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Planning Statement

30A Highgate Road

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1 INTRODUCTION

1.1 This statement has been prepared to support a detailed planning application submitted by London Buildings Highgate Limited for proposed development at 30A Highgate Road, London, NW5 1NS.

1.2 The planning application proposes:

Demolition of the existing buildings and erection of 2 buildings (2 and 3 storeys) accommodating 9 dwellings (4 x 2 bed flats, 3 x 3 bed flats and 2 x 3 bed houses), 593m² of flexible B1 floorspace, landscaping, servicing area and cycle parking.

1.3 The planning application has been prepared following pre-submission advice from officers in April 2011.

Statement Structure

1.4 This statement is set out as follows:

- Section 2 briefly describes the existing and proposed development.
- Section 3 contains an analysis of relevant planning policy at local, regional and national level.
- Section 4 reviews the planning merits of the application with particular reference to the supporting documents.
- Section 5 contains the summary and conclusion.

Consultation

1.5 The proposals have been through the Council's formal pre-application process including a meeting with officers. In addition, arrangements are being made for a visual presentation of the proposals to local residents and businesses to be held at Highgate Studios.

Supporting Information

1.6 The application is supported by the following:

- Design and Access Statement (Chassay Studios).
- Transport Assessment including CMP (TTP Consultancy Limited).

- Daylight, Sunlight and Shade (Brooke Vincent + Partners).
- Arboricultural Report (ACS Consulting).
- Archaeological Desk Based Assessment (CgMs).
- Landscape Proposals (Spacehub).
- Sustainability Statement (Energy Solutions).
- Energy Statement (Energy Solutions).
- Code for Sustainable Homes Pre-Assessment (Energy Solutions).
- Breeam Pre-Assessment (Energy Solutions)

1.7 In addition, the Design and Access Statement includes a site waste management plan and lifetime homes, refuse and secure by design details.

2 EXISTING & PROPOSED DEVELOPMENT

- 2.1 The site currently accommodates a collection of old buildings of one and 2 storeys accommodating a mix of A1 (533m² - piano retail including ancillary storage) and B1 (542m² - offices and workshop) uses. The Client Statement contained in the Design & Access Statement contains details about the poor condition of the structures and other operational issues.
- 2.2 The proposal comprises the erection of 2 and 3 storey buildings, linked by a 1st floor walkway, accommodating 9 dwellings and 593m² of adaptable B1 floorspace, secure storage for 14 cycles, loading bay and landscaping. The scheme is car free.
- 2.3 Access to the site is from Highgate Road.
- 2.4 The north west part of the site comprises a 2 storey building accommodating:
- 2 x 3 bed houses
 - 2 x 2 bed flats on the ground floor
 - 2 x 2 bed flats on the first floor
- 2.5 The south east part of the site comprises a 3 storey building accommodating:
- 260m² of adaptable B1 floorspace on the ground floor
 - 333m² of adaptable B1 floorspace on the first floor
 - 3 x 3 bed flats on the second floor
- 2.6 In total, there are 9 dwellings comprising 4 x 2 bed flats, 3 x 3 bed flats and 2 x 3 bed houses.
- 2.7 Refuse storage, cycle parking as well as servicing are located under the first floor of the 3 storey building.
- 2.8 A detailed description of the proposal is set out in the Design and Access Statement.

3 PLANNING POLICY APPRAISAL

- 3.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission should be determined in accordance with the Development Plan unless other material considerations indicate otherwise. The Development Plan for this area comprises the London Plan 2011 and Camden's Core Strategy 2010 and Development Policies 2010.
- 3.2 It should be noted that only 1 policy from the UDP (LU1 which relates to site specific land use proposals) has been saved following adoption of the Core Strategy and Development Policies.
- 3.3 Other material considerations in the determination of this application include the Council's Supplementary Planning Documents (SPD) Planning Guidance (2011) and the Government's Planning Policy Guidance (PPG) Notes and Planning Policy Statements (PPS). In particular:
- PPS1: Delivering Sustainable Development
 - PPS3: Housing
 - PPS4: Planning for Sustainable Economic Growth
 - PPS5: Planning for the Historic Environment
 - PPG13: Transport
 - PPS22: Renewable Energy
- 3.4 The significance of PPS5 is assessed in the Archaeology Assessment, PPG13 is reviewed in the Transport Statement, and PPS22 is reviewed in the Energy and Sustainability Assessments.
- 3.5 In addition, the Government published its Draft National Planning Policy Framework in July 2011 for public consultation. Whilst this has limited weight, we have nevertheless assessed its contents.
- 3.6 In light of the above, the following is a brief assessment of the proposal against the relevant adopted and emerging policies which will be used to determine this application.
- PPS1: Delivering Sustainable Development**
- 3.7 This PPS sets out the Government's overarching planning policies on the delivery of sustainable development through the planning process.

3.8 Paragraph 23 refers to sustainable economic growth and states councils should:

- (i) Recognise that economic development can deliver environmental and social benefits;*
- (ii) Recognise the wider sub-regional, regional or national benefits of economic development and consider these alongside any adverse local impacts;*
- (iii) Ensure that suitable locations are available for industrial, commercial, retail, public sector (e.g. health and education) tourism and leisure developments, so that the economy can prosper;*
- (iv) Provide for improved productivity, choice and competition, particularly when technological and other requirements of modern business are changing rapidly;*
- (v) Recognise that all local economies are subject to change; planning authorities should be sensitive to these changes and the implications for development and growth;*
- (vi) Actively promote and facilitate good quality development, which is sustainable and consistent with their plans;*
- (vii) 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;*
- (viii) Ensure that infrastructure and services are provided to support new and existing economic development and housing;*
- (ix) Ensure that development plans take account of the regional economic strategies of Regional Development Agencies, regional housing strategies, local authority community strategies and local economic strategies; and,*
- (x) Identify opportunities for future investment to deliver economic objectives.*

3.9 The general approach is set out in paragraph 27 which states that Councils should:

- (i) Promote national, regional, sub-regional and local economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.*
- (ii) Promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities. Policies should promote mixed use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places.*

(iii) Promote communities which are inclusive, healthy, safe and crime free, Whilst respecting the diverse needs of communities and the special needs of Particular sectors of the community.

(iv) Bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing for industrial development, for the exploitation of raw materials such as minerals, for retail and commercial development, and for leisure and recreation – taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management, and the need to avoid flood risk and other natural hazards.

(v) Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, while recognising that this may be more difficult in rural areas....

(vii) Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges.

(viii) Promote the more efficient use of land through higher density, mixed use development and 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 to achieve the targets the Government has set for development on previously developed land....

- 3.10 We consider the proposal will adhere to this general approach by promoting a residential and commercial development. The development will physically and socially enhance the area by providing new homes and new adaptable business floorspace in well designed buildings replacing outworn buildings.

PPS3: Housing

- 3.11 PPS3 is a direct response to the Barker Review of Housing Supply in 2004 and reflects the Government's commitment to improving the affordability and supply of housing in all communities.

- 3.12 Paragraph 10 sets out the housing objectives advising that the planning process should seek to deliver:

- *High quality housing that is well-designed and built to a high standard.*

- *A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of household in all areas, both urban and rural.*
- *A sufficient quantity of housing taking into account need and demand and seeking to improve choice.*
- *Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.*
- *A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate.*

3.13 Paragraph 50 of PPS 3 states:

Density is a measure of the number of dwellings which can be accommodated on a site or in an area. The density of existing development should not dictate that of new housing by stifling change or requiring replication of existing style or form. If done well, imaginative design and layout of new development can lead to a more efficient use of land without compromising the quality of the local environment.

3.14 This application comprises well designed buildings, replacing outworn buildings, accommodating inter alia, 9 dwellings. As such, we consider the scheme adheres to the objectives set out in PPS3.

PPS4: Planning for Sustainable Economic Growth

3.15 This PPS sets out the Government’s policy for economic development. In relation to planning applications, Policy EC10.1 specifically states that Council’s *should adopt a positive approach to planning applications for economic development.* Policy EC10.2 then states:

All planning applications for economic development should be assessed against the following impact considerations:

- a. whether the proposal has been planned over the lifetime of the development to a. limit carbon dioxide emissions, and minimise vulnerability and provide resilience to, climate change*
- b. the accessibility of the proposal by a choice of means of transport including b. walking, cycling, public transport and the car, the effect on local traffic levels and congestion (especially to the trunk road network) after public transport and traffic management measures have been secured*

- c. whether the proposal secures a high quality and inclusive design which takes the c. opportunities available for improving the character and quality of the area and the way it functions*
- d. the impact on economic and physical regeneration in the area including the impact on deprived areas and social inclusion objectives*
- e. the impact on local employment*

3.16 With regard to a), the scheme clearly complies given the sustainability proposals. In terms of b), the site is highly accessible by public transport having a PTAL of 6a and incorporates cycle parking. As such and considering the scheme is car free, public transport, cycling and walking are positively encouraged. The proposal is designed to a high standard and is a considerable improvement on the existing out worn buildings and therefore adheres to point c). Redevelopment for housing and adaptable B1 space will assist in the economic and physical regeneration of the area and therefore complies with points d) and e).

3.17 We therefore consider that the proposal adheres to the guidance set out in PPS4.

London Plan

3.18 The replacement London Plan was published in July 2011 and provides the Spatial Development Strategy for London.

3.19 The following are those policies which are particularly relevant:

- 3.3 – seeks to increase housing supply. The proposal includes 9 dwellings.
- 3.5 – refers to the quality and design of housing developments. The proposal represents a well designed building which responds positively to the local environment.
- 3.8 – refers to housing choice. The proposal incorporates a good mix of unit sizes (2 and 3 beds) and types (flats and houses).
- 4.1 – promotes London’s economy. The proposal re-provides the existing B1 floorspace (in fact, there is a small increase) albeit what is proposed is adaptable between the B class uses and will be built to modern day standards unlike the existing floorspace which is out worn.
- 4.2 – encourages redevelopment of offices to improve London’s competitiveness. The proposal complies by creating adaptable modern B1 space.
- 4.3 – supports mixed use development. The proposal complies.

- 5.2 & 5.7 – sets out the targets for carbon emissions reductions. The proposal incorporates a photovoltaic system which will provide a reduction in carbon dioxide emissions of 20%, thus achieving the London Plan target. This matter is addressed in detail in the Energy Report prepared by Energy Solutions.
- 5.11 – designs should include green roofs where possible. The roof area of the proposal will be required for the mounting of renewable energy technologies limiting the amount of available roof area for the conversion to a green roof. For this reason the specification of a green roof has been discounted on the grounds of insufficient roof area.
- 5.13 – encourages the use of sustainable drainage. The matter has been assessed in the sustainability assessment prepared by Energy Solutions.
- 6.9 – seeks better cycle facilities. The proposal incorporates 14 secure cycle parking spaces.
- 6.13 – sets out maximum parking standards. The proposal is car free.
- 7.3 – refers to designing out crime. The proposal has been thoroughly assessed with input from the Metropolitan Police.
- 7.6 – seeks a positive architectural contribution to the environment. The proposal has been designed to take account of the local environment.

3.20 We consider the proposal responds positively to the strategic policies set out in the London Plan.

Core Strategy 2010

3.21 The following policies are particularly relevant:

- CS1 – promotes making the best use of land. The proposal seeks to replace outworn buildings with a mixed use scheme comprising dwellings and adaptable B1 floorspace in a sustainable location.
- CS5 – seeks to manage the impact of growth. The proposal has been carefully designed to ensure it is compatible with its neighbours.
- CS6 – promotes additional housing. The proposal includes 9 new dwellings (flats and houses).
- CS8 – promotes a successful economy by, inter alia, protecting existing employment sites. The proposal results in a small increase in the level of B1 floorspace. Furthermore, the proposed floorspace is adaptable between B1 uses and offers the opportunity to create small units.
- CS13 – promotes sustainable development. The proposal incorporates on-site renewable energy which will result in a 20% reduction in CO2

emissions. In addition, CfSH level 3 is achieved for the dwellings and Breeams very good for the B1 floorspace.

- CS14 – promotes good design. The proposal will replace outworn buildings with well designed buildings.
- CS17 – making Camden a safer place. The scheme has benefitted from input from the Police.

3.22 In summary, we consider the scheme adheres to the overarching policy objectives of the Core Strategy.

Development Policies 2010

3.23 The following policies are particularly relevant:

- DP1 – promotes mixed use development which includes residential. The proposal complies by incorporating dwellings and B1 floorspace.
- DP2 – promotes residential development. The proposal incorporates 9 well designed dwellings (7 flats and 2 houses).
- DP5 – seeks homes of different sizes with the priority being 2 bed units. The proposal included 4 x 2 bed flats, 3 x 3 bed flats and 2 x 3 bed houses.
- DP6 – all dwellings should meet lifetime home standards. The proposal complies.
- DP13 – protects existing employment floorspace. The proposal will result in an increase in the level of B1 floorspace. Furthermore, the proposed floorspace is adaptable between B1 uses and offers the opportunity to create small units. The applicant, London Buildings Highgate Limited, is part of the London Buildings Group. London Buildings owns Highgate Studios which is a commercial complex of 21,400m² opposite the site in Highgate Road. Highgate Studios is constantly let at between 90 and 95% and therefore there is a market for good adaptable B1 floorspace.
- DP18/DP19 – set out the parking standards. The proposal is car free.
- DP22 – promotes sustainability. The proposal incorporates on-site renewable energy which will result in a 20% reduction in CO₂ emissions. In addition, CfSH level 3 is achieved for the dwellings and Breeams very good for the B1 floorspace.
- DP24 – seeks to ensure high quality design is achieved. The scheme replaces outworn buildings with well designed buildings.
- DP26 – seeks to protect amenity of neighbours and ensure the proposed accommodation is suitable. The proposal has been carefully designed to maximise the use of this brownfield site, protect the amenity of the adjoining neighbours and provide good quality accommodation.

3.24 In summary, we consider that the proposal complies with the Development Policies.

SPD Planning Guidance 2011

3.25 This SPD sets out detailed guidance in relation to, inter alia residential and commercial development. This guidance builds on the Core Strategy and Development Policies. Where appropriate, the proposal has taken account of this SPD.

Ministerial Statements 23rd March 2011 and 15th June 2011

3.26 On the 23rd March 2011, the Minister for Decentralisation, Greg Clark MP, issued a statement in the context of the budget and the publication of the 'Plan for Growth' by the Treasury and the Department for Business, Innovation and Skills.

3.27 The Statement referred to the Chancellor's 'call for action' and identified that there was a 'pressing need' to ensure the planning system plays its part in promoting economic growth. The Statement, which the Secretary of State will take into account in determining planning applications that come before him, is a material planning consideration.

3.28 Local planning requires that applications that secure sustainable growth are treated favourably. The Government's 'clear expectation is that the answer to development and growth should wherever possible be yes'.

3.29 On the 25th June 2011 the Government issued its presumption in favour of sustainable development. This Statement makes it clear that 'significant weight should be placed on the need to secure economic recovery'.

3.30 We consider this application should be seen as a sustainable development not only in the context of renewable energy but also in that it makes efficient use of an outworn brownfield site. In addition, the proposal will create a significant number of construction jobs, generate new residents that will bring benefits to the local economy as well as providing much needed housing. Finally, the proposal will provide modern adaptable B1 floorspace that has the ability to generate more jobs than the current outworn premises.

3.31 We therefore consider that there should be a presumption in favour of permitting this development.

Draft National Planning Policy Framework (NPPF)

- 3.32 The Government published this draft document for consultation in July 2011. Whilst it has limited weight it is nevertheless a material consideration.
- 3.33 The NPPF reiterates earlier Government Statements that development that is sustainable should go ahead. It also emphasises in paragraph 53 that significant weight should be attached to proposals that benefit housing growth.
- 3.34 Clearly the proposal accords with the approach set out in this draft NPPF.

4 PLANNING ASSESSMENT

Principle

- 4.1 The site currently accommodates a mix of B1 floorspace (office and workshop) and A1 retail showroom. The B1 floorspace totals 542m² and the retail 533m². The proposal includes 9 dwellings and seeks to increase the level of B1 space by 51m² to 593m². This space will be adaptable so it could accommodate B1a (offices) and/or B1c (light industry).
- 4.2 In the formal pre-app advice note dated 28th July 2011 the officer states:
- No objection is raised to the principle of redevelopment; provision of new housing plus retention of flexible business space is welcomed.....No objection is raised to the loss of A1 showroom here.*
- 4.3 These comments were based on the Core Strategy Policy CS8 and Development Policy DP13 both of which seek to retain employment floorspace. The officer's letter makes it clear that there should be no loss of employment space. In addition Policies CS6 and DP2 promote residential development.
- 4.4 The applicant, London Buildings Highgate Limited, is part of the London Buildings Group. London Buildings owns Highgate Studios which is a commercial complex of about 21,400m² opposite the site in Highgate Road. Highgate Studios is constantly let at between 90 and 95% and therefore there is a market for good adaptable B1 floorspace.
- 4.5 When assessing the scheme against the Ministerial Statements and draft NPPF set out above, it is clear that the proposal meets the policy requirements. In addition, the proposal increases the amount of B1 space and as such increases the potential number of jobs on the site. Additional jobs and new residents will have a positive impact on the local economy. The replacement of out worn buildings with well designed buildings will benefit the local environment. Finally, many construction jobs will be created.
- 4.6 Therefore, we consider the proposal is the type promoted in the Ministerial statements and the draft NPPF.
- 4.7 Given residential development is encouraged, there is an increase in B1 space and the proposal is highly sustainable, the principle of the proposal is acceptable.

Heritage

4.8 PPS 5: Planning for the Historic Environment seeks to protect the historic environment and its heritage assets.

4.9 In terms of the definition of a heritage asset as set out in Annex 2 of PPS5, the site is not recognised as an asset. In fact, in the officer's pre-application advice letter it is stated:

No objection is raised in principle at this stage to demolition, as the buildings are neither in a conservation area nor 'locally listed', and it is unlikely that they will be considered as important townscape contributors.

4.10 We are also of the opinion that the existing buildings are of little merit and are being replaced with well designed and highly sustainable buildings that will be seen architecturally as a positive addition to the environment. Furthermore, as set out in the client statement contained in the Design and Access Statement, the existing buildings are now beyond economic repair.

4.11 As a consequence, we do not consider the existing buildings need to be assessed in terms of PPS5.

4.12 PPS5 defines archaeological interest in Annex 2 and as such an archaeological desk based assessment has been carried out by CgMs. The results indicate that the site is considered to have a generally low below ground archaeological potential for all past periods of human activity. As such, no below ground archaeological mitigation measures are likely to be required.

Transport

4.13 The site has an excellent level of public transport accessibility and this demonstrated by its PTAL rating of 6a. In addition to the bus, underground and over ground services available, the local area is also well suited to pedestrians and cyclists with appropriate facilities and dedicated routes provided.

4.14 There is no car parking proposed as part of the development and, in addition, a car free agreement would be implemented to prohibit future residents from obtaining parking permits. Given that the existing site includes parking, it is reasonable to conclude that there would be a reduction in traffic generation associated with the site.

- 4.15 The existing access to the site is relatively narrow due to the constraints of the adjacent buildings. Although the access would be resurfaced and improved as part of the proposals, it is not possible to increase the width. As a result, the site would be served by small to medium sized vehicles, primarily transit sized vans which are able to enter/exit and manoeuvre within the confines of the access and service area.

Residential Amenity

- 4.16 All of the apartments have been designed to the London Plan minimum space standards.
- 4.17 Whilst several of the dwellings have small private balconies or terraces, all will have access to a communal garden between the 2 buildings. This will be landscaped to a high standard and will seek to ensure privacy is protected.
- 4.18 In relation to daylight, sunlight and shade this has been thoroughly assessed by Brooke Vincent + Partners. The proposal will not have a detrimental impact on the adjoining properties. In addition, the proposed accommodation meets the appropriate BRE guidance.

Energy and Sustainability

- 4.19 Energy has been assessed in accordance with the principles of the London Plan Energy Hierarchy: Be Lean, Be Clean and Be Green. The objective of the assessments has been to maximise the viable reductions in total carbon dioxide emissions from the proposal within the energy hierarchy.
- 4.20 In addition, the Energy Assessment takes into consideration the London Plan objective to reduce carbon dioxide emissions through the use of on-site renewable energy.
- 4.21 The application proposes a photovoltaic (PV) system mounted on the roof. This system will result in a reduction in carbon dioxide emissions of 20% through on-site renewable energy.
- 4.22 The scheme will achieve level 3 of the Code for Sustainable Homes and Breeam very good in accordance with local planning policy.

Tree Report

- 4.23 Whilst there are no trees on the site, there are several on adjoining land. These have been assessed by ACS Consulting. The conclusion is that with careful pruning and appropriate tree protection measures, which can be conditioned, the proposals are acceptable.

Landscape

- 4.24 The proposals seek to create a high quality environment for use by the residents and the business users from within the development. Residential units on the ground floor enjoy private garden space for personalization while communal garden planting provides separation from public and private domains. The public space offers the opportunity for seating which will encourage social interaction and create a sense of community.

Conclusion

- 4.25 The scheme will replace out worn buildings with a well designed and integrated development providing new homes and the potential to create new jobs.

5 SUMMARY & CONCLUSION

- 5.1 The proposal seeks to replace out worn buildings with a well designed and integrated development providing new homes and the potential to create new jobs.
- 5.2 The existing employment floorspace will be re-provided and increased with new adaptable B1 space (offices and light industrial) with the potential to create more jobs than currently exists.
- 5.3 A good mix of dwelling types is proposed including flats and houses. All of which comply with the London Plan space standards
- 5.4 We have demonstrated that the proposal complies with guidance contained in PP3 1, 3 and 4, the London Plan and Camden's Core Strategy and Development Policies.
- 5.5 In addition, in the context of the Ministerial Statements and draft NPPF, the application should be seen as a sustainable development not only in the context of renewable energy but also in that it makes efficient use of an outworn brownfield site, it will create a significant number of construction jobs, generate new residents that will bring benefits to the local economy, provide much needed housing and provide modern adaptable B1 floorspace that has the ability to generate more jobs than the current outworn premises. As such the default answer to whether planning permission should be granted is yes.
- 5.6 In conclusion, we consider the proposal complies with local, regional and national planning policy.