



PLANNING STATEMENT

In respect of

**2 DUMPTON PLACE AND
LAND TO THE REAR OF
68-88 GLOUCESTER
AVENUE, NW1 8JD**

On behalf of

SARENA LTD

CgMs Ref: VJS/AW/11911

Date: October 2010

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1.0 INTRODUCTION

1.1 This statement has been prepared by CgMs Ltd in support of an application for conservation area consent for the demolition of a former workshop premises at No. 2 Dumpton Place and redevelopment to provide a modern business unit (534m²) together with two 2 x bedroom and two 3 x bedroom houses.

1.2 This statement describes the site and its surroundings, sets out the planning history and background to the submissions, examines the relevant planning policies and provides an appraisal of the scheme having regard to the site's location and the policy context.

1.3 Prior to the planning submission the applicant's agents met with the Council's Development Control, Planning Policy and Conservation and Design Officers and received helpful recommendations with regard to the proposed development. These recommendations have been taken on board in preparing the detailed schemes.

1.4 In addition to this Planning Statement the following plans and reports are submitted with this application:

- Site Plan at scale 1:250
- Drawings Nos:

3001A, 3002A, 3003A, 3004A, 3005A, 3006A, 3011A, 3012A, 3013A, 3014A, 3015A, 3016A, 3021A and 3022A
- Landscape Plans:

1250.001, 002 and 03
- Photographs of site and surrounding area
- Design and Access Statement prepared by PMA Architects
- Heritage Statement prepared by CgMs Historic Buildings
- Employment Report prepared by Pater Goodman Merriman

- Sunlight/Daylight Assessment prepared by Right of Light Consulting
- Sustainability Statement prepared by AJ Energy
- Preliminary BREEAM Report prepared by AJ Energy
- Preliminary Code for Sustainable Homes prepared by AJ Energy
- Energy Strategy prepared by AJ Energy
- Phase 1 Environment Assessment prepared by WSP
- Noise and Vibration Impact Assessment Report prepared by WSP
- Letter from Knapp Hicks & Partners Ltd dated 27 October 2010 regarding structural issues relating to the proposed basement.

2.0 SITE AND SURROUNDINGS

- 2.1 The site is a linear strip of land to the rear of the terrace of 3-storey early Victorian residential properties, Nos. 68-88 Gloucester Avenue. The site is accessed from the eastern side of Dumpton Place which is a short cul-de-sac leading in a northerly direction from Gloucester Avenue. This is currently occupied by a part demolished single storey workshop at No. 2 Dumpton Place. This workshop was previously used as part of a Volvo Servicing Centre based at No. 1 Dumpton Place, directly opposite the site on the west site of Dumpton Place. The rear part of the warehouse has been demolished to accommodate 6 new terraced properties located to the rear of Nos. 52-68 Gloucester Avenue with the front part of the building and small open yard to the rear on the application site being used as a working area for the new construction.
- 2.2 Two new 3-storey town houses are also under construction at No. 46 Gloucester Avenue with open parking for 9 cars to the rear.
- 2.3 To the north of the site are a number of railway tracks leading to Euston Station and to the south are the rear gardens of residential 3-storey mid 19th Century terraced properties, Nos. 68 to 88 Gloucester Avenue. A high brick wall, part of the workshop building, runs along the southern boundary. This wall which is proposed to be retained is approximately 5.4m above the ground level of the proposal site but is approximately 6m above the level of the rear gardens of properties on Gloucester Avenue.
- 2.4 The site is located within the Primrose Hill Conservation Area. There are no buildings on or adjoining the site which are listed but the terraced mid 19th Century houses at Nos. 68-88 Gloucester Road are buildings that are considered to make a positive contribution to the area. Opposite the site No. 1 Dumpton Place, a red-brick flat roofed 2-storey building with a large lift area is considered to make a negative impact on the conservation area. No.1 Dumpton Place is still used by Volvo as a car repair and service centre. The Council's Conservation Area Statement remains silent in relation to the architectural or historic merits of No. 2 Dumpton Place and as such one has to assume that the Council consider that it has neutral value.

- 2.5 The site is well served by public transport with regular bus routes along Prince Albert Road to the south and Chalk Farm Road to the north providing access to Camden Town, Swiss Cottage, Hampstead and Central London. Chalk Farm Underground Station is approximately 450m from the site. This also provides quick and easy access to Camden Town, Hampstead and Central London. There are a wide range of local services and amenities in the area including a local neighbourhood centre at Regents Park Road. The site is also close to Regents Park and Primrose Hill offering excellent public open space facilities.
- 2.6 The site is within a Controlled Parking Zone and has been identified in the CPG as an area that suffers from parking stress. We have been advised by officers that a car-free scheme would be acceptable to the Council but it would be necessary to enter into a Section 106 Agreement preventing residents of any proposed residential development to be prevented from obtaining car parking permits. The applicants have agreed to this requirement.

3.0 PLANNING HISTORY

Nos. 1 and 2 Dumpton Place

- 3.1 In November 2004 planning permission was granted for the redevelopment of a larger site comprising the erection of a 3-storey B1 Use Class (business use) building located on the site of No. 1 Dumpton Place and land to the rear of Nos. 90-108 Gloucester Avenue; the erection of a 2-storey B1 Use Class (business use) building on the site to the rear of Nos. 68-88 Gloucester Avenue (the current proposal site); the erection of a 2-storey plus basement terrace of 6 x 3 bedroom houses to the rear of Nos. 52-66 Gloucester Avenue (currently under construction); and the erection of a pair of 4-storey plus basement 5 bedroom houses at 46 Gloucester Avenue (also under construction) with a 9 space car park to the rear. A separate consent for the demolition of the existing building on the site was obtained. These applications have the following references (References: PEX0200634 and CEX0200635).
- 3.2 The Section 106 requirements were for car-capped housing (i.e. residents not allowed any car parking permits) and an education contribution.
- 3.3 The conditions of the permission were discharged and the scheme has been implemented with the part demolition of the existing building and construction of the residential elements of the approved scheme.

2 Dumpton Place

- 3.4 In March 2009 an application was made for the redevelopment of No. 2 Dumpton Place, land to the rear of Nos. 52-88 Dumpton Place and No. 46 Gloucester Avenue comprising the erection of 2 x 5 bedroom houses, 1 x 4 bedroom house and 6 x 3 bedroom houses and a 2-storey office building (943 sq m) with access from Dumpton Place and associated car parking and landscaping. These applications (References: 2008/3495/P and 2008/3713/C) were withdrawn following officers advice. The Case Officer had advised that the proposed development would need to include affordable housing on the basis that the site had capacity for 10 or more homes and the proposed floor area exceeded 1,000 sq m. In addition the design of the houses on Gloucester

Avenue were not considered acceptable. Further the development would have occupied the entire extent of Site No. 15 of the Schedule of Land Use Proposals of the 2006 UDP, allocated for mixed use including residential and Class B1.

1 Dumpton Place

- 3.5 In October 2009 planning permission was granted for the erection of a building comprising basement, ground and 2 upper floors to provide offices (Class B1) and a building comprising ground and two upper floors to provide six residential units (1 x 1 bedroom and 1 x 2 bedroom flats and 4 x 3 bedroom houses) (Reference: 2008/1322/P).
- 3.6 The Section 106 requirements included financial contributions for open space, education and improvements to the highway in front of the premises. There was also a requirement for sustainability measures and a construction management plan.

2 Dumpton Place

- 3.7 On 30 November 2009 planning permission was refused in respect of a scheme for the erection of 5 x 3 bedroom single family dwellinghouses and a 3-storey office building (939m²) (Ref: 2009/1296/8).
- 3.8 The refusal of this application primarily related to the fact that the proposal for development of this smaller site was regarded by the Council as a device to avoid the provision of affordable housing and that no justification had been put forward to justify the subdivision of the site for which planning permission had already been granted. Other reasons for refusal included the bulk, height and design of the proposed office building, the internal layout of the proposed houses, lack of sustainability provision, outlook, sunlight and daylight and community safety, although most of these matters could possibly have been addressed by amendments to the plans. The scheme was also refused on grounds of there being no Section 106 Agreement in place.

4.0 POLICY CONTEXT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

4.2 At the time of writing this report the statutory development plan for this area comprised the London Plan (Consolidated with Alterations since 2004) and adopted in February 2008 and the Camden Unitary Development Plan (UDP) adopted 2006. However, the Council have announced their intention to adopt the Local Development Framework Core Strategy and Development Policies on 8 November 2010 and the policies of these documents will then supersede those of the Unitary Development Plan. The Draft Replacement London Plan is currently going through an Examination in Public and is likely to be adopted in Spring 2011. The Site Allocations Preferred Approach Document which also forms part of the new Local Development Framework was published in November 2009. This is likely to be the subject of further amendments and is expected to be submitted to the Secretary of State early 2011 with adoption later in the year. The policies of this document are a material consideration but until adopted will not have some of the soon to be adopted Core Strategy and Development Policies. We have examined the relevant policies of the above documents in our Appraisal.

4.3 In addition the Council have published Supplementary Planning Guidance Documents. The most relevant of these are:

- Camden Planning Guidance 2006
- Primrose Hill Conservation Area Statement

4.4 National guidance relevant to the consideration of this application comprises the following Planning Policy Statements and Guidance Notes:

PPS1: Delivering Sustainable Development (2005) and the Supplementary Statement on Climate Change

PPS3: Housing (2006)

PPS5: Planning for the Historic Environment (2010)

PPS9: Biodiversity and Geological Conservation (2005)

PPG17: Planning for Open Space, Sport and Recreation (1991)

PPS23: Planning and Pollution Control (2004)

PPG24: Noise (1994)

PPS22: Renewable Energy (2009)

- 4.5 We have not set out the detailed guidance in all of these documents but would point out that as a general principle there is now a strong emphasis on the need for sustainable development and high quality design. Housing is a priority use but mixed use development is encouraged in certain locations.

London Plan (2008)

- 4.6 The London Plan (Consolidate with Alterations since 2004) and adopted in February 2008 provides the strategic guidance for the considerations of planning applications and also sets the policy framework for the emerging Local Development Framework.

- 4.7 The plan sets out the Mayor's Vision for London with six policy objectives as follows:

- To accommodate London's growth within its boundaries without encroaching on open space.
- To make London a healthier and better city for people to live in.
- To make London a more prosperous city with strong, and diverse long-term economic growth.

- To promote social inclusion and tackle deprivation and discrimination.
- To improve London's accessibility.
- To make London an exemplary world city in mitigating and adapting to climate change and a more attractive, well-designed and green city.

4.8 Strategic policies that are particularly relevant to this proposal are as follows:

Policy 2A.1	Sustainability criteria
Policy 2A.2	The spatial strategy for development
Policy 3A.1	Increasing London's supply of housing
Policy 3A.2	Borough housing targets - Camden's ten year target 2007/8 to 2016/17 being 5,950 new dwellings (595 per year)
Policy 3A.3	Maximising the potential of sites - density of 200-450 hr/ha recommended in urban areas with PTAL of 2 to 3
Policy 3A.5	Housing choice - all housing to be to Lifetime Homes Standards with 10% wheelchair accessible
Policy 3A.6	Quality of new housing - need for play and informal recreation provision for children and young people
Policy 3A.8	Definition of affordable housing - i.e. social and intermediate housing
Policy 3A.9	Affordable housing target (50% provision with 70% social housing and 30% intermediate housing)

- Policy 3A.10 Negotiating affordable housing in individual private residential; and mixed-use schemes
- Policy 3A.11 Affordable housing thresholds - on site provision for schemes which have a capacity of 10 or more homes
- Policy 3A.17 Addressing the needs of London's diverse population
- Policy 3A.18 Protection and enhancement of social infrastructure and community facilities
- Policy 3B.1 Developing London's Economy - seeking a range of workspaces of different types, sizes and costs
- Policy 3B.2 Office Demand and Supply
- Policy 3B.3 Mixed Use Development
- Policy 3C.23 Parking strategy - allowing for reduced levels of car parking in areas of good transport accessibility
- Policy 3D.13 Children and young people's play and informal recreation strategies
- Policy 3D.14 Biodiversity and nature conservation
- Policy 4A.1 Tackling climate change
- Policy 4A.3 Sustainable design and construction
- Policy 4A.4 Energy Assessment
- Policy 4A.5 Provision of heating and cooling networks

Policy 4A.6 Decentralised Energy: Heating, Cooling and Power

Policy 4A.7 Renewable Energy - presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation

Policy 4A.11 Living Roofs and Walls

Policy 4A.14 Sustainable drainage

Policy 4A.16 Water supplies and resources

Policy 4A.19 Improving air quality

Policy 4A.20 Reducing noise

Policy 4B.1 Design principles for a compact city

Policy 4B.2 Promoting world-class architecture and design

Policy 4B.3 Enhancing the quality of the public realm

Policy 4B.5 Creating an inclusive environment

Policy 4B.6 Safety, security and fire prevention and protection

Policy 4B.8 Respect local context and communities

Policy 4B.12 Heritage conservation

4.9 The policies of the Draft Replacement London Plan are also a material consideration given the advanced stage of this plan. However, for this Appraisal

we have mainly focused on the local policies set out in the adopted Camden UDP and emerging LDF documents.

Camden Unitary Development Plan (2006)

- 4.10 As this plan is soon to be superseded by the LDF Core Strategy and Development Policies we have not included an analysis of the policies of the UDP as part of the Planning Statement.

Camden Core Strategy Pre-Adoption Version 2010

- 4.11 At the time of writing this statement the Council had just published the Pre-Adoption Version of the Core Strategy. Our analysis refers to this document.
- 4.12 **Policy CS1 - Distribution of growth:** This policy states that the Council expects that in the order of 12,250 additional homes will be provided in Camden between 2010/11 and 2024/25. The Council will promote the most efficient use of land and buildings expecting high density development in Central London, town centres and other locations well served by public transport and expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible. The main development opportunity sites are to be identified in the Site Allocation LDF Document. The Site Allocation Preferred Approach Document (still at consultation stage) identifies the site to the rear of Nos. 52-88 and Nos. 90-108 Gloucester Avenue as a site suitable for mixed use development.

Comment: The proposal accords with Policy CS1 in terms of providing additional housing and making efficient use of a vacant site.

- 4.13 **Policy CS6 - Providing quality homes:** This policy 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. Housing is regarded as the priority land use of Camden's Local Development Framework. The Council also aims to secure high quality affordable housing and to ensure that 50% of the borough-wide target for

additional self-contained homes is provided as affordable housing. The Council will seek to negotiate a contribution from specific proposals on the basis of the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development. The policy also seeks a range of self-contained homes of different sizes to meet the Council's identified dwelling size priorities.

- 4.14 The Camden Development Policies give more guidance on how the affordable target will be achieved with a sliding scale of 10% to 50% for housing developments of 10 to 50 units (Policy DP3).

Comment: The proposal is to provide two x 2 bedroom and two x 3 bedroom high quality houses in accordance with this policy. Affordable housing cannot be provided on site but the applicants are willing to make a contribution to affordable housing on the basis of Policy DP3.

- 4.15 **Policy CS8 - Promoting a successful and inclusive Camden economy:** This policy seeks to safeguard existing employment sites and premises in the borough that meet the needs of modern industry and other employers and to expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises such as managed affordable workspaces.

- 4.16 **Comment:** The existing Class B2 workshop is partly demolished and the building unsuitable for continued use for employment purposes. The proposal provides a modern flexible business unit suitable for a wide range of Class B1 uses in accordance with this policy. The Employment Report prepared by Pater Goodman Merriman provides further information regarding the existing premises and advantages in terms of the provision of modern business space as part of the proposed scheme. The proposed development would be suitable for two small or one medium sized enterprise as required in the policy.

- 4.17 **Policy CS13 - Tackling climate change through promoting higher environmental standards:** This policy requires all development to take measures to minimise the effects of, and adapt to, climate changes and to encourage all developments to meet the highest feasible environmental

standards that are financially viable during construction and occupation. This includes the need to minimise the need to travel by car, promote the efficient use of land and buildings, minimise carbon emissions by ensuring developments use less energy making use of energy from efficient sources and generating renewable energy on site. The policy encourages the use of CHP to reduce carbon emissions and requires all developments to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation.

Comment: An Energy Statement prepared by AJ Energy is included with the application. This states that the carbon dioxide emissions of the proposed development are reduced by 7.6% when compared to the compliance requirements of Part L 2006 due to the inclusion of energy saving measures. Air source heat pumps and photovoltaic panels are proposed to further reduce the annual carbon dioxide emissions of the proposed development by 18.9%.

- 4.18 **Policy CS14 - Promoting high quality places and conserving our heritage:** This policy refers to the need for the highest standard of design that respects local context and character and preserves and enhances Camden's rich and diverse heritage assets and their settings. High quality landscaping and works to streets and public spaces is also required. Access to buildings and places should be inclusive and accessible. Reference is made to the Council's Conservation Area Statements.

Comment: The scheme has been designed to a high quality respecting its local context and location within the Primrose Hill Conservation Area. The Architect's Design and Access Statement and CgMs Heritage Statement refer to the design approach. In addition Colvin and Moggridge, Landscape Consultants were appointed to carry out a high quality landscaping scheme to form part of the application. Access to the site will be inclusive and accessible.

- 4.19 **Policy CS15 - Protecting and improving our parks and open spaces and encouraging biodiversity:** This policy also refers to the possibilities of providing new areas of open sites for nature conservation and biodiversity.

Comment: The scheme provides for a new area of communal open space, private gardens and terraces and green roofs in accordance with this policy.

Camden's Development Policies (Pre-adoption Version, September 2010)

- 4.20 We examine below the relevant policies of the Camden Development Policies Pre-adoption Version, September 2010.
- 4.21 **Policy DP3 - Contributions to the supply of affordable housing:** This policy states that the Council will expect all residential development with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. The Council will seek to ensure that where two-or-more development sites are adjacent and related, the appropriate affordable housing contribution is comprehensively assessed for all the sites together. Where development sites are split or phased, the Council will seek to use legal agreements to ensure that all parts or phases make an appropriate affordable housing contribution.
- 4.22 The Council will expect the affordable housing contribution to be made on site, but where it cannot be practically achieved on site, the Council may accept off-site affordable housing or exceptionally a payment in lieu.
- 4.23 The Council will seek the maximum reasonable amount of affordable housing applying the target based on a sliding scale of 10% for developments with a capacity for 10 dwellings to 50% for developments with capacity for 50 dwellings.

Comment: Although the application is for only four dwellings the Council's policy does require provision for affordable housing where two or more sites are adjacent and related. The previously approved scheme for the redevelopment of the site of No. 1 Dumpton Place including land to the rear of Nos. 52-88 Gloucester Avenue and at No. 46 Gloucester Avenue and comprised a mixed use development which included six terraced 3 x bedroom houses and two semi-detached 5-bedroom houses. These are now under construction. The site of the current application site was originally intended to have been developed as a 2-storey office building but it was found that a commercial building of this size would not be viable. The proposal now seeks to provide a mix of uses on this part of the site with four new dwellings and a reduced sized business unit. The proposed scheme would result in 12 dwellings being provided on this combined

site. The Council's policy as set out above would require a 12% affordable housing contribution. Consideration has been given by the applicants to providing affordable housing on site but due to the restricted size of the site and problems of management and servicing it is not feasible to provide affordable housing on site. The applicants are, however, willing to pay a financial contribution to the provision of affordable housing elsewhere within the Borough.

- 4.24 **Policy DP5 - Homes of different sizes:** The Council expect a mix of large and small homes in all residential developments depending on consideration of site size and any other site constraints and the economic and financial viability of the site including the demand for homes of different sizes. 2-bedroom private units are regarded as those in most need with 3-bedroom and 4-bedroom or more sized dwellings being of medium priority.

Comment: The scheme has been designed to provide a mix of two 2 x bedroom and two 3 x bedroom houses having regard to this policy and the demand for houses of this size.

- 4.25 **Policy DP6 - Lifetime homes and wheelchair homes:** This policy requires all housing development to meet Lifetime Homes standards with 10% to meet wheelchair housing standards or be easily adopted to meet them.

Comment: The proposed dwellings do meet Lifetime Homes standard and are all capable of being adopted to meet wheelchair standards if required.

- 4.26 **Policy DP13 - Employment premises and sites:** This policy 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 it can be demonstrated that the site is no longer suitable for its existing business use; and there is evidence that the possibility of reusing or redeveloping the site for alternative business use is not viable.

Comment: The existing former workshop building on site has been partly demolished and is unsuitable for continued employment use. The development proposes a modern business unit capable of flexible use including clear and

flexible space, adequate floor to ceiling heights and wide doors for servicing. The siting in Dumpton Place also allows adequate space for servicing and parking of commercial vehicles. An Employment Report prepared by Pater Goodman Merriman examines the problems relating to the existing commercial premises and reasons why the proposed scheme would provide employment premises which are more suitable in terms of existing demand and will offer more employment opportunities.

- 4.27 **Policy DP22 - Promoting Sustainable Design and Construction:** This policy requires development to incorporate sustainable design and construction measures and to incorporate green or brown roofs and green walls wherever suitable. The Council expect new build housing to meet Code for Sustainable Homes Level 3 by 2010 and for non-domestic development of 500m² to achieve a "very good" in BREEAM assessment. The Council also require development to be resistant to climate change by ensuring schemes include appropriate climate change adoption measures.

Comment: A Preliminary Code for Sustainable Homes Report has been prepared by AJ Energy demonstrating that the proposed development will achieve Code Level 3. A BREEAM Assessment has also been prepared for the commercial premises and this shows that the scheme will achieve a "very good" rating in accordance with Policy DP22.

- 4.28 **Policy DP23 - Water:** This policy requires developments to reduce their water consumption to include incorporating water efficient features and equipment and capturing, retaining and re-using surface water and grey water on site.

Comment: The scheme has been designed to meet these requirements.

- 4.29 **Policy DP24 - Securing High Quality Design:** This policy requires all developments to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;

- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.

Comment: The proposed development is of the highest standard and takes account of the requirements set out in this policy. A Design and Access Statement is included with this application.

4.30 **Policy DP25 - Conserving Camden's Heritage:** This policy seeks to maintain the character of Camden's conservation areas and states that only development that preserves and enhances the character and appearance of the area will be allowed.

Comment: The proposal involves the demolition of a building which is in poor condition and does not contribute positively to the conservation area. The proposed development has been designed to a high standard and to fit in with the conservation area and will enhance the appearance and character of the area. A Heritage Statement prepared by CgMs Heritage is included with this application.

4.31 **Policy DP26 - Managing the Impact of Development on Occupiers and Neighbours:** This policy seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors to be considered include:

- a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels;
- d) noise and vibration levels;
- e) odour, fumes and dust;
- f) microclimate;
- g) the inclusion of appropriate attenuation measures.

4.32 The Council also require developments to provide:

- h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- i) facilities for the storage and recycling and disposal of waste;
- j) facilities for bicycle storage; and
- k) outdoor space for private or communal amenity space, wherever practical.

Comment: The scheme has been designed taking all the above facilities into account with careful attention given to protect the privacy, outlook, sunlight and

daylight, and avoidance of light spillage to residents of the adjoining terraced properties at Nos. 68-88 Gloucester Avenue.

- 4.33 A Sunlight/Daylight report has been prepared by Rights of Light Consulting to demonstrate that occupiers of the new dwellings will not suffer undue levels of noise and vibration and the microclimate of the site will be improved with the loss of the former B2 use and introduction of a mixed B1/C3 development to include areas of green spaces and green walls and green roofs.
- 4.34 The new dwellings have been designed to meet the Council's Planning Guidance SPD and Lifetime Homes Standard. Facilities are provided for the storage, recycling and disposal of waste, bicycle storage and outdoor amenity space.
- 4.35 Policy DP27 - Basements and Lightwells: This policy requires proposals for basements to include an assessment of the scheme impact on drainage, flooding, groundwater conditions and structural stability where appropriate. The Council will only permit basements and other underground development that does not cause harm to the built and natural environment.
- 4.36 **Comment:** A letter from Knapp Hicks & Partners Ltd dated 27 October 2010 is submitted with this application. This addresses the matters raised in this policy.
- 4.37 **Policy DP28 - Noise and Vibration:** This policy seeks to ensure that noise and vibration is controlled and managed and states that development sensitive to noise in locations with noise pollution will not be permitted unless appropriate attenuation measures are provided.
- Comment:** A Noise Report prepared by WSP is enclosed with this application.
- 4.38 **Policy DP29 - Improving Access:** This policy seeks to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities.
- 4.39 **Comment:** The proposed development has been designed to address this policy with the commercial unit being designed to accommodate wheelchair access and

the dwellings designed to Lifetime Homes Standard and readily adaptable to wheelchair use.

4.40 **Policy DP21 - Provision of, and Improvements to, Open Space and Outdoor Sport and Recreation Facilities:** This policy states that the Council will only grant planning permission for development that is likely to lead to an increased use of public open space where an appropriate contribution to the supply of open space is made.

4.41 **Comment:** The proposal does allow provision for private and communal amenity space on site.

Camden Site Allocations - Preferred Approach (November 2009 - January 2010)

4.42 The site rear of Nos. 52 - 88 and Nos. 90 - 108 Gloucester Avenue is designated as a site for mixed use redevelopment in the Camden Site Allocations - Preferred Approach Document (Site 41). Although this document has not yet been submitted to the Secretary of State this document is relevant material in the consideration of the application. This site was shown as two separate Land Use Proposal Sites (Nos. 15 and 16) in the Unitary Development Plan (UDP). The UDP is, however, about to be replaced by the LDF Core Strategy and Development Policies Document.

4.43 The Site Allocations Document describes the planning history of the combined site with reference made to the November 2004 and March 2009 planning permissions. Subject to receiving planning permission for this current application it will be necessary to update this document.

4.44 The policy document states that the site was reviewed in the Camden Employment Land Review (June 2008) and identified as a site which should be protected for employment (paragraph 6.78). The document states as follows:

"Given the limited number of larger employment sites over 1000m² in the borough, replacement employment floorspace should constitute the principle use as part of a mixed use redevelopment scheme, in line with Policy DP13.

The Employment Land Review indicates that there is potential for new office development at Camden Town. This site may therefore provide a suitable location for small office or studio units near Camden Town Centre without detracting from the special character of the centre. B1(b) and (c) would also be appropriate as part of a range of uses on site.

Residential uses are a priority land use in the borough and housing should form part of or mix of uses in any redevelopment scheme. Previous successful schemes on the site have demonstrated through a noise assessment that the site is a suitable location for residential uses."

4.45 The suggested approach for this site as set out in the document is as follows:

"A mixed use development incorporating replacement employment floorspace and residential uses.

Development will be expected to:

- Provide B1 (or appropriate B2) floorspace as a key element of a mixed use scheme*
- Accommodate residential uses, including affordable housing if triggered, subject to a PPG24 noise assessment*
- Be designed to a high standard that preserves or enhances the character of Primrose Hill Conservation Area*
- Safeguard the amenities of nearby residential occupiers."*

4.46 The main considerations for this site are as follows:

"Mixed use redevelopment will be expected to incorporate replacement employment uses (Policy CS8) and new residential use (Policy CS6) designed in a manner to preserve and enhance the character of the Primrose Hill Conservation Area (Policy CS14)."

Comment: The proposal accords with this document in terms of providing a mixed use Class B1/C3 redevelopment. The proposed business unit would be suitable for a range of Class B1 uses and a Noise Assessment has been carried out to demonstrate that the proposed residential would provide acceptable living conditions. The Employment Report prepared by Pater Goodman Merriman shows that the existing workshop is not suitable for re-use and that the new business unit would be more appropriate in this location and provide higher levels of employment.

Primrose Hill Conservation Area Statement

- 4.47 The Council have prepared a Conservation Area Statement for Primrose Hill. The proposal site falls within Sub Area Two Central Area. The Statement describes the area and lists those properties which are listed or considered to make a positive contribution to the area. The Gloucester Avenue terraced properties are shown as making a positive contribution and No. 1 Dumpton Place is considered to detract from the character and appearance of the area. The Statement remains silent in respect of No.2 Dumpton Place suggesting that it is of neutral value.

Comment: Demolition of the existing building was approved as part of the previous planning permission and a large part of this building has already been demolished. The proposed scheme has been designed to fit in with the character of the conservation are and proposes a high quality mixed use development which will enhance the appearance and character of the site. A Heritage Statement prepared by CgMs Heritage is submitted with this application.

5.0 PLANNING APPRAISAL

Principle of Mixed-Use Development

- 5.1 The applications proposing demolition of the existing Class B2 former workshop building and replacement by a mix of Class B1 and C3 are consistent with the Council's adopted and emerging policies. The Land Use Proposals section of the adopted Unitary Development Plan showed the site of No. 2 Dumpton Place and land to the rear of Nos. 52-88 and No. 46 Gloucester Avenue allocated for mixed use (Class B1 and C3) and made reference to the 2004 approved scheme for the site. The UDP is soon to be replaced by the Local Development Framework with the relevant policies set out in the Core Strategy, Development Policies and Site Allocations. The Core Strategy and Development Policies have been the subject of examination with the Inspector's report now received. These documents will be adopted by the time of consideration of these applications and will supersede the policies of the adopted UDP. The Site Allocations Preferred Approach Document also shows this site for mixed use development. Whilst the proposals of this document are not yet adopted they are a material consideration. The proposed scheme is consistent with these proposals and with the advice given to the applicants during pre-application discussions with the Council's officers.
- 5.2 As part of the Council's pre-application advice attention was drawn to the requirements of Core Strategy Policy CS8 which seeks to safeguard existing employment sites that meet the needs of modern industry and other employers and to expect a mix of employment facilities suitable for small and medium sized enterprises. Development Plan Policy DP13 also seeks to retain land and buildings that are suitable for continued business use unless it can be demonstrated that the site is no longer suitable for its existing business use and there is evidence that the possibility of reusing or redeveloping the site for alternative business use is not viable.
- 5.3 The applicants have sought advice from Pater Goodman Merriman on the potential for reuse of the existing workshop building and the viability of redeveloping the whole of the site for employment purposes as shown in the scheme approved in November 2004.

- 5.4 The advice given by Pater Goodman Merriman is set out in the Employment Report submitted with this application.
- 5.5 Hedley Merriman author of this report has advised that the existing partly demolished workshop building is not suitable for continued occupation due mainly to its poor condition. He states in the report that there is little demand for commercial units of this type and size in this area and that the main demand is for modern small to medium sized modern business units particularly in the size range of 100m² to 230m². The proposed business use which is 534m² could be used for two smaller units of this size or as a single unit suitable for a medium sized business in accordance with Policies CS8 and DP13. The proposed unit is designed with maximum flexibility in terms of being suitable for a light industrial use or the premises could be used for research, studio or office use. The proposed scheme would offer more employment opportunities than the existing workshop. We have been advised that the workshop previously provided employment for only 2 or 3 technicians with most of the staff working at the main service centre premises at No. 1 Dumpton Place (6 office staff and 2 technicians). The loss of this workshop has not therefore resulted in any significant loss of employment. In contrast the new building could provide employment for 20 - 30 people.
- 5.6 The site is considered by the Council to be suitable for a mix of Class B1/C3 development having been identified as an opportunity site in the adopted UDP and emerging LDF Site Allocations Preferred Approach. The proposal seeks to provide a mixed use development in accordance with the Council's preferred uses for this site.
- 5.7 The scheme is also consistent with Core Strategy Policy CS1 which seeks to promote most efficient use of land with a mix of uses in suitable locations. The site is allocated for mixed Class B1/C3 uses in the Site Allocations Preferred Approach Document.

Housing Quality/Mix

- 5.8 The scheme includes the provision of four high quality houses comprising a mix of two 2 x bedroom and two 3 x bedroom units in accordance with Core Strategy Policy CS6 and Development Plan Policy DP5.
- 5.9 All rooms meet the Council's internal space standards and have been designed to provide good levels of light, be energy efficient and have adequate private and communal amenity space provision. The scheme is of high design quality including a high quality landscaping scheme.
- 5.10 The housing mix accords with the recommendations set out in the text of Policy DP5 in accordance with the particular demand for two and three bedroom dwellings.

Affordable Housing

- 5.11 Although the scheme proposes only four new dwellings the applicants have had regard to Core Strategy Policy CS6 which seeks to negotiate a maximum reasonable amount of affordable housing under the specific circumstances of the site and Development Plan DP3 which requires some affordable housing in cases where two or more adjacent and related development sites together result in 10 or more additional dwellings.
- 5.12 In this case the adjoining site to the east is currently being developed to provide six 3 x bedroom terraced properties and two 5 x bedroom semi-detached houses. This development forms the residential element of a scheme which was approved in November 2004 and which included commercial development on the current application site. The scheme now proposed is for a separate mixed use development independently accessed from Dumpton Place. However, having regard to the site history it is appropriate to consider the total housing being provided on these adjoining sites which together would result in the provision of 12 dwellings. The applicants have expressed willingness to provide some affordable housing as part of the proposed scheme.

5.13 Consideration has been given to providing these units on site but given the restricted size of the site, problems of management and complications with regard to service charges this is not considered to be appropriate or feasible.

5.14 The applicants are, however, willing to provide a financial contribution to off-site affordable housing in accordance with Policy DP3.

Lifetime Homes/Wheelchair Housing

5.15 The proposed dwellings are designed to Lifetime Homes standards with all dwellings being readily convertible to wheelchair standards if required.

Sustainability

5.16 The scheme has been designed to be highly sustainable in terms of sustainable construction and design, energy efficiency, use of renewable energy and taking opportunities to provide for a scheme which provides for future biodiversity in accordance with core Strategy Policy CS13 and Development Policies DP22.

5.17 A Sustainability Statement is included with the application. This also includes a Code for Sustainable Homes Assessment with the proposed homes able to reach Code Level 3 standard and the commercial unit reach a BREEAM "very good" rating.

5.18 An Energy Report has also been prepared by AJ Energy. This demonstrates that the scheme does accord with the Mayor's Energy Strategy and Policies. The scheme has also been designed for water run off attenuation in accordance with Policy DP23.

Amenity for Occupiers and Neighbours

5.19 The scheme has been carefully designed to provide good levels of amenity for the future occupiers of the residential properties and to protect the amenity of residents of the adjoining residential properties in accordance with Policy DP26.

- 5.20 A Sunlight/Daylight Report by Rights of Light Consulting is included with this application. This shows that good levels of natural lighting to the new buildings will be achieved and that there will be no harm to the daylight to existing properties. The proposed development lies north of the properties in Gloucester Avenue so there will be no loss of sunlight to the properties or the gardens.
- 5.21 There will be no problems of loss of privacy or overlooking. The scheme retains the existing 6m high rear boundary wall of the Gloucester Avenue and this forms the rear wall of the new residential properties with a modest increase in its height of approximately 1.2m to form the side wall of the proposed business unit. The proposed buildings are stepped back behind this wall to avoid any harm to the outlook from these properties.
- 5.22 There are no new habitable room windows facing directly towards properties in Gloucester Avenue. The area of glazing to the rear second floor landing areas are of opaque panels to retain privacy and avoid any light pollution.
- 5.23 A Noise Report has been prepared by WSP with mitigation measures against potential noise nuisance to protect future residents has been incorporated into the scheme.

Conservation and Urban Design

- 5.24 The scheme has been designed to a very high quality respecting its local context within the Primrose Hill Conservation Area.
- 5.25 The existing workshop building is of very poor quality in terms of design and construction. We consider that this building currently has a negative impact on the conservation area. Its previous use as a car repair and service centre is also a use which is not compatible with the primarily residential character of the conservation area resulting in problems of noise and disturbance to the adjoining residents.
- 5.26 The proposed development in contrast will provide a positive enhancement to the character and appearance of the conservation area with the scale, layout

and design of the buildings carefully considered to respect the character, setting, context and the form and scale of the neighbouring mid-Victorian terraced properties.

- 5.27 Materials have also been carefully chosen to match those of the surrounding properties with the use of yellow stock brick and white render for the commercial unit fronting Dumpton Place and coloured render, brick and glazed elevations for the new houses which border onto the railway. These new houses will not be viewed directly in relation to the Gloucester Avenue houses apart from long distance and oblique views of the rear of these properties. This new terrace, does, however respect the traditional layout of properties in the area and has regard to the layout and design of the newly constructed terrace of houses to the east of the site.
- 5.28 Further details of the design approach and the relationship of the scheme to the conservation area as set out in the Architect's Design and Access Statement and the Heritage Statement prepared by CgMs Heritage.

Community Safety

- 5.29 The scheme has been designed to avoid opportunity for crime and to create a safe and secure environment. The Architects sought advice from the Metropolitan Police Crime Prevention Design Advisor at Camden Borough Police Headquarters at Holborn at an early stage in the design process and the notes of this meeting and design considerations that have been taken into account in ensuring safety for future residents and their visitors is set out in the Design and Access Statement.

Transport/Public Realm

- 5.30 The proposal is for a car free scheme and the applicants have agreed to enter into a Section 106 Agreement to prevent future occupiers being able to obtain car parking permits. The applicants have also agreed to paying a contribution to improving the public in order to enhance the appearance of Dumpton Place and

to ensure satisfactory arrangements for the servicing of the proposed development.

- 5.31 Separate refuse and recycling storage facilities are provided for the residential and commercial uses. The arrangements for servicing are explained in the Design and Access Statement.
- 5.32 Five cycle spaces are provided for the commercial premises with a cycle store provided within the building at ground floor level. Cycle stores are also provided in the basement of each house.

6.0 CONCLUSIONS

- 6.1 The proposed mixed use redevelopment scheme accords with the Council's policies which seek to promote a successful economy whilst providing opportunities for new housing and accommodation suitable for small to medium sized business entrepreneurs as part of mixed use redevelopment schemes.
- 6.2 The site is identified as an opportunity for a new Class B1/C3 development in the adopted UDP and the emerging LDF Site Allocations Preferred Approach.
- 6.3 The scheme has been designed to take account of the Council's policies for high quality sustainable development respecting its site context and the amenities for the existing and future occupants.
- 6.4 The proposal is for a car free scheme but the applicants are willing to enter into an Agreement to prevent the owners and occupiers of the new dwellings from being able to purchase car permits. A Section 106 Agreement will also allow for the provision of affordable housing and improvements to the public realm.
- 6.5 The site is within the Primrose Hill Conservation Area and has been carefully designed to respect the character and appearance of the site and surrounding area and to enhance its heritage assets.

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