



Planning Statement

248 Kilburn High Road, London, NW6 2BS

STUDIO 246 MEDIA LTD

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1 Introduction & Purpose

1.1 Introduction

- 1.1.1 This Statement comprises the Planning Statement prepared in support of a planning application for a redevelopment to provide 14 Passivhaus Lifetime Homes with associated landscaping (the 'proposed development') at 248 Kilburn High Road (the 'application site').
- 1.1.2 The applicant is Studio 246 Media Ltd.

1.2 Purpose

- 1.2.1 Planning law¹ requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The purpose of this statement is therefore, to identify development plan policies that may be relevant in the assessment of the development proposal; and to consider whether the proposal conflicts with their provisions and, if so, whether there are material considerations that outweigh any conflict with the development plan.
- 1.2.2 The Courts² have determined that it is enough that a proposal accords with the development plan when considered as a whole. It is not necessary to accord with each and every policy contained within the development plan. Indeed it is not at all unusual for development plan policies to pull in different directions.
- 1.2.3 The Planning & Compulsory Purchase Act 2004 defines the development plan for the purposes of this assessment process as the regional strategy for the region in which the site is located and development plan documents, taken as a whole, which have been approved or adopted for the area.

¹ Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004

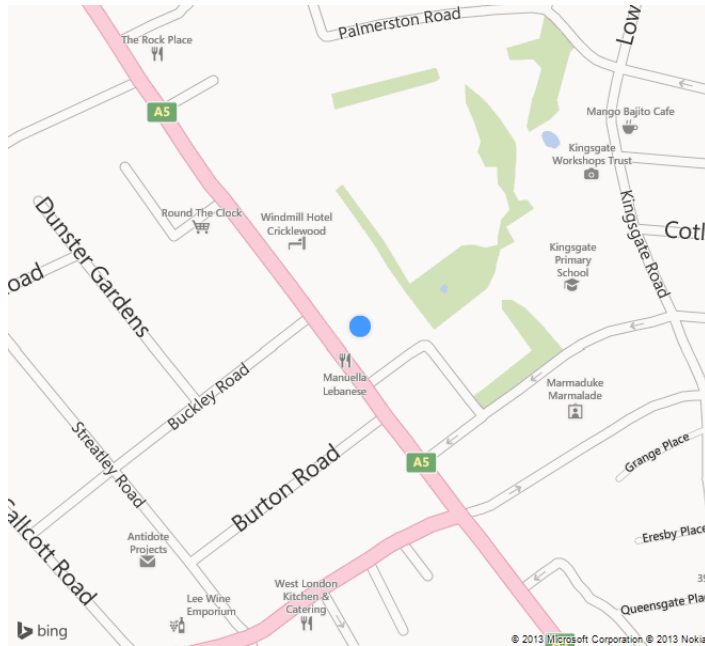
² Laura Cummins and London Borough of Camden, SETR and Barrett Homes Limited [2001]; R. v Rochdale MBC ex parte Milne [2000] & City of Edinburgh Council v. Secretary of State for Scotland [1997]

2 Site Location & Site Description

2.1 Site Location

2.1.1 The site is located on the eastern side of Kilburn High Road, with Kilburn Grange Park to the rear of the site.

2.1.2 The location is identified on the following map extract:

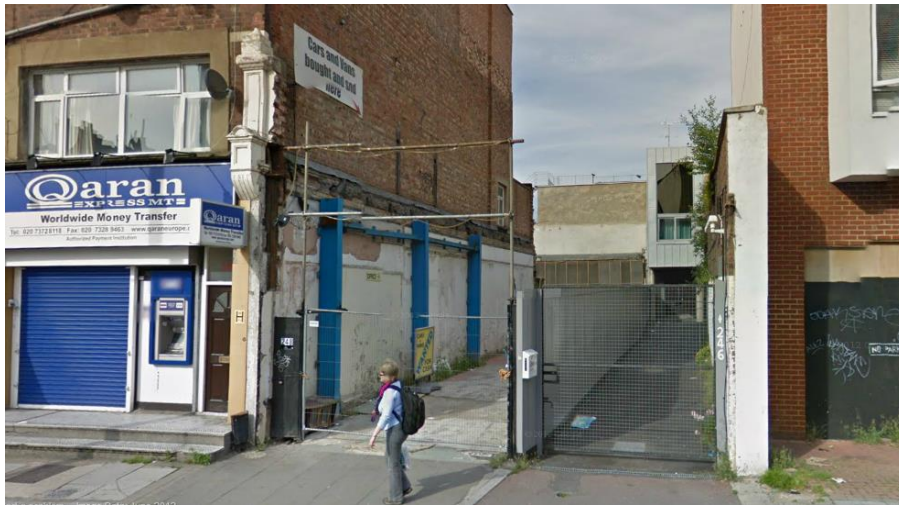


2.1.3 The area surrounding the site on Kilburn High Road is characterised by retail on the ground floor and a mix of commercial and residential uses above ground floor. The site is located in a highly accessible location, within walking distance of Kilburn Underground station and Brondesbury Overground station.

2.1.4 On the basis of the Transport for London (TfL) Planning Information Database, the site is categorised as having a PTAL rating of 6a, which equates to an ‘excellent’ level of public transport accessibility. A summary extract from the TfL Planning Information Database is attached as **APPENDIX 1**.

2.2 Site Description

- 2.2.1 The site of 246A and 248 Kilburn High Road is formed of two pieces of land: 246A to the rear, 248 fronting the High Road. The records at the Land Registry have been updated to simplify the naming to 248 Kilburn High Road. The site is 497m² in area.
- 2.2.2 The site is currently vacant and cleared of buildings and has been for 5 years or more. The previous and lawful use was B1. However the site has had previous approvals for the loss of the B1 use (2004/4552/P) and two mixed use schemes that had B1 use only at ground level (2007/3467/P & 2009/5625/P). The following image shows the site looking from Kilburn High Road.



- 2.2.3 The following aerial photograph confirms that the site is surrounded primarily by a combination of three- and four-storey buildings which are generally in retail and commercial use on the ground floor with the upper floors in a mixture of commercial and residential uses.



- 2.2.4 The site is accessed from Kilburn High Road. The site does not contain any statutory or locally listed buildings and there are no such properties adjoining or surrounding the site.
- 2.2.5 The site constitutes 'previously developed land' in accordance with the definition contained in the National Planning Policy Framework³.

³ Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

3 Proposed Development & Application Content

3.1 Proposed Development

3.1.1 The proposed development comprises:

- 14 residential units, providing 1020m² of dwelling space on a site of 497m² (0.0497ha)
- Site area of 543m² including air rights over 246 Kilburn High Road
- 4 x 1-bed, 7 x 2-bed and 3 x 3-bed units
- Shared amenity space in the form of a roof terrace comprising 59.9m²
- Individual amenity areas for each unit ranging from 6m² to 29.3m² and totalling 210.7m²
- Units sizes ranging from 50.9m² to 96.7m²
- In total 41 habitable rooms providing a density of 755 hr/ha
- The development will be car free, except for 1 disabled space
- Provision for 18 cycle parking spaces

3.1.2 The development is more fully described in the Design & Access Statement that accompanies this application.

3.2 Application Content

3.2.1 The planning application comprises:

3.2.2 Inside Out Architecture Drawings (all drawings carry the prefix P1112_P_):

- a. 100: Site location plan
- b. 101: Site plan
- c. 102: Existing plan
- d. 110: Existing street elevation
- e. 111: Existing No.250 gable elevation
- f. 112: Existing street block rear elevation
- g. 113: Existing SE elevation
- h. 114: No. 246-244 gable elevation
- i. 115: Existing SW elevation
- j. 116: Existing NE (Park) elevation
- k. 200: Proposed ground floor plan
- l. 201: Proposed first floor plan
- m. 202: Proposed second floor plan

- n. 203: Proposed third floor plan
- o. 204: Proposed fourth floor plan
- p. 205: Proposed roof plan
- q. 207: Lifetime Homes demonstration plan
- r. 210: Proposed landscaping plan
- s. 300: Courtyard block – North West elevation
- t. 301: Courtyard block – South West elevation 01
- u. 302: Courtyard block – South East elevation
- v. 303: Street block – South West elevation
- w. 304: Street block – North East elevation
- x. 305: Courtyard block – North East elevation
- y. 306: Courtyard block – South West elevation 02
- z. 307: Courtyard Green Wall – North West elevation
- aa. 310: Existing site elevation
- bb. 311: Proposed site elevation
- cc. 320: Courtyard block – detailed elevation
- dd. 321: Front block – detailed elevation
- ee. 500: Sketch planter / green roof details.

3.2.3 Reports supporting the application comprise:

- A covering letter
- Application form
- Planning Statement prepared by PDA
- Design & Access Statement prepared by Inside Out Architecture
- Energy Efficiency Statement prepared by Brooks Devlin
- Code for Sustainable Homes Pre-Assessment prepared by Brooks Devlin
- Affordable Housing Statement prepared by Framberg
- Report on Desk Study & Contamination Assessment prepared by K F Geotechnical
- Skylight & Sunlight Impact Assessment prepared by Brooks Devlin
- Construction Management Plan

4 Planning History & Pre-Application Consultation

4.1 Planning History

- 4.1.1 Planning permission was granted on 12/10/2007 for the erection of building fronting Kilburn High Road comprising ground floor retail unit (Class A1) and 4 upper floors to provide 4 x 2-bedroom residential units, plus erection of a building to the rear comprising basement and ground floor (Class B1) business use and 3 upper floors to provide 3 x 3-bedroom flats and 3 x 2-bedroom flats with balconies and terraces (2007/3467/P). No pre-commencement conditions were discharged and no s106 contributions were paid. The application therefore lapsed on the 12/10/2010.
- 4.1.2 Planning permission was granted on 17/02/2010 for amendment to planning permission 2007/3467/P dated 12/10/2007 (Erection of building fronting Kilburn High Road comprising ground floor retail unit (Class A1) and 4 upper floors to provide 4 x 2-bedroom residential units, plus erection of a building to the rear comprising basement and ground floor (Class B1) business use and 3 upper floors to provide 3 x 3-bedroom flats and 3 x 2-bedroom flats with balconies and terraces) to remove basement and other internal alterations at ground floor level with associated revisions to the south east elevation. All time scales relating to the original application including time period remained unchanged and therefore this application has also lapsed.

4.2 Pre-Application Consultation

- 4.2.1 Pre-application consultations were undertaken with Camden Council in May 2012 under reference CA\2012\ENQ\01357. The purpose of the pre-application consultation was to discuss redevelopment of the site for a mixed use scheme (commercial and residential uses) following the planning permission that was approved in February 2010 (2009/5625/P).
- 4.2.2 In terms of feedback from the Council's Planning and Conservation Officers, a meeting was held to discuss the proposals and written feedback provided. The following points were confirmed in the written feedback, a copy of which is attached as **APPENDIX 2**:

- The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8th November 2010, the London Plan 2011 and the NPPF adopted on 27th March 2012
- The previous scheme included A1 retail use on the ground floor of the front building. It is now proposed to provide B1 office floorspace within the new building fronting Kilburn High Road at ground floor level. Given that the authorised use of the original building was B1 there would be no objection to B1 unit onto Kilburn High Road
- Additional B1 floor space provided at ground floor level to the rear of the site is also considered acceptable as overall floor area of both ground floors (277 sq. m) would increase B1 office floorspace from previous music studio (209 sq. m)
- The provision of residential units at upper floor levels of the building fronting Kilburn High Road and to rear part of the site would be considered acceptable in principle. There would be an increase in the number of units from the previously approved scheme from 10 residential units to 12

- The Gross External Area of the new floors totals approximately 1335.42 sq. m and therefore exceeds the Council's threshold (1000 sq. m) for the contribution to the supply of affordable housing. In line with this policy, 13% of the development would need to be provided as affordable housing
- This would result in 75% of the units being 2 bed units and only 8% of the units would be 3 bed units. It would be necessary to reduce the number of 2 bed units to approximately 50% and provide more family units in order to provide a range of residential units to comply with Policy DP5. Whilst it is appreciated that the site is located in a busy environment and the new flats may have modestly sized private outdoor amenity space, it is located within close proximity to Kilburn Grange Park and in light of this it is considered that a scheme offering a proportion of family-sized accommodation would be required
- Please be aware of the need to meet the 16 Lifetime Homes criteria. Please also refer to policy DP6 (Lifetime Homes) which states that 10% of homes development should either meet wheelchair housing standards or be easily adapted to them
- In terms of footprint and orientation the scheme is considered to be a welcomed response from the previous scheme. There is greater space within the 'courtyard' and consideration has been given to adjoining occupiers rather than maximising the footprint
- This has resulted in an additional storey to the central block. However this will respect the scale along Kilburn High Road and would not unduly impinge on views from the park which already has individually taller building rising above the predominant three or four storey development which surround it
- There should be no issues with the architectural form of the central block. This should be continued through to the fenestration to create a cohesive piece of architecture
- Any plant or roof top equipment must be integrated within the overall design and form, particularly given the long views of the site from the park
- The use of high quality materials which relate to the site and its surroundings is encouraged
- The impact of the new building on the amenity of the existing surrounding neighbouring residential units on Kilburn High Road should be assessed in the form of a Daylight/Sunlight Report. It is also important that any daylight/sunlight study takes account of the impact on light levels reaching B1 tenants in the vicinity
- The distance between proposed habitable rooms in the new building to the rear and existing habitable rooms to units on 244, 246, 248 will need to be taken into account in the design of any new residential units. Similarly any roof terraces should be designed to minimise any overlooking impacts onto existing residential units
- Due to the close proximity of the new building to the rear of the site to existing properties fronting onto Kilburn High Road it would be necessary to take into consideration any potential sense of enclosure to any habitable residential windows
- The site has a PTAL score of 5 (excellent), which indicates that it has a good level of accessibility by public transport. The site is located within Controlled Parking Zone CA-M, which operates between 8.30 and 18:30 Monday to Friday. The development will be expected to be car free, in line with policies DP18 of the LDF and CPG 7 (transport) and this will be secured by means of a Section 106 Agreement
- Cycle parking needs to be provided in relation to the Camden Guidance and TfL cycle parking standards (1 space for 2 bedroom dwellings or less, 2 spaces for 3 bedroom dwellings or more) and should be covered, safe and secure and in line with the Camden Design Guidance in CPG 7. The location of the cycle parking area should not have an adverse impact on outlook to any existing or future residential occupiers

- Given the overall scale of development, location and limited means of access a Construction Management Plan will need to be submitted with the application. This should provide details of how the proposed development will be constructed, how the site will be accessed and the likely number of vehicle movements during the demolition and construction phases. You are advised to explore any restrictions and rights that your client has in this respect
- In order to mitigate the impact of the increase in trips this development may generate, and to tie the development into the surrounding urban environment, a financial contribution would be required to repave the footway adjacent to the site and the removal of any vehicle crossover and reinstatement of the footpath along Kilburn High Road. An estimate of the likely cost of the highway works will be provided once the planning application is submitted
- CPG guidance requires the provision of 9 sq m of open space per person for residential developments providing 5 or more additional dwellings. Open Space provision will initially be expected to be provided on site. Where a site cannot provide open space provision on site the preferred option would be to provide suitable open space off-site, but at a maximum of 400m from the development. If either of the above is not practical a financial contribution to open space will be acceptable
- All residential developments involving a net increase of 5 or more units will normally be expected to provide a contribution towards education provision in the Borough (excluding any affordable elements of a housing scheme)
- Policy DP22 and CPG (3) gives further guidance on sustainable design and construction measures and requires that a pre-development Code for Sustainable Homes Assessment be submitted as part of an application to demonstrate that the proposed new development can achieve a rating of 'very good' or more
- You are encouraged (although this would not be a statutory requirement for a proposal of this scale) to engage the Council's Crime Prevention Design Advisor
- It is recommended that appropriate site investigation works would be undertaken and a report prepared including any recommendations for remediation works would be required to be submitted as part of the application
- Anticipated heads of terms to be secured by the Section 106 Agreement could be as follows (please note that this list is indicative only):

- o Car Free development,
- o Construction Management Plan (CMP),
- o A financial contributions for any relevant repaving works in the area,
- o Compliance with Code for Sustainable Homes/BREEAM/Energy/Sustainability plan,
- o A financial contribution towards public open space calculated in line with CPG8 (planning obligations) and CPG6 (amenity) section 11 and appendix A
- o A financial contribution towards education calculated in line with CPG8 (planning obligations)

- Please note that this proposal would be subject to a Community Infrastructure Levy (CIL) which was adopted from April 2012. The Mayor of London introduced a CIL to help pay for Crossrail on 01st April 2012. Any permission granted after this time which adds more than 100 sq. m of new floorspace or a new dwelling will need to pay the CIL. The proposed charge in Camden will be £50 per sq. m on all uses except affordable housing, education, healthcare, and development by charities for their charitable purposes. Based on a floor area of 1335.42 sq. m the development would generate CIL contributions of £66,771

4.2.3 The pre-consultation process has informed the design process and the scope and content of the application. Some discussions have been undertaken with adjoining property owners to inform them of the development proposals. The Applicant has also met with the agent for the sale of 254 Kilburn High Road and with the architects of their feasibility study to discuss their respective schemes. Once they found out that the property was sold (at the end of July) contact details were passed on to the new owners but no contact has been made since. No material planning considerations have arisen as a result of these pre-application discussions with neighbours.

5 Development Plan Context & Designations

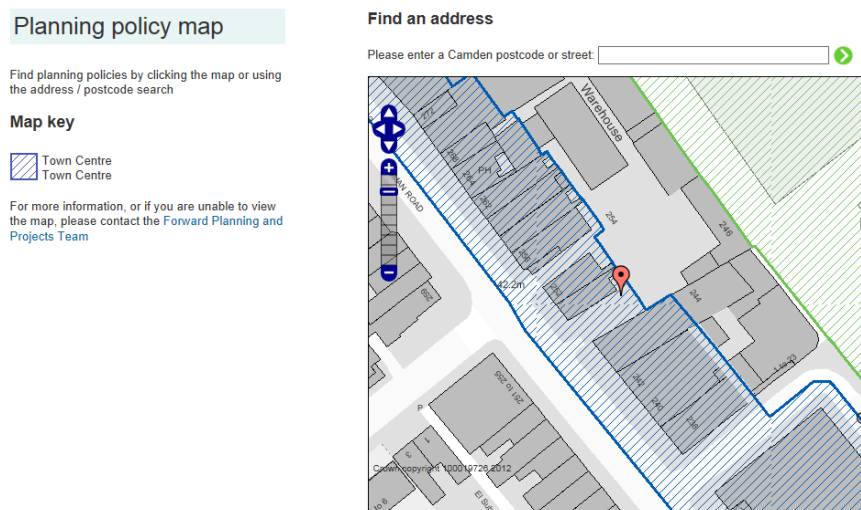
5.1 Development Plan Context

5.1.1 The development plan context in Camden is provided by the London Plan (Adopted July 2011); Camden Core Strategy (CS – Adopted November 2010) and Camden Development Policies (Adopted November 2010).

5.1.2 The LDF is accompanied by the Camden Planning Guidance (CPG) which was adopted in two stages during 2011. It comprises CPG1-8, covering matters specified in the LDF in more detail and outlining how the Council apply planning policies in Camden. It is a fully adopted Supplementary Planning Document (SDP) and therefore a material consideration in the assessment of development proposals and considered in Section 7.0.

5.2 Development Plan Designation

5.2.1 The following extract from the Core Strategy Proposals Map confirms that the only designation affecting the site is a ‘town centre’.



5.3 Relevant Development Policies

5.3.1 In terms of the London Plan, Camden is located within ‘Inner London’ for the purposes of the Plan. The following policies have been identified as relevant:

- Policy 2.9 – Inner London
- Policy 2.15 – Town Centres
- Policy 3.3 – Increasing Housing Supply
- Policy 3.4 – Optimising Housing Potential
- Policy 3.5 – Quality and Design of Housing Developments
- Policy 3.6 – Children and Young People’s Play and Informal Recreation Facilities

- Policy 3.8 – Housing Choice
- Policy 3.10 – Definition of Affordable Housing
- Policy 3.11 – Affordable Housing Targets
- Policy 3.12 – Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- Policy 3.13 – Affordable Housing Thresholds
- Policy 5.2 – Minimising Carbon Dioxide Emissions
- Policy 5.3 – Sustainable Design and Construction
- Policy 5.13 – Sustainable Drainage
- Policy 6.9 – Cycling
- Policy 6.13 – Parking
- Policy 7.2 – An Inclusive Environment
- Policy 7.3 – Designing out Crime
- Policy 7.4 – Local Character
- Policy 7.6 – Architecture

5.3.2 The following Camden Core Strategy planning policies are considered relevant:

- Policy CS1 - Distribution of Growth
- Policy CS3 - Other highly accessible areas
- Policy CS5 - Managing the impact of growth and development
- Policy CS6 - Providing quality homes
- Policy CS7 - Promoting Camden's centres and shops
- Policy CS11 - Promoting sustainable and efficient travel
- Policy CS13 - Tackling climate change through promoting higher environmental standards
- Policy CS14 - Promoting high quality places and conserving our heritage
- Policy CS17 - Making Camden a safer place
- Policy CS18 - Dealing with our waste and encouraging recycling

5.3.3 In following Camden Development Management Policies are considered to be relevant:

- Policy DP2 - Making full use of Camden's capacity for housing
- Policy DP3 - Contributions to the supply of affordable housing
- Policy DP5 - Homes of different sizes
- Policy DP6 - Lifetime homes and wheelchair homes
- Policy DP13 - Employment sites and premises
- Policy DP16 - The transport implications of development

- Policy DP17 - Walking, cycling and public transport
- Policy DP18 - Parking standards and limiting the availability of car parking
- Policy DP19 - Managing the impact of parking
- Policy DP22 - Promoting sustainable design and construction
- Policy DP23 – Water
- Policy DP24 - Securing high quality design
- Policy DP26 - Managing the impact of development on occupiers and neighbours
- Policy DP31 - Provision of, and improvements to, open space and outdoor sport and recreation facilities

6 Planning Policy Assessment

6.1.1 The following assessment set out in Table 6.1 considers the relevant development plan policies identified in the preceding section and the degree to which the proposed development complies with their provisions or not as the case may be.

Table 6.1 Planning Policy Assessment

Policy #	Policy Requirement	Assessment	Compliance	Conflict
London Plan 2011				
2.9	The Mayor will, and boroughs and other stakeholders should, work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, and improving quality of life and health for those living, working, studying or visiting there	The proposed development utilises a vacant site in a designated town centre and provides additional housing. It will assist in realising the potential of the wider area and enhance both economic and demographic growth whilst improving the environment in compliance with this policy	✓	
2.15	Development proposals in town centres should conform with policies 4.7 and 4.8 and: a sustain and enhance the vitality and viability of the centre b accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations c support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services d be in scale with the centre e promote access by public transport, walking and cycling f promote safety, security and lifetime neighbourhoods g contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure h reduce delivery, servicing and road user conflict	The proposed development will contribute to sustaining and enhancing the vitality and viability of the town centre by re-using a vacant site and providing for housing growth through intensification in a highly sustainable location	✓	
3.3	Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1 and, if a target beyond 2021 is required, roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target. Annual average housing provision monitoring targets 2011-2021 Camden 6,650 665	The proposed development provides additional housing and therefore contributes to meeting the housing targets for the Borough	✓	
3.4	Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for	The proposed development will optimise housing output. Whilst the density (755 hr/ha) is at the upper end of the density range and slightly exceeds the upper threshold of 700	✓	

	different types of location within the relevant density range shown in Table 3.2. [200-700 hr/ha 4 to 6 URBAN]	hr/ha in the range set out in Table 3.2, the supporting text to the policy acknowledges that the density ranges provide a framework for boroughs to refine. The proposal does take account of local context, the design principles and public transport capacity and is considered appropriate for the site and locality. However it is acknowledged that the density slightly exceeds the range set out in Table 3.2, but of insufficient magnitude to conflict with this policy		
3.5	The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people. LDFs should incorporate minimum space standards that generally conform with Table 3.3. The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. 1p 37 1b2p 50 2b3p 61 2b4p 70 3b4p 74 3b5p 86 3b6p 95	The DAS outlines the design approach adopted for the site. The design solution is considered to enhance the quality of the place and takes into account the local physical context. The size of the dwellings complies with the minimum recommended space standards	✓	
3.6	Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation sets out guidance to assist in this process.	The site does not offer any scope for on-site play space and the scale of the development would not justify it. The proposal does include amenity space for each dwelling which is considered commensurate with the mix and type of units. The site also benefits from close proximity to Kilburn Grange Park where a range of recreational facilities are available	✓	
3.8	A New developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors, including the private rented sector, in meeting these B provision of affordable family housing is addressed as a strategic priority in LDF policies C all new housing is built to 'The Lifetime Homes' standards ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users	A range of unit sizes is proposed and the units are planned for Lifetime Homes with a 10% wheelchair accessible provision In terms of affordable housing the supporting Affordable Housing Statement confirms that 'as the GLA Toolkit produces a negative residual value against the land acquisition cost, no apartments have been dedicated for Affordable Housing; all 14 units are proposed for private sale by the developer'. The proposals therefore comply in part with the provisions of this policy, but do not in regard of affordable housing on viability grounds	✓	✗
3.12	The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to: a current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 and 3.10 and 3.11 b affordable housing targets adopted in line with Policy 3.11,	In terms of affordable housing the supporting Affordable Housing Statement confirms that 'as the GLA Toolkit produces a negative residual value against the land acquisition cost, no apartments have been dedicated for Affordable Housing; all 14 units are proposed for private sale by the developer'. The policy allows for development viability to be factored into the affordable housing assessment and therefore, in this respect the	✓	✗

	<p>c the need to encourage rather than restrain residential development (Policy 3.3), d the need to promote mixed and balanced communities (Policy 3.9)</p> <p>e the size and type of affordable housing needed in particular locations</p> <p>f the specific circumstances of individual sites.</p> <p>B Negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for reappraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.</p>	<p>application is policy compliant</p>		
3.13	<p>Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes, applying the density guidance set out in Policy 3.4 of this Plan and Table 3.2.</p>	<p>The proposed development does not include a component of affordable housing on the basis that this renders the scheme unviable. The GLA Toolkit (2012) was used to assess the financial viability of providing Affordable Housing, S106, and CIL financial contributions from the proposed scheme at 248 Kilburn High Road and this is submitted with the application to demonstrate that the development is not viable if affordable housing is included. Whilst therefore there is conflict with the terms of the policy, the requirement is caveated by 'should normally' and therefore is not prescriptive</p>		✘
5.2	<p>Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:</p> <ol style="list-style-type: none"> 1 Be lean: use less energy 2 Be clean: supply energy efficiently 3 Be green: use renewable energy <p>The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.</p> <p>Residential buildings: Year Improvement on 2010 Building Regulations 2010 – 2013 25 per cent (Code for Sustainable Homes level 4) 2013 – 2016 40 per cent 2016 – 2031 Zero carbon</p> <p>Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.</p>	<p>The application is supported by an Energy Efficiency Strategy which confirms that the proposed development will be constructed to the exemplary Passivhaus standard. In summary the assessment concludes that: <i>The calculations completed for this report conclude that adoption of the Passivhaus standard will deliver significant carbon emission reductions in comparison to a conventional 'Be Lean, Be Clean, Be Green' approach.</i> <i>A conventional Be Lean, Be Clean, Be Green approach, including 10.5KWp of PV delivers a maximum emissions reduction compared to a base case Part L1a compliant scheme of 18% (as calculated by the more accurate Passivhaus Planning Package).</i> <i>In contrast, the scheme as proposed adopts an exemplary fabric first approach and delivers a 32% reduction in total carbon dioxide emissions compared to the same base case Part L1a compliant scheme (as calculated by the more accurate Passivhaus Planning Package).</i> <i>Furthermore, the quality assurance process incorporated into Passivhaus certification will deliver a scheme where the actual space heating consumption will be within an acceptable margin (+/-10%) of that predicted at design stage. This is compared to typical UK practice where actual performance can be at least 50% worse than predicted.</i> <i>It therefore proposed to develop the scheme to meet the Passivhaus certification standard in lieu of the London Plan Energy Hierarchy requirements. It has been demonstrated that this will result in lower</i></p>	✓	

		<p><i>annual carbon emissions.</i> <i>Notwithstanding the above, it can also be confirmed (via SAP modelling) that adoption of the Passivhaus standard as detailed in this report will comfortably satisfy the mandatory performance requirements for Code for Sustainable Homes Level 4.</i></p>		
5.3	<p>B Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.</p> <p>C Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:</p> <ul style="list-style-type: none"> a minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems) b avoiding internal overheating and contributing to the urban heat island effect c efficient use of natural resources (including water), including making the most of natural systems both within and around buildings d minimising pollution (including noise, air and urban run-off) e minimising the generation of waste and maximising reuse or recycling f avoiding impacts from natural hazards (including flooding) g ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions h securing sustainable procurement of materials, using local supplies where feasible, and i promoting and protecting biodiversity and green infrastructure. 	<p>The planning application is supported by an Energy Efficiency Strategy and Code for Sustainable Homes Pre-Assessment which confirms that the energy efficiency will exceed the London Plan standards and that based on the information available to date, the scheme has the potential to comfortably satisfy the minimum performance standards to achieve Code for Sustainable Homes Level 4.</p> <p>The application is also supported by a Construction Management Plan which outlines the sustainability of the approach to construction</p>	✓	
5.13	<p>Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:</p> <ul style="list-style-type: none"> 1 store rainwater for later use 2 use infiltration techniques, such as porous surfaces in non-clay areas 3 attenuate rainwater in ponds or open water features for gradual release 4 attenuate rainwater by storing in tanks or sealed water features for gradual release 5 discharge rainwater direct to a watercourse 6 discharge rainwater to a surface water 	<p>The supporting DAS contains a section on SUDS and confirms that the proposed development is designed to capture, filter and store rainfall and runoff to reduce the volume and rate of water leaving the site. Collection of rainfall and runoff will be linked into the grey water harvesting system and utilised for care of onsite landscaping which will also reduce the overall municipal water demand of the development. The permeable pavers and landscaping in the courtyard are designed to absorb a majority of rainfall, but any runoff will be diverted to drainage grates and then into the grey water harvesting system for the development subject to engineering feasibility.</p> <p>Drainage and reuse of grey water for plantings associated with both green roofs and green walls are indicated on the submitted drawings.</p>	✓	

	sewer/drain 7 discharge rainwater to the combined sewer. Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.			
6.9	B Developments should: a provide secure, integrated and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 b provide on-site changing facilities and showers for cyclists. For dwellings the standards is 1 per 1 or 2 bed unit and 2 per 3 or more bed unit	18 cycle parking spaces are proposed to serve the 14 units. This level of provision is consistent with the policy standard. The spaces are secure, integrated and accessible	✓	
6.13	The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be applied to planning applications. Maximum residential parking standards Number of Beds 4 or more 3 1-2 2 – 1.5 per unit 1.5 –1 per unit Less than 1 per unit All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit	The proposed development will be car free except for the provision of 1 disabled space. The car free nature of the proposal is considered entirely compatible with the policy given the excellent PTAL rating of the location	✓	
7.2	The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments: in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments: a can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances b are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment c are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways d are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.	The inclusivity of the design approach is explained in the supporting DAS and confirms policy compliance	✓	
7.3	Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.	Preliminary discussions have been held with the Camden Crime Prevention Adviser and the feedback has guided the design approach. This is confirmed in the DAS	✓	
7.4	Buildings, streets and open spaces should provide a high quality design response that: a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass b contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area c is human in scale, ensuring buildings create a positive relationship with	The DAS demonstrates that the design approach is both considered and of high quality and that the considerations included in this policy have been addressed	✓	

	<p>street level activity and people feel comfortable with their surroundings</p> <p>d allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area</p> <p>e is informed by the surrounding historic environment.</p>			
7.6	<p>Buildings and structures should:</p> <p>a be of the highest architectural quality</p> <p>b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm</p> <p>c comprise details and materials that complement, not necessarily replicate, the local architectural character</p> <p>d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.</p> <p>This is particularly important for tall buildings</p> <p>e incorporate best practice in resource management and climate change mitigation and adaptation</p> <p>f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces</p> <p>g be adaptable to different activities and land uses, particularly at ground level</p> <p>h meet the principles of inclusive design</p> <p>i optimise the potential of sites.</p>	<p>The proposed development has been through a lengthy design gestation process, which has included pre-application consultation. The result is a considered design response which is deemed appropriate to its context; creates interest and activity at ground level; is inclusive and most importantly optimises the potential of the site and enhances the overall streetscape</p>	✓	
Camden Core Strategy 2010				
CS1	<p>Promotes the most efficient use of land and buildings in Camden seeking development that makes full use of its site and seeks a mix of uses in suitable schemes, in particular in the most accessible parts of the borough.</p>	<p>The proposed development will make the fullest use of a vacant site in a highly sustainable location to meet this policy requirement</p>	✓	
CS2	<p>Confirms that the Council will promote appropriate development in the highly accessible areas including Kilburn High Road. These areas are considered suitable for uses including homes, shops, offices and that development in these locations is of a suitable scale and character for the area.</p>	<p>The proposed development is appropriately located in an accessible location and includes an appropriate use consistent with the scale and character of the area in compliance with this policy</p>	✓	
CS5	<p>Promotes uses that meet the needs of Camden's population as well as making sure that the impact of developments on their occupiers and neighbours is fully considered</p>	<p>The proposed development will provide additional housing in a sustainable and accessible location. The impact on neighbouring properties has been considered and assessed in a daylight and sunlight assessment which supports the planning application. This assessment has been prepared in accordance with the methodologies set out in BRE report 209 – Site Layout Planning for Sunlight and Daylight, Littlefair, 2nd Edition, 2011 (BR 209). On the basis of the modelling carried out the following observations and conclusions are drawn:</p> <ul style="list-style-type: none"> Detailed assessment has shown that all existing windows serving rooms in adjacent properties covered under BR 209 are predicted to enjoy a VSC either above 27% 	✓	

		<p>and/or not less than 0.8 times a previous value after development in accordance with the advisory guidance.</p> <ul style="list-style-type: none"> · A small high level window along the South East boundary of the site is predicted to have its VSC reduced beyond the above suggested limits. However, as this particular window lies close to the site boundary and is therefore taking more than its fair share of light, a revised VSC target value of 17% has been derived in accordance with Appendix F of BRE Report 209 and is achieved. · Two small high level windows along the South East boundary are predicted to have their APSH reduced beyond the limits advised in BR 209, but as these windows are sited very close to the boundary this result is not deemed to be unacceptable or breach the policy 		
CS6	Aims to maximise Camden's capacity for housing to meet or exceed Camden's target of 5,950 homes from 2007-2017 as well as the maximum reasonable amount of affordable housing provision	The proposed development will provide additional housing which will contribute to meeting the Council's housing target. Affordable housing is not provided on site because of the negative impact that it will have on development viability	✓	
CS7	Confirms Kilburn High Road as a town centre where the Council will promote successful and vibrant centres to serve the needs of residents, workers and visitors	The proposed development will contribute to the promotion of a successful and vibrant centre by utilising a vacant previously developed site for new housing and therefore serving the needs of residents. The site has been vacant for 5 years or more	✓	
CS8	Aims to secure a strong economy through promoting office provision to meet the forecast demand of 615,000 sqm to 2026 as well as safeguarding existing employment sites	The site is currently vacant, but previously accommodated an employment use. However, previous planning decisions have allowed the previous employment use to be replaced and the fact that the site is now vacant means that it now longer qualifies as an existing employment site	✓	
CS13	Requires all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental situations	The planning application is supported by an Energy Efficiency Strategy and Code for Sustainable Homes Pre-Assessment which confirms that the energy efficiency will exceed the London Plan standards and that based on the information available to date, the scheme has the potential to comfortably satisfy the minimum performance standards to achieve Code for Sustainable Homes Level 4. The application is also supported by a Construction Management Plan which demonstrates the potential for sustainability of the construction process and the procurement of building materials	✓	
CS14	Requires development of the highest standard of design that respects local context and character as well as seeking the highest standards of access	The DAS demonstrates that the design approach is to the highest standard and respects the local context. It has been informed by a pre-application engagement which has tested the design assumptions	✓	
CS17	Requires developments to demonstrate that they have incorporated design principles which contribute to community safety	Preliminary discussions have been held with the Camden Crime Prevention Adviser and the feedback has guided the design approach and this is recorded in the DAS	✓	
CS18	Aims to make sure that developments include facilities for the storage and collection of waste and recycling	The submitted drawings confirm that provision has been made for refuse storage and collection which is both accessible to	✓	

		residents and the collection agency and fully integrated in to the development. Collection is available within 10m of the public highway		
Camden Development Policy Documents 2010				
DP1	Requires a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing	The proposal does not provide for a mix of uses. However this is considered appropriate given the configuration of the site and the inability to provide for independent servicing. The proposal will contribute to the supply of housing in the Borough	✓	
DP2	Aims to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing and expect the maximum appropriate contribution to supply of housing on sites that are underused or vacant	The proposal will contribute to maximising the supply of additional homes in the Borough and utilises a vacant site	✓	
DP3	Expects all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. The Council will negotiate the development of individual sites and related sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace, but will apply the target with regard to a sliding scale	The proposal does not include any affordable housing. However viability evidence is advanced to justify this omission		✗
DP5	Aims to create mixed and inclusive communities by securing a range of self-contained homes of different sizes bedroom homes). The Council will consider large homes to be homes with 3-bedrooms or more. The Council's priorities for market housing are contained in a 'Dwelling Size Priorities Table' which affords the highest priority to 2-bed units; medium priority for 3-bed and a lower priority for 1-bed units. The overall aim is that 40% of units are 2-bed	The proposed mix is 50% of units as 2-bed and this exceeds the policy aim	✓	
DP6	All housing development should meet Lifetime Homes standards and 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them	The proposed development will meet Lifetime Homes standards and 10% of the units are wheelchair accessible	✓	
DP13	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.	Planning permission has previously been granted for the redevelopment of the site without retaining a B1 use and so a precedent has been established and evidence provided sufficient to satisfy the Council as to the loss of the employment use.	✓	
DP16	Aims to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links	The site has an excellent PTAL rating. Provision is included within the development for cycle parking and the location within a designated town centre ensures that access by foot is possible to a wide range of local services and facilities	✓	
DP17	Promotes walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport	The site has an excellent PTAL rating. Provision is included within the development for cycle parking and the location within a designated town centre ensures that access by foot is possible to a wide range of local services and	✓	

		facilities		
DP18	Expects developments to be car free in the Kilburn High Road area.	The development will be car free consistent with this policy. The only exception is the provision of one disabled space	✓	
DP22	Requires development to incorporate sustainable design and construction measures	The planning application is supported by an Energy Efficiency Strategy and Code for Sustainable Homes Pre-Assessment which confirms that the energy efficiency will exceed the London Plan standards and that based on the information available to date, the scheme has the potential to comfortably satisfy the minimum performance standards to achieve Code for Sustainable Homes Level 4. The application is also supported by a Construction Management Plan which demonstrates the potential sustainability of the construction process and the procurement of building materials	✓	
DP23	Requires developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding	The supporting DAS contains a section on SUDS and confirms that the proposed development is designed to capture, filter and store rainfall and runoff to reduce the volume and rate of water leaving the site subject to engineering feasibility. Collection of rainfall and runoff will be linked into the grey water harvesting system and utilised for care of onsite landscaping which will also reduce the overall municipal water demand of the development. The permeable pavers and landscaping in the courtyard are designed to absorb a majority of rainfall, but any runoff will be diverted to drainage grates and then into the rain water harvesting system for the development. Drainage and reuse of rain water for plantings associated with both green roofs and green walls are indicated on the submitted drawings.	✓	
DP24	Requires all developments to be of the highest standard of design	The DAS confirms that the design has been prepared to reflect the context. It has also been informed by a pre-consultation engagement and is considered to deliver the high quality required by this policy	✓	
DP26	Protects the quality of life occupiers and neighbours by only granting permission that does not cause harm to amenity. Factors to be considered are: 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. Also requires 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, recycling and disposal of waste; j) facilities for bicycle storage; and k) outdoor space for private or communal amenity space, wherever practical.	The impact on neighbouring properties has been considered and assessed in a daylight and sunlight assessment which supports the planning application. This assessment has been prepared in accordance with the methodologies set out in BRE report 209 – Site Layout Planning for Sunlight and Daylight, Littlefair, 2nd Edition, 2011 (BR 209). On the basis of the modelling carried out the following observations and conclusions are drawn: • Detailed assessment has shown that all existing windows serving rooms in adjacent properties covered under BR 209 are predicted to enjoy a VSC either above 27% and/or not less than 0.8 times a previous value after development in accordance with the advisory guidance. • A small high level window along the South East boundary of the site is predicted to have its VSC reduced beyond the above suggested limits. However, as this particular window lies close to the site boundary and is	✓	

		<p>therefore taking more than its fair share of light, a revised VSC target value of 17% has been derived in accordance with Appendix F of BRE Report 209 and is achieved.</p> <ul style="list-style-type: none"> Two small high level windows along the South East boundary are predicted to have their APSH reduced beyond the limits advised in BR 209, but as these windows are sited very close to the boundary this result is not deemed to be unacceptable or breach the policy. <p>None of the other factors identified in this policy are considered pertinent.</p> <p>The proposals are compliant with the standards for residential accommodation and provide adequate and accessible storage facilities for refuse and cycles</p>		
DP29	Promotes fair access and aims to remove the barriers that prevent people from accessing facilities and opportunities	The proposed development is Lifetime Homes compliant and 10% of the proposed units are wheelchair accessible	✓	
DP31	Seeks to ensure the quantity and quality of open space and outdoor sport and recreation facilities in Camden are increased and deficiencies and under provision are not made worse, 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. Priority will be given to the provision of publicly accessible open space.	Provision has been made for a contribution to open space provision in compliance with the terms of this policy	✓	

6.1.2 In summary, the above assessment of the relevant planning policies in the adopted development plans confirms that there is no major conflict with their provisions and the statutory test imposed by Section 70(2) of the Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004 is met. The only aspect where policy is not complied with is in the omission of affordable housing on site. However this is justified on viability grounds and such an approach is considered acceptable and appropriate under the terms of the relevant policies. A minor exceedence of the London Plan density threshold is not considered to be a major conflict with the development plan. In terms of energy conservation the Passivhaus concept exceeds the development plan policy requirements.

7 Material Considerations

7.1 National Planning Policy Framework

7.1.1 The Government's National Planning Policy Framework (March 2012) (the 'Framework') is a material consideration in the assessment of planning applications. The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development and that the policies contained in paragraphs 18-219 of the Framework, taken as a whole, constitute the Government's view of what sustainable development means in practice for the planning system. In brief, sustainable development is about change for the better, and not only in the built environment. Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.

7.1.2 The Framework confirms that there are three dimensions to sustainable development – economic, social and environmental; and that these dimensions give rise to the need for planning to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

7.1.3 The Framework emphasises that these roles should not be undertaken in isolation, because they are mutually dependent. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

7.1.4 The Framework confirms that at its heart is a presumption in favour of sustainable development and that for decision taking this means approving development proposals that accord with the development plan without delay. The Framework contains a set of 12 core land-use principles that should underpin plan-making and decision-taking and these include that planning should:

- ● not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;

- ● proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- ● always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- ● take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- ● support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
- ● contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- ● encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- ● promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
- ● conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- ● actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- ● take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

7.1.5 The Framework sets out the Government’s policy on the Housing. It confirms that housing applications should be considered in the context of the presumption in favour of sustainable development.

7.1.6 The Framework also sets out the Government’s policy on town centres and seeks to ensure their vitality. Local Planning Authorities are therefore advised in drawing up Local Plans to recognise that residential development can play an important role in ensuring the vitality of centres and to set out policies to encourage residential development on appropriate sites.

7.1.7 In terms of design, the Framework confirms good design is a key aspect of sustainable development and is indivisible from good planning. Planning decisions are required to ensure that developments:

- ● will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- ● establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- ● optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- ● respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- ● create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- ● are visually attractive as a result of good architecture and appropriate landscaping.

- 7.1.8 The national design policies and aspirations are considered complied with as articulated in the DAS.
- 7.1.9 An assessment of the Framework in terms of design, housing and town centres confirms that the proposed development is consistent with national planning policies and this provides further support for the proposed development.

7.2 London Plan Supplementary Planning Guidance

- 7.2.1 The Mayor's SPG 'Housing' (November 2012) contains the residential design, density and space standards that will apply to new residential developments. These reflect the space and density standards set out in the London Plan, but also provide more detailed guidance on individual room sizes and internal layouts.
- 7.2.2 The proposed development has been assessed against the individual room and amenity spaces standards contained within the SPG and is compliant.

7.3 Camden Supplementary Planning Guidance

- 7.3.1 Although they are not part of the statutory development plan, Camden's Supplementary Planning Documents are material to any planning decisions.
- 7.3.2 Camden Planning Guidance in respect of 1 - Design (Adopted September 2013); 2 – Housing (Adopted September 2013); 3 – Sustainability (Adopted September 2013); 5 – Town Centres, retail & employment (Adopted September 2013); 6 – Amenity (Adopted September 2011); 7 – Transport (Adopted September 2011) and 8 – Planning Obligations (Adopted September 2011).
- 7.3.1 **CPG 1 (Design):** Outlines the importance of high quality design to the success of a development as well the need to demonstrate that all impacts of a proposed development on crime and safety have been considered.
- 7.3.2 **CPG 2 (Housing):** States that residential and mixed-use developments that area adding 1000 sqm gross housing or more should provide affordable housing and that most mixed-use developments should provide a proportion of affordable housing depending on their capacity for homes. Development should also provide a high quality of housing that provides secure, well-lit accommodation that has well-designed layouts and forms and should meet lifetime homes standards. The CPG also outlines the minimum space standards required for new development.
- 7.3.3 **CPG 3 (Sustainability):** All development should be designed to reduce carbon dioxide emissions and as a guide, at least 10% of the project cost should be spent on environmental improvements. Developments are to target a 20% reduction in carbon dioxide emissions from on-site renewable energy technologies and all developments should be water efficient. The CPG outlines the aim to reduce waste by re-using your building and where this is not possible, the waste hierarchy should be implemented which prioritise the reduction, re-use and recycling of materials.
- 7.3.4 **CPG 5 (Town Centres, retail and employment):** aims to protect the retail functions of town centres by ensuring that there is a high proportion of premises in shopping use. In instances where the principle of redevelopment of an employment site is accepted, the priority will be to secure permanent housing and/or community use.
- 7.3.5 **CPG 6 (Amenity):** expects all buildings to receive adequate daylight and sunlight. Development should be designed to protect the privacy of existing dwellings and mitigation measures are to be included when overlooking is unavoidable. Developments also need to be designed to ensure they are accessible and useable by all to promote equality of opportunity.

7.3.6 Reference was made to the Camden Planning Guidance during the pre-application process and this has been reflected in the submitted design. It is not considered therefore that any of the Camden Guidance is contravened.

8 Summary & Conclusion

8.1 Summary

- 8.1.1 In summary, this Planning Statement has been prepared in support of a planning application for a proposed residential development at 248 Kilburn High Road, London, NW6 2BS.
- 8.1.2 The purpose of this statement is to identify development plan policies that maybe relevant in the assessment of the development proposal; and to consider whether the proposal conflicts with their provisions and, if so, whether there are material considerations that outweigh any conflict with the development plan.
- 8.1.3 The site is a vacant parcel of land, located within the Kilburn designated town centre and with an excellent PTAL of 6a. It is 497m² in area and is flanked by three/four storey properties in commercial use at ground floor with mixed commercial/residential uses on the upper floors.
- 8.1.4 The development plan context in Camden is provided by the London Plan; Camden Core Strategy and Development Policy Documents (DPD) which were adopted in 2011 and 2010 respectively.
- 8.1.5 An assessment of the relevant planning policies in the adopted development plans confirms that there is no significant conflict with their provisions and that the statutory test imposed by Section 70(2) of the Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004 is met. The only departure from the development plan is in respect of the omission of an element of affordable housing. However viability evidence is submitted in support of the application and demonstrates that the inclusion of affordable housing negatively impacts on development viability and would prejudice the development of the site. A minor exceedence of the London Plan density threshold is not considered significant because the design approach and the objective of optimising previously developed land in a sustainable urban area are more important determinants of an appropriate design approach.
- 8.1.6 The National Planning Policy Framework is a material consideration in the assessment of the development proposal. An assessment of the Framework in terms of design, housing and town centres confirms that the proposed development is consistent with national planning policies and provides further support for the application.
- 8.1.7 Camden Planning Guidance has also been considered and the proposed development is compliant with this guidance.
- 8.1.8 Finally the proposed development has been subject to pre-application consultation both with the Council and neighbouring owners and this has informed the submitted design.

8.2 Conclusion

- 8.2.1 In conclusion, this assessment confirms that the development proposal accords with the provisions of the development plan and as a consequence a presumption in favour of a grant of planning permission is derived.
- 8.2.2 Material considerations in the form of the NPPF and SPDs provide further support to a grant of planning permission.

APPENDICES

APPENDIX ONE:
PTAL SUMMARY ASSESSMENT

PTAI Study Report File Summary

PTAI Run Parameters

PTAI Run 20132710153212
Description 20132710153212
Run by user PTAL web application
Date and time 27/10/2013 15:32

Walk File Parameters

Walk File PLSQLTest
Day of Week M-F
Time Period AM Peak
Walk Speed 4.8 kph
BUS Walk Access Time (mins) 8
BUS Reliability Factor 2.0
LU LRT Walk Access Time (mins) 12
LU LRT Reliability Factor 0.75
NATIONAL_RAIL Walk Access Time (mins) 12
NATIONAL_RAIL Reliability Factor 0.75

Coordinates: 524989, 184224

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Weight	Walk time (mins)	SWT (mins)	TAT (mins)	EDF	AI
BUS	WEST END LN MESSINA AVE	139	527.36	7.5	0.5	6.59	6.0	12.59	2.38	1.19

BUS	KILBURN MARKET	328	526.12	9.0	0.5	6.58	5.33	11.91	2.52	1.26
BUS	KILBURN H RD BUCKLEY RD	316	29.24	6.5	0.5	0.37	6.62	6.98	4.3	2.15
BUS	KILBURN H RD BUCKLEY RD	332	29.24	5.5	0.5	0.37	7.45	7.82	3.84	1.92
BUS	KILBURN H RD BUCKLEY RD	189	29.24	6.5	0.5	0.37	6.62	6.98	4.3	2.15
BUS	KILBURN H RD BUCKLEY RD	32	29.24	7.5	0.5	0.37	6.0	6.37	4.71	2.36
BUS	KILBURN H RD BUCKLEY RD	16	29.24	9.0	1.0	0.37	5.33	5.7	5.26	5.26
BUS	WILLESDEN L KILBURN H RD	98	205.75	10.0	0.5	2.57	5.0	7.57	3.96	1.98
LU LRT	Kilburn	Jubilee Line Stratford to Stanmore	563.11	17.8	1.0	7.04	2.44	9.47	3.17	3.17
LU LRT	Kilburn	Jubilee Line Willesden Green to Stratford	563.11	4.4	0.5	7.04	7.57	14.61	2.05	1.03
LU LRT	Kilburn	Jubilee Line Stratford to Wembley Park	563.11	4.4	0.5	7.04	7.57	14.61	2.05	1.03
NATIONAL_RAIL	KILBURN HIGH ROAD BR	LONDON EUSTON BR to WATFORD JUNCTION	802	3.0	0.5	10.03	10.75	20.78	1.44	0.72
NATIONAL_RAIL	BRONDESURY	CLAPHAM JUNCTION to STRATFORD	332.1	2.0	0.5	4.15	15.75	19.9	1.51	0.75
NATIONAL_RAIL	BRONDESURY	RICHMOND to STRATFORD	332.1	4.0	1.0	4.15	8.25	12.4	2.42	2.42

Total AI for this POI is 27.39.

PTAL Rating is 6a.

APPENDIX TWO:
PRE-APPLICATION CONSULTATION RESPONSE

Pre-application meeting report



Agents name and address:

Colin Pennington
IOA Architecture
6-8 Cole Street
London
SE1 4YH

Site address:

246a-248 Kilburn High Road

Meeting date:

04/05/2012

Case Ref:

CA\2012\ENQ\01357

Proposal(s)

Front part of the site:

Demolition of the existing single storey building and erection of a five storey building fronting Kilburn High Road that would provide 44 sq.m of B1 office floorspace at ground floor level and 4 x 2 bed units at first to fourth floor levels

Rear part of the site:

Erection of a five storey building to the rear of 248 Kilburn High Road providing 233 sq. m of B1 office floorspace at ground floor level and 2 x 1 bed units, 5 x 2 bed units and 1 x 3 bed units at first to fourth floor levels

Lead officer for Camden:

Elaine Quigley (Senior Planning Officer – West Area Team)

Other Camden officers attending:

Charlie Rose (Conservation and Urban Design)

Applicant(s)/Agents(s) attending:

Colin Pennington (Inside Out Architecture Ltd)
(Inside Out Architecture Ltd)

Principal issues discussed at our meeting	
Introduction/Purpose of Meeting	To discuss redevelopment of site for a mixed use scheme (commercial and residential uses) following a planning permission that was approved in February 2010 (ref 2009/5625/P)
Planning history	<p>Planning permission was granted on 12/10/2007 for erection of building fronting Kilburn High Road comprising ground floor retail unit (Class A1) and 4 upper floors to provide 4 x 2-bedroom residential units, plus erection of a building to the rear comprising basement and ground floor (Class B1) business use and 3 upper floors to provide 3 x 3-bedroom flats and 3 x 2-bedroom flats with balconies and terraces (2007/3467/P). No pre-commencement conditions discharged and no s106 contributions paid. Therefore application lapsed 12/10/2010.</p> <p>Planning permission was granted on 17/02/2010 for amendment to planning permission 2007/3467/P dated 12/10/2007 (Erection of building fronting Kilburn High Road comprising ground floor retail unit (Class A1) and 4 upper floors to provide 4 x 2-bedroom residential units, plus erection of a building to the rear comprising basement and ground floor (Class B1) business use and 3 upper floors to provide 3 x 3-bedroom flats and 3 x 2-bedroom flats with balconies and terraces) to remove basement and other internal alterations at ground floor level with associated revisions to the south east elevation. All time scales relating to original application including time period still remained (this application has therefore also lapsed).</p>
Implementation of the previous scheme	The original planning permission would only be implemented if all outstanding financial contributions (education, open space, highway contributions, sustainability plan, lifetime homes plans, construction transport plan) and pre-commencement conditions have been discharged. This has not been undertaken to date. Demolition of buildings on site would not constitute implementation of the original permission.
Land use principles	<p>The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8th November 2010, the London Plan 2011 and the NPPF adopted on 27th March 2012.</p> <p>The aim of the LDF is to seek to move away from the strictly land use based plans with a compendium of detailed policies and regulatory standards, towards plans which provide a strategic vision and objectives for the future of an area over time. The LDF aims to give scope to consider the wider benefits a development would bring to an area considering the wider aims and objectives identified by the Council for the area. Many of the policies in the previous Unitary Development Plan have been retained and tightened for the LDF. The LDF is available to view and download from the Council's website: http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf-/:jsessionid=1DA2018841FAE94451C85600F5F2B893.node2</p> <p>The LDF is accompanied by the Camden Planning Guidance (CPG) which was adopted in two stages during 2011. It comprises CPG1-8, covering matters specified in the LDF in more detail and outlining how we apply planning policies in Camden. It is a fully adopted Supplementary Planning Document (SDP). A full copy of CPG 2011 is available to view from the Council's website: http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en</p>
Land use issues	<p>Commercial use</p> <p>The previous scheme included A1 retail use on the ground floor of the front building. It is now proposed to provide B1 office floorspace within the new</p>

building fronting Kilburn High Road at ground floor level. Given that the authorised use of the original building was B1 there would be no objection to B1 unit onto Kilburn High Road.

Additional B1 floor space provided at ground floor level to the rear of the site is also considered acceptable as overall floor area of both ground floors (277 sq. m) would increase B1 office floorspace from previous music studio (209 sq. m)

Residential

Policy CS6 relates to a wide range of housing, including permanent self-contained housing. The general approach outlined in CS6 aims to make full use of Camden's capacity for housing.

The provision of residential units at upper floor levels of the building fronting Kilburn High Road and to rear part of the site would be considered acceptable in principle. There would be an increase in the number of units from the previously approved scheme from 10 residential units to 12.

Affordable housing

Policy CS6 expects all developments with a capacity to provide 10 units or more (or 1,000sq. m or more) to make a contribution towards affordable housing. DP3 introduces a sliding scale for developments between 10 units and 50 units.

The Council considers that a floorspace of 1000 sq. m (gross) is capable of accommodating 10 family dwellings and will expect all residential developments that would provide additional built residential floorspace of 1,000 sq. m (gross) to make a contribution towards the supply of affordable housing. Calculations are based on gross external area (GEA). This is generally the total area if every floor in the building including common areas and external walls.

The Gross External Area of the new floors totals approximately 1335.42 sq. m and therefore exceeds the Council's threshold (1000 sq. m) for the contribution to the supply of affordable housing. In line with this policy, 13% of the development would need to be provided as affordable housing.

In terms of the mix of tenure of the affordable housing units the following applies:

60% - social rented (housing rented from the Council and other registered affordable housing providers such as Housing Associations and Housing Cooperatives)

40% intermediate affordable housing (costs more than social rented housing but substantially less than market housing. It caters for occupiers who are unable to afford market housing e.g. key workers and first time buyers).

Of these affordable homes (particularly social rented homes) the Housing Needs Survey identifies that the highest demand is for 3 bed units

On site contributions to affordable housing offer the best prospect for mixed and inclusive communities, offers the best prospect for timely delivery of both the affordable and market elements of the development, and avoids the difficulties of having to identify a second suitable site nearby that can viably be developed for affordable housing. However, the Council accepts that off-site solutions may be necessary where it is not practical to include affordable housing within a market housing development, for example where the development is relatively small (up to 3,500 sq. m gross), such as is the case here.

Where this is not possible, in exceptional circumstances, a payment in lieu would be accepted. It would be necessary to submit a viability assessment to demonstrate that affordable housing cannot be provided on-site or off-site (see details in Paragraphs 2.59 to 2.67 of CPG 2 (Housing) for arrangement for financial viability appraisal applies). You can find these details on the Councils' website (www.camden.gov.uk).

	<p>You should involve a housing association or other affordable housing provider in the design of proposed affordable homes before submitting a planning application as it needs to be purpose designed.</p>
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<p>Mix of units</p>	<p>Policy DP5 (Homes of different sizes) seeks to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, Policy DP5 includes a Dwelling Size Priority Table. The Council would expect any housing scheme to meet the priorities outlined in the table, or provide robust justification for not providing a mix in line with the table and the requirements outlined in paragraph 5.5 of the supporting text to the policy. The policy seeks provision of large and small units.</p> <p>The proposal would include the following mix of units within the front and rear buildings on the site:</p> <p>2 x 1 bed units 9 x 2 bed units 1 x 3 bed units</p> <p>This would result in 75% of the units being 2 bed units and only 8% of the units would be 3 bed units. It would be necessary to reduce the number of 2 bed units to approximately 50% and provide more family units in order to provide a range of residential units to comply with Policy DP5. Whilst it is appreciated that the site is located in a busy environment and the new flats may have modestly sized private outdoor amenity space, it is located within close proximity to Kilburn Grange Park and in light of this it is considered that a scheme offering a proportion of family-sized accommodation would be required.</p> <p>Please note that if affordable housing is provided on site the proposed mix should be altered accordingly.</p>
<p>Lifetime homes</p>	<p>Please be aware of the need to meet the 16 Lifetime Homes criteria. Please also refer to policy DP6 (Lifetime Homes) which states that 10% of homes development should either meeting wheelchair housing standards or be easily adapted to them. If all of the criteria cannot be met a 'best endeavours' exercise should be undertaken by the applicants to justify the reasons why the development cannot meet the criteria. Please refer to DP6 (Lifetime homes and wheelchair housing), DP29 (Improving Access) and CS6 (Providing quality homes).</p>
<p>Conservation and urban design</p>	<p>The drawings submitted were limited to floor plans and basic 3d modelling. In this regard comments can only be made on the height, bulk and footprint and orientation of the scheme.</p> <p>It is recommended that the applicants seek further advice from the Council on the more detailed design aspects of the scheme including façade treatment and materials, prior to submission of any planning application.</p> <p>In terms of footprint and orientation the scheme is considered to be a welcomed response from the previous scheme. There is greater space within the 'courtyard' and consideration has been given to adjoining occupiers rather than maximising the footprint.</p> <p>This has resulted in an additional storey to the central block. However this will respect the scale along Kilburn High Road and would not unduly impinge on views from the park which already has individually taller building rising above the predominant three or four storey development which surround it.</p> <p>There should be no issues with the architectural form of the central block. This should be continued through to the fenestration to create a cohesive piece of architecture.</p> <p>Any plant or roof top equipment must be integrated within the overall design and form, particularly given the long views of the site from the park.</p> <p>The use of high quality materials which relate to the site and its surroundings is</p>

	encouraged.
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<p>Amenity</p>	<p><u>Daylight and sunlight</u> The amenity of potential occupiers of the proposed residential units and neighbouring occupiers would be a key consideration in any future application of this nature. As such please refer to policies CS5 (Managing the impact of growth and development), DP26 (Managing the impact of development on occupiers and neighbours) and the CPG for further guidance.</p> <p>The impact of the new building on the amenity of the existing surrounding neighbouring residential units on Kilburn High Road should be assessed in the form of a Daylight/Sunlight Report. It is also important that any daylight/sunlight study takes account of the impact on light levels reaching B1 tenants in the vicinity.</p> <p><u>Overlooking</u> The CPG states that in order to ensure privacy there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. The distance between proposed habitable rooms in the new building to the rear and existing habitable rooms to units on 244, 246, 248 will need to be taken into account in the design of any new residential units. Similarly any roof terraces should be designed to minimise any overlooking impacts onto existing residential units.</p> <p><u>Sense of enclosure</u> Due to the close proximity of the new building to the rear of the site to existing properties fronting onto Kilburn High Road it would be necessary to take into consideration any potential sense of enclosure to any habitable residential windows.</p>
<p>Transport</p>	<p>A transport officer was not present at the meeting therefore the following advice is general advice in respect of highways matters. Should you require further detailed advice in respect to the issues detailed below transport advice can be provided.</p> <p><u>Car free development</u> The site has a PTAL score of 5 (excellent), which indicates that it has a good level of accessibility by public transport. The site is located within Controlled Parking Zone CA-M, which operates between 8.30 and 18:30 Monday to Friday. The development will be expected to be car free, in line with policies DP18 of the LDF and CPG 7 (transport) and this will be secured by means of a Section 106 Agreement.</p> <p><u>Cycle parking</u> Cycle parking needs to be provided in relation to the Camden Guidance and TfL cycle parking standards (1 space for 2 bedroom dwellings or less, 2 spaces for 3 bedroom dwellings or more) and should be covered, safe and secure and in line with the Camden Design Guidance in CPG 7. The location of the cycle parking area should not have an adverse impact on outlook to any existing or future residential occupiers.</p> <p>In terms of the commercial floorspace where a development exceeds 500 sq. m threshold, 1 space should be provided per 250 sq. m or part thereof for staff and a minimum of 2 for visitors if visitors are expected.</p> <p><u>Construction Management Plan</u> Given the overall scale of development, location and limited means of access a Construction Management Plan will need to be submitted with the application. This should provide details of how the proposed development will be constructed, how the site will be accessed and the likely number of vehicle movements during the demolition and construction phases. You are advised to explore any restrictions and rights that your client has in this respect.</p> <p><u>Highways works</u></p>

	<p>In order to mitigate the impact of the increase in trips this development may generate, and to tie the development into the surrounding urban environment, a financial contribution would be required to repave the footway adjacent to the site and the removal of any vehicle crossover and reinstatement of the footpath along Kilburn High Road. An estimate of the likely cost of the highway works will be provided once the planning application is submitted.</p>
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Servicing	It would be necessary to include details of how the proposed A1/B1 units would be serviced in terms of deliveries.
Open Space	CPG guidance requires the provision of 9 sq m of open space per person for residential developments providing 5 or more additional dwellings. Open Space provision will initially be expected to be provided on site. Where a site cannot provide open space provision on site the preferred option would be to provide suitable open space off-site, but at a maximum of 400m from the development. If either of the above is not practical a financial contribution to open space will be acceptable. Full details of the methodology for open space contributions can be found in CPG 6 (amenity).
Education contributions	All residential developments involving a net increase of 5 or more units will normally be expected to provide a contribution towards education provision in the Borough (excluding any affordable elements of a housing scheme). The contribution sought is proportionate to the size of dwellings proposed, and is not sought for single-bed units, as these are unlikely to house children. Full details of the methodology for educational contributions can be found in CPG8 (planning obligations).
Waste and recycling	Please also refer to CPG1 (design) with regard to the Council's waste collection and recycling policies for residential and commercial developments
Sustainability	<p>The overall approach to energy should be in line with the Mayor's Energy Hierarchy (i) using less energy; ii) supplying energy efficiently; iii) using renewable energy. Policy CS13 and CPG (3) states that the Council will require all development to take measures to minimise the effects of climate change and to meet the highest feasible environmental standards during construction and occupation. It states that new development should be designed to minimise carbon emissions by reducing energy consumption, supplying energy more efficiently and using renewable energy and developments should achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation (which can include sources of site-related decentralised renewable energy). Policy DP22 and CPG (3) gives further guidance on sustainable design and construction measures and requires that a pre-development Code for Sustainable Homes Assessment be submitted as part of an application to demonstrate that the proposed new development can achieve a rating of 'very good' or more.</p> <p>A BREEAM report for the new commercial element of the scheme should be provided that would demonstrate that the proposal can achieve a BREEAM rating of either 'very good' or 'excellent' (from 2016).</p> <p>Policy DP22 seeks to ensure that new development incorporates green and brown roofs wherever suitable. The use of green/brown roofs may be viable on this site, and the applicants would be well advised to explore this, on the basis that a brown roof using aggregates from the site would be preferable</p> <p>Water run-off and attenuation - Although this may be included in any BREEAM assessment, the applicants should make provision for water run-off attenuation measures.</p>
Crime prevention	The relevant Core Strategy policy to consider is CS17. Please also see CPG1 Ch9 and CPG8 Ch5. It may be beneficial in the supporting information submitted as part of any future application to provide commentary on the measures proposed to prevent crime (and fear of crime). Moreover, you are encouraged (although this would not be a statutory requirement for a proposal of this scale) to engage the Council's Crime Prevention Design Advisor Adam Lindsay (Adam.Lindsay@met.pnn.police.uk) prior to the submission of any application.

Contaminated land	The former uses of the site could have potentially led to contamination of the site. Adjacent historical land uses, which include a printing works, may have also led to contamination migrating onto the site. It is recommended that appropriate site investigation works would be undertaken and a report prepared including any recommendations for remediation works would be required to be submitted as part of the application.
S106 heads of terms	<p>Although this pre-application report should not be taken as a guarantee that planning permission will be granted, anticipated heads of terms to be secured by the Section 106 Agreement could be as follows (please note that this list is indicative only):</p> <ul style="list-style-type: none"> • Car Free development, • Construction Management Plan (CMP), • A financial contributions for any relevant repaving works in the area, • Compliance with Code for Sustainable Homes/BREEAM/Energy/Sustainability plan, • A financial contribution towards public open space calculated in line with CPG8 (planning obligations) and CPG6 (amenity) section 11 and appendix A, • A financial contribution towards education calculated in line with CPG8 (planning obligations)
CIL Levy	Please note that this proposal would be subject to a Community Infrastructure Levy (CIL) which was adopted from April 2012. The Mayor of London introduced a CIL to help pay for Crossrail on 01 st April 2012. Any permission granted after this time which adds more than 100 sq. m of new floorspace or a new dwelling will need to pay the CIL. The proposed charge in Camden will be £50 per sq. m on all uses except affordable housing, education, healthcare, and development by charities for their charitable purposes. Based on a floor area of 1335.42 sq. m the development would generate CIL contributions of £66,771.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter or the attached document please do not hesitate to contact **Elaine Quigley** on **020 7974 5101**.

Thank you for using Camden's pre-application advice service.