

Proposals for Mixed Use Regeneration

140-146 CAMDEN STREET LONDON NW1 9PF



Planning Report
Planning Statement

Prepared by:
CgMs Consulting



December 2014



PLANNING STATEMENT

**PLANNING
APPLICATION FOR
MIXED USE
REDEVELOPMENT OF
BUILDINGS AT
140-146 CAMDEN
STREET
LONDON
NW1 9PF
(Resubmission
following withdrawal
of 2014/4679/P)**

Elebro Limited

December 2014

Planning • Heritage

Specialist & Independent Advisors to the Property Industry

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Report Status:
FINAL

Issue Date:
18 December 2014

CgMs Ref:
MR/BH/12551

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1.0 INTRODUCTION

1.1 This planning statement has been prepared on behalf of Elebro Limited in support of a full planning application for the proposed redevelopment of 140-146 Camden Street, London.

1.2 The application seeks planning permission and conservation area consent for:

"Demolition of existing buildings and erection of a part 4, 5, 6 and 8 storey building with basement to provide 1959 m² of commercial floorspace (Use Class B1) and 53 residential units with associated landscaping".

1.3 The application proposals have been the subject of a series of pre-application meetings held with officers of the London Borough of Camden (hereinafter 'the Council') since February 2011. The scope of the planning application has been agreed in writing from the letter submitted to Camden Council on 22nd November 2013 by CgMs Consulting. The supporting documentation required for validation of the planning application includes:

- a. Planning Statement December 2014– CgMs Consulting;
- b. Townscape, Heritage and Visual Impact Assessment December 2014 – City Designer;
- c. Design & Access Statement (Include the Waste and Storage Strategy) December 2014 – Chassay + Last;
- d. Air Quality Assessment December 2014 - Air Quality Consultants;
- e. Arboricultural Impact Assessment December 2014 – Landmark Trees;
- f. Basement Impact Assessment December 2014 – Price & Myers;
 - a. Contaminated Land Assessment;
 - b. Soil Investigation;
 - c. Thames Water build over;
- g. Biodiversity and Ecological Assessment June 2014 – The Ecology Consultancy;
 - a. Bat Survey;
- h. BREEAM Report December 2014 – Price and Myers;
- i. Code of Sustainable Homes December 2014 – Price and Myers;
- j. Energy Strategy Report December 2014 – Price and Myers;

- k. Construction Management Report including details on waste reduction (WRAP) December 2014 – Chassay + Last;
- l. Daylight within the Proposed Development December 2014 – Anstey Horne;
- m. Daylight and Sunlight Report December 2014 – Anstey Horne;
- n. Design & Access Statement December 2014 – Chassay + Last;
- o. Interim Office Travel Plan December 2014 – TTP Consulting;
- p. Noise Impact Assessment December 2014 – Hana Tucker Associates;
- q. Residential Travel Plan December 2014 – TTP Consulting;
- r. Statement of Community involvement December 2014 – Bellenden;
- s. Service Strategy July 2013 – KUT Associates;
- t. Transport Statement December 2014 – TTP Consulting;
- u. Affordable Housing Statement including Planning Obligations December 2014 – Douglas Birt Consulting. This document should be treated confidentially;
- v. Existing Commercial Employment and Marketing Report December 2014 – Goldstein Leigh;
- w. Viability Report relating to Employment Floorspace December 2014 – Currell Commercial;
- x. Secured by Design December 2014 – Chassay + Last;
- y. Landscape Design & Access Statement – Turkington Martin; and
- z. Lifetime Homes Statement and Wheelchair Accessibility December 2014 – Chassay + Last.

The report is structured as follows:

- 1.0 Introduction (this section);
- 2.0 The site and surrounding area
- 3.0 Proposed development
- 4.0 Relevant Development Plan Policies
- 5.0 Planning considerations
- 6.0 Conclusion

- 1.4 The scheme has evolved through extensive pre-application discussions and community consultation as detailed in the Statement of Community Involvement and Design and Access Statement. On 20th June 2014 detailed information was submitted to the Council in support of the redevelopment concerning the residential mix, the extensive marketing of the employment space and

affordable housing viability as agreed at the pre-application meeting on 3rd October 2013.

- 1.5 On the 16th July 2014 a proposal scheme was submitted to the Camden Council for:

"Demolition of existing buildings and erection of a part 3, 4, 5 and 9 storey building with basement to provide 1803m² of commercial floorspace and 62 residential units with associated landscaping" (Application Ref. 2014/4679/P).

- 1.6 Feedback from officers was that the proposed development could not be supported due to the height of Block C. Key comments were as follows:

- Block C should be reduced by one storey and a robust justification for this height should be provided;
- The housing tenure split should be closer 60:40 social rented / intermediate; and
- The colonnade should be removed as it creates a challenging area in terms of management and maintenance.

- 1.7 The application was withdrawn on 17th October 2014 and it was agreed to resubmit a revised application which addressed the feedback from officers and residents.

- 1.8 Therefore, this revised Planning Statement details the amended proposal and assesses it against national and local planning policy taking into consideration the opportunities and constraints of development site.

2.0 THE SITE AND SURROUNDING AREA

- 2.1 The application site is located on the corner of Camden Street and Bonny Street, on the edge of Camden Town. Built development comprises two separate 1950s commercial warehouse buildings: i) a single storey brick built warehouse building with an informal internal mezzanine on the corner of Camden Street and Bonny Street; and ii) a two and three storey office building which abuts the Regents Canal. The main pedestrian entrance to the site is on Camden Street via the central staircase. The goods entrance which serves the existing buildings is located on the Bonny Street frontage. This currently disrupts the residential nature of the residential street. In addition the building lacks day lighting; though it has roof lights, much of this light is blocked by mezzanine to the ground floor.
- 2.2 Currently the warehouse building is vacant. Some of the office space is being used by the British Transport Police. As identified in the Design and Access Statement and the Townscape, Heritage and Visual Impact Assessment. The current 1950s commercial buildings located on site are of poor architectural quality and do not make a positive contribution to the character or appearance of the Regent's Canal Conservation Area.
- 2.3 Built development adjoining the site includes a nineteenth century terrace of residential dwellings including 2 – 8 Bonny Street. The dwellings are three storeys in height, grade II listed and located in the Regents Canal conservation area. The further surrounding area comprises a mix of residential and commercial uses. Of importance, within the local vicinity of the proposal is the Regents Canalside development which was granted permission in June 2011 (ref.2011/2072/P). The development design includes a residential building which is 8 storeys in height and additional A1, A2, A3 class uses at ground and lower ground level.
- 2.4 The proposal site is located in a sustainable location and is in close proximity to public transport nodes, local amenities and services and public open spaces as demonstrated by the following:

- a. The site has unrivalled access to extensive areas of high quality public open spaces. This ranges from more localised provision at Camden Gardens (60m in distance) and Castlehaven Open Space (320m in distance) to Regents Park and Primrose Hill. In addition, the Regent's Canal runs along the rear of the site where a public footpath links the site to the immediate surroundings and Camden's Town Centre.
- b. The proposal site is located approximately 320m from Camden Town Centre which offers a vibrant and exciting area to live within London. As Camden town is a short walk from the site it will provide the proposed development with a diverse range of shopping, cultural and leisure facilities. In addition, there are a number of schools, health services and community facilities within close proximity to the site which make the area suitable for both young professionals and families.
- c. The site is located within a highly accessible location and therefore is suitable for high density development. The proposal site has a PTAL score of 6b and is within a short walking distance from Camden Town Overground (85 metres) and Camden Tube Station (480 metres) which links the proposal site to the wider London area. Camden Street and Camden Road are main bus corridors through the area and the site benefits from a number of bus stops located within close proximity including Camden Gardens and Camden Roads. Therefore, connecting the site to the north London and wider area. Thus the site has excellent access to public transport.

3.0 PROPOSED DEVELOPMENT

3.1 The proposed development is illustrated on Chassay and Last's drawings and the scheme comprises the following:

- The demolition of the existing buildings;
- 1959m² of flexible commercial floorspace at lower ground and ground floor levels, which will be suitable for the full range of B1 uses. Generous floor to ceiling heights are proposed at 3550 mm F/F from 2550mm and the doors are to be 1.5 metres wide to meet the needs of a wide range of occupiers. The floorspace has been designed so it can be occupied by a range of small and medium sized businesses as detailed on Chassay and Last Drawings;
- In total 53 flats high quality at the upper levels comprising;
 - 23 x 1 bed flats;
 - 20 x 2 bed flats; and
 - 10 x 3 bed flats.
- 12 affordable flats equating to 22% of the overall scheme comprising;
 - 6 x 1 bed flats;
 - 3 x 2 bed flats; and
 - 3 x 3 bed flats.
- 122 cycle spaces;
- 1 disabled parking space
- 1 electric car parking space; and
- 1 loading bay for servicing vehicles.

3.2 The key design changes to the scheme are detailed below:

- Block C has been reduced from 9 to 8 storeys;
- Block B has been reduced by 200mm in height.
- Blocks C and D have been combined into one core with the main entrance off Camden Street. This core is proposed to serve only the private residential units.

- A wheelchair – accessible maisonette now occupies the ground-floor location approximately 12m closer to Camden Street.
- The stairs have been removed from the internal courtyard.
- The Canal Elevation has been amended at lower ground and ground floors to reflect the new commercial spaces behind the retained green faience wall cladding.
- The colonnade fronting Camden Street has been removed.

3.3 Further details of these design changes are illustrated on the proposed drawings and the explained within Design and Access Statement produced by Chassay + Last.

3.4 The residential units comply with lifetime homes standard and meet the residential space standards set out in the London Plan. All of the units have a high level of amenity space, through balconies shared amenity space and private terraces. In addition the majority of apartments are proposed to be dual aspect.

3.5 The proposed development is to be constructed in high quality materials incorporating future proofing. The proposed development will also achieve Code 4 for Sustainable homes and the commercial space will be BREEAM excellent rating.

3.6 Further details of the proposed development and the residential mix can be found in the supporting Design & Access Statement produced by Chassay + Last.

4.0 RELEVANT POLICY CONTEXT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires any planning application to be determined in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan comprises the London Plan (adopted in July 2011), the Camden Core Strategy and Development Policies Document adopted in 2010.

4.2 The National Planning Policy Framework is also a material consideration, together with the Camden Planning Guidance (adopted 2011).

- London Plan Policy 3.1 Ensuring Equal Life Chances for All
- London Plan Policy 3.3 Increasing Housing Supply
- London Plan Policy 3.4 Optimising Housing Potential
- London Plan Policy 3.5 Quality And Design OF Housing Development
- London Plan Policy 3.6 Children And Young People's Play And Informal Recreation Facilities
- London Plan Policy 3.8 Housing Choice
- London Plan Policy 3.13 Affordable Housing Thresholds
- London Plan Policy 3.19 sports Facilities
- London Plan Policy 4.4 Managing Industrial Land and Premises
- London Plan Policy 5.2 Minimising Carbon Dioxide Emissions
- London Plan Policy 5.3 Sustainable Design And Construction

- London Plan Policy 5.7 Renewable Energy
- London Plan Policy 5.9 Overheating and Cooling
- London Plan Policy 5.11 Green Roofs and Development Site Environs
- London Plan Policy 6.1 Strategic Approach
- London Plan Policy 6.3 Assessing Effects of Development on Transport Capacity
- London Plan Policy 6.9 Cycling
- London Plan Policy 7.2 An Inclusive Environment
- London Plan Policy 7.4 Local Character
- London Plan Policy 7.6 Architecture
- London Plan Policy 7.8 Heritage Assets and Archaeology
- London Plan Policy 7.9 Heritage-Led Regeneration
- Core Strategy Policy CS 6 Providing Quality Homes
- Core Strategy Policy CS 8 Promoting Successful and Inclusive Camden Economy
- Core Strategy 11 Promoting Sustainable and Efficient Travel
- Core Strategy Policy CS 14 Promoting High quality Places and Conserving Our Heritage

- Core Strategy Policy CS 18 Dealing with out Waste and Encouraging Recycling
- Development Management 2 Making Full Use of Camden's Capacity for Housing
- Development Management 5 Homes of Different Sizes
- Development Management 6 Lifetime Homes and Wheelchair Homes
- Development Management 13 Employment Sites and Premises
- Development Management 22 Promoting Sustainable Design and Construction
- Development Management 24 Securing High Quality Design
- Development Management 25 Conserving Camden's Heritage
- Development Management 27 Basements and Lightwells
- Development Management 28 Noise and Vibration
- CPG Guidance 1 Design
- CPG Guidance 2 Housing
- CPG Guidance 3 Sustainability
- CPG Guidance 4 Basements and Lightwells
- CPG Guidance 5 Town Centre, Retail and Employment

- CPG 6 Amenity
- CPG 8 Planning Obligations

National Policy

National Planning Policy Framework (March 2012)

4.3 The NPPF is centred around a presumption in favour of sustainable development. Paragraph 9 states that 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, including (but not limited to):

- Making it easier for jobs to be created in cities, towns and villages;
- Moving from a net loss of bio-diversity to achieving net gains for nature;
- Replacing poor design with better design;
- Improving the conditions in which people live, work, travel and take leisure; and
- Widening the choice of high quality homes.

4.4 The core planning principles outlined in Paragraph 17 includes the following key statements:

- a) 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;
- b) planning should also proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;

- c) planning should also encourage the effective use of land by reusing land that has been previously developed; and
- d) planning should promote mixed used development, and encourage multiple benefits from the use of land in urban and rural areas.

The London Plan

- 4.5 The London Plan was adopted in July 2011. Policy 4.4 sets out the Mayor's policies for managing industrial land and premises. It is stated that the Mayor will work with boroughs and other partners to "plan, monitor and manage release of surplus industrial land... so that it can contribute to strategic and local planning objectives, especially to provide more housing, and in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.
- 4.6 It also recognises the pressing need for more homes in London to promote opportunity and real choice for all Londoners. Policy 3.3 sets out the objectives for increasing housing supply and states that Boroughs should identify and seek to enable development capacity to be brought forward.

Permitted Development Rights

- 4.7 On 30th May 2013, the Government introduced new legislation which granted new permitted development rights to enable offices to be converted to homes without the need for planning permission. The Government granted 17 local authorities exemptions from the change in certain specified parts of their administrative areas including parts of Camden. The application site does not fall within an exempt area. As such, it would be possible to apply to the local authority for a determination as to whether their prior approval will be required as to transport and highways, flooding and contamination on the office element of the application site. The prior approval requires the local authority to consider certain consultation responses and the National Planning Policy Framework, but notably not local planning policy. If approved this would allow change of use to occur without the need for Section 106 obligations. In particular, there will be no obligation to provide an element of affordable housing, or contributions towards

social and community infrastructure. This is a material consideration in the determination of any application for the redevelopment of this site.

Local Policy

- 4.8 The Borough of Camden's Local Development Framework which will be used to assess the development proposal includes the Core Strategy (CS) 2010 and the Development Policies 2010 (DP) and related supplementary planning guidance 2013 (CPG).

5.0 PLANNING CONSIDERATIONS

- 5.1 This section reviews all of the above policies that are relevant to the proposed development and provides an assessment of how the proposed development complies with relevant planning policy.

Land Use – Commercial Floorspace

- 5.2 Camden Core Strategy Policy CS8 seeks to ensure that the borough retains a strong economy and states that *"the Council will support Camden's industries by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers."*
- 5.3 Camden Development Policies Document was adopted in November 2010. Policy DP13 provides more detailed information as to how the aims of Core Strategy Policy CS8 will be implemented and sets out the Council's policy on employment premises and sites. It is stated that *"The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:*
- a) It can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use;*
 - 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;*
 - c) Once a change of use has been justified to the Council's satisfaction, we will seek to maintain some business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business uses; and*
 - d) 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 uses.*

5.4 Paragraph 13.3 states that when assessing proposals that involve the loss of a business use the Council will considered whether there is potential for that use to continue taking into account:

- a. Is located in or adjacent to the Industry Area or other locations suitable for large scale general industry and warehousing;*
- b. Is in a location suitable for a mix of use including light industry and local distribution warehousing;*
- c. Is easily accessible to the Transport for London Road Network and/or London Distributor Roads;*
- d. Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;*
- e. Has adequate on-site vehicle space for servicing;*
- f. Is well related to nearby land uses;*
- g. Is in a reasonable condition to allow the use to continue;*
- h. Is near to other industry and warehousing, noise/vibration generation uses, pollution and hazards; and*
- i. Provides a range of unit sizes, particularly those suitable for small businesses (under 100m²).*

5.5 Camden Planning Guidance (CPG) 5 Town centres, Retail and Employment provides additional guidance on the loss of employment floor space. In Paragraph 6.4 it is stated that there are a number of considerations that the Council will take into account when assessing applications for a change of use from office to a non-business use, specifically:

- a. the criteria listed in paragraph 13.3 of policy DP13 of the Camden Development Policies;*
- b. the age of the premises. Some older premises may be more suitable to conversion;*
- c. whether the premises include features required by tenants seeking modern office accommodation;*
- d. 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;*
- e. whether there are existing tenants in the building, and whether these tenants intend to relocate;*
- f. the location of the premises and evidence of demand for office space in this location; and*
- g. whether the premises currently provide accommodation for small and medium businesses.*

5.6 Paragraph 6.18 states that evidence of a marketing exercise for the loss of employment uses, in line with Core Strategy Policy CS8 and Policy DP13 of the Camden Development Policies will be expected to include the following:

- a. Use of a reputable local or national agent with a track record of letting employment space in the borough;*
- b. A visible letting board on the property (constant throughout the marketing period);*
- c. Marketing material should be published on the internet, including popular online property databases such as Focus;*

- d. Continuous over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed). We will consider shorter marketing periods for B1(a) office premises;*
- e. Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property;*
- f. Lease terms should be attractive to the market: – at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake some works – and/or short term flexible leases for smaller premises which are appropriate for SMEs;*
- g. A commentary on the interest shown in the building, including any details of why the interest was not pursued; and*
- h. Where there is an existing employment use then we will require evidence that the tenant intends to move out.*

Assessment - Commercial floorspace

5.7 The supporting reports from the employment agents detail the constraints of the existing floorspace and conclude comprehensively that the space is no longer suitable or viable for continued employment use. Key aspects of our case can be summarised as follows:

1. The office building which is occupied by the British Transport Police is landlocked with no direct vehicle access thus, it can only reasonably be occupied for B1a office purposes. 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. Even though this unit is treated as one it is actually divided into three levels just connected by the semi-public staircase and without a joint lobby, making an efficient control of access difficult. Lower ground and ground floor level are only supplied with sufficiently lit spaces along the facade leaving large parts in the centre of the floor without natural light.

Several windows facing Regent Canalside have been closed off due to the recently completed development on this site.

2. The warehouse unit currently has its access for goods along the Bonny Street facade. The proximity to surrounding residential properties in Bonny Street has caused a conflict with residents of the area who have in the past campaigned against the presence of delivery vehicles. On-site servicing, which would have to be taken by road (and is not possible by water or rail) is also heavily constrained by the traffic in the area. The limited dimension of the loading bay that has been located at the site for the last 8 years and causes poor access to the building for large commercial vehicles due to the one way street system. There is no designated on street-loading bay outside the property. These inadequacies lead to inconvenience and obstruction of the highway by larger vehicles servicing the premises.
3. The warehouse building is coming to the end of its life and needs major updating to be marketable at an economic rent in the future. The property has an asbestos roof and numerous other defects including an absence of external.
4. Whilst the warehouse has two available levels only the ground floor is actually fully usable as the mezzanine has only small areas of sufficient headroom due to roof trusses which are below head height. Only the mezzanine level enjoys good natural light through roof lights, whereas the ground floor is mainly without natural light apart from a few windows along Camden Street.
5. Moving goods within the existing buildings is also hampered by the lack of goods lift. In its current format it would not lend itself to the creation of small units because of inadequacies of the loading bay, internal circulation and lack of natural daylight.

5.8 Using the criteria outlined in paragraph 13.3 of policy DP13 of the Camden Development Policies and Paragraph 6.4 of the CPG5 it is clear that the buildings are not suitable for its existing business use.

- 5.9 Paragraph 6.4 sets out a number of considerations which the Council will take into account when assessing applications for a change of use from office to a non-business use as follows:

The age of the premises. Some older premises may be more suitable to conversion.

- 5.10 The application site was built in the late 1950s of mainly brick construction which has been rendered under a flat roof.

Whether the premises include features required by tenants seeking modern office accommodation.

- 5.11 The building is dated and no longer meets the requirements of modern B1 occupiers particularly due to the depth of the office floors and the subsequent lack of natural life.

The quality of the premises and whether it is purpose built accommodation.

- 5.12 As demonstrated above and supported by the evidence from the employment agents the premises are outdated and fail to provide the quality of accommodation expected by modern occupiers. The Currell Commercial Viability Report (December 2014) of the existing employment floorspace report concludes that the premises would require significant investment to bring up to modern standards and demonstrates that it is not financially viable to undertake these works.

Whether there are existing tenants in the building, and whether these tenants intend to relocate.

- 5.13 The warehouse element was historically used for the re-manufacture of electronic production machinery, however, this use had to relocate to Scotland due to on-going disputes with local residents about the premises' use, and in particular it's servicing requirements. This part of the site has been largely

vacant since September 2009. There was a temporary occupier leasing the site at an extremely low rent to keep the building secure.

- 5.14 The office element is occupied by the British Transport Police however have announced they are going to terminate their lease. The use of the building has been gradually scaled down and has been significantly underutilised for some time.

Whether the premises currently provide accommodation for small and medium businesses.

- 5.15 Due to the layout of the existing building, the lack of natural light and the lack of an efficient control of access the building in its current form is unable to provide adequate accommodation for small and medium businesses. The Currell Commercial Viability Report concludes that even if the buildings are refurbished it will not be possible to secure a commercial occupier.

- 5.16 CPG5 also categorises sites according to their characteristics to determine which sites and premises should be retained. This site is not within category 1, the highest quality accommodation. It also fails to provide several characteristics of a Category 2 premises, notably clear, high floor to ceiling heights, lots of natural height and flexible neighbouring uses. The category 3 description is the closest – “a heavily compromised site which may not be suitable for continued industrial use when they become empty or need significant investment”.

Marketing of the Existing Commercial Space

- 5.17 Part (b) of Policy DP13 requires evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time. The existing warehouse has been vacant since 2009 and has been extensively and unsuccessfully marketed over this period has evidenced by the letters from Goldstein Leigh, Roy Hayim and 3H Property Consultants. Both are reputable local agents with a track record of letting employment space in the borough. The space has been widely marketed over this period for both freehold and leasehold purposes. Over the course of time the rents and site value were reduced and rental

incentives offered but no viable tenant or office developer has been found. Whilst interest has been received from developers this been from parties were looking to redevelop the site much in the same way as the client is proposing to do.

Replacement Commercial Space

5.18 The proposed scheme includes 1,959 m² (GIA) of flexible commercial floor space at lower ground and ground floor level. This has increased from 1803 m² in the withdrawn planning application. The commercial floorspace now covers the lower ground and ground floor level and no longer includes a mezzanine level and thus is considered more useable than the previous scheme

5.19 The replacement commercial floorspace will be suitable for the full range of B1 uses consistent with the Council's employment policies. The space is flexible and can be adapted to meet the needs of prospective occupiers and particularly small and medium sized businesses. The commercial space will be of high quality with higher ceiling heights and better natural lighting than at present. Specifically the design of the commercial floorspace has improved following the process of application ref.2014/4679/P. The design improvements are as follows:

- No mezzanines
- Increased floor to floor height to 3550 mm F/F from 2650 mm.
- More daylight provisions to the lower ground floor by the introduction of lightwells and voids.
- The main space fronting onto Camden Street will have a floor to ceiling height of 3 metres.
- The basement will have a floor to ceiling height of 3.5m. Heavy duty lifts, exposed services and large 1.5 metre wide doors will also be provided.

Summary on Employment Use

5.20 The site currently provides 2,577 (GIA) m² of employment floor space, however this includes the mezzanine in the warehouse which has a significantly comprised floor to ceiling heights. In response to the detailed feedback from the officers throughout the planning submission (ref.2014/4679/P), the proposed replacement Class B1 space has now increased to 1959 m² GIA. The justification for the decrease in floor space mindful of relevant development plan policy CS6 and DP13 is threefold:

- a) Marketing Letter from Goldstein Leigh dated June 2014 and includes an enquiry of interest dated December 2014. This sets out the marketing strategy for the warehouse and office space from June 2009 to date. This concludes that there has been no viable interest in letting the space or redeveloping for employment purposes. The main interest has been from residential developers and house builders. This continues to be the case to date and the interest from agents into the commercial space has further confirmed that the space is unsuitable in its current configuration;
- b) Marketing Letter from 3H Property dated November 2013 – this addresses the commercial interest of the warehouse and details the marketing strategy over a defined period. It confirms that despite extensive marketing, there has been no viable interest in the current buildings for employment purposes.
- c) Viability Report from Currell Commercial dated December 2014 – This report identifies that there is a market need for quality office buildings that benefit from being in established office locations and have modern facilities and floorplates. The report confirms that the site is located outside of the main commercial area and within a residential area and thus in a secondary location to more desirable office locations such as the regenerated areas of Kings Cross and Central Activity Zones/Central London Area. The report concludes that the site is at a disadvantage to other available buildings in the area due to the diversity of the buildings on the site and the lack of cohesion between the existing buildings. It has been noted that even if the space was refurbished and capable of subdivision into smaller office suites

that that the external appearance of the building and its slightly off pitch location would deter occupiers from taking office floors/suites within the buildings.

- 5.21 Therefore, bearing in mind the current configuration, layout and lack of modern facilities alongside the current market requirements this has resulted in little interest from commercial tenants to occupy the space. It is considered that this extensive marketing campaign has been in full accordance with the guidance in CPG5. It has been demonstrated by the evidence above that the site is no longer suitable for its existing building use in accordance with DP Policy 13. It should be noted that following the submission of the previous application (application ref. 2014/4679/P) the commercial floorspace has further been increased and improved in design. The proposal now provides 1989.4m² from 1803 m² and now covers the lower ground and ground floor level. The proposal no longer provides a mezzanine level, therefore increasing the floor to floor height to 3550 mm from 2650mm. This will allow more daylight provisions to the lower ground floor by the introduction of light wells and voids. And overall improve the quality of the employment floorspace. Therefore, the proposed redevelopment scheme will offer purpose built accommodation for small and medium sized businesses and offer almost the same level of useable floorspace as the existing buildings should therefore be supported.

Land Use – Residential Units

- 5.22 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and is the document which sets out the Government's planning policies for England and how these are expected to be applied. It has been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities. The NPPF is therefore part of the development plan and proposed development should reflect its principles.
- 5.23 When determining planning applications, the NPPF directs LPAs to apply the presumption in favour of sustainable development; the 'golden thread' which is expected to run through their plan-making and decision-making. Policy 14 of the NPPF notes that the presumption in favour of sustainable development for

decision-taking means *"approving development proposals that accord with the development plan without delay."* This is re-iterated within Policy 196.

- 5.24 Policy 17 of the NPPF sets out 'core planning principles', including that planning should *"encourage the effective use of land by reusing land that has been developed previously (brownfield land), provided that it is not of high environmental value"*. These principles also include to *"proactively drive and support sustainable economic development to deliver homes..."*.
- 5.25 Section 6 of the NPPF specifically addresses delivery of a wide choice of high quality homes and Policy 49 notes that *"Housing applications should be considered in the context of the presumption in favour of sustainable development."* Policy 50 goes on to encourage the delivery of a wide choice of quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 5.26 In addition to the NPPF, the Government emphasised the need to secure a significant increase in house building in their Housing Strategy for England November 2011. More recently, the need to promote construction as part of the economic recovery has been the subject of policy statements, leading to the Growth and Infrastructure Act 2013.
- 5.27 An overriding theme within the London Plan (LP) is to accommodate growth in a sustainable way. Para. 3.13 notes that London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs and at prices they can afford.
- 5.28 LP Policy 3.3 'Increasing Housing Supply' notes that 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"*.
- 5.29 Policy 3.3 and Table 3.1 of the LP sets a minimum housing target of 32,210 additional homes per year. Borough targets are provided within Table 3.1 and this provides an annual monitoring target of 6,650 units (2011-2021) for the

London Borough of Camden. Para. 3.19 notes that these are minimum targets, to be exceeded by optimising development on individual sites and other sources of housing capacity. Finally, Part E of Policy 3.3 refers to Boroughs identifying and seeking to enable development capacity, in particular brownfield capacity, especially of surplus commercial capacity and surplus public land.

- 5.30 The quality of new housing provision is addressed within Policy 3.5 of the LP which seeks to ensure that residential development should take into account the physical and local context; density; tenure mix; and provision of amenity space. These issues are considered later within this section of the Statement.
- 5.31 Core Strategy Policy CS6 – Providing quality homes sets a target of delivering 5,950 homes from 2007 – 2017 and maximising the supply of addition housing over the entire plan period to meet or exceed a target of 8,925 homes from 2010 - 2025. The policy also states that housing will be *'the priority land use of Camden's Local Development Framework'*.
- 5.32 Development Policy DP2 – Making full use of Camden's capacity for housing states that development must make 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.

Assessment – Residential Land Use

- 5.33 In accordance with the NPPF and local planning policy it is considered this is a highly sustainable site which is wholly appropriate for residential use for the following reasons:
1. The proposal optimises brownfield land that is currently underused for residential development in accordance with policy 17 of the NPPF and Development Management Policy DP2.
 2. The site is highly sustainable. It is located on the edge of Camden Town Centre which is only 320 metres away and offers an unrivalled variety of retail, cultural services and amenities. In addition surrounding the site, there are a number of areas of open green space. These include local

facilities such as Camden Gardens (60m) and Castlehaven Open Space (320m) and major open space of London wide importance including Primrose Hill and Regents Park.

3. The site is highly accessible by public transport located on Camden Street (A400), one of the main 'A' roads that runs through Camden and has the highest possible PTAL score of 6b. It is located within a short walking distance (85m) from Camden Town Overground and within walking distance (480m) of Camden Town Tube Station. In addition there are a number of bus stops located along Camden Street that connect the site to the wider area.
4. The site is wholly suitable for residential use as it is surrounded by residential development including the Regent Canalside Development to the east of the site, flatted social housing on the opposite side of Camden Street and further housing to the north on Bonny Street and beyond.
5. The proposed development will deliver 53 high quality residential units that will contribute to Camden's housing supply and the London wide housing supply in accordance with policy 3.3. of the London Plan and Core Strategy 6. Residential use is a priority land use of Camden's development plan and this proposed land use was supported by officers and local residents throughout pre-application discussions. It should be noted that this provision has decreased from 62 residential units following the withdrawal of planning application ref.2014/4679/P. This is due to block C being reduced by a storey and the reconfiguration of the floorspace.

Design Approach

- 5.34 The NPPF advocates good design and high quality, inclusive development for all (policy 57). Section 7: 'Requiring Good Design' reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in Policy 58, the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character

and history, reflecting the built identity of the surrounding area. Policy 17 of the NPPF also notes that planning should “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.”

5.35 Importantly, the NPPF at Policy 60 confirms that Local Planning Authorities 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...’.

5.36 Architecture is addressed within London Plan Policy 7.6 which comments that buildings should, inter alia:

- a) Be of the highest architectural quality;
- b) Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
- c) Comprise details and materials that complement, not necessarily replicate, the local architectural character;
- d) Not cause unacceptable harm to the amenity of surrounding land and buildings;
- e) Incorporate best practice in resource management and climate change;
- f) Provide high quality indoor and outdoor spaces;
- g) Be adaptable to different activities and land uses, particularly at ground level;
- h) Meet the principles of inclusive design; and
- i) Optimise the potential of sites.

- 5.37 London Plan Policy 7.4 addresses local character and comments that new buildings should provide a high quality design response that has regard to the pattern and grain of existing spaces together with providing a human scale. Policy 7.2 of the London Plan addresses inclusive design and notes that the needs of disabled people should be integrated within the development proposals.
- 5.38 Core Strategy Policy CS14 Promoting high quality places and conserving our heritage seeks to ensure that Camden's buildings are attractive, safe and easy to use, taking into account local context, the rich and diverse heritage assets and by seeking high quality landscaping and access. This policy is expanded upon in Development Management Policies DP24 Securing high quality design, DP25 Conserving Camden's heritage and CPG1 Design.

Assessment - Design of the Proposed Development

- 5.39 The Design and Access Statement submitted with the application fully explains the components and architectural design of the proposal and how the layout, massing and architectural style has evolved. Following the withdrawal of the previous application the design has been further refined and enhanced to respond to the comments of the officers and the residents. The key changes are:
- Block C has been reduced from 9 to 8 storeys.
 - Block B has been reduced in height by 200mm.
 - Block C and Block D have been combined into one core with the main entrance off Camden Street.
 - The stairs have been removed in the internal courtyard.
 - The colonnade fronting Camden Street has been removed.
 - Introduction of large balconies onto the canal elevation to create natural surveillance.

- Alterations of the canal elevation at lower ground and ground floors to reflect the new commercial spaces behind the green terracotta wall cladding retained.

5.40 Therefore in summary, a number of key principles have been included within the revised design including:

- Massing complimentary to context – The detailed design of the development includes simple massing over the site with four distinct blocks set around a roof garden at the centre. Block A is designed to relate principally to the domestic scale and proportions of Bonny Street. Block B steps up from Block A to address the junction of Bonny Street with Camden Street. Block C steps up again from Block B and is the principal element of the proposal, rising to 8 storeys on Camden Street and on the north side of the Regent's Canal. Block D is located on the canal-side and is one storey higher than the existing canal-side building. Block B and D are now proposed as one core with the main access off Camden Street. It is proposed that this core would only serve the private residential units.
- This increase in height from the existing buildings brings the proposal up to the same height as the new Regent's Canalside building, which is immediately adjacent to the east. The building complements the existing buildings at Regent Canalside and Shirley House.
- Visually attractive the indented form is a creative response to the sites specific constraints. The plan form helps to unlock the sites potential for residential development whilst respecting the amenity of its neighbours. Care has been taken to design a visually interesting proposal which takes reference from the surroundings in relation to simplicity of form and also robust detailing.
- The relationship between the proposed development and the canal is important to the development and the proposal follows the curve of the canal in plan. Furthermore, large balconies have been proposed along

this elevation to create an active frontage and natural surveillance along the canal path.

- There has been an alteration of the Canal elevation at lower ground and ground floors to reflect the new commercial spaces behind the green faience wall. The green variegated tiles are used at the lower levels of block D and are intended to reference the movement and reflective nature of the canal.
- While the character of the canal-side is generally of high wall rather than fenestration, the existing fenestration at low level on the site alongside the canal presented the opportunity to the architects to replicate this characterful feature arising from the 1950s design. High quality detailing and materials including a variety of brick work to respond and compliment the buildings that surround the site and a green faience façade that fronts the Regent's Canal.
- Given the nature of the application site and the position along the canal, residential development along the ground floor would lack privacy and therefore would not be appropriate. In order to optimise the site we have proposed the ground floor be modern flexible employment floor space which will benefit from very good floor to ceiling heights, wide doors/corridors and a large amount of natural light.

Heritage and Townscape Impact

5.41 Paragraph 126 – 141 of the NPPF set out the national level guidance on the conservation and preservation of the historic environment. Paragraph 126 notes that local authorities should take into account:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

- The desirability of new development making a positive contribution to local character and distinctiveness; and
- Opportunities to draw on the contribution made by the historic environment to the character of a place.

5.42 Policies 7.8 and 7.9 of the London Plan 'Heritage and Conservation' detail that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

5.43 Policy CS14 of the Core Strategy deals with promoting high quality places and conserving heritage. Policy DP24 of the Development Management Policies 'high quality design' requires all developments to be of the highest standard of design and conserve heritage.

Assessment - The Regent's Canal Conservation Area

5.44 The proposed development would replace a 1950's light industrial building which has been acknowledged by the LB of Camden at pre-application meetings to make no contribution to the Regent's Canal Conservation Area. The proposals have evolved to provide a development which enhances the character and appearance of the Regent's Canal Conservation Area and the adjacent Jeffrey's Street Conservation Area. Furthermore, following the meeting with the Head of Development Management and the officers on 6th October 2014, the context of the proposal within the conservation area was further addressed and the significance of this was reinforced. The consultants and the design team have since revisited the design and robustly justified this through the amended Design and Access Statement.

5.45 City Designer consultants have re-assessed the townscape and visual effects of the revised proposals in an updated Townscape, Heritage and Visual Impact Assessment (THVIA) document, which forms part of the application. They have also included in the THVIA an updated Chapter 6 'The proposed development

and its Townscape Context', which considers the design and its appropriateness on the site at Camden Street, bounded by the Regent's Canal and Bonny Street.

- 5.46 The HTVIA details the design of the development and how it has responded to Camden's Officers approach to development within the conservation area. The HTVIA summarises that the Regent's Canal Conservation Area is a sensitive heritage asset, that the proposed development would contribute to the tight, enclosed character of the canal between the Camden and North Road Bridges and would complement the recently completed Regent Canalside development.
- 5.47 THE HTVIA concludes that in longer views from within the boundary of the conservation area the proposed development would contribute positively to the composition of townscape and the skyline as identified in the AVR images. In conclusion, the proposed development is of high quality design which would enhance the character and appearance of the area in accordance with LP Policy 7.8, CS14 and DP25 policy.

Assessment - Listed Buildings

- 5.48 2 – 8 Bonny Street are Grade II listed and are adjacent to the site at the north east side. The terrace consists of 4 early Victorian houses; each of three storeys. The THVIA details the development of the design and how it has responded to the adjacent listed buildings character and context. It notes the design of Block A of the proposed development has been carefully designed to relate, in terms of scale, proportion, to these listed buildings, which are separated from the site by Pulse House. It concludes the proposed development will therefore enhance the setting of the Grade II listed building significantly.

Quantum of Residential Provision

- 5.49 LP Policy 3.4 advises that, taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2LP Table 3.2 contains a density matrix which sets a strategic framework for appropriate densities at different locations. Density

ranges for new residential developments are set out in the London Plan and relate to the accessibility of sites.

Assessment - Quantum of Residential Provision

- 5.50 Mindful of Table 3.2 of the London Plan, it is clear the site lies in a central area, which is defined in Notes to Table 3.2 as: *“Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre”*. The site falls within 320 metres of Camden Town Centre and is surrounded by buildings of up to 8 storeys many of which with large footprints e.g. Shirley House and Regents Canalside. Furthermore the application site has a PTAL of 6b reflecting its excellent accessibility by public transport. In central areas with a PTAL of 4 to 6, Table 3.2 of the London Plan indicates that appropriate density ranges of 650 – 1100 hr/ha are acceptable.
- 5.51 The revised scheme proposes a residential density of 979 habitable rooms/hectare which has decreased from 1143 habitable rooms/hectare in the withdrawn scheme (planning application ref.2014/4679/P) which exceeded the guideline density ranges. The proposed density falls within the upper quartile of the threshold and provides a density which is appropriate to the site’s context and surroundings in accordance with in the London Plan. The Design and Access Statement and the HTVIA conclude that the scale, bulk and height of the proposal are acceptable and will have a positive impact on relevant heritage assets. It is considered that this quantum of development is acceptable in this highly sustainable and accessible location on the edge of Camden Town Centre. The proposed density optimises the use of the site in accordance with national, regional and local guidance whilst creating a high quality sustainable mixed-use development which respects the amenity of existing occupiers.

Residential Unit Mix

- 5.52 Policy 3.8 of the London Housing Planning Guidance states that development proposals should demonstrate how the mix of dwelling types and sizes meet the strategic and local borough targets and are appropriate to the location in

London. The dwelling mix table under Development Management Policy DP5 sets out Camden's priorities in relation to dwelling sizes. The dwelling size priority table (Policy DP5) identifies social rented dwellings of 3 bedrooms and 4 or more bedrooms as a 'very high priority' within the borough. In addition, the table further highlights intermediate affordable dwellings of 2, 3, 4 bedrooms to be of a 'high priority'. In terms of market housing the dwelling size priority table identifies that 2 bedroom dwellings are of very high priority. Therefore, the council will seek to focus provision around the very high and high priority dwelling sizes, by assessing dwelling mixes against the aims in the priorities table. Furthermore, the council states that where possible a mix of large and small homes should be included within each category provided, therefore, ensuring development provides some dwelling sizes that are of high priority.

Assessment – Residential Unit Mix

- 5.53 At the pre application meeting on 3rd October 2013 the planning officer noted that the residential mix has improved throughout the evolution of the scheme, however, identified that there were too many 1 bed market units. Therefore, it was suggested that some of the 1 bed market units should be combined into 3 and 4 bed units to face onto Camden Street. Following the withdrawal of planning application ref. 2014/4679/P the residential mix has been revised accordingly to reflect the views of officers.
- 5.54 The withdrawn application (ref.2014/4679/P) proposed 62 residential units, the mix of units is detailed below:
- Of the proposed provision 14 flats were proposed to be affordable (26%). Of this 45% were proposed to be social rented and 55% were proposed to be Intermediate (based on areas).
 - 48 Market flats were proposed which equated to 77.4% of the total proposed. 50% of which were proposed as 2 bed flats in compliance with Camden's Development Management policy 5 (40% requirement).

- 9 Intermediate flats were proposed which equated to 14.5% of the total proposed. The policy requirement of DP5 requires 10% of these to be large flats.
- 5 social rented flats were proposed which equated to 8.1% of the total proposed. 80% of which were proposed as large flats in compliance with Camden's Development Management policy 5 (50% requirement).

5.55 Following the discussions with the officers at Camden Council it was confirmed they would prefer to see a housing tenure split which reflected 60:40 social rented / intermediate in accordance with Development Management Policy 3. The residential mix has been revised to respond to the comments received and comply further with Development Management Policy 3 and 5. The development now proposed 53 residential units, the mix of units is detailed below:

- Of the proposed provision 12 flats are proposed to be affordable (23%). Of this 59% are proposed to be social rented and 41% are proposed to be Intermediate. This is therefore in broad compliance with Development Management Policy 3.
- 41 Market flats are proposed which equates to 77.4% of the total proposed. 41.5% of which were proposed as 2 bed flats in compliance with Camden's Development Management Policy 5 (40% requirement).
- 6 social rented flats are proposed which equates to 11.3% of the total proposed. 50% of which were proposed as large flats in compliance with Camden's Development Management policy 5 (50% requirement).

The proposed residential mix is further detailed in the below matrix.

5.56

<i>Proposed Residential Mix</i> <i>by Flat Types</i>						
	<i>1 bed</i>	<i>2 bed</i>	<i>3 bed</i>	<i>Total</i>	<i>Percentage</i>	<i>Aim*</i>
				<i>of each category</i>	<i>of all flats</i>	<i>according to Policy DP5</i>
						<i>by current scheme</i>
<i>Market (Private)</i>	17	17	7	41	77.4%	<i>of Market (Private)</i>
	41.5%	41.5%	17.1%			40.0% 2-bedroom flats 41.5% 2-bedroom flats
<i>Intermediate</i>	4	2	0	6	11.3%	<i>of Intermediate</i>
	66.7%	33.3%	0.0%			10.0% large flats 0.0% large flats
<i>Social Rented</i>	2	1	3	6	11.3%	<i>of Social Rented</i>
	33.3%	16.7%	50.0%			50.0% large flats 50.0% large flats
TOTAL	<i>1 bed</i>	<i>2 bed</i>	<i>3 bed</i>	<i>Total</i>		
	23	20	10	53		
	43.4%	37.7%	18.9%	100.0%		

** high / very high priority*
1) RSL requirement for Intermediate is for 1B & 2B units

5.57 The proposed schemes residential mix has been revised to further accord with Camden's Development Management Policy DP3 'Contributions to the supply of affordable housing' and Development Management Policy DP5 'Homes of Different Sizes'. In particular the scheme now provides:

1. Over 40% of provision as two bedroom market units
2. 50% of the affordable provision as family sized affordable units.

5.58 Therefore, we consider that the revised scheme meets the requirements of the priorities table set out within policy DP3, DP5 and policy 3.5 of the London Housing Guidance and offers a range of dwelling sizes and tenures to meet the identified local housing priorities. The residential unit schedules are detailed within the application drawing package and Design & Access statement produced by Chassay + Last.

Quality of Residential Accommodation

Residential Space Standards

- 5.59 The LP Policy 3.5 contains minimum space standards for new residential developments (Table 3.3). Table 3.3 requires a minimum size of 83m² for two bedroom, four person dwellings accommodated over two floors.

Assessment – Residential Space Standards

- 5.60 The proposed residential unit sizes have been considered against the space standards contained within the London Plan. The flat areas for the proposed development range from 50 m² (one bed two person) – 101 m² (three bedroom six person). In addition, there is also an accessible wheelchair unit at ground floor level that is 119m² in size. Therefore, all units accord or exceed the space standards prescribed, thereby providing an excellent standard of accommodation and amenity for prospective occupants.

Amenity Space Standards

- 5.61 Policy 3.6 of the London Plan states that all children and young people should have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible. It goes on to state that 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.
- 5.62 London's Housing SPG (November 2011) requires a minimum of 5 m² of private outdoor space should be provided for 1-2 person dwellings and an extra 1 m² should be provided for each additional occupant.
- 5.63 Policy 3.4 of the London Housing Planning Guidance details that whilst optimising development sites the public amenity and should not be compromised. The document states that private open space is highly valued and should be provided in all new housing developments. The standards for amenity space are as follows;
- Standard 4.10.1 – a minimum of 5m² of private outdoor space should be provided for 1 – 2 person dwellings and an extra 1 m² should be provided for each additional occupant

- Standard 4.10.2 – all private outdoor space should have level access from the home
- Standard 4.10.3 – The minimum depth and width for all balconies and other private external spaces should be 1500mm.

5.64 LB Camden's CPG2 refers to private outdoor amenity space and in particular:

- All new dwellings should provide access to some form of private outdoor amenity space, e.g. balconies, roof terraces or communal gardens;
- Private gardens should be allocated to family dwellings; and
- The access to private amenity space should be level and should be from the main living space.

Assessment – Amenity Space Standards

5.65 The scheme proposes a minimum of 5m² amenity space for each of the dwellings. It is considered the scheme provides attractive, usable amenity space which meets the requirements set out above, and mindful of the constrained nature of the site a relatively significant level of amenity space is achieved through high quality and extensive design.

Noise Impact

5.66 Camden's Development Management Policy DP26 'Managing the impact of development on occupiers and neighbours' states that the Council will protect the quality of life of occupiers and neighbours by granting permission for development that does not cause harm to amenity including noise and vibration levels. Policy DP28 of Camden's Local Policy details that the council will seek to ensure that noise and vibration is controlled and managed within new developments. The policy details that the council will seek to minimise the impacts on the local environments from the demolition and construction phases of development. The policy further details that the effects of noise and vibration

can be minimised by separating uses sensitive to noise from development that generates noise by taking specific measures to reduce potential impacts. Camden's guidance CPG 6 'Amenity' details the above measures.

Assessment – Noise Impact

- 5.67 The supporting Noise Assessment produced by Hann Tucker Associates details the results of a 24 hour environmental noise survey which has been undertaken. The report details that the site falls into Noise Exposure Category C and proposes the external envelope of the new residences to incorporate suitable specified glazing and ventilation, to achieve the BS 8233 criteria. The issue of noise has been considered throughout the design of the proposed scheme and has been fed into the detailed design. This therefore concludes that these measures are achievable through conventional construction and that the proposed development will have an acceptable noise climate. Therefore, the proposed measures are in accordance with Policy DP28 and Camden's CPG6.

Daylight and Sunlight Levels within the Proposed Development

- 5.68 Camden's Development Management Policy DP26 details 'Managing the Impact of Development on Occupiers and Neighbours' specifically sunlight, daylight and artificial light levels. The policy notes that this needs to be taken into consideration for the future occupiers of the proposed development. The policy further details that these elements should be considered at the design stage and prevent potential negative impacts of the development on occupiers.

Assessment – Daylight and Sunlight Levels within the Proposed Development

- 5.69 The Light Within Assessment (December 2014) produced by Anstey Horne confirms that there are no mandatory standards for daylight provision within dwellings in the Building Regulations or the Code for Sustainable Homes, however, a number of good practice guides are available.
- 5.70 The revised Assessment concludes that daylight levels have been assessed in a number of habitable rooms in the proposed development in accordance with the BRE guidelines (2011, second edition). The report confirms a high level of

compliance of the BRE target values achieved for the ground and first floor level of the proposed development. It is expected that the residential accommodation at the upper levels to obtain even high levels of daylight in excess of the BRE guidelines therefore in compliance with the Camden's Development Management Policy DP26.

Affordable housing

- 5.71 London Plan Policy 3.10 highlights that affordable housing should be provided in developments of a particular size, which incorporates social rented, affordable rented and intermediate housing. It further details that Boroughs should seek to maximise affordable housing by providing 60% social and affordable rent and 40% for intermediate rent or sale and should set overall targets having regard to guidance provided in the London Housing Supplementary document (3.11).
- 5.72 Policy 3.12 of the London Plan states that negotiations for the reasonable level of affordable housing should priorities the provision of affordable family housing. However, account should be afforded to individual circumstances including development viability and resources available from registered providers. Policy 3.13 states that sites with the capacity to provide 10 or more homes should normally provide affordable housing on site.
- 5.73 Camden's Core Strategy Policy CS6 states that an affordable housing target of 50% of total addition to housing floorspace should be met, with guidance of 60% social rented and 40% intermediate housing. The council will expect the appropriate contribution to be made on-site and where it cannot practically be achieved on site, the council may accept off-site affordable housing.
- 5.74 Development Policy DP3 states that 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 the 50% target, but will apply this target with a sliding scale.

Assessment - Affordable Housing

5.75 The proposed scheme which was discussed at the 4th pre application meeting offered 23% affordable housing. At the pre application meeting the planning officer stated that they would normally expect 50% affordable housing from a development of this scale. Before the submission of application ref. 2014/4679/P, a viability appraisal was submitted which justified the level of provision offered. This was submitted to the council on 20th June 2014. The Officers discussed the proposed affordable housing provision throughout the application process of the submitted application. It was confirmed that the revised provision would need to be robustly supported by a Affordable Housing Statement. The Affordable Housing Statement report (December 2014) produced by Douglas Birt concludes that the financially viable level of affordable housing that the scheme can support is 12 new affordable homes, 3 of which will be family sized 3 bed general needs rented flats and 1 2 bed 3 person wheelchair accessible unit. This provision equates to an affordable housing level of:

- a. 23% of the number of units; and
- b. 23% of the habitable rooms; and
- c. 23% of the persons housed.

5.76 This is the maximum viable amount of affordable housing the scheme can support. The viability assessment is considered robust on the basis that the level of developer profit is below the industry standard of 20%.

Impact on Amenity of Adjacent Residents

5.77 A core principle of the NPPF seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. The NPPF further considers amenity of local residents and neighbours in its assessment for proposed residential development.

5.78 Policy 3.5 of the London Housing Guidance to require designs of new housing developments to consider elements that enable the home to become a comfortable place of retreat. In densely developed areas natural light may be

restricted therefore this is a key consideration. When considering the amenity of neighbours each dwelling is to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces in accordance with policy 5.1.1.

- 5.79 Standard 5.5.1 and Standard 5.5.2 details that glazing to all habitable rooms should not be less than 20% of the internal floor area of the room. The second standard states that all homes should provide for direct sunlight to enter at least one habitable room for part of the day. The standard further states that living areas and kitchen dining spaces should preferably receive direct sunlight.
- 5.80 Camden's Policy CPG1 and CPG8 details that house and flat developments should be arranged to safeguard the amenity and privacy of occupiers and neighbours. Therefore, new developments should not subject neighbours to unacceptable noise disturbance, loss of security or overlooking and minimised levels of daylight/sunlight.
- 5.81 Camden's Development Management Policy DP 26 'Managing the impact of development on occupiers and neighbours' confirms that planning permission will not be granted where proposed developments have a detrimental impact on the neighbouring residents and cause harmful overlooking to these residents. Camden expect the following factors to be considered through the design of the development:
- Visual Privacy and Overlooking;
 - Overshadowing and Outlook; and
 - Sunlight, Daylight and Artificial Light Levels.

Assessment - Impact on Amenity of Adjacent Residents

- 5.82 Following the submission of the previous planning application (Application Ref. 2014/4679/P), the proposed layout of the scheme has evolved to optimise unit numbers, whilst ensuring the highest standards of design to include dual aspect

dwelling units. To the south-east and east of the site is the Regent's Side Canal and buildings such as Shirley House, which is currently a commercial building. To the east and north east is the Regent Canal side Development which is of a distance once completed from the proposal site that privacy and overlooking will not cause a detrimental impact to the surroundings.

- 5.83 Consideration has also been given to privacy and overlooking with immediately surrounding residential properties. The closet neighbouring residential premises are located along Bonny Street, where the direct distance from balcony to the wall of the adjacent mews is approximately 10.6m. However, this is across a public highway where overlooking is not considered to be a material consideration. This is not uncharacteristic of the urban area due to the contextual layout of the surrounding residential area. The supporting Design and Access Statement produced by Chassay + Last details the proposed developments design and has concluded that there are no significant issues with privacy and overlooking between the proposed residential units in accordance with DP26.
- 5.84 The supporting Daylight and Sunlight Assessment produced by Anstey Horne confirms that there will be no detrimental impact on the daylight and sunlight of the neighbouring occupants in accordance with Camden's Development Management Policy DP26.
- 5.85 Therefore in summary, there are no detrimental impacts on the privacy and daylight and sunlight levels of the neighbouring occupants in accordance with Camden's Development Management Policy DP26.

Basement Impact

- 5.86 Camden's Development Policy DP27 states that for basement and other underground development, an assessment of the proposed scheme's impact on drainage, flooding, groundwater conditions and structural stability should be conducted and submitted. The policy details that basement development will only be permitted where it does not cause harm to the built environment and local amenity that could result in flooding or ground instability. This policy is

further detailed within Camden's Planning Guidance 'CPG4 Basements and Lightwells'.

Basement Impact - Assessment

- 5.87 In accordance with CPG4, The updated Basement Impact Assessment (December 2014) addresses the screening, scoping and impact of CPG4. The report produced by Price and Myers concludes that the soil investigation and associated studies have demonstrated that the development will not have an adverse effect on the local ground and surface water regime. In addition, the assessment concludes that the proposed development is unlikely to cause damage to the surrounding buildings and structures.

Landscaping and Open Space

- 5.88 London Plan Policy 7.5 seeks to ensure that proposed developments contributes and enhances the public realm and that landscaping treatment should be of the highest quality.
- 5.89 Core Strategy Policy CS15 aims to protect and improve open spaces and encourage the enhancement of existing habitats through the provision of new trees and vegetation.
- 5.90 Development Policy DP24 details that developments should consider existing natural features and the provision of appropriate hard and soft landscaping including boundary treatments and the provision of appropriate amenity space.

Assessment - Landscaping and Open Space

- 5.91 An Arboricultural Impact Assessment has been prepared by Landmark Trees and concludes that the potential impacts of development are relatively low and that the full potential of the impacts can be largely mitigated through design. Therefore, it can be concluded that the proposals will not have any significant impact on either the retained trees or wider landscape.

- 5.92 Proposed landscaping within the development is located along the Bonny Street frontage and through the inclusion of green roofs. This will enhance both the street scene and the environment of Regent's Canal Conservation Area. This is in accordance with CS15 which seeks to preserve and enhance the quality of the environment of the Regent's Canal and DP24. Further details of the landscaping can be found in the Landscape Design and Access Statement (December 2014) produced by Turkington Martin.
- 5.93 Within the development itself there is no open space provided. However, the site is within close proximity to a number of large open spaces including Camden Gardens located 60m in distance, Castlehaven Open Space 320m in distance and Primrose Hill/Regents Park 1.6km in distance. Therefore, the site has excellent access to open space which justifies this aspect of the development due to its central urban location. This is in accordance with CS15 and the proposal will contribute towards the enhancement of these through the S106 Agreement.
- 5.94 The proposed drawings and Design and Access Statement produced by Chassay + Last detail the proposed landscaping in further detail.

Sustainability, Energy, Code for Sustainable Homes and BREEAM

- 5.95 The NPPF encourages the use of renewable and low carbon energy (Policy 97).
- 5.96 Policy 5.2 of the London Plan requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- Be lean: use less energy
 - Be clean: supply energy efficiently
 - Be green: use renewable energy

- 5.97 Policy 5.2 also notes that residential development should improve on 2010 Building Regulations by 25%. The LP also seeks to increase the proportion of energy generated from renewable sources (Policy 5.7).
- 5.98 Policy 5.3 of the London Plan addresses Sustainable Design and Construction and notes the development proposals should, inter alia.
- Minimise carbon dioxide emissions across the site;
 - Include efficient use of natural resources including water;
 - Minimise the generation of waste; and
 - Secure sustainable procurement of materials.
- 5.99 London Plan Policy 5.7 addresses renewable energy and notes that within the energy hierarchy of Policy 5.2, major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 5.100 London Plan Policy 5.9 requires major development proposals to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs. Green roofs and walls are encouraged within London Plan Policy 5.11.
- 5.101 Development Management Policy DP22 requires development to incorporate sustainable design and construction measures and expect that new build housing will meet code level 3 by 2010 and code 4 by 2013.

Assessment - Sustainability, Energy, Code for Sustainable Homes and BREEAM

- 5.102 The updated Sustainability Assessment by Price & Myers for the revised proposal notes that the proposed scheme's anticipated credit score is 70.36% which equates to a Code for Sustainable Homes Level 4 rating. This demonstrates that

the proposal complies with London Plan policy and Development Management Policy DP22.

- 5.103 The scheme will provide high quality sustainable Houses through its use of low energy sources and robust construction. The scheme has been designed to meet Code for Sustainable Homes Level 4 and therefore complying with both local and national policy.

Transport, Servicing and Cycle Parking

- 5.104 Policy 30 of the NPPF states encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion... local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

- 5.105 The London Plan (Policy 6.1) encourages closer integration of transport and development by:

- encouraging patterns and nodes of development that reduce the need to travel, especially by car;
- seeking to improve the accessibility of public transport, walking and cycling;
- supporting development that generates high levels of trips at locations with high levels of trips at locations with high public transport accessibility and / or capacity.

- 5.106 Policy 6.9 of the London Plan indicates that developments should provide secure, integrated and accessible cycle parking facilities. The London Plan Table 6.3 notes that 1 cycle space per 1 or 2 bed units and 2 cycle spaces per 3 or more bed units should be provided for residential use.

Assessment - Transport, Servicing and Cycle Parking

- 5.107 TTP have produced a Transport Statement and Travel Plans associated with the proposed office and residential areas which support this application. The proposal is car free and therefore there will be no impact on the highway. This reflects the excellent accessibility of the site. The pre-application response welcomed this and states the Council's intention is to secure this through a S106 agreement which will ensure that new residents will not be able to apply for resident parking permits, ensuring that the ability of existing residents to park is not impacted upon.
- 5.108 In terms of cycle parking following the pre-application meetings the number of bicycle stands within the lower ground floor has increased from 70 and the proposed development now provides 122 cycle spaces. Therefore the cycle parking provision is in accordance with policy 6.9 of the London Plan and provides adequate facilities for both the residential and commercial development.
- 5.109 In summary the proposed development is acceptable in traffic and transport terms and meets national and local policy.

Accessibility

Lifetime Homes and Wheelchair Accessible Units

- 5.110 London Plan Policy 3.8 states that all new housing is built to 'Lifetime Homes' standards. Policy 3.8 also notes that 10% of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Policy DP6 requires that all new dwellings meet lifetime homes standards. In addition 10% should be wheelchair accessible.

Assessment - Lifetime Homes and Wheelchair Accessible Units

- 5.111 Lifetime Homes standards are met in all residential units and follow the technical guidance issued in the Code for Sustainable Homes.

- 5.112 The proposal ensures that all units have been designed to comply with Lifetime Homes Standards and all five units have been designed to be easily adapted to wheelchair accessible standards.
- 5.113 In addition the proposed development provides 1 2 bed wheelchair accessible unit in accordance with Camden's Local Policy DP6.
- 5.114 It is therefore concluded that the Development fully complies with policy in relation to Lifetime Homes and wheelchair standards. This is further details in the Lifetime Homes Statement and Wheelchair Accessibility Statement produced by Chassay + Last.

Waste Storage and Collection

- 5.115 Core Strategy Policy CS18 relates to the reduction of waste and encouraging recycling in the borough. Point b of the policy ensures that developments include facilities for the storage and collection of waste. This is reiterated in Development Management Policy DM26. Camden Planning Guidance 1 Design requires 0.2m² waste storage per two bedroom dwelling.

Assessment – Waste Storage and Collection

- 5.116 Separate waste and recycling facilities will be provided within each dwelling in the kitchen area. The amount provided will accord with CPG1 as outlined above. External waste storage areas are not required.
- 5.117 Further details of the waste and recycling facilities can be found in the Waste Storage and Collection Strategy produced by Chassay + Last.

6.0 PLANNING OBLIGATIONS

6.1 The proposed development includes a package of planning obligations that will be secured through a S106 Agreement. These obligations will secure the necessary infrastructure improvements to meet the needs of prospective residents and will benefit the existing local community. In identifying the level and scope of planning obligation to be secured, the Council's Supplementary Planning Guidance has been followed.

6.2 A summary of the Heads of Terms that will be secure through the S.106 Agreement is set out below. It should be noted that the Section 106 contributions in the appraisal is based on £420,000 (£417,172.54) which is broken down as follows:

- Education Facilities and Life Long Learning – £81,875 (based on CPG8);
- Community Facilities – £91,140 (based on CPG8);
- Public Open Space - £73,332.54 (based on CPG8);
- Decentralised Energy Networks - £148,825 (based on CPG8)
- Loss of Employment space – £22,000 (based on CPG8);
- Public Art – 1% of gross development value (sum offered).

6.3 The level of Mayor CIL is £149,950. The Section 106 contributions are considered reasonable given the scale and nature of the proposed scheme. Any increase in the level of Section 106 contributions will have an adverse impact on the affordable offer.

6.4 Therefore to conclude, it is considered that the optimal planning contributions are being delivered for the proposed scheme in accordance with Policy DP3 and CPG 8.

7.0 SUMMARY AND CONCLUSION

7.1 This planning statement has assessed the proposed development against the National Planning Policy Framework (NPPF), The London Plan, Camden's Local Development Framework and National and Local Supplementary Planning Guidance.

7.2 The proposal has responded and evolved to extensive pre-application discussions and feedback received from the local consultation held between February 2011 – October 2014 with Camden's Officers and key stakeholders.

7.3 The planning statement and accompanying planning application documents demonstrate a wide range of benefits that the proposed development will offer to the London Borough of Camden. In addition, the proposal has been thoroughly assessed against national and local policy and accords with the key policy themes and policies. In particular, the proposed development will;

- Redevelop and optimise a highly accessible and sustainable brownfield site on the edge of Camden Town.
- Provide 1959 m2 of adaptable, high quality and modern commercial floorspace that will support the local economy of Camden and the wider area and be suitable for small and medium sized businesses
- Respond to the local character of the area by providing a suitable development where residential and commercial areas interact.
- Respect and complement the character of the Regents Canal Conservation Area through providing a development that has included extensive design work to meet the design officer's expectations.
- Enhance the character of both the Regent's Canal Conservation Area and the listed buildings located along Bonny Street through demolition of redundant buildings and redevelopment of the site as concluded by the THVIA.

- Contribute towards Camden's housing supply through proposing 53 residential units.
- Deliver 53 high quality residential units across a mix of private and affordable tenures;
- Deliver various residential unit sizes appropriate to the needs identified within Camden's local policy;
- Create a high quality residential environment with generous room sizes and amenity space with many dual aspect units.
- Respect the amenity of the neighbouring residents;
- Incorporate principles of sustainable design through construction, energy, water and waste reduction measures; and
- Provide a car free scheme that's promotes the use of sustainable transport within the area.

7.4 It is considered that the proposed development is in accordance with relevant local and national planning policy guidance, we therefore respectfully request that the Council grants planning permission for the proposed development.

