



JS/DJB/LN3007

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25 September 2015

Mr D. Leon
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Dear Daniel,

REAR GARDENS OF 29-33 ARKWRIGHT ROAD, LONDON, NW3 6BJ

Further to our recent discussions, I set out below a planning statement detailing the relevant general planning considerations (principally relating to housing need) pertinent to the proposals for the development of three properties in the rear gardens of 29-33 Arkwright Road.

PLANNING STATEMENT

This planning statement is prepared in support of a proposal for three dwellings in the rear gardens of 29 and 33 Arkwright Road, London, NW3 6BJ. This planning statement considers the general planning issues associated with the proposal. Relevant design and access matters are covered within the Design and Access Statement prepared by Square Feet Architects whilst relevant heritage matters are set out within the Heritage Statement submitted by John Allen Architects.

Background Matters

A description of the application site and the application site's planning history is set out within the accompanying Design and Access Statement prepared by Square Feet Architects. Accordingly, this information is not replicated here.

National Planning Guidance

National Planning Policy Framework (March 2012)

The National Planning Policy Framework (NPPF) was published on 27 March 2012 and constitutes guidance for local planning authorities and decision takers.



The ministerial foreword confirms that “*The purpose of planning is to help achieve sustainable development*” and that “*development that is sustainable should go ahead, without delay—a presumption in favour of sustainable development that is the basis for every plan, and every decision*”. In addition, the ministerial foreword confirms that “*in order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives*”.

The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6).

Paragraph 7 confirms there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

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

Paragraph 8 confirms that these roles should not be undertaken in isolation because they are mutually dependant. In order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. It is confirmed the planning system should play an active role in guiding development to sustainable solutions.

The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications (paragraph 13).

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking, this means:

- Approving development proposals that accord with the Development Plan without delay, and
- Where the Development Plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
 - Specific policies in the Framework indicate development should be restricted (paragraph 14).



Paragraph 17 confirms that, within the overarching roles the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These principles include:

1. 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;
2. Proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places the country needs.
3. Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
4. Promote mixed use developments, and encourage multiple benefits from the use of land of urban and rural areas;
5. Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future (paragraph 18).

Housing applications should be considered in the context of the presumption in favour of sustainable development (paragraph 49). To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should, inter alia, plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups; identify the size, type, tenure and range of housing that is required (paragraph 50).

In assessing the determining development proposals, local planning authorities should apply the presumption in favour of sustainable development (paragraph 197).

Development Plan

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

The statutory development plan for this application comprises The London Plan Consolidated with Alterations since 2013 (March 2015), the Camden Core Strategy 2010-2025 (November 2010) and the Camden Development Policies 2010-2025 (November 2010).

The London Plan Consolidated with Alterations Since 2013 (March 2015)

Policy 1.1 (Delivering the Strategic Vision and Objectives for London) confirms growth will be supported and managed across all parts of London to ensure it takes place in the current boundaries of London without either encroaching on the Green Belt, London's protected open spaces or having unacceptable impacts on the environment.

Policy 3.5 (Quality and Design of Housing Developments) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment.



Policy 5.3 (Sustainable Design and Construction) states the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including construction and operation and ensure they are considered at the beginning of the design process.

Policy 7.4 (Local Character) confirms that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation surrounding buildings and should improve an areas visual or physical connection with natural features. Buildings, streets and open spaces should provide a high quality design response.

Associated Policy 7.6 (Architecture) confirms that architecture should make a positive contribution. Buildings and structures should:

- 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, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings;
- e incorporate best practice in resource management and climate change mitigation and adaptation;
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
- g be adaptable to different activities and land uses, particularly at ground level;
- h meet the principles of inclusive design;
- i optimise the potential of sites.

Camden Core Strategy 2010 (November 2010)

The vision statement for Camden states, inter alia,

“Camden will be a borough of opportunity – a vibrant and diverse part of inner London that will develop its position as a key part of the capital’s success, whilst improving the quality of life that makes it such a popular place to live, work and visit. A borough with the homes, jobs, shops, community facilities and infrastructure needed to support its growing population, businesses and visitor.”

In terms of the Strategic Objectives of the Core Strategy, Objective 1 is “*A sustainable Camden that adapts to a growth population*” which is to be achieved through the, inter alia, providing homes to meet Camden’s housing needs as far as possible in terms affordability, the type of properties built and the mix of sizes, and to promote their sustainable design and construction.

Policy CS1 (Distribution of Growth) confirms that the Council will promote the most efficient use of land and buildings in Camden by, inter alia, seeking development that makes a full use of its site, taking into account quality of its design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site whilst resisting development that makes inefficient use of Camden’s limited land.



Policy CS5 (Managing the Impact of Growth and Development) confirms the Council will manage the impact of growth and development in Camden through a variety of means. Including, providing uses that meets the needs of Camden's population and contribute to the Borough's London-wide role and protecting and enhancing the environment and heritage and amenity and quality of life of local communities. In particular, the Council will protect the amenity of Camden's residents through a variety of means, but principally, by ensuring that the impact of their occupiers and neighbours is fully considered and requiring mitigation measures where required.

Camden Development Policies 2010-2025 (November 2010)

Policy DP2 (Making Full Use of Camden's Capacity for Housing) confirms the Council will seek to maximise the supply of additional homes in the borough.

Policy DP5 (Homes of Different Sizes) confirms the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes.

DP6 (Lifetime Homes and Wheelchair Housing) states that all new housing development should meet the Lifetime Homes Standards and that 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them.

Policy DP22 (Promoting Sustainable Design and Construction) confirms the Council will require development to incorporate sustainable design and construction measures. Subsequent Policy DP23 (Water) confirms the Council will require developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding by, inter alia, incorporating water efficient features.

Policy DP24 (Securing High Quality Design) requires all developments including alterations and extensions to existing buildings, to be of the highest standard of design and to consider character and setting, proportions of the existing building, quality of materials, and the appropriate location for building services equipment.

Policy DP25 (Conserving Camden's Heritage) advises that in respect to listed buildings, that the Council will preserve and enhance listed buildings and will prevent the total loss or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention; only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and not permit development that it considers would cause harm to the setting of a listed building. The policy also confirms the Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them in their setting, including physical preservation where appropriate and that it will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.



The policies confirm that in order to maintain the character of Camden's conservation areas, the Council will, inter alia, only permit development within conservation areas that preserves and enhances the character and appearance of the area; prevent the total loss or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of the conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention; will not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and preserve trees and garden spaces which contribute to the character of a conservation area which provide a setting for Camden's architectural heritage. The policy also confirms the Council will take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas.

DP26 (Managing The Impact Of Development On Occupiers And Neighbours) confirms the Council will protect the quality of life of occupiers and neighbours by only granting planning permission development which does not cause harm to amenity. The policy confirms the factors the Council will consider include:

- Visual privacy and overlooking;
- Overshadowing and outlook;
- Sunlight, daylight and artificial light levels;
- Noise and vibration levels;
- Odour, fumes and dust;
- Microclimate;
- The inclusion of appropriate attenuation measures.

The policy also states that developments will be required to provide an acceptable standard of accommodation in terms of internal arrangement, dwelling and room sizes and amenity space, facilities for the storage, recycling and disposal of waste; facilities for bicycle storage; and outdoor space of private or communal amenity space wherever practical.

Policy DP28 (Noise And Vibration) confirms the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for development likely to generate noise pollution or development sensitive to noise in locations with noise pollution unless appropriate attenuation measures are provided.

Camden Planning Guidance 2 - Housing (September 2013)

Section 4 deals with residential development standards with a key message that development should provide high quality housing that provides secure, well-lit accommodation with well-designed layouts and rooms. The guidance provides detailed internal space standards including ceiling heights and room sizes as well as detailing with amenity requirements. Section 5 deals with Lifetime Homes and Wheelchair Housing and provides advice on how proposals can be made accessible to all by incorporating Lifetime Homes standards and creating wheelchair accessible homes.

Planning Issues

Housing Need

The appeal proposes valuable new housing for the London Borough of Camden.



There is overwhelming policy evidence in support of new housing, both in the Borough and in a wider context. The NPPF seeks to significantly boost the supply of housing (paragraph 47). Table 3.1 of the London Plan (June 2011) identifies an annual requirement of 889 new homes per annum in Camden to 2021. Policy 3.3 (Increasing Housing Supply) of the London Plan confirms that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets as set within the London Plan, as there is 'a pressing need for more homes in London'. Part D of the policy states the boroughs should seek to achieve and exceed housing targets through the intensification of brownfield housing sites, town centre renewal and mixed-use redevelopment. The general problems of supply with housing in London are well documented and as such the introduction of new units on the site is to be welcomed.

The London Plan (Consolidated with Alterations from 2011) (March 2015) provides a housing target from 2015 of 424,000 homes (up by a 100,000 from the 2011 version of the document). Previously, some 322,000 new homes were envisaged between 2011 and 2021 in the current London Plan. The consolidated London Plan also proposes increased annual housing targets for all of the London boroughs (with the exception of LB Newham). The document confirms that London will become the first City in Europe to be home to 10 million people by 2030 and is experiencing an *"unprecedented population boom"*.

The alterations to the housing figures from the 2011 version of the London Plan follow a Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) carried out by the GLA. The document states *"that the central projection in the SHMA indicates that London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year. The 2015-2036 figure of 49,000 additional homes a year provides the basis for the detailed housing needs figures set out in this plan"*. It is confirmed that in light of the projected higher need, especially at the start of the plan period, that this figure should be regarded as a minimum.

In respect to the Inspector's Report on the Further Alterations to the London Plan published in November 2014, these contain a number of key messages in respect to the issue of housing need within London. It is confirmed that London faces an annual shortfall of 6,600 homes under the alterations. The Further Alterations to the London Plan set London's housing target at 42,400 homes a year against an assessed need of between 49,000 – 62,000 over the next 10 to 20 years. In his report the Inspector was unable to see how the Mayor could guarantee delivery. *"The evidence before me strongly suggests that the existing strategy will not deliver sufficient homes to meet objectively assessed need"* he concluded. The Inspector found the Alterations sound, but suggested these should be subject to an early review. Despite his reservations, the Inspector recommended the further alterations to the London Plan should be adopted to avoid perpetuating the current under delivery arising from the 2012 Plan's *"woefully short"* target of 32,210 dwellings per annum. The Inspector suggested that a review should commence immediately after adoption this year.

The most recent overview of how London's housing need is being met at the current time is a report by Stirling Ackroyd (London New Homes Monitor) (April 2015). This confirms that London's new homes targets are currently out of reach the current rate of planning permissions being granted. This confirms that currently the number of planning permissions for new homes is running at a rate of 27,470 per year. A figure only some two thirds of the annual target for finished London homes. This confirms that London's planning system is allowing new homes at an annualised rate of just 27,470 as of June 4th 2014 – or just over two thirds (69%) the political target of 40,000 finished new homes each year. An analysis of planning applications across all of the Capital's 32 boroughs plus the City of London shows just 6,780 homes were given planning permission in 2014 spread across 826 different sites.



These approvals represent 80% of all potential homes receiving a planning decision in 2014. This is out of plans for 8,632 possible homes in Quarter 4 of 2014. By contrast, if 100% had been approved, this could have allowed an annualised rate of up to 34,530 new homes, or 86% of the official target.

There is thus a strong policy presumption which supports the delivery of new houses to meeting housing need London Plan Policy's 3.3 (Increasing Housing Supply) and 3.4 (Optimising Housing Potential), and Camden Core Strategy Policy CS1 (Distribution of Growth) and Development Management Policy DP2 (Making Full Use of Camden's capacity for housing).

Undoubtedly there is a significant need for new housing in London. This application helps provide additional units to help meet this huge need. Although the application proposal only seeks three units, this amount will still help meet the future housing need within London.

The significant failure by London to meet its housing delivery targets is a key material consideration which weighs in favour of a grant of planning permission. Accordingly, this is a material consideration which weights in favour of the grant of planning permission.

Summary

Given the site's location within the Redington and Frogna Conservation Area, the primary issues relating to this proposal relate to design and access and heritage matters which are covered in other supporting documents. However, in terms of more general planning considerations, the need for new housing in London is significant as demonstrated above. This is a significant material consideration which weighs in favour of a grant of planning permission.

Kind regards

Yours faithfully
For Signet Planning

JULIAN SUTTON
Regional Director

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