



PLANNING STATEMENT

**PLANNING
APPLICATION FOR
MIXED USE
DEVELOPMENT OF
EXISTING BUILDINGS
AT
REAR OF 36 – 52
FORTESS ROAD,
FORTESS GARAGE AND
20 FORTESS GROVE,
CAMDEN, LONDON
NW5 2HB**

**The Estate Charity of
Eleanor Palmer**

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Planning • Heritage

Specialist & Independent Advisors to the Property Industry

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1.0 INTRODUCTION

1.1 This planning statement has been prepared on behalf of The Estate Charity of Eleanor Palmer in support of a full planning application and conservation area consent for the proposed redevelopment of 36-52 Fortess Road, Fortess Garage & 20 Fortess Grove, Camden, London, NW5 2HB.

1.2 The application seeks planning permission for the:

"Part demolition and part retention of existing warehouse structures to create 1,138 sqm of commercial floorspace over 3 levels, 8 no. 3 bedroom and 1 no. 2 bedroom dwellings, together with associated landscaping"

1.3 The application proposals have been the subject of a number of pre-application meetings held with officers at the London Borough of Camden (hereinafter 'the Council'). The supporting documentation required for validation of the planning application is detailed below. This has been sent to the relevant officers and discussed at the pre-application meetings.

- a. Planning Statement June 2015 – CgMs Consulting;
- b. Air Quality Assessment June 2015 - Air Quality Consultants;
- c. Geotech/ Contaminated Land Assessment April 2015 – Delta Simmons;
- d. Construction Management Plan July 2015- Cooley Architects;
- e. Daylight Report August 2014 – Right of Light Consulting, EB7;
- f. Employment Land Viability Report July 2015 – Davis Brown;
- g. Energy Report July 2015 – NRG consulting;
- h. Structural Assessment June 2015- Blyth Blyth;
- i. Archaeological Assessment July 2015- Heritage Collective; and
- j. Heritage Assessment July 2015 – CgMs Consulting.

1.4 The report is structured as follows:

1.0 Introduction (this section)

2.0 The site and surrounding area

- 3.0 Evolution of development scheme
- 4.0 Proposed development
- 5.0 Relevant Development Plan Policies
- 6.0 Planning considerations
- 7.0 Conclusion

2.0 THE SITE AND SURROUNDING AREA

- 2.1 The application site covers approximately 0.17ha and sits between Fortess Road and Leverton Street in the London Borough of Camden. The existing buildings completely occupy the site and comprises of a single storey vehicle repair workshop premises, a single storey warehouse and a dwelling (use class B2 and Sui Generis) located on the east side of Fortess Road and the northern side of Fortess Grove. The warehouses are thought to have been built in the 1930's and have had their roofs replaced in the 1970/80s.
- 2.2 Access to the site is from both streets via two small mews, Fortess Grove and Railey Mews. It is located within close proximity to Kentish Town Tube station (approximately 350m to the south of the site) which is located within Zone 2. Several bus routes operate in the area and the closest bus stop is located on Fortess Walk. The site is therefore highly accessible by public transport and achieves a PTAL score of 5 offering a sustainable location for development.
- 2.3 The surrounding area is characterised by primarily residential dwellings with ground floor commercial use along Fortess Grove. The buildings immediately along Fortess Grove are 5 storeys in height with Leverton Street being lower in scale. The immediate mews streets are lower in scale and generally two storeys in height.
- 2.4 A section of the workshop (alongside Railey Mews) and No.20 Fortess Grove is located within the Kentish Town Conservation Area. The remainder of the site bounds the Kentish Town Conservation Area. The application site is located within a TFL Underground Zone of Influence, an Archaeological Priority Area and potentially contaminated land.
- 2.5 The Pineapple public house on Leverton Street is listed and no.28-34 Fortess Road is a non-designated heritage asset.
- 2.6 The site is not located within a flood risk zone.

3.0 EVOLUTION OF DEVELOPMENT SCHEME

Initial pre-application- November 2013

3.1 The scheme has evolved through extensive pre-application discussions with planning officers. On 22nd November 2013 a pre-application meeting was held with officers at Camden Council. A number of options were presented at the meeting:

- 1) Proposal for the change of use an existing vehicle repair workshop and premises of approximately 1400sqm to residential accommodation.*
- 2) Proposal for 6 no. 3bed units arranged in a single row north to south.*
- 3) Proposal for 6 no. x 3bed units and 2 no. 4 bed units arranged in a crescent to the south of the site.*
- 4) Proposal for 2no. 1 bed flat, 1no. 2 bed flat, 1 no. 3 bed flat within a four storey block facing Railey Mews. This proposal also included an element of affordable accommodation.*

3.2 The pre-application response from the officers at Camden Council dated 14th February 2014 appraised the proposed development schemes and highlighted the key considerations of the proposed development. These were considered to be:

Design and townscape

3.3 At this stage the outline massing was only detailed on the drawings which had taken into account the surrounding buildings. The proposals included three - four storey buildings. Officers required further detailed design drawings to determine the appropriate height of the proposed buildings but confirmed that a four storey block at the site would not be acceptable.

Land Use – Loss of workshop accommodation

- 3.4 The pre-application advice detailed that the officers consider the premises/site suitable for continued business use and detailed that within the context of the site, it is understood that any redevelopment of the site is to include the re-provision of the employment floorspace.

Provision and quality of residential accommodation

- 3.5 The pre-application advice stated that the proposed residential mix would provide a significant number of large (3 bed+) units and was subsequently considered acceptable. The advice further highlighted that all new homes should comply with Lifetime Homes and residential development standards.

Adjacent residential amenity

- 3.6 The officers considered that the arrangement of buildings in a crescent to the south of the site and in a single row to the north to south would lead to a loss of privacy and sense of enclosure along Fortess Grove and Railey Mews, however, suggested that design development and further measures could mitigate against this.

Transport, access and parking

- 3.7 The advice highlighted that there is a potential need for parking associated with the proposed larger units, however, due to CPZ constraints the council considered that a car free development scheme is appropriate. The advice confirmed that the cycle parking provision is in line with the council's policy.

Second pre-application - December 2014

- 3.8 The pre-application advice was taken into consideration and the design was developed further. A second pre-application meeting on the revised scheme was held on December 2014 for the:

"Demolition of the existing car repair/warehouse (B2/B8/Sui Generis) and retention of an existing dwelling for the erection of 9 dwellings (Class C3) comprising 8x3 bedroom, 1 x 2 bedroom (excluding the existing dwelling) and re-provision of commercial floorspace (B1 Use) totalling 1,067sqm."

- 3.9 The pre application response, received on the 8th April 2015 highlighted the key considerations of the proposed development. These were considered to be:

Design related issues/townscape

- 3.10 The pre-application advice confirmed that the design of the commercial element must be sympathetic to the character of the area's built form and be appropriate for the intended commercial users.

Land Use – Loss of workshop (B2) accommodation

- 3.11 The pre application advice detailed that the officers considered the proposed replacement of employment floorspace acceptable, aligning with policies CS8 and DP13. The Officers confirmed that the proposed floorspace would be suitable for small businesses, able to support light industrial uses and likely to represent an uplift in the number of jobs supported by the site officers confirmed the small overall loss in floorspace of 356sq m was acceptable.

Provision and quality of residential accommodation

- 3.12 The pre-application advice confirmed that the proposed residential mix would provide a significant number of large (3 bed+) units (medium priority) and 1 x 2 bed unit (high priority) and was subsequently considered acceptable. The advice further highlighted that the units would comply with the minimum floorspace requirements set out in the CPG and London Plan.

Adjacent residential amenity

- 3.13 The officers considered that the form and position of the proposed Type A and Type B residential units would not result in materially detrimental loss to adjacent properties along Railey Mews.

Transport, access and parking

- 3.14 The pre-application advice confirmed that any proposals for general car parking would be resisted given the highly sustainable location of the site and that a car free development is appropriate.

Summary on Pre-application Advice Received

- 3.15 The advice received through the pre-application process has been thoroughly considered throughout the development of the scheme. This Planning Statement details how the proposal has evolved and assesses it against national and local planning policy taking into consideration the opportunities and constraints of development site.
- 3.16 The proposed scheme has three distinct but interrelated parts:
- The townhouses occupying the shell of the large industrial building;
 - The commercial building in the smaller industrial building;
 - The small mews house filling the shell on Railey Mews.

Consultation Process

- 3.17 The applicant and consultant team have consulted the local residents of the surrounding area of the proposed development. There was initially dialogue between the architect, Cooley Architects and the Railey Mews Residents Association. The aspirations of the applicant and proposal were explained to the chair of the organisation who fed back these details to the residents. Following this, leaflets detailing the proposed plans were circulated to those properties

surrounding the site on 4th March 2015. A website was also made available which included details about the proposal and published the full planning drawings. Comments were received from a number of residents which generally requested further information and clarity over certain aspects of the development.

- 3.18 There was further dialogue between Colley Architects and the chair of the Railey Mews Residents Association which requested that a meeting was held with the group when the proposed plans were finalised but prior to the submission of the planning application. This meeting was held on 27th July at the Pineapple Pub, where approximately 45 residents queried and explained their concerns over the proposal. The consultant team responded to these and presented the finalised drawings at this meeting and detailed the timeframes of the planning application.

4.0 PROPOSED DEVELOPMENT

4.1 The proposal comprises of:

“Part demolition and part retention of existing warehouse structures to create 1,138 sqm of commercial floorspace over 3 levels, 8no.3 bedroom and 1no.2 bedroom dwellings, together with associated landscaping”

4.2 Further details of the design are illustrated on the proposed drawings and the explained within Design and Access Statement produced by Cooley Architects.

4.3 The commercial building is proposed to be located to the entrance of the site and will provide 1,138sq m of commercial floorspace. The commercial building is proposed to contain units which will be suitable for small – medium commercial enterprises. The proposed buildings sit within the shell of the existing building and maintains the existing entrance.

4.4 The 9 proposed residential units (excluding the retained) are proposed as both House Type A (3 bedrooms) and House Type B (2 bedrooms). These are further illustrated within the Design and Access Statement.

4.5 The residential units have been designed to lifetime homes standard and meet the residential space standards set out in the London Plan. The proposed development retains the existing brick shell and is to be constructed in high quality materials incorporating future proofing.

4.6 The development is proposed to be car free. A cycle store is provided in the commercial building for about 26 cycles using a 2-tier system and Sheffield cycle stands will be provided for visitors at the entrance.

4.7 The landscaping proposed comprises of metal planting boxes suspended on the old walls and the incorporation of green roofs within the development. The ground floor terraces will also be shielded by a deep metal screen with planting and the passage to the dwellings will include planting boxes for trees and shrubs.

5.0 RELEVANT POLICY CONTEXT

5.1 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 2011 and consolidated with further alterations in March 2015), the Camden Core Strategy and Development Policies Document adopted in 2010.

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

National Policy

National Planning Policy Framework (March 2012)

5.3 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.

The London Plan

5.4 The London Plan was adopted in July 2011 and has been since been consolidated with further alterations (FALP) in March 2015. 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".

5.5 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.

Local Policy

- 5.6 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).
- 5.7 It should also be noted that the Kentish Town Neighbourhood Forum published their Draft Neighbourhood Plan in April 2015 which detailed their aspirations for Kentish Town and the site. Their Draft Plan designated the site for 'Potential for development of better use'.

6.0 PLANNING CONSIDERATIONS

- 6.1 This section reviews the proposed development against the relevant planning policy and other material considerations.

Land Use – Redevelopment of Commercial Floorspace

- 6.2 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."

- 6.3 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. This applies to both B Class uses and other sui generis uses. Policy DP13 states that:-

"The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business use". Non-business use is considered acceptable if it can be demonstrated that the site is no longer suitable for its existing use. Policy DP13 further states that *"Where 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".*

- 6.4 Paragraph 13.3 of the Core Strategy states that when assessing proposals that involve the loss of a business use the Council will consider whether there is potential for that use to be retained. Camden Planning Guidance (CPG) 5 Town centres, Retail and Employment provides additional guidance on the loss of employment floor space. In CPG 5 Paragraph 6.4 states 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. CPG 5

Paragraph 6.18 states that there must be 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.

Assessment - Commercial Floorspace

6.5 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 in their current configuration are not suitable their continued business use.

6.6 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.

6.7 Based on the construction type and condition it is assumed that the larger warehouse is approximately 80 years old, and the smaller warehouse is either of similar age or built later. The roofs are assumed to have been replaced around 1970-1980.

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

6.8 The building is dated and no longer meets the requirements of modern occupiers. The commercial unit in particular requires an open layout and more robust floor construction to be occupied by a different user. Currently only part of the buildings are used for the car workshop.

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

6.9 The premises are outdated and fail to provide the quality of accommodation expected by modern occupiers. The Davis Brown Viability Report (July 2015)

concludes that 'the current buildings are economically, physically and functionally obsolete'. The report further states 'much of the premises do not comply with modern standards or meet with the statutory and regulatory requirements in terms of health and safety'. Therefore, the buildings require substantial expenditure to bring them up to any form of modern standard, the cost of which has been deemed uneconomical.

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

- 6.10 At present the site houses two functional warehouses used for prestige car repair by M&A Coachworks Ltd who are looking to relocate premises.

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

- 6.11 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 the premises are unable to provide adequate accommodation for small and medium businesses. The Davis Brown Viability Report concludes that even if the buildings are refurbished it will not be possible to secure a commercial occupier.
- 6.12 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

- 6.13 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.

- 6.14 The Viability Report concludes that the configuration is poor and the buildings are not well designed. The premises would require significant investment to bring up to any form of modern standards required by an industrial/warehouse occupier; the costs of which would be prohibitive to any occupier. Therefore the premises are considered neither suitable nor viable to undertake a full refurbishment. It concludes that even if the existing buildings were refurbished it would be difficult to secure a commercial tenant. Thus it is considered that the marketing of the commercial space would be little as no tenant could be found.

Replacement Commercial Space

- 6.15 Notwithstanding the above position on the viability of the existing floorspace the scheme proposes 1138sqm of flexible commercial floor space over 3 levels. The replacement commercial floorspace will be suitable for the full range of 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 in accordance with Policy DP13.

Summary of Commercial Floorspace

- 6.16 The principle of commercial floorspace at the site is accepted due to the existing site's use. The reduction in commercial floorspace in this instance has been accepted by Camden Council in their pre-application response dated 8th April 2015. The formal pre-app written response confirms that:
- a. Elements of the existing commercial space are only suitable for circulation and thus can be discounted from the total figure;
 - b. The slight reduction in employment floorspace is justified and accepted by the council; and
 - c. The part conversion and refurbishment of the site will significantly increase overall employment numbers at the site.

- 6.17 The replacement floorspace is proposed to be:

- a. Flexibly designed to be suitable for a number of different occupiers or single occupation;
- b. Have high floor to ceiling heights; and
- c. Retain large entrance doors for servicing.

6.18 The proposal seeks to redevelop the commercial floorspace so that it is suitable for a full range of B1 occupiers, including light industrial. Although there is a small loss of overall employment floorspace from the existing, it has been demonstrated that the current configuration of the building is not appropriate and flexible for a wide range of commercial tenants. The current commercial floorspace is restricted to its existing use and therefore we feel it is appropriate to redevelop the site. The proposed replacement of employment floorspace therefore adheres to Policy DP13.

6.19 The Viability Report produced by Davis Brown confirms that in the buildings current form it would be very difficult to secure a tenant who would take on the building. This is due to the existing constraints including the height of the building, the split level floors and the limited parking/unloading facilities. The report confirms that the costs of refurbishment would be prohibitive to any occupier and that the buildings are economically, physically and functionally obsolete.

6.20 In addition, the redevelopment of commercial space will offer the opportunity to enhance the localised economy through providing floorspace that has the capacity to provide more jobs than the existing use. The supporting Viability Report confirms that between 13 and 15 persons are employed in the current buildings which is a very low employment rate for the floor area. The proposed commercial floorspace will have the capacity to employ up to 27 employees, therefore, highlighting a significant increase.

Land Use – Residential Provision

- 6.21 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and sets out the Government's planning policies for England. The NPPF is part of the development plan and proposed development should reflect its principles.
- 6.22 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. Paragraph 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 Paragraph 196.
- 6.23 Paragraph 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...*".
- 6.24 Section 6 of the NPPF specifically addresses delivery of a wide choice of high quality homes and Paragraph 49 notes that "*Housing applications should be considered in the context of the presumption in favour of sustainable development.*" Paragraph 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.
- 6.25 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.
- 6.26 An overriding theme within the London Plan (LP) is to accommodate growth in a sustainable way. London Plan 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*".

- 6.27 Policy 3.3 and Table 3.1 of the LP sets a minimum housing target of 42,000 additional homes per year. Borough targets are provided within Table 3.1 and this provides a minimum 10 year target of 8,892 units (2015-2025) and an annual monitoring target of 889 units (2015-2025) 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.
- 6.28 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.
- 6.29 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*'.
- 6.30 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

- 6.31 In accordance with the NPPF (paragraph 17) and local planning policy (CS6 and DP2) it is considered the proposed development will optimise land which is brownfield and currently underutilised. The site is wholly suitable for residential use as it is surrounded by residential dwellings along Fortess Grove, Railey Mews and the wider area.

6.32 Housing has been identified as the priority land use of Camden Local Development Framework (Policy CS6). Furthermore, Policy DP2 states developments must make the full use of Camden's capacity for housing. The surrounding area of the site is residential and as such, the introduction of high quality residential dwellings at the site is policy compliant alongside the existing commercial use.

6.33 The proposed development will deliver 8 no. 3 bedroom houses (medium priority) and 1 no. 2 bedroom house (high priority). The provision of 9 residential dwellings will contribute positively to Camden's housing target as outlined in the LP Policy 3.3 and Policy DP2 whilst meeting the identified housing needs. Furthermore, the delivery of new housing in a highly sustainable and accessible location adheres to Policy 3.5 of the LP.

Design Approach

6.34 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."

6.35 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...'.

6.36 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.

6.37 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.

6.38 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

- 6.39 In accordance with the NPPF (Policy 57, 58 and 17) and local planning policy (CS14) it is considered the proposed development will be of high quality design and provide a good standard of amenity for all existing and future occupants. The high quality design will optimise the floorspace of the site whilst creating residential dwellings and replacement commercial floorspace. The proposal is deemed to be of an appropriate proportion, composition, scale and orientation that enhances, activates and appropriately defines the area. Therefore, the development is compliant with Policy 7.6 of the LP.
- 6.40 The proposed dwellings type A and type B are of a high quality and have been designed to respond and respect the site's context and surroundings of Railey Mews and Fortess Grove. A courtyard style design is proposed to overcome the constraints of light, outlook and overlooking from neighbouring properties. The houses have two variations (type A and type B) to provide a variation of frontage to the buildings. The houses have rooflights and a courtyard to ensure that there are sufficient sources of natural light to the properties. The upper level windows facing the Railey Mews bedrooms will have translucent glass to allow light to enter the building but ensure that there is no outlook in that direction.
- 6.41 House type C retains its existing fabric and is designed as a courtyard-style mews house with access from Railey Mews. Furthermore, a fully glazed wall and rooflights ensure the living spaces have sufficient sources of natural light whilst the orientation of the property ensures that it will not be overlooked from the second floor of the commercial unit.
- 6.42 The proposed commercial building utilises the shell of the existing structure and will provide high quality flexible floorspace for a range of commercial tenants. A high quality design is proposed which will use glass to reduce the mass of the building to the surrounding area. A new tall slot window will punctuate the façade increasing its permeability and light. Further rooflights and a lightwell will ensure sufficient light enters the building whilst minimising the potential to overlook gardens. The roof is also designed to be sensitive to its surroundings.

The building plan will be flexible and able to support a mix of different unit sizes suited for enterprises of all types.

- 6.43 The proposed scheme retains the shell of the existing buildings to ensure continuity with the townscape and conservation of heritage assets. The development is complementary to the local character and context, in accordance with policies CS14 and DP24 of Camden Council and Policy 7.6 of the LP. Further details of the heritage of the site are detailed within the Heritage Assessment produced by CgMs Consulting.

Assessment - Structural Feasibility

- 6.44 The supporting structural feasibility report produced by Blyth and Blyth details the structural feasibility on the partial demolition and redevelopment of the site. The report concludes that the new development is to be constructed within these existing perimeter walls. It concludes that demolishing the existing roof structure will not have adverse structural implications on the neighbouring buildings as long as a safe demolition sequence and temporary propping is followed. Therefore the scheme is structurally feasible.

Heritage and Townscape Impact

- 6.45 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.

6.46 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.

6.47 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- Heritage and Townscape

6.48 The supporting Heritage Statement produced by CgMs, details the impact of the proposed development on the Kentish Town Conservation Area. The statement highlights that the application site has been shown to have a low to moderate potential for evidence of Roman agricultural activities, located within the rural hinterland of the city of London. There is also a moderate to high potential for medieval occupation, relating to the medieval settlement of Kentish Town and the possible Cantelowe manor house within 50m to the south of the application site. The assessment further states that there is a moderate potential for post-medieval garden features and remains associated with the demolished 19th century buildings. The consideration of heritage and townscape and the contribution made by the existing historic environment to the character of place has been recognised and the development is compliant with NPPF policy.

6.49 The assessment concludes that the proposals will result in the loss of elements of a group of industrial buildings that are of limited architectural and historic value adhering to NPPF policy and policies 7.8 and 7.9 of the LP. The proposed development retains heritage features such as the existing structure and will make a more valuable contribution to the surrounding townscape whilst preserving the employment uses and providing much-needed residential units. It concludes that the proposed development will enhance the character and

appearance of the conservation area. The development is therefore in accordance with Policy CS14 and DP24 which details heritage and conservation policy.

Quantum of Residential Provision

- 6.50 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 3.2. LP 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

- 6.51 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: *"Urban - areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes"*. The site is located in Kentish town just north of Camden Town Centre and the surrounding streets are primarily residential with some ground floor commercial use along Fortess Road. Fortess Road houses buildings which are generally 5 storeys in height but this is complemented by the mews streets which are generally two storeys in height. Furthermore the application site has a PTAL of 5 reflecting its very good accessibility by public transport. In urban areas with a PTAL of 4 to 6, Table 3.2 of the London Plan indicates that an appropriate density range of 200 - 700hr/ha is acceptable.
- 6.52 We believe that the scale of development proposed here has responded to the site's context and surroundings in accordance with the relevant policy. The Design and Access Statement and the Heritage Assessment conclude that the scale, bulk and height of the proposal are acceptable and will have a positive impact on the area. It is considered that this quantum of development is acceptable in this highly sustainable and accessible location.

- 6.53 In summary, the proposed development optimises the use of the site in accordance with national, regional and local guidance whilst reflecting its heritage context and creating a high quality sustainable mixed-use development which respects the amenity of existing occupiers.

Residential Unit Mix

- 6.54 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. Policy CS6 states that 2 bedroom units are of a high priority and 3 bedroom units of a medium priority within the borough.

Assessment – Residential Unit Mix

- 6.55 The development proposes 9 residential units plus one retained, the mix of units is detailed below:
- a. 4x3 bedrooms (House Type A)
 - b. 4x3 bedrooms (House Type B)
 - c. 1x2 bedrooms (House Type C)
- 6.56 The residential unit schedules are detailed within the application drawing package and Design & Access statement produced by Cooley Architects.
- 6.57 The development responds to Policy CS6 and the proposal for eight additional 3 bedroom units (medium priority) and the 2 bedroom unit (high priority) has been deemed acceptable in the pre-application response and meets a recognised housing need within the borough.

Quality of Residential Accommodation

Residential Space Standards

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

Assessment – Residential Space Standards

- 6.59 The proposed residential unit sizes have been considered against the space standards contained within the London Plan. The areas for the proposed development range from 102.8 sqm (GIA) for a two bed four person unit to a 127.04sqm (GIA) - 129.95sqm (GIA) for a three bedroom five person unit. 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

- 6.60 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.
- 6.61 London's Housing SPG (November 2011) requires a minimum of 5 sq m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq m should be provided for each additional occupant.
- 6.62 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 5sq m of private outdoor space should be provided for 1 – 2 person dwellings and an extra 1 sq m 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.

6.63 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

6.64 The scheme proposes a minimum of 7.7sq m amenity space for each of the dwellings. This exceeds the minimum requirements outlined in the London Housing SPG (2011) Policy 3.4. 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. The amenity space provided is therefore compliant with Camden's CPG2 and local policy.

Noise Impact

6.65 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

- 6.66 Given the existing use of the site there will be no additional adverse noise impact to the neighbouring units. Noise during the construction phase of the development will be limited and monitored to minimise its impact. Further details are outlined in the supporting Construction Management Plan. The proposed measures are therefore in accordance with Policy DP28 and Camden's CPG6.

Daylight and Sunlight Levels within the Proposed Development

- 6.67 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

- 6.68 The Daylight & Sunlight Report produced by EB7 confirms that all units achieve good daylight levels and are therefore compliant with BRE guidance.

- 6.69 The north-western orientation of the main façade and the availability of external amenity space have enabled the design team to take maximum advantage of the amount of daylight available. The trade-off of good daylight levels and private external amenity space leading off living rooms for direct sunlight is seen as acceptable considering the flexibility of the BRE guidance and it is therefore compliant with Camden's Development Management Policy DP26.

Air Quality Policy

- 6.70 Camden's Local Development Framework (LDF) Policy DP32 Air Quality and Camden's Clear Zone, in the Camden Development Policies Local Development Framework (London Borough of Camden, 2010) document, sets out how Camden will expect developments to reduce its impact on air quality. It states:

"The Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality."

- 6.71 The London Borough of Camden has also prepared a Supplementary Planning Document - Camden Planning Guidance (CPG) 6 Amenity (London Borough of Camden, 2011), which provides further guidance on air quality. It includes information on when an air quality assessment will be required, what an air quality assessment should cover and what measures can reduce air quality emissions and protect public exposure. The Council's overarching aim is for new development to be 'air quality neutral' and not lead to further deterioration of existing poor air quality. Mitigation and offsetting measures to deal with any negative air quality impacts associated with the development proposals may be required. The development should be designed to minimise exposure of occupants to existing poor air quality. It states that the Council requires assessments for:

"development that could have a significant negative impact in air quality. This impact can arise during both the construction and operational stages of a development as a result of increased NOx and PM10 emissions."

Assessment- Air Quality

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- 6.72 The Air Quality Assessment (June 2015) produced by Air Quality Consultants confirms that the proposed development is consistent with the NPPF, with Policy 7.14 of the London Plan.
- 6.73 The assessment recognises that the scheme will be car free and thus will not significantly increase traffic congestion and the impacts on local air quality will be insignificant. The building and transport related emissions associated with the proposed development are both expected to be below the relevant benchmarks.
- 6.74 Furthermore, with the mitigation measures to be implemented during construction it is expected that any residual effects will be 'not significant' and that the dust emission class is considered small. The development subsequently fulfils the requirements set out by supplementary Planning Document - Camden Planning Guidance (CPG) 6.
- 6.75 The proposal is compliant with Camden's LDF Policy DP32 as the report confirms that the overall operational air quality impacts of the development are judged to be insignificant and the dust emission small.

Impact on Amenity of Adjacent Residents

- 6.76 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.
- 6.77 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.

- 6.78 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.
- 6.79 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.
- 6.80 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

- 6.81 The proposed layout of the scheme has evolved to optimise unit numbers whilst ensuring the highest standards of design. The Design and Access Statement details this further and confirms that there are no significant issues with privacy and overlooking between the proposed commercial and residential units and existing residential units.
- 6.82 The proposed use of the site will reduce the output noise considerably in comparison to the existing car workshop/garage use. The proposed commercial

units will be well insulated and working hours similar to those of the workshop. Therefore, the noise impact on the surrounding area will be reduced due to the reduction in use of industrial machinery.

6.83 The supporting Daylight and Sunlight Assessment produced by EB7 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.

6.84 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.

Landscaping and Open Space

6.85 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.

6.86 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.

6.87 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

6.88 Given the site constraints and the boundary location, there is limited scope for landscaping. However, in accordance with LP Policy 7.5 landscaping is located along the pedestrian access leading to the type A and type B houses. Metal planting boxes will be suspended on the old wall here to break up its mass and provide a focal point enhancing the public realm further as detailed in LP Policy 7.5.

- 6.89 Green roofs will also be incorporated into the development contributing to rainwater attenuation. The ground floor terraces sit behind a deep metal screen with planting and the passage to the houses will be punctuated with planting boxes allowing trees and shrubs to break up the space and soften hard edges. This provision ensures that development is compliant with CS15 and DP24 as detailed above.

Contaminated Land

- 6.90 London Plan Policy 5.21 states that the Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use. As such, appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.

- 6.91 Core Strategy Policy CS16 seeks to improve health and well-being in Camden. CPG6, PPS 23: Planning and Pollution Control and Camden's Contaminated Land Strategy state that contaminated land issues must be considered at the planning application stage. Where contamination is known or suspected on a site or the proposed use would be vulnerable to contamination, the following information must be provided:

- the existence or otherwise of contamination;
- the nature of the contamination and the risks it may pose; and
- whether these can be satisfactorily reduced to an acceptable level.

Contaminated Land Assessment

- 6.92 The supporting Contaminated Land Assessment produced by Delta-Simons (June 2015) identified potential sources of contamination at the site, associated with its current use. As such, Delta- Simons have proposed mitigation measures such as a pre-demolition asbestos survey and a clean certified layer of topsoil/subsoil

to reduce any risk. No substantial contamination issues have been found and the proposed mitigation measures ensure that the development adheres to LP Policy 5.21, Camden Council CPG6 and PPS23.

Sustainability, Energy, Code for Sustainable Homes and BREEAM

6.93 The NPPF encourages the use of renewable and low carbon energy (Policy 97).

6.94 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.

6.95 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).

6.96 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.

- 6.97 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.
- 6.98 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.
- 6.99 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.

Energy and Sustainability Assessment

- 6.100 The Energy and Sustainability Report produced by NRG Consulting (June 2015) confirms that the development has CO2 baseline emissions that are Part L compliant via passive Energy Efficiency Measures alone. In addition to the passive measures, PV Panels will be installed in order to achieve a 31.52% reduction in CO2 emissions. The remainder of the required 35% reduction will be achieved through Carbon Offsetting to the value of £3,240. This reduction in CO2 emissions exceeds the standards outlined by LP Policy 5.2 requiring a 25% reduction.
- 6.101 Furthermore the incorporation of green roofs in the development is supported by LP Policy 5.11.

Parking, Servicing and Cycle Parking

- 6.102 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.

6.103 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.

6.104 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.

6.105 Development Management Policy DP18 requires development to incorporate high quality cycle parking. Appendix 2 sets out the Council's minimum standards for cycle parking:

- Staff – from threshold of 500 sq m, 1 space per 250 sq m or part thereof.
- Visitor - from threshold of 500 sq m, minimum of 2 if any visitors are expected, plus any additional spaces needed to bring the total number up to 10% of the visitors likely to be present at any time.

Assessment - Servicing and Cycle Parking

6.106 The site occupies a highly sustainable location for development, achieving a PTAL score of 5. The initial pre-application discussion held with officers at Camden Council in November 2013 confirmed that it is an appropriate location for a car free development for both the residential and the commercial elements.

As such the development will have no impact on the highway and facilitates the use of sustainable modes of transport in accordance with NPPF Policy 30 and LP Policy 6.1.

- 6.107 For deliveries to both elements of the development turning space is limited to the commercial forecourt which is negotiable for smaller vehicles. This is the exact set up currently provided for the existing business, with pickup trucks and lorries visiting the site regularly.
- 6.108 In terms of cycle parking a cycle store is provided in the commercial building for approximately 26 cycles and further cycle stands will be provided for visitors at the entrance. Therefore the cycle parking provision is in accordance with policy 6.9 of the London Plan and DP18 standards providing adequate facilities for the development.
- 6.109 In summary the proposed development is acceptable in servicing and cycle parking provision and meets national and local policy.

Accessibility

Lifetime Homes

- 6.110 London Plan Policy 3.8 states that all new housing is built to 'Lifetime Homes' standards. Policy DP6 requires that all new dwellings meet lifetime homes standards.

Assessment - Lifetime Homes

- 6.111 Lifetime Homes standards are met in all residential units and follow the technical guidance issued in the Code for Sustainable Homes.
- 6.112 The proposal ensures that all units have been designed to comply with Lifetime Homes Standards.

- 6.113 It is therefore concluded that the Development fully complies with policy in relation to Lifetime Homes standards. This is further details in the Lifetime Homes Statement produced by Cooley Architects.

Waste Storage and Collection

- 6.114 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 0.2sq m waste storage per two bedroom dwelling and 1 m³ per 300-500sqm of commercial space.

Assessment – Waste Storage and Collection

- 6.115 A total of 2.4m³ waste storage is provided for the 8 type A and type B dwellings, amounting to 0.3m³ per dwelling. Recyclable and non-recyclable waste is to be divided between two 1280litre Eurobins located in the entrance court of the compound, Provision of a 660litre Eurobin for non-recyclables is provided for house type C with a sack or box for recyclables. This provision is in accordance with CPG1 and Policy DM26.
- 6.116 In the commercial aspect of the development, 1m³ of waste storage per 300-500sq m for both recyclables and non-recyclables will be provided. These bins can be delivered to the external compound on collection days. This provision fully adheres to CPG1 and Policy DM26.
- 6.117 Therefore the refuse requirements for the development have been fully fulfilled and comply with the relevant policy. Further details are provided in the Design and Access Statement produced by Cooley Architects.

7.0 PLANNING OBLIGATIONS

- 7.1 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.
- 7.2 The site is based within Zone B and we have calculated the figures from the revised Cooley Architects received in July 2015, the Borough of Camden's charges for the site are as follows:
- a. Residential charge (Zone B) at £500 per sq m (below 10 residential dwellings)
 - b. Commercial charge (Zone B) at £25 per sq m
- 7.3 In addition the calculations are subject to indexation. If planning permission is granted before November 2015 the indexation rate is 1.14 for Mayoral CIL and 1.03 for Camden's CIL rate.
- 7.4 The Borough of Camden's CIL rate for the residential element of site totals £216,597.35 and has taken consideration to the existing floorspace at Fortess Grove (1,400 sq m). The indexation rate of 1.03 increases the figure to £281,576.55.
- 7.5 The Borough of Camden's CIL rate for the commercial element of the site totals £10,893.63 and has taken consideration to the existing floorspace at Fortess Grove (1,400 sq m). The indexation rate of 1.03 increases the figure to £11,220.44.
- 7.6 The proposal is also liable for Mayoral CIL which is proposed at £50 per sq m. The calculation taking account of the existing commercial floorspace at Fortess Grove and totals £43,447. If planning permission is granted before November

2015, the indexation rate for Mayoral CIL is 1.14. This increases Mayoral CIL to £49,529.58.

- 7.7 If planning permission is granted post November 2015 the indexation rate will increase and this will impact directly on the CIL rates for this site.
- 7.8 A summary of the Heads of Terms will be secured through the S.106 Agreement during the application process and these will be site specific due to the CIL contribution.
- 7.9 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.

8.0 SUMMARY AND CONCLUSION

8.1 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.

8.2 The proposal has responded and evolved to extensive pre-application discussions and feedback received from the local consultation held between November 2013 and April 2015 with Camden's Officers and key stakeholders.

8.3 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;
- Provide 1138sq m of adaptable, high quality and modern commercial floorspace that will support the local economy of Camden and the wider area and be suitable for a mix of different unit sizes suited for enterprises of all types. The development is also likely to represent an uplift in the number of jobs supported by the site;
- 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 Kentish Town Conservation Area through providing a development that has included extensive design work to meet the design officer's expectations;
- Contribute towards Camden's housing supply through proposing 9 high quality residential units;

- Deliver a mix of required residential units: 8 x 3 bedrooms identified as a medium priority within Camden's local policy and 1 x 2 bedrooms identified as high priority;
- Create a high quality residential environment with generous room sizes and amenity spaces;
- 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.

8.4 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.

