

# ROLFE JUDD PLANNING PLANNING STATEMENT

On behalf of Rolfe Judd Planning

**134a & 136 Gloucester Avenue  
London, NW1**

P4417

September 2011

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# 1.0 Introduction

## Summary

- 1.1 This planning statement has been prepared by Rolfe Judd Planning on behalf of Alex Bard, the owner of the site, in support of an application for planning permission for the conversion of the existing 1 ½ - 2 storey office and ancillary accommodation building to a mix of residential uses (Use Class C3) and flexible business (Use Class B1) accommodation at 134a and 136 Gloucester Avenue, NW1 8JA.
- 1.2 The site is within a conservation area (Primrose Hill) but is not a listed building. Furthermore, the existing collection of buildings on site are of a poor architectural and structural quality.
- 1.3 The proposed development comprises the conversion of existing vacant office and ancillary accommodation to a 4 bedroom residential unit (Use Class C3) and flexible B1 Business accommodation. In addition, the scheme includes a servicing bay for the business accommodation as well as the landscaping of the courtyard space.
- 1.4 The existing office space has been vacant since October 2010 despite extensive marketing of the Class B1 floorspace. A number of prospective buyers viewed the accommodation although did not seek to purchase the accommodation as a result of a number of issues including the poor access to the building, the poor quality of the accommodation and the proximity of the accommodation to residential uses.
- 1.5 The proposed flexible B1 accommodation and residential unit are provided in separate parts of the converted building. This is as a result of discussions with LB Camden with regards to the need to segregate the uses to ensure the flexibility of the B1 accommodation.
- 1.6 Careful consideration of LDF policies, pre-application advice from officers and a thorough site analysis has resulted in an innovative and sympathetic design for the site. The scheme proposes much needed family housing for the borough whilst providing modern flexible commercial accommodation in replacement of the poor quality office and ancillary accommodation currently on site.
- 1.7 This statement will demonstrate that the proposed development will provide an appropriate provision of housing which corresponds to local and borough housing needs. This statement will also demonstrate that the proposed development will constitute a high quality sustainable design which is respectful of the local townscape and will have no adverse effect on the local built environment. The statement contains the following information:

**Section 1: Introduction**

**Section 2: The Application Site and Surrounding Area** – sets the context the current proposal and provides a detailed description of the application site and its previous uses;

**Section 3: The Proposal** – describes the proposed development;

**Section 4: Planning Policy Context** – summarises the planning policy relevant to this proposal at national, strategic and local levels;

**Section 5: Planning Considerations** – reviews the proposal in terms of the relevant policy context and other material considerations; and

**Section 6: Conclusion**

## Supporting Application Documents

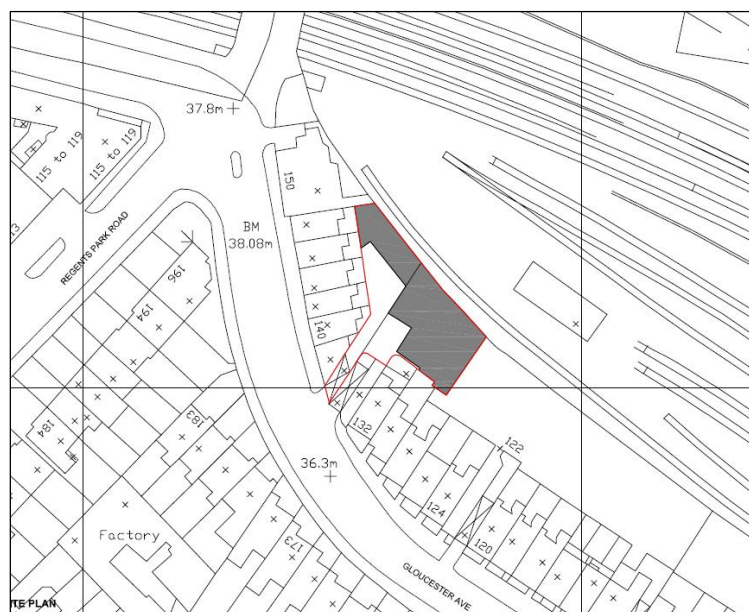
1.8 This planning statement should be read in conjunction with the following additional documents, which accompany the application:

- Marketing Assessment – prepared by Dutch and Dutch
- Design & Access Statement – prepared by DMFK Architects
- Transport Statement – prepared by The Stilwell Partnership
- Sunlight Daylight Report – prepared by Watts Inc.
- Sustainability and Energy Assessment- prepared by Cundall's

## 2.0 The Application Site and Surrounding Area

### Site Description & Location

- 2.1 The site, which is roughly triangular in form, is located to the north of Gloucester Avenue and to the east of the junction between Gloucester Avenue and Regents Park Road. The site partially backs onto properties along its west and south western edge, which split into 2 groups in use terms.
- 2.2 The site is within the Primrose Hill Conservation Area although is not a listed building nor are there any listed buildings adjacent or in proximity to the site. Furthermore, the existing building is of a poor architectural quality.
- 2.3 Numbers 138 through to 148 are mainly commercial at ground and basement level, with a mixture of shops, an estate agent, and a vet, with residential uses over. Most of the rear facing residential windows above ground floor appear to be serving non habitable rooms with some exceptions marked on the attached drawings.
- 2.4 Numbers 128 through to 136 are residential use. Numbers 134 and 136 have a substantial drive through spaces with residential over.
- 2.5 The site currently contains a mix of unremarkable 1½ - 2 storey buildings including office accommodation (redeveloped in the 1980's and 1990's) and an area of hard standing currently used informally for car parking. In addition, the centre of the site includes an older, undated building which has been significantly altered internally although retains its gabled façade. This building forms part of the existing office accommodation on site. Site access is through a 1 storey undercroft entrance from Gloucester Avenue which is not considered suitable for the type of existing office accommodation on site. The site is within the Primrose Hill Conservation Area although does not contain any listed buildings or structures.
- 2.6 The north east of the site bounds a railway siding.



Site Location Plan showing site area in red

## **Surrounding Area**

- 2.7 The site is located to the rear of residential properties fronting onto Gloucester Avenue. The road contains a mix of some commercial premises at ground level and residential dwellings above whilst a number of the properties are wholly in residential use.
- 2.8 In terms of access, the site is located within close proximity to Primrose Hill Railway Station (to the north) and in proximity to Chalk Farm Underground Station whilst a number of buses serve the surrounding area.
- 2.9 Adjacent to the site and most relevant to this proposal is 122 Gloucester Avenue, an elegant, successful, award winning mixed use scheme designed by DMFK Architects who are also engaged to work on this site. 122 Gloucester Avenue is in a similar situation to the application site, being located to the rear of properties facing onto Gloucester Avenue.
- 2.10 Two Planning permissions were granted for the redevelopment of the warehouse to the rear of 122 Gloucester Avenue (directly to the east of the site), by the same architect working on this scheme. The first scheme for the site comprised the erection of 4 dwelling houses and offices, similar to our proposals for 134a and 136 Gloucester Avenue. This scheme was not implemented.
- 2.11 The second, implemented scheme re used the existing shed structures, creating a central courtyard, with 2 residential units at 1st floor level, and 2 B1 units at ground floor level.

## **Relevant Planning History**

- 134A Gloucester Avenue: Change of use from light industrial to offices (2,900 sq. ft.) – Application refused 11/12/1975
- 134A Gloucester Avenue: Erection of extension at first floor level in connection with existing B1 office use as shown on drawing no. 2723 – Approved 13/02/1990
- 136 Gloucester Avenue: Alteration to elevational treatment of southwest elevation of class B1 building granted planning permission 12/5/95 PL9401870 by insertion of garage door. – Approved 11/02/2011
- 134/136 Gloucester Avenue: The retention of a new staircase wrapping around the existing storage building. – Approved 04/09/2003

## 3.0 The Proposal

- 3.1 The proposals seek the conversion of the existing buildings on site (comprising 134a and 136 Gloucester Avenue) for a mix of residential accommodation and flexible B1 commercial accommodation. The buildings on site are currently vacant although their last known use was as office and ancillary accommodation (Use Class B1(a)) and a small portion of workshop floorspace (Use Class B1(c)). The existing areas are indicated on the attached plans as well as the enclosed Statutory Declaration. In addition, the proposals include the provision of an extension in the north western corner of the site, landscaping improvements to the courtyard and the provision of a single servicing bay for the B1 accommodation.
- 3.2 As noted, the existing buildings were used for a mix of office and workshop uses (totalling 554 sqm) although are now vacant. The office and ancillary uses covered a significant portion of the available floorspace with the workshop only accounting for 76 sqm as indicated on the enclosed plans. The existing office and workshop accommodation on site is considered to be of a poor quality. The existing buildings are in a state of disrepair and are of a poor quality whilst the access to the site is narrow and difficult to navigate. Furthermore, the site is in close proximity to residential uses which are considered incompatible to the existing workshop use within the building. As such, it is considered the existing accommodation is of a Category 3 as defined within CPG 5:Town Centres, Retail and Employment.
- 3.3 The proposals seek the retention of a significant amount of flexible employment generating floorspace (244 sqm) whilst also providing high quality residential accommodation. The proposed uses have been separated with the flexible commercial element located in the northern building and the residential element located in the southern building. This is as a result of pre-application discussions with LB Camden where the need to ensure the flexibility of the B1 business floorspace was requested. The separation of the uses allows for the flexibility of the B1 floorspace without affecting the residential uses.
- 3.4 The proposed provision of B1 type business accommodation provides an excellent opportunity to provide innovative, modern, flexible office type accommodation which could be utilised by a start up company or other small or medium sized enterprise. It also allows for the flexible use of the accommodation including for light industrial purposes if required. Furthermore, the entrances to the office and residential unit have been segregated to ensure privacy and security for the residential dwelling.
- 3.5 The proposals comprise the retention of the existing building structures and building envelope on site and the conversion for these buildings for use as a mixed use scheme. Some minor amendments are proposed to the existing buildings to ensure the areas provided are suitable for a mix of residential and flexible commercial uses. This includes the infilling of a portion of the building to the north west of the site for the business floorspace as well as the use of some of the roof areas as terraces for the residential dwelling.
- 3.6 The proposed amendments require the demolition of a single portion of external wall on the existing buildings, hence the application for Conservation Area Consent. As indicated on the enclosed demolition plan, the area affected is not significant in size and will not affect the special character or appearance of the Conservation Area. Furthermore, the demolition of this external wall is proposed in conjunction with the single storey extension to improve the flexible B1 accommodation.
- 3.7 Through the retention of the building structures, the scheme is considered to be highly sustainable whilst minimising the effect of the proposals on the existing residential units to the south west of the site.

- 3.8 With regards to car parking, there is currently an informal parking arrangement on site with up to 4-5 cars parked on the site at any one time. The revised proposals seek to reduce the amount of car parking provided on site whilst formalising the car parking arrangement. To this end, it is proposed to provide a service parking bay for the commercial floorspace only. This space is considered important to ensure the proposed flexible commercial floorspace can be easily serviced. A car parking strategy including the provision of a car turntable is provided as part of the application. It is not proposed to have any car parking for the residential use.
- 3.9 With regards to the residential accommodation, the proposed scheme will contain significant amenity space at roof level as indicated on the enclosed drawings as well as high quality, well proportioned living accommodation.
- 3.10 In order to prevent overlooking from the proposed dwellings into the rear of the properties facing Gloucester Avenue, the scheme includes the provision of screening at roof level as well as containing no residential habitable room windows facing directly into the rear of the Gloucester Avenue properties.
- 3.11 The scheme includes the provision of green terraces and green roofs, thereby improving the sustainability of the buildings whilst helping to reduce water run off rates. This will also significantly improve the outlook from the properties along Gloucester Avenue which currently have an unattractive outlook.

## 4.0 Relevant Planning Policies

### Government Guidance

- 4.1 Relevant national guidance for this proposal is summarised below:
- 4.2 PPS1; Delivering Sustainable Development, which sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. PPS1 emphasises the need to deliver homes, jobs, and better opportunities for all, whilst protecting and enhancing the natural and historic environment, now and for future generations. It also promotes the sustainable and inclusive patterns of urban development by protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities; ensuring high quality development through good and inclusive design.
- 4.3 PPS3; Housing: sets out the Government's key strategic objectives for planning for housing one of which seeks to create sustainable, inclusive, mixed communities in all areas, both urban and rural. In order to achieve this objective the Government is seeking to ensure a flexible, responsive supply of land, including re-use of previously developed land.
- 4.4 PPG13; Transport sets out the objectives to integrate planning and transport at the national, regional, strategic and local level and to promote more sustainable transport choices both for carrying people and for moving freight.

### The London Plan

- 4.5 The London Plan covers the following topics relevant to this proposal:
- § Sustainable Development
  - § Living in London
  - § Transport
  - § Design
- 4.6 The London Plan provides strategic guidance to London councils regarding the development of London. As part of the plan for London, the Mayor seeks an additional 30,500 new homes each year from all sources until 2016/17. The emerging draft London Plan includes a target of 6650 homes for Camden between 2011 and 2021.
- 4.7 These policies also seek the maximum intensity of use compatible with local context, the design principles set out elsewhere in the Plan, and with public transport capacity.

### Core Strategy

- 4.8 The Local Development Framework (LDF) has now replaced in part the adopted UDP. As part of the framework Camden have approved development policies. These are:

### Core Strategy

- CS1 Distribution of Growth
- CS3 Highly Accessible Areas
- CS5 Managing the Impact of Growth and Development
- CS6 Proving quality homes

- CS8 Promoting a successful and inclusive economy
- CS11 Promoting sustainable and efficient travel
- CS13 Tackling climate change through promoting higher environmental standards
- CS18 Dealing with our waste and encouraging recycling

#### **Development Policies**

- DP2 - Making full use of Camden's capacity for housing
- DP3 - Contributions to the supply of affordable housing
- DP5 - Homes of Different Sizes
- DP13 - Employment sites and premises
- DP16 - Transport Implications of development
- DP17 - Walking, cycling and public transport
- DP18 - Parking standards and limiting the availability of car parking
- DP22 - Promoting sustainable design and construction
- DP24 - Securing high quality design
- DP25 - Conserving Camden's heritage
- DP26 - managing the impact of development on occupiers and neighbours
- DP29 - Improving access
- DP31 - Provision of and improvements to open space and outdoor sport and recreation facilities.

#### **CPG 5: Town Centres, Retail and Employment**

- 4.9 LB Camden has recently adopted a number of planning policy guidance documents including CPG 5, which provides guidelines on planning policy relating to, amongst other things, the conversion of offices in the Borough.
- 4.10 CPG 5 states that: *We expect the supply of offices to meet the projected demand over the plan period and as a result we may allow a change from B1(a) offices to another use in some circumstances, such as older office premises or buildings that were originally built as residential dwellings. Our priority is for the replacement use to be permanent housing or community use.*
- 4.11 The document also provides categories of accommodation for Light industrial, industrial, storage and distribution uses. As noted above, the site contains a small area of light industrial use (workshop). The categories range from accommodation suitable for industrial type uses and therefore likely to be retained for these uses (Category 1) to accommodation unsuitable for these uses and likely to be acceptable for a change of use, including offices.
- 4.12 The document provides the following criteria for Category 3 accommodation:
- small, isolated premises;
  - poor access - narrow streets, small doors, steps;
  - no goods lifts;
  - little or no space for servicing;
  - incompatible neighbouring uses (most often residential); and
  - lower ground or basement level.
- 4.13 The categories are used by LB Camden to determine if sites are suitable for continued industrial use.

## 5.0 Planning Considerations

### **The provision of much needed family residential accommodation**

- 5.1 Housing is considered the priority land-use of the Local Development Framework. Core Strategy CS3 focuses on highly accessible areas and that these areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel.
- 5.2 Core Strategy CS6 focuses on providing quality homes and that the Council will aim to make full use of Camden's capacity for housing by maximising the supply of additional housing to meet or exceed Camden's target of 5,950 homes from 2007-2017, including 4,370 additional self-contained homes and maximising 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.
- 5.3 Housing Policy DP2 aims to encourage the provision of more housing and that the Council will seek to maximise the supply of additional homes in the borough by resisting alternative development of sites considered particularly suitable for housing.
- 5.4 The Core Strategy states that 'The Council aims to close the gap between housing demand and supply by minimising the net loss of existing homes, and by regarding housing as the top priority when considering the future of unused and underused land and buildings. '
- 5.5 The Council accepts that not all potential housing sites can be identified in the Sites Allocations documents and therefore small sites may come forward through the life of a development plan which have not been identified but are suitable for housing.
- 5.6 Therefore it is wholly appropriate to consider the suitability of the underused application site for housing.
- 5.7 Core Strategy policy CS6 sets out the Council's objectives in relation to affordable housing and the threshold for providing affordable housing is for schemes that exceed 10 units. The scheme proposes 1 unit and hence the provision of affordable housing is not applicable.

### **Loss of Class B1 office space**

- 5.8 The Core Strategy details the likely demand and supply requirements of office floorspace to meet the needs of the borough up until 2026. Para 8.8 states that the provision outlined in the Core Strategy "*means that the future supply of offices in the borough can meet projected demand*". Consequently, the Council will consider proposals for other uses of older office premises if they involve the provision of permanent housing and community uses. The site has been vacant since 2010 but the previous occupiers were looking to vacate the premises prior to this date.
- 5.9 Policy DP13 sets out the Council's policy for the retention of employment land and uses within the Borough. This policy resists any changes of use that results in a loss of a non commercial use. Notwithstanding this, if a change of use is justified after meeting certain criteria to demonstrate the business is no longer viable, then mixed use development will be considered in the first instance which seeks to maintain an element of business use on site.

- 5.10 This policy is supported in CPG 5: Town Centres, Retail and Employment which states that; *'We expect the supply of offices to meet the projected demand over the plan period and as a result we may allow a change from B1(a) offices to another use in some circumstances, such as older office premises or buildings that were originally built as residential dwellings. Our priority is for the replacement use to be permanent housing or community use.'*
- 5.11 The proposals seek the conversion of the existing building, which contains a mix of office (Use Class B1 (a)) and workshop (Use Class B1(c)) accommodation for a mixed use scheme comprising residential use and flexible B1 use accommodation. The existing office accommodation is of a poor quality and has been vacant since October 2010.
- 5.12 A marketing report has been prepared by Dutch and Dutch indicating the marketing campaign that has been implemented unsuccessfully to sell the accommodation on site. As noted in the enclosed report, a number of potential tenants have viewed the property but did not agree to purchase due to the quality of the accommodation and the poor access to the building amongst other things.
- 5.13 Evidence of enquiries received acknowledges that the space requires considerable investment to make it a more attractive office premises in this particular area but at the same time would not guarantee a tenant taking the space. It is therefore considered that the building is not a financial viable option for extensive future investment.
- 5.14 The documentation also maps out the location and description of surplus vacant office space in the immediate vicinity that would seem to be more attractive in terms of location and the quality of space.
- 5.15 It is considered that the outdated office space can not compete with other nearby 'preferable' vacant office space and thus it is considered that the existing building should be considered for a mix of residential use (a priority use) whilst retaining flexible accommodation on site.
- 5.16 The proposals seek the conversion of approximately 478 sqm of office accommodation and its replacement with approximately 244 sqm of modern, flexible B1 accommodation as well as a 4 bedroom family dwelling.
- 5.17 It is considered that the proposals comply with the Core Strategy policies and CPG 5. The existing office accommodation on site is of a poor quality and, following a marketing campaign, has not been let. Furthermore, there are modern offices in the vicinity that are more likely to serve the requirements of tenants than the existing office accommodation. The proposals seek the conversion of these offices for a mix of family accommodation and modern, flexible office accommodation, both of which are considered acceptable alternative uses in policy terms and both of which will ensure the long term use of the site for employment generating uses.

#### **Conversion of B1(c) Light Industrial accommodation**

- 5.18 The proposals seek the replacement of the existing office accommodation and workshop space on the site with a mix of residential use and flexible B1 accommodation. As identified on the enclosed plans and statutory declaration, the existing building includes approximately 76 sqm B1(c) accommodation (workshop).
- 5.19 Core Strategy Policy CS8 seeks to secure a strong economy within Camden through, amongst other things, the safeguarding of existing employment sites and premises in the borough that meet the needs of modern industry and expecting a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace.
- 5.20 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 policy states that where a change of use has been justified, the Council will seek to maintain some business use on site, preferably flexible business accommodation.

5.21 CPG 5: Town Centres, Retail and Employment states that Camden has a very restricted supply of sites and premises suitable for light industrial, storage and distribution uses. The document identifies three categories of accommodation ranging from Category 1 (highest quality accommodation) to Category 3 (poorest quality accommodation). Camden council will ensure that category 1 accommodation is always protected as it is rare in the Borough whilst it is recognised that category 3 accommodation may not be suitable for continued industrial use although could be suitable for office (Use Class B1 (a)) accommodation. With regards to category 3 accommodation, CPG 5 provides the following criteria:

- small, isolated premises;
- poor access - narrow streets, small doors, steps;
- no goods lifts;
- little or no space for servicing;
- incompatible neighbouring uses (most often residential); and
- lower ground or basement level.

5.22 The proposals seek the conversion of the existing buildings on site including the workshop element of the site to a mix of residential use and B1 flexible business accommodation. The existing buildings on site are of a poor quality and considered to be Category 3 accommodation. There is poor access to the site from Gloucester Avenue with vehicles required to enter through a 1 storey undercroft entrance into the yard. The existing situation is shown on the enclosed existing plans and elevations. Due to the restrictive height of the entrance undercroft, it is not possible for large vehicles to enter the site. This is considered to have an impact on the suitability of the light industrial accommodation on site.

5.23 In addition to the very poor access to the site, there is also little space for servicing on site at present. The site contains a courtyard space but this space is limited in size and difficult for vehicles to manoeuvre in. When the offices were occupied, this courtyard was used as an informal parking area for cars. This had a further effect on limiting the available of the space for servicing.

5.24 The site is located to the rear of commercial and residential uses which face onto Gloucester Avenue. The proximity of these uses, in particular the residential use, is considered to have a further impact on the suitability of the accommodation for light industrial use.

5.25 In addition to the above issues, the accommodation is in poor condition and would require a significant investment to bring it up to modern standards. Notwithstanding this, there is no guarantee that the accommodation could be leased. As such, it is considered the accommodation is Category 3. Further details of the marketing of the accommodation to date is enclosed within the Marketing Assessment by Dutch and Dutch.

5.26 The proposals seek the provision of 244 sqm of high quality, flexible B1 business accommodation. This accommodation will be provided in the north western portion of the site and so will be separated from the residential use. The proposed level of flexible accommodation is significantly in excess of the existing light industrial

accommodation on site and would provide for light industrial use amongst other uses. In addition, the proposed flexible business accommodation is considered to be more suitable to the site and area in comparison to the historical use of the site for offices and light industrial uses.

- 5.27 The accommodation is considered to be ideal for start up companies and small and medium sized businesses similar to the types of businesses that operate at 122 Gloucester Avenue. This is as a result of the flexibility of the accommodation and it's location in close proximity to public transport and local town centres.
- 5.28 It is considered that the proposed conversion of the existing light industrial floorspace to flexible B1 accommodation is in compliance with Camden's planning policy and will ensure the retention of a significant portion of employment generating floorspace on site.

### **Housing Mix and Amenity**

- 5.29 Policy DP5 of the LDF aims to secure in all new housing developments (including conversions) throughout the borough a range of housing sizes: The Council will be flexible when assessing development against policy DP5, the dwelling size priority table, and the aims set out in paragraph 5.5. The mix of dwelling sizes appropriate in a specific development will be considered taking into account the character of the development, the site and the area.
- 5.30 The conversion scheme proposes the provision of a 4 bed family dwelling. The configuration of the building lends itself to comfortably accommodate a family dwelling whilst also providing a significant amount of amenity space for the unit which meet the Council's space and design standards.
- 5.31 In addition, the proposed unit meets the Council's need for family sized housing in accordance with the above policy.
- 5.32 Policy DP31 seeks the provision of, and improvements to open space and recreation facilities. The Council acknowledge that land is limited in the borough to provide open space and recreations facilities as part of new schemes could be limited the Council considers that all developments that increase the demand for public open space facilities will be expected to make an appropriate contribution to meeting that additional demand. Schemes considered to increase the demand for public open space are:
- schemes of 5 or more additional dwellings;
  - developments of 500sqm or more of floorspace that are likely to increase the resident, worker or visitor populations of the borough.
- 5.33 Notwithstanding that the scheme proposes only 1 unit and the above policy is thus not applicable, private amenity space is proposed on the roof level for the residential unit.

### **Feasibility for Commercial Space**

- 5.34 The site has been vacant since October 2010. An assessment has been carried out by Dutch and Dutch providing evidence of the marketing campaign that has taken place to date with regards to the sale of the property at 134a and 136 Gloucester Avenue.
- 5.35 In summary, the report notes the following:

5.36 Dutch & Dutch were instructed by the previous owners in October 2010 to market the site for sale. During the course of an extensive marketing campaign we conducted approximately 25 viewings with property developers and commercial owner occupiers. The feedback from all commercial owner occupiers was that whilst the site was in an excellent location the access to the property and general arrangement of the buildings did not suit their requirements.

- “The vehicular access is too restrictive for our needs”
- “We cant get deliveries to our door”
- “The floor to ceiling height is too limited for our storage requirements”
- “The space is too dark and fragmented”

5.37 As a result, the only interest secured in the site was from developers and occupiers prepared to invest in a residential or mixed use scheme on the site.

#### **Sunlight and daylight**

5.38 A sunlight and daylight assessment has been conducted to establish if the proposal impacts on adjacent neighbours in terms of sunlight and daylight.

5.39 The analysis concludes that in terms of daylight the proposal is within the context of the BRE daylight guidelines and that the noted minor impacts are not material and will not be noticeable by adjacent occupants.

5.40 In terms of the sunlight analysis very small reductions to sunlight were shown, however these small reductions are considered not to be material within the context of the BRE sunlight guidelines.

5.41 The analysis shows that there will be no material impact on daylight and sunlight within the context of the planning policy guidelines and in consequence daylight and sunlight amenity continues to be adequate. The analysis demonstrates that the BRE sunlight and daylight guidelines have been met.

5.42 A full sunlight and daylight assessment accompanies the application.

#### **Parking, Servicing and Traffic Generation**

5.43 A transport assessment has been prepared by Stilwell Partnership for the proposals. In summary, the Assessment notes the following:

- The Stilwell Partnership has been instructed by Alex Bard, to undertake a Transportation Statement to support a Planning Application for the proposed redevelopment at 134a and 136 Gloucester Avenue, Camden.
- We have shown that the site is in a sustainable location with good links to public transport, shops and employment opportunities.
- We have shown that the sites accessibility and PTAL score (5) is rated as “Very Good” by TfL.
- The site will provide a servicing bay for the commercial accommodation as discussed with London Borough of Camden. This bay will allow for the servicing of the flexible commercial units.

- 4 No. secure cycle parking will be provided in line with London Borough of Camden requirements.
- No occupiers or users of the development will be eligible for local parking permits; this can be secured using a S106 Agreement.
- The provision of turning table will improve servicing arrangements, allowing the very small number of service vehicles to enter and leave in a forward gear.
- In summary, we conclude that the proposed development can be accommodated without detriment to vehicular flows and road safety on the surrounding highway network.

### **Sustainability and Energy**

5.44 LDF policy DP22 promotes sustainable design and construction. The policy states however that developments of less than 5 units do not require a sustainability report and as the scheme is a conversion a Code for Sustainable Homes Assessment is not applicable.

5.45 Notwithstanding this, following discussions with LB Camden we have prepared a sustainability/energy statement including an ecohomes assessment. In summary, the statement notes the following:

- Good practice sustainability measures have been incorporated in the design, including:
  - Heating and cooling demand will be satisfied by high efficient
  - air source variable refrigerant flow (VRF) heat pump system, which is predicted to achieve a 7.4% reduction in office's annual CO<sub>2</sub> emissions
  - Thermal insulation levels will be improved to the Building Regulation standards to prevent excessive heat loss.
  - The proposed scheme will have good natural lighting within all occupied areas, which will improve comfort and reduce the requirement for artificial lighting
  - Good solar control will be provided by the selection of glazing/shading so as to avoid overheating in summer and increase passive gains in winter
  - The development will use low energy lighting together with daylight linked dimming, where appropriate • Energy efficient appliances will be installed in order to reduce the energy and water demands of the development
  - All insulation materials used within the proposed development will be selected to ensure they are CFC free both in manufacture and through their composition
  - Building materials where possible will be sourced locally to reduce transportation pollution & support the local economy.

- All timber will be purchased from responsible forest sources • Recycling facilities will be provided on site for construction and operational waste
- Water consumption will be reduced through the use of low volume flow fittings
- Water metering and leak detection alarms will be installed to monitor and minimise wastage
- The construction site will be managed in an environmentally sound manner in terms of resource use, storage, waste management, pollution. A Site Waste management Plan (SWMP) will be produced for the works.
- Surface water run-off will be reduced through the provision of green roofs

### **Noise and Vibration**

5.46 A Noise Assessment and vibration report has been prepared for the proposals as a result of their proximity to a rail line. In summary, the Noise Assessment notes the following:

- The proposed development generally falls into Category C with regards to the provision of PPG24.
- Any planning application of this nature must take account of the local noise environment and impose conditions to ensure an adequate level of protection against high noise levels
- In order to achieve this level of noise reduction we would recommend that the outer skin of the building be a traditional brick and heavy block cavity wall construction with render and plaster on the inner face to ensure the structure is well sealed.
- The windows on all the facades facing the railway should be double windows of 10mm thickness externally and 6mm internally with a 200mm airgap between the inner and outer windows.
- Due to the high noise requirement the flat should be provided with mechanical ventilation systems, fitted with suitable attenuators, to provide fresh air into living spaces so that it is not necessary to open the windows of the flat during the nighttime period.
- The weakest element of the structure is likely to be the roof. The roof structure should give a minimum noise reduction of 56 db and preferably should be a solid flat reinforced concrete slab of at least 200mm thickness

## 6.0 Conclusion

- 6.1 The proposal involves the conversion of existing vacant office/light industrial floorspace to provide a mix of residential accommodation and flexible B1 business accommodation. The scheme includes a servicing bay for the B1 floorspace in addition to bicycle parking spaces.
- 6.2 The existing office space on the upper levels has been vacant since early this year despite an extensive marketing exercise.
- 6.3 Careful consideration of UDP and LDF policies, pre-application advice from officers and a thorough site analysis has resulted in an innovative and sympathetic design for the site that is most compatible with the immediate area.
- 6.4 The scheme will provide an opportunity for the Council to secure greater provision of housing units to meet identified market housing needs. The development of the site will provide residential accommodation that is compatible within this part of Central London.
- 6.5 The proposed design will be of a high quality and has been designed to address officers' concerns regarding the provision of flexible B1 accommodation and the effect of the proposals on the surrounding properties. Furthermore, the proposals do not have a significant effect on the special character and appearance of the Conservation Area.
- 6.6 The proposed planning application is considered to be consistent with the relevant planning policies set out within the London Plan and Camden's LDF and is wholly in keeping with the emerging national planning objectives in respect of housing, established within the PPS3. The proposed development site makes efficient use of vacant office/light industrial floorspace with very good public transport accessibility and, critically, would provide significant provision toward meeting the demand for larger family housing units within the Borough as acknowledged in the LDF.
- 6.7 In addition, the proposals provide a significant amount of high quality, flexible B1 accommodation.
- 6.8 In conclusion, it is considered that this scheme complies with principles and objectives of the development plan policies of the London Plan and adopted LDF and proposes a high quality development in a sustainable location which it is considered should be supported by the Council.