



45 HOLMES ROAD

PLANNING STATEMENT

APRIL 2014

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1.0 INTRODUCTION

1.1 This planning statement has been prepared by DP9 on behalf of Tiuta Properties ('the Applicant') in support of an application for full planning permission for a mixed use development at 45 Holmes Road. The site is located within the Kentish Town Ward within the London Borough of Camden (LBC).

1.2 The full planning permission seeks permission for the "*Redevelopment of the existing site into a mixed use development comprising 845 sq m of B1 floorspace and 8 residential units together with associated amenity space, landscaping and servicing arrangements*"

1.3 This document will provide an overview of the site and the proposed development, considers the relevant planning policies and sets out a justification for the development.

1.4 The planning statement should be read in conjunction with the other supporting information submitted in support of the application which comprises;

- Planning application forms and Certificates prepared by DP9;
- CIL information form prepared by DP9
- Design and Access Statement prepared by Lynas Architects;
- Energy & Sustainability Strategy prepared by Malcolm Hollis;
- BREEAM Assessment prepared by Rybka;
- Sunlight and Daylight Assessment prepared by Waldrams;
- Statement of Community Involvement prepared by Four Communications;
- Marketing Assessment prepared by Salter Rex;
- Transport Assessment prepared by TTP Consulting
- Acoustic Survey prepared by Clement Acoustics;
- Draft Construction Management Plan prepared Tiuta Properties Ltd

1.5 The following section of the report is structured as follows:-

- Section 2: Site and Surrounding Area – describes the location, character and physical features of the site.
- Section 3: Planning History – sets out the relevant planning history of the site.
- Section 4: Proposed Development – describes the application proposal.

- Section 5: Consultation – describes the consultation that has been undertaken on the proposed development prior to the submission of the planning application.
- Section 6: Planning Policy Framework – sets out the relevant planning policy associated with the site.
- Section 7: Assessment – assesses the proposals against the provisions of the Development Plan and other planning policy and material considerations
- Section 8: Planning Benefits – outlines the planning benefits that the development scheme brings
- Section 9: Conclusion – draws together the Statement into a set of conclusions.

2.0 THE SITE AND THE SURROUNDING AREA

The site

- 2.1 The site is situated in the Kentish Town Ward of the LBC. The application site is located on the south side of Holmes Road, to the west of Kentish Town and Kentish Town Road.
- 2.2 The site currently comprises a workshop for a frame and canvas manufacturers as part of the main building on the site. The owners have also diversified other parts of the building to include a shop sales area for members of the public and an unconsented dance studio for occasional use. The smaller two storey extension is also being used as a separate dance studio on ground floor with a residential use above.
- 2.3 The building itself is not listed and is not located within a Conservation Area. The eastern boundary of the site adjoins, but does not form part of, the Inkerman conservation area.
- 2.4 The site is located in an area with a Public Transport Accessibility Level (PTAL) rating of 4, demonstrating a good level of public which is rated as 'Excellent', as calculated using the Transport for London (TfL) PTAL calculation methodology.
- 2.5 Kentish Town Station (National Rail and Northern Line services) and Kentish Town West (Overground services) are both located within a short walking distance of the site to the north east and south west respectively.

The Surrounding Area

- 2.6 The area is characterised by a variety of building sizes and uses, including mixed use (business and residential) buildings of up to six storeys. Historically, the Holmes Road area has been characterised as an employment area with offices, light industrial and storage uses. However, recent developments have brought about a significant proportion of residential and student accommodation developments to the area. The site and the immediate surrounding area is outside the designated Kentish Town Industrial Area which runs to the north of the Holmes Road area.

2.7 There has been a recent change in the character of the Holmes Road area from the previous largely low-rise industrial location to an area with several larger scale residential-led mixed use developments with commercial floorspace.

3.0 PLANNING HISTORY

- 3.1 Planning permission (2003/1043/P) was granted in 2003 for the demolition of the existing single storey timber building used as a warehouse storage and the erection of a 2 storey building to provide warehouse storage on the ground floor with a 2 bedroom self-contained residential flat above.
- 3.2 Planning permission (2012/2016/P) was refused in 2012 for change of use of the ground floor storage unit (B8) to a 2 bedroomed self-contained flat (class C3).
- 3.3 In 2013 a prior approval application was made (Class J change of use B1 to C3) for the change of use of the ground floor from offices (B1a) to 1 x 2 bedroom flat (C3). This was refused on the grounds that the building was not used for a use falling within Class B1 (a) (offices) before 30th May 2013, nor was it last in use as Class B1 (a) offices.

Surrounding Developments/Precedents

- 3.4 Table 1 below outlines the nearby development sites that have gained planning permission in the last 6 years.

Site	Description	Decision Granted
41 -43 Holmes Road Homeless Hostel	Application Reference – 2013/6756/Ful Alterations to fenestration on east elevation, installation of additional PV panels to main roof, change to shape of rooflights, reduction in number of rooms from 26 to 25 and changes to internal layout, all as amendments to planning permission dated 07/10/2013 (Ref: 2012/6344/P) for extensions and alterations to Holmes Road Hostel (Sui Generis)	29 th October 2013
	Application reference – 2012/6344/P The erection of a part 3 part 2 storey extension to the south, new roof extension to rear and elevational alterations to retained building facing Holmes Road to provide an additional 16 rooms to	7 th October 2013

	existing 43 room hostel (sui generis) and ancillary office/commercial and storage space, following demolition to the existing rear buildings to the south.	
65-69 Holmes Road (Magnet)	2010/6039/P (LBC Reference) Demolition of the existing Magnet Warehouse building and erection of part six, part three storey building with two basement levels to provide student accommodation comprising 268 student rooms housed with 245 units with ancillary (sui generis), storage and distribution use (class b8) at lower basement and ground floor level and coffee shop (class A1) at ground floor level.	Appeal Decided 1 st December 2011
	Application Reference - 2013/7130/P Erection of part seven, part three storey building above two basement levels to provide student accommodation comprising 273 units (337 rooms and 439 bed spaces) with ancillary facilities (sui generis), warehouse (Class B8) at basement and ground floor levels and coffee shop (Class A1) at ground floor level following demolition of existing B8 buildings.”	March 2014
55 Holmes Road	2008/1304/P (LBC Reference) The development proposed is the replacement of disused rooftop plant room with two new 2 bed flats and one new 3 bed flat over two floors	18 th September 2009
	Redevelopment of the site and the erection of a four storey building providing office/warehouse use and 14 residential units.	7 th March 2008

4.0 PROPOSED DEVELOPMENT

4.1 The application seeks full planning permission for:

‘Redevelopment of the existing site into a mixed use development comprising 845 sq m of B1 floorspace and 8 residential units together with associated amenity space, landscaping and servicing arrangements

4.2 The proposals seek to retain the existing commercial floorspace and provide additional high quality residential accommodation. The proposed scheme will accommodate 4 x 2 bed dwellings and 4 x 3 bed dwellings

4.3 The area is characterised by a variety of building sizes and uses, including mixed use (business and residential) buildings of up to six storeys. The scheme has been designed to reflect the existing roof profile and industrial feel to the area. The site is considered to be a ‘backland’ site as it does not have a formal frontage on to the street. Therefore the design has ensured to address each of the rear aspects as much as the main approach from Holmes Road.

4.4 The proposals have been designed and carefully considered against the emerging development proposals surrounding the site (refer to table 1), in particular the proposals at 41-43 Holmes Road in terms of access, both pedestrians and vehicular.

4.5 There are no car parking spaces proposed as part of the development.

4.6 Cycle parking for the commercial use will be provided within the commercial building area, with a cycle store providing space for 15 cycles. Each residential unit will have access to a secure cycle store inside each residential unit.

4.7 The existing access to the site would be retained for use by pedestrian and delivery vehicles.

4.8 Separate residential and commercial refuse stores have been provided at ground floor level. A managed collection system will operate whereby bins are moved from the storage areas to the pick-up point within an acceptable distance to the public highway. The proposed refuse and servicing strategy is outlined further within the Transport Assessment.

5.0 CONSULTATION

- 5.1 The applicant has carried out pre-application discussions with Officers at the LBC, including Development Control, Urban Design and Conservation, Sustainability and Transport from December 2013 through to March 2014. The submitted development proposals reflect these discussions.
- 5.2 In order to ensure that the public were provided with an opportunity to comment on the proposed development, an invitation was sent out to local residents, stakeholders and local Ward Councillors, inviting them to a public exhibition on 19th February 2014 between 3pm – 8pm.
- 5.3 A Statement of Community Involvement (SCI) has been submitted with the application which outlines all consultation activities that have taken place with stakeholders and the local community. It also outlines the issues raised during the consultation exercise and how the applicant has responded to them.

6.0 PLANNING POLICY FRAMEWORK

6.1 This section of the statement reviews relevant planning policy in relation to the proposed development.

National Planning Policy Framework (NPPF)

6.2 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and supersedes previous national planning guidance setting out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system. The NPPF sets out key policies on delivering sustainable development, which include:

- Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.
- Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- Housing applications should be considered in the context of the presumption in favour of sustainable development. Local Planning Authorities (LPA) should normally approve applications for change to residential use and any associated development from commercial buildings, provided that there are not strong economic reasons why such development would be inappropriate.
- Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is however, proper to seek to promote or reinforce local distinctiveness. Planning policies and decisions should

address the connections between people and places and the integration of new development into the natural, built and historic environment.

Development Plan

- 6.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan for the area consists of the London Plan adopted in July 2011, and the London Borough of Camden Core Strategy and Development Plan Policies Documents (2010).
- 6.4 On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). From this date, the REMA are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the development plan for Greater London.
- 6.5 On 15th January 2013, the Mayor published his Draft Further Alterations to the London Plan (FALP) for consultation. The Draft FALP proposes a significant increase to the annual housing supply numbers from 32,000 per annum to 42,000 per annum. This echoes the recent proposals in the Draft Housing Strategy which was published for consultation at the end of last year. The Draft FALP will be open to a 12 week consultation followed by a public examination in 2014. The aim is to adopt the Further Alterations by mid-2015.

The London Plan (2011)

- 6.6 The London Plan was formally adopted in July 2011 and is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Within the London Plan, the site lies within the Inner London area.
- 6.7 The London Plan contains a number of key policies relevant to the development proposals including: -

- London Plan Policy 3.3 seeks to increase housing supply and the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.
- London Plan Policy 3.4 requires housing development to take into account local context and character amongst other design principles and optimise housing output through new development.
- Policy 3.5 examines the quality and design of housing developments and states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The design of all new housing development 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 space;
- London Plan Policy 3.8 concerns housing choice in London and that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments;
- London Plan Policy 6.1 seeks to reduce the need to travel while Policy sets out the requirements in relation to cycle parking;
- London Plan Policy 7.2 relates to an inclusive environment that 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; and
- London Plan Policy 7.4 relates to local character and states that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

LB Camden Core Strategy (2010)

- 6.8 The Core Strategy and Development Plan Policies Document were adopted in November 2010. In addition, further guidance is provided in the form of the Council's and Mayor's Supplementary Planning Guidance ('SPG') or Supplementary Planning Documents ('SPD') as well as Camden Planning Guidance notes ('CPG').
- 6.9 The Core Strategy sets out the Council's spatial vision, strategic objectives and spatial strategy on how the borough should develop. Key policies within the document relevant to the development proposals are as follows:
- 6.10 Policy CS1 aims to focus Camden's growth in the most suitable locations while achieving sustainable development, and providing in the region of 12,250 additional homes between 2011/11 and 2024/25;
- 6.11 Policy CS5 aims to manage the impact of growth and development in Camden by ensuring that development meets the full range of objectives of the Core Strategy and other Local Development Framework documents;
- 6.12 Policy CS6 of the Core Strategy relates to housing and has the key aim to provide quality homes within Camden. Housing is regarded as a priority land use within the LDF;
- 6.13 Policy CS8 of the Core Strategy seeks to safeguard existing employment sites and premises in the Borough that meet the needs of modern industry and other employers. Paragraph 8.8 states that the future supply of offices in the Borough can meet projected demand and that consequently the Council will consider proposals for other uses of older office provision if they involve the provision of permanent housing and community uses.
- 6.14 Policy CS10 of the Core Strategy supports the retention and enhancement of existing community, leisure and cultural facilities.
- 6.15 The CS (paragraph 8.20) seeks to protect premises that are suitable for small businesses, particularly those under 100sq.m, and ensure that new proposals do not result in a net loss of premises suitable for small businesses.

- 6.16 Policy CS13 will require 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 standards that are financially viable during construction and occupation;
- 6.17 Under Policy CS14 the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by requiring development of the highest standard, seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible; and
- 6.18 Policy CS17 aims to make Camden a safer place by ensuring to work with their partner to tackle crime and anti-social behaviour and to encourage appropriate security and community safety measures. Camden requires development to demonstrate that they have incorporated the Design principles which contribute to community safety and security, particularly in areas with relatively high levels of crime, in particular Camden Town, King's Cross, Bloomsbury, Covent Garden and Kilburn; and
- 6.19 Under Policy CS18 the Council will seek to make Camden a low waste borough and make sure that developments include facilities for the storage and collection of waste and recycling.

LB Camden Development Policies Document (November 2010)

- 6.20 The DPD supports the Core Strategy and London Plan, setting out the detailed policies for managing development within the borough. Key policies relevant to the development proposals are considered to be:
- Policy DP2 aims to make full use of Camden's capacity for housing and seeks to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing. The Council will expect the maximum appropriate contribution to the supply of housing and resist alternative development of sites considered particularly suitable for housing;
 - Policy DP3 demonstrates that the Council will expect all residential developments with a capacity for 10 or more additional dwellings and/or a floorspace of 1,000 sq m (gross) which is capable of accommodating 10 family dwellings will expect all residential developments that would provide additional built residential floorspace of 1,000 sq m (gross) to make a contribution to the supply of to make a contribution to the supply of

affordable housing. The Council will expect the affordable housing contribution to be made on site, but where it cannot practically be achieved on site, the Council may accept off-site affordable housing, or exceptionally a payment-in-lieu.

- Policy DP6 states that all housing development should meet lifetime homes standards and that 10% of homes developed should meet either wheelchair housing standards, or be easily adapted to meet them;
- Policy DP13 of the Development Policies seeks to retain land and buildings that are suitable for continued business use and resists a change to non-business use 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;
- Policy DP13 states that when it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential use or community use;
- Paragraph 13.3 of the Development Policies states the Council will take into account the below criteria when considering proposals that involve the loss of a business use. Whether the site:
 - Is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;
 - Is in a location suitable for a mix of uses including light industry and local distribution warehousing;
 - Is easily accessible to the Transport for London Road Network and/or London Distributor Roads;
 - Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;
 - Has adequate on-site vehicle space for servicing;
 - Is well related to nearby land uses;
 - Is in a reasonable condition to allow the use to continue;

- Is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards;
 - Provides a range of unit sizes, particularly those suitable for small businesses (under 100sq.m).
- Policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. The Council will resist development that fails to assess and address any need for movements to, from and within the site and additional transport capacity off-site where existing or committed capacity cannot meet the additional need generated by the development;
 - The Council will promote walking, cycling and public transport use under Policy DP17 and development should make suitable provision for pedestrians, cyclists and public transport use. The Council will resist development that would be dependent on travel by private motor vehicles;
 - Policy DP22 requires developments to incorporate sustainable design and construction measures by incorporating green or brown roofs and green walls wherever suitable and by expecting new build development to achieve Code for Sustainable Homes Level 4 by 2013;
 - Under Policy DP23 the Council will require developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding;
 - Policy DP24 requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider a variety of factors such as the quality of materials to be used, the appropriate location for building services equipment and the provision of appropriate amenity space;
 - Policy DP25 seeks to conserve the heritage of Camden. Development affecting conservation areas should take account of conservation area statements and will only be permitted if it preserves and enhances the character of the conservation area. It seeks

to preserve trees and garden spaces which contribute to the character of the conservation area; and

- Policy DP26 aims to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity such as visual privacy, overshadowing, noise & vibration and microclimate. The Council will also require developments to provide an acceptable standard of accommodation (dwelling and rooms' sizes etc), facilities for the storage of waste, bicycle storage and outdoor space for private or communal amenity space wherever practical.

Camden Planning Guidance 1: Design (2013)

6.21 This Planning Guidance has been prepared to support the policies in our Local Development Framework (LDF). It is consistent with the Core Strategy and the Development Policies, and forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions.

6.22 This guidance provides contained within this section therefore considers a range of design related issues for both residential and commercial property and the spaces around them.

Camden Planning Guidance 2: Housing (2013)

6.23 This guidance note provides information on all types of housing development within the borough including affordable housing, student housing, residential space standards and lifetime homes and wheelchair housing. It provides further detail on how the Council will deal with the delivery of affordable housing and the use of affordable housing credits.

Camden Planning Guidance 3: Sustainability (2013)

6.24 This guidance provides information on ways to achieve carbon reductions and more sustainable developments. It also highlights the Council's requirements and guidelines which support the relevant Local Development Framework (LDF) policies

Camden Planning Guidance: 5: Town Centres, Retail and Employment (2011)

6.25 This guidance provides information on way;

- Retail uses;
- Town centres;
- Central London local Areas;
- Central London frontages;
- Neighbourhood centres;
- Small shops;
- Controlling the impact of food, drink and entertainment uses; and
- Employment sites and business premises.

6.26 The guidance outlines the following criteria which the Council will take into account when considering proposals for the loss of office use:

- The age of the premises. Some older premises may be more suitable for conversion.
- Whether the premises include features required by tenants seeking modern office accommodation.
- The quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion.
- Whether there are existing tenants in the building, and whether these tenants intend to relocate.
- The location of the premises and evidence of demand for office space in this location; and
- Whether the premises currently provide accommodation for small and medium businesses.

Camden Planning Guidance 6: Amenity (2011)

6.27 This guidance is intended to provide information on all types of amenity issues including, daylight/sunlight, overshadowing, construction management plans and open

space facilities. The guidance provides details on the level of contributions required where public open space is not provided on site.

Camden Planning Guidance 7: Transport (2011)

6.28 Camden faces considerable transport challenges including congestion and poor air quality and this guidance contains information on a variety of transport issues including travel plans, car free development, vehicle access, public spaces and cycling facilities.

Camden Planning Guidance 8: Planning obligations (2011)

6.29 The purpose of this guidance is to provide an indication of what may be required when the Council considers that a development proposal needs a planning obligation to be secured through a legal agreement. These obligations will be used to ensure that the strategic objectives of the LDF Core Strategy and Development Policies are met through requirements attached to individual development proposals.

7.0 ASSESSMENT

7.1 This section assesses the proposals against the Development Plan and other relevant Planning Policy at national or local level.

Site Designations

7.2 The site has no relevant site specific designations but is identified within the Core Strategy as a Central London Area.

Principle of Development

7.3 The site currently falls under a B1 c (light industrial) use. The current owners of the site have occupied the building for a substantial period of time in their business as frame and canvas manufacturers and the business is predominantly 'family run'. Their need for space has decreased, which has resulted in the level of actual employment floorspace on the site being reduced substantially in recent years. There is still a workshop for the frame manufacturers as part of the main building on the site but the owners have diversified other parts of the building to include a shop sales area for members of the public and an unconsented dance studio for occasional use. The smaller two storey extension is also being used as a separate dance studio on ground floor with a residential use above. There are currently 4 full time employees and 1 part time employee on site. It is proposed that the replacement commercial floorspace could provide up to 30 employment opportunities on site.

7.4 Policies CS8 of Camden's Core Strategy and DP13 of their Development Policies DPD outlines that Camden will look to safeguard existing employment sites and premises in the borough that meet the need of modern industry and other employers. The proposed development will be providing 845 sq m of flexible B1 commercial floorspace. There is currently 841 sq m of existing commercial floorspace (this includes the unconsented dance studio and shop) on the site. The existing property is dated and in a dilapidated state of repair requiring up-grading and on-going maintenance and does not meet the need of the modern industry.

7.5 As part of this application, the Applicant has taken some advice from a Local Agent (Salter Rex) regarding the current quality of the existing commercial floorspace, the

proposed commercial floorspace and the potential market demand for premises in the proposed development site.

- 7.6 In summary, they consider that the existing accommodation would be of very limited attraction to the B1 market once the current tenants vacate due to the current condition and configuration of the building. The proposed scheme would provide a higher quality and more useable space than currently exists. The proposed development would be more flexible catering for a smaller range of B1 businesses/industries and being attractive to either a single occupier or subdivision for up to 6 small businesses.
- 7.7 The site is accessed via tight residential streets which make it difficult to service with larger Lorries and those businesses would likely locate at Regis Road Industrial Park. At this location a better commercial product is one that accommodates a range of small cultural or creative industry, such as furniture making, high skilled practical architect practices and model workshops. Further information is detailed within the Salter Rex Commercial Report.
- 7.8 Therefore, given the above, it is considered that the proposed development meets the requirements of, and accords with the London Plan and CS8, DP13 and CPG 3.

Residential

- 7.9 The NPPF seeks to significantly boost the supply of housing. Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 7.10 Housing is regarded as the priority land-use within the LDF and a residential development which seeks to maximise the supply of additional homes in the borough and the principle of this use should therefore be supported. Policy DP2 outlines that the Council will seek to maximise the supply of additional homes in the borough and expects the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site.
- 7.11 In 2003, planning permission was granted for a 2 bedroom self-contained residential flat above commercial demonstrating that the principle of residential development is acceptable to the LBC in this location. In addition, and as highlighted in section 3.4

there have been a number of mixed use developments being approved within the sites immediately adjacent to this development.

- 7.12 Therefore, given the above, it is considered that the proposed development meets the requirements of, and accords with the NPPF, London Plan and DP2.

Affordable Housing

- 7.13 Policy DP3 of the Council's Development Policies document sets the threshold of 10 units (1000sq.m gross residential floorspace) at which the requirement for affordable housing provision is triggered. The Development Policies document states that the Council's target of 50% of total additional housing floorspace as affordable housing operates on a sliding scale, subject to the financial viability of the development, with a norm of 10% for 1,000sq.m of additional housing and 50% for 5,000sq.m of additional housing, on sites with a capacity of 10 dwellings and 50 dwellings respectively.

- 7.14 Taking into account the existing residential dwelling (90 Sq m GEA) on site, the proposed residential floorspace will be 1057 Sq m GEA, totalling a net addition of 965 Sq m residential floorspace. Therefore, in line with Policy DP3, affordable housing is not applicable in this case.

Residential Quality

Residential Amenity Space

- 7.15 Policy CS5 of the Core Strategy requires development to protect and enhance the amenity and quality of life of local communities.
- 7.16 Policy DP26 contained within the Development Policies document requires outdoor space for private or communal amenity space wherever practical.
- 7.17 The proposals seek to demolish the existing building and provide 8 residential units. Each residential unit will have its own private amenity space, in the form of a sunken garden or private patio spaces in line with CS5, DP26 and CPG 6 amenity.

Overlooking

- 7.18 Policy DP26 states that the council will protect the quality of occupiers and neighbours by only granting planning permission for development that does not cause harm to the amenity.
- 7.19 The proposed development has been designed to avoid any potential overlooking into nearby properties. Analysis has been undertaken to see where the existing windows look onto the proposal and to ascertain where angled screens might be used to allow light into windows whilst preventing overlooking from neighbouring windows. The proposal is to look at a façade of fins and shutters and the building will be designed so it can be completely closed off with a button that controls the external shutters. These shutters are fixed diagonally to obscure the view into the new dwellings from neighbouring windows.
- 7.20 The development has, in line with DP26 and CPG 6 been designed to protect the privacy of both new and existing dwellings.

Design and Layout

- 7.21 As outlined throughout this statement, the existing character of the area has changed, it has moved away from being an industrial location to an area of mixed use development, namely, commercial, residential and student accommodation. The proposals have been designed in line with these changes but have focussed on maintaining the Industrial feel of existing area within the design.
- 7.22 The aim for the commercial area is to provide a high quality flexible B1 floorspace over lower ground and upper ground floor levels. The scheme is proposing to exceed the existing floorspace on site. The space has been designed as a large area divided into a simple grid providing maximum flexibility for the use of the site. The building has been designed to accommodate a range of B1 businesses/industries and attractive to either a single occupier or sub division of up to 6 small businesses.
- 7.23 There are eight residential units being proposed over lower ground floor and upper ground floor which sit above the commercial. The townhouses located over the commercial are accessed by a deck leading from a stair from ground floor. The ground

floor duplex units will be accessed from a brick pathway that leads to a private patio spaces in front of each entrance door.

- 7.24 Due to the proximity of surrounding buildings, careful consideration has been taken to ensure that there is no overlooking/privacy issues arising from the development towards the surrounding neighbouring properties, in particular Azania Mews. The aim has been to minimise the impact of the loss of daylight caused by the development on the amenity of existing occupiers and ensure sufficient daylight to occupiers of the new dwellings in line with CPG 6.
- 7.25 The provision of soft landscaping has been integrated where possible to help divide the commercial and residential areas. The approach to the landscape design is to use several materials to produce subtle level changes with some sculptural elements such as trees or external lights to break up the space for external vehicles and pedestrians. The scheme is looking at using grasscrete and brick paving to create a hard landscape. The proposals also look into the possibility of incorporating the shared access road into the landscaping proposal. This has been outlined within the Design and Access Statement. Any landscaping designs outside of the red line (ownership) boundary is indicative and needs to be agreed with the respective landowner.

Accessibility

- 7.26 London Plan Policy 3.8 requires all new housing to be built to ‘Lifetime Homes’ standards. The ‘Camden Planning Guidance Housing’ SPD reiterates this requirement and provides advice on how proposals can be designed in an inclusive manner and be accessible to all by incorporating ‘lifetime’ home standards. All residential dwellings have been designed to meet the Lifetime Homes standards.
- 7.27 The proposed development has been designed to incorporate a number of access principles, including maximising access to all parts of the residential parts, for all future residents and building users. The proposal aims to ensure accessibility and inclusion so that all potential users, regardless of disability, age or gender can use them safely and easily. The provision of toilets, showers and cycling facilities will be considered with Part M of the building regulations in mind. Please refer to the design and access statement for full details.

Housing Mix

7.28 The unit mix to be included within the scheme is demonstrated in Table 2 below.

Table 2: Unit Mix

Unit Size	Private
2 bed	4
3 bed	4
Total	8

7.29 Policy DP5 seeks to provide a range of unit sizes to meet demand across the Borough. The Dwelling Size Priority Table included within Policy DP5 demonstrates that there is a ‘very high’ priority for private two bed units and that developments should aim for 40% of two beds. The scheme also provides four family sized three bed dwellings which are considered a ‘medium priority’ in Camden. The mix provided is considered appropriate as it contributes to the creation of mixed and inclusive communities by containing a mixture of large and small homes in line with Policy DP5. The mix has been designed to suit the existing footprint and character of the building.

Townscape, Heritage and Visual Impact

7.30 The building on site is not listed, nor does it lie within a Conservation Area. The site adjoins the boundary of the Inkerman Conservation Area, therefore it has been ensured that any design proposals takes into account the view from the existing conservation area.

7.31 The Inkerman Conservation Area lies to the west of Kentish Town Road and is bounded to the south by Prince of Wales Road and Anglers Lane, to the north by Holmes Road, to the east by Raglan Street and to the west by the railway viaduct. The Inkerman Conservation Area appraisal outlines that the prevailing character is residential, with incidental corner shops on ground floor level integrated with institutional, educational, light industrial and commercial uses. The later buildings and the mix of uses give the area a lively diversity and mostly they have had a positive impact on the townscape and contribute to the character of the Conservation Area.

- 7.32 DP25 outlines that in order to maintain the character of Camden's conservation areas the council will not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area.
- 7.33 The proposed building is only visible from two locations within the designated conservation area; Cathcart Street and Inkerman Road. There are glimpsed views between existing buildings. The proposed building is an attractive building which is in keeping with the prevailing character of the Inkerman Conservation area as identified by the Conservation Area appraisal. There are other recently consented taller buildings that are visible from the conservation area (55 Holmes Road) and in comparison the proposed development will only be glimpsed from the conservation area.
- 7.34 It is considered that the proposal provides a scheme of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively and therefore preserve the Inkerman Conservation area in accordance with the NPPF and Policy DP25.

Residential Amenity

Sunlight/Daylight

- 7.35 In accordance with Policy DP26, a Daylight and Sunlight report has been undertaken by Waldrams in support of this application to consider the sunlight and daylight impact on neighbouring buildings.
- 7.36 The daylight and sunlight report prepared is based on the methods laid out in the BRE guidelines to determine the acceptability of daylight and sunlight using a detailed 3D computer model of the site and the surrounding incorporating the consented schemes in the vicinity.
- 7.37 The results for daylight and sunlight to the surrounding properties show all rooms and windows that serve habitable rooms in the neighbouring buildings meet the levels recommended in the BRE Guidelines, except for a small number of windows in the adjacent St Pancras Hostel (in both planning consents) that do not meet the BRE Guidelines in terms of VSC, however all these rooms served by these windows meet the BRE Guidelines in terms of ADF and daylight distribution, indicating these rooms will be well lit in the proposed situation. It should also be taken into consideration that

the adjacent Hostel accommodation is temporary accommodation and should be considered more flexibly than permanent residential accommodation.

- 7.38 In terms of sunlight amenity, all gardens analysed around the proposal and internal to the proposal itself meet the BRE Guidelines and so are in accordance with local planning policy.
- 7.39 Overall, the sunlight and daylight report considered that the scheme is in accordance with the BRE Guidelines for daylight and sunlight and is compliant with planning policy.
- 7.40 For further detail in this regard please refer to the accompanying Daylight and Sunlight Report provided by Waldrams.

Transport, Parking and Servicing

- 7.41 The proposed development will not provide any car parking on site. Residents would not be permitted to apply for on-street car parking permits for themselves or visitors. The proposed development therefore accords Policy DP18 which expects development to be car free in development.
- 7.42 The proposed development will provide cycle parking in accordance with the relevant minimum cycle parking standards – 1 per 250sq m for the flexible B1 commercial floorspace with a minimum of 2 visitor spaces (Camden & London Plan standards) and 1:1 for 1 and 2 bed residential units and 2:1 for 3+ bed residential units (London Plan standards). Visitor parking for both uses will be provided externally, with 5 Sheffield stands providing parking for 10 cycles. Cycle parking for the commercial use will be provided within the commercial building area, with a cycle store providing space for 15 cycles and each residential unit will have a cycle store area inside the unit. The proposed development therefore accords with and exceeds the number of cycle spaces required under Policy DP18
- 7.43 The development proposal envisages an internal layout capable of accommodating vehicles up to and including 7.5t/8m box vans arriving and departing in forward gear. Swept path analysis can be found within the Transport Assessment prepared by TTP Consulting.

- 7.44 It is anticipated that there will be a relatively small demand for servicing for the commercial on a day to day basis due to the nature of the proposed commercial floorspace. The number of deliveries associated with the residential units per day would be minimal and would also tend to comprise small to medium sized vehicles. TTP Consulting have estimated that circa 8-9 deliveries will be generated per day for every 100 residential units. It is therefore reasonable to assume that the proposed 8 residential units would generate approximately 1 delivery per day, which combined with the commercial deliveries, would result in a total demand for of the order of 3 deliveries per day.
- 7.45 The transport assessment concludes that all regular servicing demands arising as a result of the proposed development would be met on-site (and off-street).

Sustainability and Energy

- 7.46 The NPPF states that local planning authorities should approve planning applications if their impacts are (or can be made) acceptable in sustainability terms. Policy 5.2 of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy; 1) Be lean: use less energy 2) Be clean: supply energy efficiently 3) Be green: use renewable energy.
- 7.47 An energy strategy and BREEAM assessment has been prepared for this application which identifies how the development will comply with the requirements of both the London Plan and Camden Council. The strategy has been based on the energy hierarchy as identified above. In order to minimise the buildings energy consumption, a low carbon approach for the design of the buildings fabric and associated engineering system has been undertaken. The design has incorporated solar light tubes and natural ventilation openings to reduce the use of artificial light and minimise the need for cooling in the commercial areas. Heat energy to both the commercial and residential areas is provided by Air Source Heat Pumps. In order to provide further CO₂ reductions, it is proposed to install photovoltaic panels on the roof of the residential properties to increase the amount of electrical energy generated on site. The PV panels shall be installed on the south facing roof areas of the residential units allowing for the maximisation of the PV installation without increasing the height of the building. These

measures have resulted in a reduction in CO² emissions of approximately 40% when measured against Part L 2010 building regulations.

- 7.48 Please refer to the BREEAM and Energy assessments prepared in support of this application for further details.

Noise

- 7.49 A noise assessment has been carried out by Clement acoustics that assesses the suitability of the site for residential development. Environmental noise surveys that have been undertaken as part of the assessment to identify the level of exposure to noise have demonstrated that the noise levels are commensurate with those expected for a quiet urban location. Subject to adequate mitigation measures being put in place during the construction phase a “good” internal noise level can be achieved.
- 7.50 The noise assessment prepared by Clement Acoustics provides further information on level of exposure to noise, internal noise levels for residential areas and the external building fabric performance requirements.

8.0 PLANNING BENEFITS

- 8.1** The Applicant has worked closely with the LBC and residents to produce a scheme that is in keeping with the surrounding area but also to maximise the provision of planning benefits for the locality.
- 8.2** The scheme is exceeding the existing commercial floorspace and replacing the dated building with a high quality design to suit future modern occupiers. There are currently four employees on site. The replacement floorspace has been designed to accommodate up to 30 employees on site illustrating a significant economic benefit that the proposals bring.
- 8.3** Eight new residential dwellings are being proposed as part of the scheme, all of which are in line with Camden's dwelling size priority table. The mix will contribute to the creation of mixed and inclusive communities and ensure accessibility and inclusion so that all potential users, regardless of disability, age or gender can use them safely and easily.
- 8.4** The architects have worked closely with LBC Design Officer to ensure that the building design is considered interesting architecture and reinforcing the character of the existing area. One of the main objectives was to ensure that the surrounding residential amenity is protected by carefully considering any potential overlooking or sunlight and daylight issues. A draft construction management plan has been submitted in support of this application in order to minimise the disruption to surrounding residents.
- 8.5** The draft S106 Heads of Terms will include;
- Demolition and Construction Management Plan
 - Energy/Sustainability
 - Education Contribution

9.0 CONCLUSIONS

- 9.1 DP9 have been appointed to submit a full planning Application for the redevelopment of the existing site into a mixed use development comprising 845 sq m of flexible commercial B1 floorspace and 8 residential units together with associated amenity space, landscaping and servicing arrangements
- 9.2 The planning statement has assessed the proposed scheme against the provisions of the development plan and other material considerations relevant to the determination of the application. It is considered that the proposal accords with the development plan, is a sustainable scheme and in accordance with the National Planning Policy Framework.
- 9.3 The proposals have been designed to be in keeping with the character and appearance of the Holmes Road area. The proposals seek to retain the existing commercial floorspace and redevelop the building into a high quality and sustainable mixed use development. The proposed development would significantly increase the employment opportunities within the local area resulting in a positive economic benefit and working towards the LBC Core Strategy.
- 9.4 The details of the proposed development have been subject to extensive discussions with the LBC and neighbouring residents. The works will not harm the character and appearance of the nearby Inkerman conservation area. For the above reasons, and those set out in this statement, planning permission is sought for the development.