles have been incorporated into the design and proposed implementation; and
 - incorporate green or brown roofs and green walls wherever suitable.
- 4.33. Policy DP22 states that 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.
- 4.34. Policy DP22 also requires development to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures, such as:
- summer shading and planting;
 - limiting run-off;
 - reducing water consumption; and
 - reducing air pollution.

Parking

- 4.35. Policy DP18 of the Development Policies DPD requires development to be car free in areas within Controlled Parking Zones (CPZs) that are easily accessible by public transport.
- 4.36. For car free developments, Policy DP18 states that the Council will:
- limit on-site car parking to spaces designated for disabled people and any operational or servicing needs, and
 - not issue on-street parking permits; and
 - use of legal agreements to ensure that future occupants are aware they are not entitled to on-street parking permits.
- 4.37. Policy DP18 also requires that development adhere to the Council's minimum standards for cycle parking of 1 space per unit for residents, and 1 space per 10 units for visitors.

5. Consultation

- 5.1. In putting together this development proposal, Indigo Planning and the project team have consulted with the planning and design team at Camden Council and the local community, and have taken into consideration comments received, including at a Development Control Forum event on 2 November 2011.
- 5.2. This section outlines the pre-application consultation exercise undertaken and provides a summary of the comments received.

Aims of the Consultation

- 5.3. The pre-application consultation exercise aimed to:
- to engage with Camden Council's planning and design team to discuss the proposed development and gain feedback; and
 - to engage with the local community and local amenity groups in a discussion about the plans for the site allowing for constructive feedback.

The Consultation Process

- 5.4. The pre-application consultation exercise comprised:
- meetings with planning and design officers at Camden Council; and
 - a Development Control Forum with Camden Council representatives and local people;
- 5.5. The development team first met with the duty planning officer (David Peres da Costa) for an initial pre-application discussion on 19 July 2011. A second more formal pre-application meeting took place on 16 September 2011. This was attended by Max Smith (planning officer) and Catherine Bond (design officer). The feedback from officers at these meetings was positive with in principal support for the proposal. Officers also confirmed that the scale and massing of the pre-application scheme was considered to be acceptable at this location. The design officer was also supportive of the design, referring to this site as an opportunity to provide a landmark building to mark the entrance to West Hampstead rail station. Following this meeting, officers provided written advice (letter dated 18 October 2011). A copy of this is enclosed as Appendix 3.
- 5.6. The Development Control Forum took place on the 2 November 2011. This event was organised with the objective of consulting and engaging with local residents; local amenity groups; and local representatives. The event served to inform local residents of the proposals and gain feedback. At this event, the development team presented the pre-application development scheme (this scheme has since been revised) and attendees were given the opportunity to ask questions and raise concerns. A copy of the Development Control Forum presentation with scheme plans and images is enclosed as Appendix 4. The Council's Minutes of this meeting are also enclosed as Appendix 5.
- 5.7. Exhibition boards were also prepared by the project team, which set out the background to the proposal and provided details of the pre-application development scheme. These were displayed at the Development Control Forum and members of the project team were available to discuss the proposal on a one-to-one basis with attendees.
- 5.8. The Forum was attended by about 40 residents and other interested parties throughout the evening. A list of attendees is set out in the Council Minutes at Appendix 5. Most attendees arrived and spent some time looking over the exhibition boards before taking a seat to listen to the presentation and ask questions. A number of people also stayed at the end of the

Forum to further discuss the proposals with representatives from the project team. Some attendees also took the time to fill in Feedback Forms (15 completed forms were received in total). Some attendees took the Feedback Forms away to fill out later or pass on to friends / neighbours. A copy of the Feedback Form is enclosed at Appendix 6.

Consultation Feedback and Design Revisions

- 5.9. Following the Development Control Forum meeting, the team considered the feedback from local people and made amendments to the pre-application scheme where possible.
- 5.10. Local people had three main concerns:
- the scale of development;
 - the lack of car-parking provided; and
 - the design of the scheme.

Scale of Development

- 5.11. The scale of the development has been carefully considered and measured against surrounding buildings and developments in the immediate area. Initially the scheme comprised 38 units and was six storeys at its tallest point. While Council officers advised that this scheme was acceptable in terms of its scale and height (see enclosed letter dated 18 October 2011 at Appendix 3), the project team took the decision to reduce the scheme to address the concerns of local residents. The scheme is now five storeys at its tallest point, with the number of units reduced to 36.

Car-Parking

- 5.12. While the project team appreciate that local people have concerns on this issue, the proposed scheme is car-free in order to comply with the Council's strict policy requirements for sites located within Controlled Parking Zones.
- 5.13. The initial pre-application scheme included an area of car parking provision at basement level but the Council's planning team advised that this was not acceptable in planning policy terms (see enclosed letter dated 18 October 2001 at Appendix 3). The basement level was converted to residential accommodation on the advice of the Council's planning team.

Design of the Scheme

- 5.14. The scheme is contemporary in its design, as with the existing and adjoining new railway station building. While the project team appreciate that some local people may have a preference for a more traditional design style, the reality is that surrounding area is mixed in character. The site is not within a Conservation Area, and there are no planning policy requirements to provide a particular design style. Design is subjective with different people having different views. Careful consideration has been given to the scheme design and the project team consider the proposed design to be the best solution to this difficult site. This view was supported by the Council's planning and design officer during pre-application discussions (see enclosed letter at Appendix 3).
- 5.15. A number of local people commented at the Forum meeting that wider pathways would be helpful, particularly for parents with children's pushchairs. To address this, the footprint of the building has been pulled back to increase the width of the pavement. The distance from the kerb to the building footprint now ranges from 2.7 to 3.1 metres.
- 5.16. On the suggestion of local people, more green elements have been incorporated into the design, with a green wall on the western elevation and the incorporation of planting boxes on the balconies and roof terraces (in addition to the existing green roof).
- 5.17. A third and final pre-application meeting carried out with officers on 17 November 2011 to

discuss the revised scheme prior to submission of this application. This was attended by Max Smith (planning officer) and Catherine Bond (design officer). The various changes to the scale and design were explained to officers, who understood the reasoning for doing so. Following this meeting, officers provided additional written pre-application advice on the revised scheme and as copy of this is enclosed at Appendix 7 (letter dated 15 December 2011), which was subsequently responded to by the Project Architects on 16 December (see Appendix 8). Following this, officers agreed that the application was ready for submission.

6. Key Considerations

- 6.1. The planning application submission highlights how the proposed development would fit with the aspirations and commitments of Camden Council and wider regional and national level policy planning objectives.
- 6.2. The proposed development complies with planning policy guidance, and successfully translates the strategic and design principles into a proposal of high design quality. It has also been the subject of pre-application advice from officers at Camden Council.
- 6.3. This section demonstrates that the proposal will provide a high quality sustainable development, which would set a positive benchmark; that would be accessible by public transport now and in the future; would respect the amenities of surrounding residents; and would be in accordance with planning policy and guidance.
- 6.4. Each of the main planning considerations relevant to this application are discussed below.

Principle of Development

- 6.5. The site comprises previously developed, former railway land in an area which benefits from good public transport accessibility and good access to local amenities. The site is unallocated in the Camden Council's policy documents and is vacant. The site was last used as a garden centre, however, officers have confirmed in their pre-application advice that this use is not subject to policy protection (see enclosed advice letter dated 18 October 2011 – Appendix 3; and DC Forum Minutes – Appendix 5).
- 6.6. As set out in Section 4, current planning policy encourages the re-use of previously developed land and higher density development on sites with good accessibility. This is a key principle of good planning. The site adjoins the West Hampstead Growth Area, which is identified as a focus for major housing growth. The surrounding area is predominantly residential in character. The proposed development will make excellent use of this previously developed site and will fit in with the surrounding land uses.
- 6.7. In considering the proposal during pre-application discussions, Council officers concluded that the principal of development was acceptable. The Council's pre-application advice letter (Appendix 3) states:

'The existing warehouse building on the site is not listed and is not located in a conservation area, nor is it considered to be an undesignated heritage asset. Therefore there is no objection to the building's demolition in conservation terms. The loss of the current A1 retail use of the site is acceptable as it is not located in a town centre or designated retail frontage.'

Although the site is not located in the West Hampstead Growth Area, as defined by policy CS2 of Camden's Local Development Framework, residential development on un-designated sites is encouraged by other policies. For example, policy DP2 (Making full use of Camden's capacity for housing) seeks to maximise the supply of housing in the Borough. The principle of the re-development for the site for residential purposes is therefore acceptable.'

- 6.8. We consider that the proposed residential development is in accordance with the Council's policy objectives and, therefore, acceptable in principle.

Design

- 6.9. The design of the proposed development has evolved in consultation with the Council's planning and design officers, and local residents / amenity groups. The accompanying Design and Access Statement sets out this evolution in more detail, and describes how the project architects (DMA) formulated their design rationale for the application site.
- 6.10. We consider the key design issues below.

Scale, Form and Height

- 6.11. The scale, form and height of the proposed development is a result of a design-led approach to create a new development that completes the street-scape and makes the best use of the difficult Y-shaped site, which is currently under-used.
- 6.12. The proposals comprise the construction of a part three storey, part four storey and part five storey building (partly above basement). The proposed building has taken account of guiding principles contained within policy guidance and developed them to create a scheme which respects the scale, rhythm and massing of the existing surrounding buildings whilst employing a high quality, contemporary style design approach. Care has been taken to consider the scale, height and architectural rhythm of the surrounding buildings, particularly the adjoining new railway station, which is also contemporary in its design style.
- 6.13. A survey was undertaken of the existing building on the opposite side of Iverson Road to establish how the proposed development relates to these along the different element of the scheme. This relationship is illustrated in the cross sectional plans provided in the accompanying Design and Access Statement (Page 20).
- 6.14. To the east of the site, adjoining the new rail station, the scheme is three storeys in height to match the height of the adjoining new station building. This element of the scheme is 8.5 meters, and is lower than the existing cottages on the opposite side on Iverson Road, which are 9.3 metres (see accompanying Design and Access Statement).
- 6.15. The scheme steps up to four storeys above the lower ground floor (15.4 metres) on the frontage along Iverson Road. This height is slightly taller than the existing flatted residential building on the opposite side of Iverson Road, which is 13.7 metres (see accompanying Design and Access Statement).
- 6.16. The scheme steps up to five storeys on the rear, adjoining the railway. This 'tree house' element is partly on stilts, raised above the communal garden area.
- 6.17. The scheme design was amended following the Development Control Forum meeting, in early November, to address feedback from local residents. The scheme presented at pre-application was six storeys at its tallest element. This is also the scheme presented to officers at our initial pre-application meetings (19 July and 16 September 2011). In advising on design considerations in relation to pre-application scheme, officers states in their written advice (Appendix 3):

'The proposal is considered generally acceptable in terms of bulk and mass. Its scale would relate well to the existing townscape in this location.'

- 6.18. Despite this advice, the project team decided to reduce the height of the building to address concerns from local residents. The tallest element (at the rear) is now five storeys in height.
- 6.19. The scheme relates well to the existing buildings in terms of its scale, form and height and is, therefore, considered to be acceptable.

Building Line

- 6.20. A number of local people commented that wider pathways would be helpful, particularly for parent with children's pushchairs. This was identified as an existing problem along Iverson Road. While the Council's planning team did not raise these as an issue during pre-application discussions on the scheme, the project team have pulled back the building footprint to increase the width of the pavement area to address this concern. The distance from the kerb to the building footprint now ranges from 2.7 to 3.1 metres.

Density

- 6.21. The London Plan encourages the re-use of previously developed land. It also encourages higher density development in areas of good public transport accessibility. The application site has a PTAL of 6a, which is classed as 'excellent' by TfL and exactly the type of location where higher density development is supported by planning policy - as these locations places are seen as inherently sustainable.
- 6.22. The proposed development comprises 36 residential units (110 habitable rooms) on 0.138 ha. This calculates to a density of 261 units / ha or 796 habitable rooms / ha. This density accords with the London Plan's density range, with seeks higher density development in areas with good public transport accessibility.

Residential Accommodation

- 6.23. The scheme provides a mix of unit sizes to meet local need, including studios and 1-bed flats; 2-bed flats and terrace houses; and larger family-sized 3-bed units. In accordance with local need and Council policy requirements, the majority of the market units are 2-bed in size and the majority of affordable units are larger 3-bed units.
- 6.24. The units are in accordance with the internal spaces standards set out in the London Plan. They are also designed to 'Lifetime Homes' standards. The scheme also provides 10% (4 units) which are capable of being easily converted to wheelchair units, in accordance with policy requirements.
- 6.25. Amenity space within the scheme is provided in the form of private balconies and terraces, as well as a landscaped communal garden area located beneath the 'tree house' element. The scheme provides 664 sq.m of amenity space in total, which includes the 223 sq.m communal garden at lower ground floor level.
- 6.26. Safe secure storage for bicycles, refuse and recycling facilities are conveniently located adjacent to the two site entrances for easy access by all residents.

Affordable Housing

- 6.27. Policy DP3 of Camden's Development Policies DPD requires developments with a capacity for 10 or more units to make a contribution towards the supply of affordable housing. This seeks the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development, on the basis of an affordable housing target of 50%. The policy applies this target on a sliding scale from 10% for developments with capacity for 10 units to 50% for developments with capacity for 50 units. In the context of a scheme for 36 units, this would suggest a requirement for 36% affordable units.
- 6.28. The supporting text states that the 50% target will operate on a sliding scale for housing developments, subject to the financial viability of the development, with a norm of 10% for 1,000 sq.m (gross) of additional housing and 50% for 5,000 sq.m (gross) of additional housing (considered to be sites with capacity of 10 dwellings and 50 dwellings respectively). As the scheme is approximately 4,000 square metres, then the policy justification suggests a higher amount of affordable housing would be required closer to 40%.

- 6.29. The proposal has a high quality, bespoke design with various materials but this non-conventional approach has obvious cost implications for the scheme. The difficult size shape also leads to inefficiencies in the internal layout. These factors combined with the s106 requirements and reduction in unit numbers as a result of feedback from local people has meant that the scheme is at the margins of viability and it would not be financially viable to provide the level of affordable units required by policy. The accompanying Affordable Housing Toolkit Assessment prepared by Savills provides further detail on this issue and explains that the scheme can only afford to provide 7 affordable units.
- 6.30. The application scheme therefore currently proposes 7 affordable units and 29 market units. This equate to 19.44% affordable housing provision on a unit basis. The affordable housing units provided in the scheme will be predominantly larger sized units to meet the Council's identified need for family-sized affordable housing units. In our view, the scheme as proposed is acceptable in terms of the level of affordable units.

Residential Amenity

- 6.31. The key issues in terms of residential amenity are:
- the impact of the adjoining railway, roadway and tyre centre on the residential amenity of future residents of the proposed scheme; and
 - the potential impact of the proposal on the existing residential properties on Iverson Road in terms of potential overlooking, outlook and daylight/sunlight impacts.
- 6.32. These are considered below.

Noise / Disturbance to Future Residents

- 6.33. The site is adjacent to the railway, which has implications for future residents in terms of potential noise and disturbance from railway activity. The scheme is also adjacent to the roadway so consideration has been given to potential disturbance from vehicle movements.
- 6.34. An acoustic assessment has been carried out to assess this effect of noise exposure from these sources, and this report accompanies this application. This has been prepared in consultation with Camden Council's environmental health team.
- 6.35. Careful consideration has been given to the scheme design to minimise disturbance from the surrounding noise sources, particularly the railway. Mitigation measures include the location of bedroom windows facing away from the railway; the location of private amenity space away from the railway; screening of communal and private amenity space; appropriate window and door treatment; and enhanced sound insulation.
- 6.36. The site also adjoins an existing tyre centre use. As set out in Section 2, the tyre centre benefits from a light industrial (Use Class B1(c)) planning consent, which in planning terms means that this use is considered appropriate next to residential properties in principle. However, in order to ensure that this operation does not disturb future residents, there are no windows on the western elevation. Instead, this elevation features a green wall to provide an ecological feature.
- 6.37. The proposed development will bring a significant benefit to the existing residential properties on Iverson Road by screening these properties from the railway. This will bring about a marked reduction in railway noise exposure.

Relationship to Existing Residential Properties

- 6.38. The site is also located opposite existing residential properties so consideration has been given to the potential impact on these properties. The scheme is located 20 metres from the existing residential properties at its nearest point. These separate distances are considered appropriate and comply with Council standards (which require an 18 metre separate

distance). Given this, the scheme will not have a negative impact in terms of overlooking or potential loss of privacy. The Council's written advice on this point states (Appendix 3):

'It is not considered there would be any significant impact on neighbours in terms of loss of privacy or noise disturbance.'

- 6.39. The potential impact in terms of daylight/sunlight is considered in more detail in the accompanying Daylight and Sunlight Report. This concludes that the existing residential properties will not experience any significant loss of daylight or sunlight amenity as a result of the proposed development.
- 6.40. It is recognised that the outlook from the existing residential properties will change as a result of the proposed development. However, as the scale and massing is similar to these buildings, and the separate distances meet the Council's standards, it is considered that the new outlook is acceptable in planning terms.

Transport

- 6.41. The application site benefits from good accessibility to public transport, employment areas in the local area, and to local services, and in line with PPS3 and PPG13 is therefore an appropriate location for higher density residential development and a car free development.

Public Transport Accessibility

- 6.42. The site benefits from good level of public transport accessibility (PTAL 6a) and has good access to local shops and amenities, with its close proximity to West Hampstead town centre.

Parking

- 6.43. The scheme is 'car free' in accordance with Council policy, which requires new residential development schemes in areas within Controlled Parking Zones (CPZ) to be 'car free'. The site is located within the Kilburn CPZ. The site benefits from very good public transport accessibility and it is therefore envisaged that future residents will travel by public transport and/or cycle. Future residents will be informed that the development is 'car free' and that they will not be issued with on-street parking permits. This will be agreed in the Section 106 legal agreement.
- 6.44. The scheme provides secure cycle parking to meet Council standards. This is located in two communal storage areas for the flats. These are located adjacent to two entrances to the scheme. The three terrace houses have cycle storage in the front entrance area. Cycle parking is provided at one cycle parking space per unit for the smaller 1 and 2-bed units; two spaces for each of the 3-bed units; and one space per 10 units for visitors.
- 6.45. With regard to disabled car parking, dedicated spaces will be provided on-street to the front of the development to comply with the 10% required by the London Plan.

Sustainability

- 6.46. Sustainability and environmental performance is integral to design development and the proposals respond to a number of key sustainability objectives.
- 6.47. At London Plan level, policy requires new developments to provide 20% of their energy needs through on site renewables. The accompanying Energy Statement considers the most suitable technologies and outlines a strategy to achieve this target. This report concludes that a 25% reduction is achievable employing a combination of energy efficiency measures and the installation of solar PV panels.
- 6.48. At local level, Camden Development Policy DP22 requires new residential development to meet Code for Sustainable Homes standards (Code Level 4 by 2013). The accompanying

Code for Sustainable Homes Pre-Assessment outlines the route by which Code Level 4 could be achieved for proposed development. This assessment has been prepared in consultation with the design team, however, the final route to be followed to achieve Code level 4 will be determined during detailed design, and therefore may differ slightly from the route presented in the accompanying report.

- 6.49. In terms of sustainable measures, the proposed development will achieve the following:
- A 25% reduction in CO2 emissions compared with Building Regulations 2010 (Part L1A) will be achieved through a combination of energy efficiency and renewable measures;
 - Water efficient devices will reduce internal water consumption; internal potable water usage will be less than 105 litres/person/day;
 - The use of sustainable transport modes will be encouraged. Dedicated cycle storage facilities will be provided, as well as home office facilities;
 - Insulation materials with boilers will reduce air pollution;
 - Where practical, building materials will be sourced locally to reduce transportation pollution and support the local economy;
 - All timber will be purchased from responsible forest sources. Materials selection will take into account their overall environmental impacts, with 'A+' or 'A' rated materials from the BRE Green Guide to Specification to be preferred;
 - Recycling facilities will be provided for domestic, commercial and construction related waste, and a minimum of 50% of construction waste will be recycled;
 - The development will comply with Lifetime Homes criteria; and
 - The development will incorporate the principles of Secured by Design.
- 6.50. Further details are set out in the accompanying reports:
- Code for Sustainable Homes Pre-Assessment; and
 - Energy Statement.

Ecology

- 6.51. The site is a vacant, previously developed site. The majority of the site is covered with hardstanding / gravel and therefore is of very limited ecological value. A number of residents at the Development Control Forum meeting mentioned that there may be bats on the site and/or in the adjacent trees and therefore an ecologist was instructed to assess this, along with other possible ecological impacts.
- 6.52. An extended Phase 1 habitat survey, protected species risk assessment and building assessment for bats was carried out at the site on 23 November 2011. The survey was carried out in order to assess the ecological value of the site, and to provide recommendations for protecting, managing and enhancing the wildlife value of the site.
- 6.53. This assessment did not uncover evidence of bats during the internal and external building assessment, but it was concluded that the presence of bats could not be ruled out. Based on the design/type of buildings onsite, it was concluded that these have a moderate potential for bats and therefore additional surveys are recommended.
- 6.54. This assessment concluded the following recommendations:
- On-site habitats have high potential to support nesting and foraging birds.
 - It is recommended that the development avoids impacting upon the tree/hedge line along the northern site boundary with the SINC.
 - Three dusk emergence and/or dawn re-entry surveys for bats should be carried out to determine the presence or likely absence of a roost within the warehouse. These surveys should be carried out between May and September (May to August inclusive being optimal survey months).
 - Where the scope of works requires the removal of semi-mature trees or hedgerows this should be carried out outside of the main bird nesting season (which is normally taken to

be March to August inclusive) to avoid any potential offences relating to nesting birds (Newton et al, 2004). Where this is not possible a search for any nesting birds prior to vegetation clearance should be undertaken by an experienced ecologist and, if any are found, the nests should be protected until such time as the young have fledged and left the nest.

- 6.55. The enclosed Phase 1 Habitat Survey Report and Bat Survey document provide further details on this issue.
- 6.56. The scheme design has also considered opportunities for enhancing the site's ecological value, and includes a green wall at the western end of the site; a green roof on the element fronting Iverson Road; planting boxes on the balconies and roof terraces; and additional landscaping in the communal garden area and on the site boundaries.

Trees and Landscaping

- 6.57. There are a number of trees on the application site and on the adjoining railways land. A survey of the existing trees has been carried out and consideration has been given to the impact of the proposal on existing trees. The scheme has been pulled back from the rear boundary to minimise impact on the root systems of the existing trees. It is proposed to remove a number of trees located on the application site and on the site boundary, however, these are not particularly valuable specimens and additional landscaping is to be provided as part of the new development, particularly in the communal garden area to create a pleasant environment for residents; to screen noise exposure; and to enhance the 'tree house' element.
- 6.58. Further details are set out in the enclosed Tree Report.

Land Contamination

- 6.59. An initial desk study has been carried out to establish the likelihood of land contamination. The factor affecting this property in terms of potential sources are as follows:
- A detailed examination of the historical Ordnance Survey maps from 1871 to the present day has revealed that the site remained largely undeveloped, existing as open land, up until sometime between 1896 and 1915 when the site was developed with sidings and an embankment. By 1935 the site had been further developed with buildings of unspecified use. Mapping from 1954 shows an iron and steel warehouse adjacent to the site, and a tank is identified in the west. This use remained up until sometime between 1965 and 1974 when the site was developed with a warehouse. By 1994 a garden centre is marked on site. This use remains up to present day mapping.
 - From contemporary trade directory entries it would appear that Iverson Tyres Ltd are located on or within 25 metres of the property. Although this may identify current occupiers no details are available to confirm whether or not potentially contaminative operations are taking place.
 - A review of selected 1:2500 and 1:1250 scale Ordnance Survey mapping covering period from 1943 to 1996 has identified that the centre of the search is on or within 25 metres of tanks.
- 6.60. The potential pathways identified are as follows:
- Direct human contact with soil (and water);
 - Contamination transport to shallow groundwater; and
 - Contamination transport to deep groundwater.
- 6.61. The potential receptors identified are the property itself, surrounding properties and their respective occupants
- 6.62. The data examined in this risk assessment indicates that there may be a potential source of

contamination arising from the potentially contaminative past land uses which may have implications. A detailed land contamination assessment of the site will be undertaken prior to construction to further investigate this matter. This assessment will be submitted and agreed with the Council prior to the commencement of development.

Construction Management

- 6.63. In order to minimise disturbance to local residents, best practice will be employed to carefully manage the construction stage. The hours of operation during the construction period will be restricted to minimise disruption to local residents. In addition, contractors will be employed who are registered under the 'Considerate Constructors Scheme'. This initiative operates voluntary 'Site and Company Codes of Considerate Practice', within which participating construction companies and sites register.
- 6.64. A detailed Construction Management Plan will be prepared and submitted for the Council's approval prior to the commencement of development in site. The document will be prepared in consultation with the on-site contractors and will cover the following (and other issues where relevant):
- Construction Noise and Vibration;
 - Construction Lighting
 - Dust Management
 - Traffic Management Plan
 - Concrete Pouring; and
 - Pollution Control
- 6.65. The Construction Management Plan will also contain the names and contact details for the on-site construction team so members of the public can contact the team directly to report any concerns.
- 6.66. In relation to this issue, the Council pre-application advice letter dated 18 October 2011 (Appendix 3) states:
- 'Given the constrained nature of the site and the scale of the development, a Construction Management Plan would be required, secured via a S.106 agreement.'*
- 6.67. Further detail will be provided in the Construction Management Plan in consultation with the site contractors, and this will be agreed through the Section 106 legal agreement.

7. Conclusions

- 7.1. The proposal comprises 36 residential units in total – 33 flats (made up of a mix of one, two and three bed units) and 3 houses (made up two bed units). In conclusion, the proposed development is considered acceptable for the following reasons:
- The development proposal will enable the redevelopment of an under-utilised previously developed site within West Hampstead;
 - The application site currently has very good accessibility to public transport (PTAL 6a), employment areas in the local area, to local shops and services, and is therefore an appropriate location for higher density residential development;
 - The development is in accordance with Council policy requiring a ‘car free’ scheme;
 - The design of the proposed development will ensure that the built environment and associated amenity space will offer a living environment that is safe, clean, and secure and that residents can be proud of;
 - There will not be any significant environmental impacts as a result of the proposals;
 - The proposal will provide a high quality, sustainable development;
 - The proposed development has been designed with sustainability in mind and will achieve Code for Sustainable Homes Level 4;
 - The proposal has been developed in consultation with officers at the London Borough of Camden, local residents and amenity groups.
 - The proposed development complies with minimum unit size standards as laid out in the London Plan;
 - The proposed development accords with the aims and objectives of national, regional and local planning policies;
 - The application is supported by a comprehensive package of technical documents, including this planning statement, which demonstrates the acceptability of the proposals and allows the Council to make a considered and informed decision.
- 7.2. As the proposal accords with the aims and objectives of national, regional and local guidance, the application site is a suitable location for the proposed scheme and permission should be granted.