

1.0 Introduction

1.1 KR Planning has been instructed by IDM Land Ltd to prepare this Planning Statement in support of a planning application for the redevelopment of 1A Highgate Road, in the London Borough of Camden.

1.2 The application proposes the following works:

Demolition of existing buildings and redevelopment to provide 9 units (7 x 2-bed and 2 x 3-bed) and 460sqm commercial (B1) floorspace, with associated landscaping, refuse and recycling storage, and cycle parking.

1.3 The scheme builds on the principles established by an earlier refusal, which includes:

- There is no objection to the loss of the existing building
- There is no objection to the loss of the B8 land use
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1.4 This statement outlines the application proposals in more detail and relates them to local, regional and national planning policy.

Submission Documents

1.5 This Planning Statement should be read in conjunction with the following reports, submitted in support of this application:

- Design and Access Statement, produced by Ellis Miller;
- Daylight and Sunlight Studies, produced by Right of Light Consulting;
- Heritage Impact Assessment, prepared by Heritage Collective;
- Noise Assessment, prepared by Sound Advice
- Transport Assessment, prepared by Ardent
- Contamination Report, prepared by Geo Smart

- Archaeology Report, prepared by LP Archaeology
- BRE Assessment, prepared by Point Surveyors
- Energy Report, prepared by Build Energy

2.0 Site and Surrounding Area

- 2.1 The site is 0.07ha in size, and is located to the rear of the properties on the south side of Highgate Road in the north of the designated Kentish Town town centre. The site is accessed via a narrow cobbled alleyway between the 3-storey Bull and Gate public house and 4- and 5-storey mixed use properties with residential use on upper floors (nos. 1-7 odd) fronting onto Highgate Road.
- 2.2 The site comprises a single-storey double height, late 19th Century brick-built warehouse and adjoining garage, which occupies the entire footprint of the site (excluding the alleyway). The building is neither statutorily nor locally listed, nor is it a non-designated heritage asset.
- 2.3 The site is a backland site, surrounded by a mix of uses to the north, east and west, including retail, office, residential and entertainment uses, all of which front onto the busy Highgate Road. Properties nos. 1-7 (odd) to the northeast of the site are Grade II Listed buildings, as well as the Bull and Gate pub to the east, and The Forum nightclub further to the north/northwest. To the southwest, the site is bounded by a strip of land used for access to the rear of the neighbouring properties, and beyond this is the overground railway line. There are no trees on the site.
- 2.4 The site has a Public Transport Accessibility Level (PTAL) of 6a (where 1 is low and 6 is high), being located less than 200m from the Kentish Town underground and overground stations to the southeast, connecting Kentish Town with central London and Luton, and a number of bus routes along Highgate Road and Kentish Town Road (A400) into and out of central London. The site is also located within Flood Risk Zone 1 (low risk) according to the Environment Agency's Flood Riskmaps.

3.0 Planning History

- 3.1 A Planning application was refused for 6 units in September 2014. There were XX reasons for refusal, but only was substantive and related to a harmful impact caused to the neighbor by overlooking.

Neighbouring and Nearby Sites

- 6.1 The Bull and Gate PH

- 3.2 In August 2013, planning and listed building consent applications (LPA refs: 2013/4816/P and 2013/4878/L) were submitted to the Council for the demolition of existing derelict out-buildings plus extension, and erection of a single-storey extension at the rear; internal and external alterations to the existing building; including formation of new windows plus replacement windows and doors to the front at ground floor level to the existing public house (Use Class A4).

- 3.3 The applications are currently under consideration, and have yet to be determined.

- 6.2 30a Highgate Road

- 3.4 In February 2012, planning permission (LPA ref: 2011/5391/P) was granted for the redevelopment of a backland site comprising 19th Century workshops (B1) and warehouses (B8), to provide two buildings (of 2 and 3 storeys high) containing nine dwellings (4 x 2-bed flats, 3 x 3-bed flats and 2 x

- 6.3 3-bed houses) together with 593sqm of business floorspace (B1) with associated landscaping, servicing and landscaping.

- 3.5 This permission was granted prior to the Prior Approval regime being introduced in May 2013.

4.0 Proposed Development

- 4.1 This application seeks permission for the demolition of the existing single-storey warehouse and garage building, and redevelopment of the site to provide a flatted development of seven 2bed and two 3-bed units together with studios on the ground floor providing a total of 460sqm of B1 commercial floorspace.
- 4.2 The commercial space is located immediately to the rear of the Bull and Gate pub, and is accessed directly off the alleyway.. The office building has been designed to a high quality and to utilise sustainable design techniques.
- 4.3 There is no on-site car parking provided, but each house is provided with safe, secure cycle parking spaces within the curtilage of the houses. Sufficient refuse and recycling storage is provided for near the development entrance.
- 4.4 It is proposed that three new trees will be planted within the development together with shrubs, and the roof will accommodate PV panels.
- 4.5 Some minor improvement works will be undertaken to the cobbled alleyway, and for refuse collection, as well as the installation of a dry riser midway along the alleyway, for fire brigade purposes.

5.0 Planning Policy Framework

- 5.1 Planning applications in the London Borough of Camden must be determined in accordance with the adopted Core Strategy and Development Management Policies DPD of the Local Development Framework (LDF), and the London Plan (2011). Consideration will also be given to national planning policy and emerging policy at all levels of Governance.
- 5.2 A summary of the key planning policies are set out below.

National Planning Policy Framework

5.3 The National Planning Policy Framework (NPPF) was published by the Government on 27th March 2012. It sets out the Government's national policy for planning issues in a single, comprehensive document.

5.4 The NPPF asserts that the planning system should carry a "presumption in favour of sustainable development" and that "Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay". In particular, paragraph 49 states that "Housing applications should be considered in the context of the presumption in favour of sustainable development".

5.5 Section 1 of the NPPF considers the economy, and states that significant weight should be placed on the need to support economic growth through the planning system. It is considered that planning policies should:

"support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new and emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances".

5.6 Section 2 considers the vitality of town centres, and that local policies should:

- *"recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;...*
- *promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;...*
- *where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity."*

5.7 Section 4 of the NPPF promotes sustainable transport and encourages patterns of development which maximise the use of sustainable transport modes. New developments should be located and

6.4 designed to accommodate efficient delivery of services and goods, and should create safe and secure layouts which minimise conflict between traffic and cyclists or pedestrians.

5.8 Section 12 of the NPPF 'Conserving and enhancing the historic environment', states:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".

Regional Planning Policy

6.5 The London Plan (2011)

5.9 The London Plan was adopted in July 2011 and provides a new up to date strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development and growth of London over the next 20-25 years. The following are considered to be the key relevant policies.

5.10 Policy 3.3 sets a London-wide target to provide an annual average of 32,210 net homes across London. Table 3.1 of the Plan sets the London Borough of Camden an annual monitoring target of 665 additional homes per year to contribute towards the net target.

5.11 Policy 3.4 encourages the optimisation of development potential of residential sites. Table 3.2, the Density Matrix for residential developments, sets a density range of between 200-700 habitable rooms per hectare (hrh) for a site with a PTAL of 6 situated within an "urban"

location.

- 5.12 Policy 3.5 requires all new residential development to meet the minimum internal space standards set out in Table 3.3, reproduced below:

| Unit | Mix | Size (sqm) |
|--------|------|------------|
| Unit 1 | 2B4P | 87 |
| Unit 2 | 2B4P | 78 |
| Unit 3 | 2B4P | 82 |
| Unit 4 | 2B4P | 76 |
| Unit 5 | 2B4P | 74 |
| Unit 6 | 2B4P | 77 |
| Unit 7 | 2B4P | 70 |
| Unit 8 | 3B6P | 101 |
| Unit 9 | 3B5P | 93 |
| | | 736 |

- 5.13 Policy 2.17 encourages boroughs to promote, manage and, where appropriate, protect the designated strategic industrial locations (SILs) as London's main reservoirs of industrial and related capacity, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.

Local Planning Policy

- 5.14 The London Borough of Camden's current development plan comprises the London Plan (2011); and the adopted Core Strategy (2010), Development Management Policies DPD (2010) and Proposals Map, and adopted Supplementary Planning Guidance and Documents

(SPGs and SPDs), which all form part of the Local Development Framework (LDF).

5.15 The LDF Proposals Map shows the site to have the following policy designations:

- Kentish Town Centre
- Kentish Town Archaeological Priority Area
- Designated Viewing Corridor (Kenwood Gazebo to St Paul's Cathedral)
- Adjacent to Grade II Listed buildings (nos. 1-7 Highgate Road (odd) and The Bull and Gate PH)

5.16 The building is neither statutorily nor locally listed, and the site is not located within a conservation area. No objection was raised to its loss in the previous determination. There is also the designated Kentish Town Industrial Area located around 10m to the west of the site, but the site itself does not fall within the Industrial Area.

6.6 Core Strategy (2010)

5.17 **Policy CS1 (Distribution of Growth)** states that Camden's growth will be focussed in the most suitable locations to achieve sustainable development, concentrating development in highly accessible locations such as town centres, including Kentish Town. The Council will seek development that makes the most efficient use of land in the borough, will expect high density development in town centres and locations well served by public transport, and will expect the provision of a mix of uses on-site where appropriate.

5.18 Further, the Council has a target for the provision of approximately 12,250 additional homes in the borough between 2010 and 2025.

5.19 **Policy CS3 (Other Highly Accessible Areas)** states that highly accessible locations such as Kentish Town are suitable locations for uses including residential, retail, food, drink and entertainment uses, offices and community facilities.

5.20 **Policy CS6 (Providing Quality Homes)** states that the Council will maximise the borough's

capacity for housing by maximising the supply of additional housing to meet or exceed Camden's target of 5,950 homes from 2007-2017, including 4,370 additional self-contained homes; and maximising the supply of additional housing over the entire plan period to meet or exceed a target of 8,925 homes from 2010-2025, including 6,550 additional self-contained homes. The Council will also regard housing as a priority land use through the Local Development Framework (LDF).

5.21 The Council will also seek to create mixed and inclusive communities by seeking a range of housing in both the market and affordable housing sectors, of a range of sizes and types to meet the Council's housing priorities, and seeking housing suitable for different groups including families, people with mobility difficulties, older people and vulnerable people.

5.22 **Policy CS8 (Promoting a Successful and Inclusive Camden Economy)** states that the Council will promote the provision of office floorspace in growth areas within the borough, and will safeguard existing employment sites and premises that meet the needs of modern industry. The Council will also expect a mix of employment facilities, including provision for small and medium sized enterprises, and will encourage concentrations of creative and cultural businesses. Kentish Town is identified in the Camden Employment Land Review 2008 as having potential for the provision of office floorspace.

Development Management Policies DPD (2010)

Principle of Development

5.23 **Policy DP1 (Mixed Use Development)** states that the Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. Developments providing 1,000sqm or more must provide secondary uses on-site.

5.24 **Policy DP13 (Employment Premises and Sites)** states that the Council will seek to retain land and buildings that are suitable for business use, and will resist a change to non-

business uses, unless it can be demonstrated that a site or building is no longer suitable for its existing use, and there is evidence to demonstrate that the possibility of retaining, reusing or redeveloping the site for similar or alternative business use has been fully explored.

5.25 When considering the loss of business floorspace, the Council will take into consideration the following points:

- Whether the site is located in or adjacent to an Industry Area;
- If it is in a location suitable for a mix of uses including light industry;
- If it is easily accessible by the Transport for London Road Network and/or London Distributor Roads;
- If the site will be accessible by means other than car i.e. rail or water;
- If there is adequate on-site parking for servicing;
- If the site is well related to nearby uses;
- If it is in a reasonable condition to allow the use to continue;
- If the site is near to other industry/warehousing, noise/vibration generating uses, pollution and hazards; and
- Whether or not a range of unit sizes, particularly those suitable for small businesses (under 100sqm) are provided.

5.26 Where a change of use has been justified to the Council's satisfaction, they 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. When it can be demonstrated that a site is not suitable for any business use other than offices, the Council may allow a change to permanent residential uses or community uses.

5.27 **Policy DP2 (Making Full Use of Camden's Capacity for Housing)** states that the Council will seek to maximise the supply of additional housing in the borough by expecting the maximum appropriate contribution to housing on sites that are underused or vacant but taking into account the need for other uses on the site, and resisting the development of sites considered particularly suitable for housing, for alternative uses.

Housing

- 5.28 **Policy DP3 (Contributions to the Supply of Affordable Housing)** states that sites providing, or capable of providing, 10 or more residential units should provide between 10% and 50% on-site affordable housing. Sites are deemed capable of providing 10 or more residential units where 1,000sqm or more of additional residential floorspace is provided. The proposals for the application site fall below both of these thresholds.
- 5.29 **Policy DP5 (Homes of Different Sizes)** states that all residential developments should provide a mix of small and large homes, in line with the Dwelling Size Priorities Table. For market housing, the highest priority is considered to be 2-bed housing, with the Council seeking 40% provision of 2-bed housing in developments. 3-bed+ homes are considered a medium priority for market housing and 1- bed homes are a low priority.

Residential Standards and Amenity

- 5.30 **Policy DP6 (Lifetime Homes and Wheelchair Housing)** states that all new housing should meet the Lifetime Homes standards, and that 10% of new homes should be wheelchair accessible or easily adaptable.
- 5.31 **Policy DP29 (Improving Access)** states that the Council will expect all buildings and places to meet the highest practicable standards of access and inclusion; expect spaces between buildings to be fully accessible; secure car parking for disabled people; and secure accessible homes.
- 5.32 **Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours)** states that the Council will not permit development that will cause harm to the amenity of neighbouring occupiers. In particular, the Council will consider matters of privacy and overlooking, overshadowing and outlook, daylight and sunlight, noise and vibration, odour, fumes and dust, and microclimate. Development will also be expected to provide acceptable sized dwellings, rooms and amenity space, refuse and recycling storage space, bicycle

storage space, and outdoor private or communal amenity space where practical.

- 5.33 **Policy DP28 (Noise and Vibration)** states that the Council will seek to ensure that noise and vibration is controlled by not permitting development likely to generate noise pollution, or development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided. The Council will seek to minimise the impact on local amenity from demolition and construction phases of development. Planning conditions may be used to control and minimise impact.

Sustainability and Design

- 5.34 **Policy DP22 (Promoting Sustainable Design and Construction)** states that new developments must incorporate sustainable design and construction principles, including green and brown roofs and green walls where suitable.
- 5.35 **Policy DP24 (Securing High Quality Design)** states that the Council will require all developments to be of the highest standard of design and will expect developments to consider, amongst other things, character, setting, context and the form and scale of neighbouring buildings; the quality of materials to be used; the provision of visually interesting frontages at street level; the provision of appropriate hard and soft landscaping including boundary treatments; the provision of appropriate amenity space; and accessibility.
- 5.36 **Policy DP25 (Conserving Camden's Heritage)** states that to preserve or enhance the borough's listed buildings, the Council will not permit development that it considers would cause harm to the setting of a listed building. In terms of archaeological artefacts, the Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting.

Transport and Parking

- 5.37 **Policy DP18 (Parking Standards and Limiting the Availability of Car Parking)** states that the Council will seek the minimum amount of car parking possible, and will expect car

free development in highly accessible areas including Kentish Town. For car free development, the Council will limit any on-site car parking to parking for disabled people and operational or service needs; will not issue on-street parking permits; and will use a legal agreement to secure the car free development preventing occupants from applying for and obtaining parking permits for the surrounding area.

- 5.38 Developments will also be expected to meet the Council's minimum standards for cycle parking set out in Appendix 2 of the DPD:

Supplementary Planning Guidance (SPGs)

- 5.39 The London Borough of Camden has produced a series of Camden Planning Guidance (CPG) documents, giving detailed guidance on particular topics. Those of particular relevance to this planning application are as follows:

- CPG1: Design
- CPG2: Housing
- CPG3: Sustainability
- CPG5: Town Centres, Retail and Employment
- CPG6: Amenity
- CPG7: Transport
- CPG8: Planning Obligations

6.0 Planning Considerations

- 6.7 In this section we set out the main material planning considerations of the proposed development in relation to the planning policy context.

Principle of Development

- 6.8 The NPPF promotes sustainable development, as a 'golden thread' running through the Framework. This includes a preference for redeveloping brownfield sites, and maximising the

potential of sites in highly accessible locations.

- 6.9 The proposal site is an underutilised brownfield site, and has a PTAL score of 6a, which makes this a highly accessible and sustainable location, particularly for redevelopment to provide much needed residential accommodation, together with a small flexible commercial space. Therefore the proposal to redevelop the site is in accordance with the objectives of the NPPF.

Loss of Warehouse (B8) Floorspace

- 6.10 This issue is now settled by the previous determination, but in any instance the application proposes replacement commercial floorspace.

Design

- 6.11 At the outset, there are matters which should be uncontroversial between us:
- to be of good design a building need respond to the character of the surrounding locality in which the site is set at contextually and proportionally appropriate scale (in its architectural sense), height, mass and alignment (disposition);
 - to reinforce local distinctiveness and legibility in response to neighbouring development without stifling innovation or originality;
 - to be a “good neighbour” to the occupiers of neighbouring dwellings in terms of their privacy and overshadowing and
 - to avoid the inefficient use of the site and, commensurate with those contextual and environment considerations, to use the site in the most effective and efficient way to provide for more intensive development
- 6.12 We can also agree, and as identified in the Design Statement, that application site differs

significantly from its context, both in its urban grain, but also in built form. This distinction is important when considering the appropriate built form in the redevelopment of the site.

6.13 Pre-application advice has been that only small scale building could be put in place of the existing negative contributor, but the quality of the pre-application advice is found to be very wanting. It appears to be a cut and paste job without reference to the scheme submitted for comment at a fee of £5000. Officers should re-consider how they approach this engagement if they are not going to provide a service reflective of the fee required.

6.14 Instead, I provide an explanation of the concept of scale as a fundamental architectural principle because, whilst scale in architecture and urban design is well understood by architects to whom its potential and application is largely intuitive, it is frequently misunderstood by others who tend to use the term simply as an alternative to “size”:

- Whilst “size, as a product of height, mass, disposition and form, bears a relationship to “scale”, the terms are not synonymous. Indeed, a small building can be large in scale and a large building can be small in scale.
- As I say, a distinction can be drawn between primary scale and secondary scale. Primary scale concerns the relationship which the building has as a component with other buildings in the wider context. Secondary scale concerns the components and features which make up the building itself and which, related to human form, provide reference to function and status.
- Scale can be manipulated with proportion, height, mass and form to provide a subtle and inventive tool in urban design and architecture.

6.15 Architectural plans, sections and elevations have a fixed scale-relationship with an observer who is interpreting them, whereas the scale-relationship between a building and an observer constantly changes as the building is approached and as more scale clues are revealed. So-called scale clues allow us to assess the size of a building by comparison with the sizes of known elements so that (either consciously or unconsciously) we learn to make judgments about a building’s dimensions by constant reference to familiar elements and artefacts of

known size.

- 6.16 These familiar elements fall into two categories. First there are general environmental elements which form the physical context for buildings, like trees and planting, vehicles, street furniture and even the occupants and users of the building; these are familiar objects and as environmental scale clues allow us by comparison to make some assessment of size. Second, there are familiar building elements like storey heights, masonry courses, windows, doors, and staircases which further add to our perception of a building's size; these are building scale clues and are used by the designer to determine the scale of a building
- 6.17 Traditionally, designers working within a classical architectural language could call upon a series of familiar devices like podium, entablature, columns, and pilasters, all ordered within a strict proportioning system. But the rejection of such an architectural vocabulary by modernists during the past century has been problematic as far as scale clues are concerned; an architecture embracing new structural forms with large spans and large monolithic expanses of unrelieved surfaces potentially did not offer traditional scale clues.
- 6.18 The above text, whilst appearing like a lecture, is important in considering why the design appears as it does. The Client instruction to the Architect was to achieve a contemporary development that is innovative, legible and designed in a manner that responds to its location and context.
- 6.19 In meeting the above objective, the Architect has deployed the following strategies:

- Encourage development that provides an appropriate degree of visual interest and design articulation.
- Enhance and create visual and physical links to adjoining streets, public transport and/or key community facilities when developing large or consolidated sites.
- Ensure that the siting (including setbacks and site coverage) of new development responds to the opportunities, constraints and features of the site.
- Ensure that development minimises off-site amenity impacts.
- Encourage the highest standards of urban design within the Conservation Area
- Consider the impact of additional residential development, particularly in areas where the streetscape value has already been affected by infill development.
- Ensure new development presents integrated building forms that have a sense of address and clearly articulated facades.
- Encourage new development to apply design techniques (including façade variation, contrast/repetition, colour, texture and detail) that will integrate a building with its surroundings and create attractive and interesting forms.
- Ensure that new development provides appropriate enclosure to its frontages and high quality detailing and massing that presents to its surroundings and street frontages.

6.20 The following is an analysis of the proposal against the relevant policy items listed above:

- The architect has explicitly chosen a modern idiom to directly contrast with the more traditional built forms seen within its immediate context. As noted above, the hierarchy of a building is an identifier of both its use, but also its place in time
- It follows that there can be no attempt to disguise this building from what it is a mixed use block, different in both primary and secondary scale from adjacent mansion blocks.
- The Design and Access details the Architects attempts to provide enclosure commensurate with the scale of nearby buildings, and the trees within the designated open space
- The appearance of the of the development identifies it as a residential building. The proposal displays a significant level of articulation which has been achieved through the use of varied setbacks, a mixture of materials, and the prominence of the external terraces which create recessive elements within the facade.
- As developers, the Client wish to develop a scheme with kerb appeal and an identifiable sense of address, also a policy aim.

6.21 In terms of design, the DAS describes how the design proposals have been developed in line with the principles of good design, and in particular in terms of amount, layout, height, massing, landscape, appearance and access.

6.22 We contend that the new scheme will improve the visual appearance of the street scene, as better access, legibility, and clearly defined spaces help the proposal to maintain and enhance the character of the area.

6.23 Aesthetically, the building is a modern piece of architecture, constructed using modern methods. However, it is important to reflect local vernacular materials to achieve a sense of place and fit in with the feel of the locality. Here, high quality materials, subtly brought together with considered detailing provide a high class finish whilst remaining respectful to the surroundings.

6.24 Local policy requires that the design of new development considers and respects the form and scale of surrounding development. The proposal site currently contains a large single-

storey warehouse building and attached garage, with pitched roofs. The surrounding development which fronts on to Highgate Road is much taller at 3, 4 and 5 storeys.

- 6.25 The site is also located within a Designated Viewing Corridor; however, given that the proposed development is only 2, 3 and 4 storeys tall, and is much lower than the existing surrounding development, it will have no impact on the views to St Paul's Cathedral.

Residential Density

- 6.26 The London Plan sets a density range of 200-700hrh for a development in an 'urban' location with a PTAL score of 6a. The density of the residential element of the proposed scheme is 645hrh, which falls within this density range, and is therefore policy compliant.

Materials and Landscaping

- 6.27 Although the proposal site is not located within a conservation area, particular consideration has been given to the proposed materials to be used in the development due to the proximity of the development to the Grade II Listed buildings to the north and east of the site.
- 6.28 Further detail on the proposed materials is provided in the Design and Access Statement accompanying this application.

Residential Mix

- 6.29 Policy DP5 states that the Council will seek the provision of a mix of different sized properties within new developments, with approximately 40% of new private residential units as 2-bedroom properties, being the highest priority, and the provision of 3-bedroom properties being a medium priority. 1-bedroom private units are a low priority for the Council.
- 6.30 The proposed development provides 11 of the units as 2-bedroom properties, which exceeds 40% of the provision, and with 4 x, providing a mix of both smaller houses and family-sized

properties within the development. The proposal therefore meets with the Council's objectives for mixed and balanced developments and communities, and is policy compliant.

Residential Standards and Amenity

Internal Space Standards

- 6.31 The London Plan has been altered to reflect the requirements of the National Housing Standards. All of the units meet or exceed these minimum internal space standards to provide high quality residential development, and so are compliant with London Plan and local minimum standards. A schedule of unit sizes is provided above.

Privacy and Overlooking

- 6.32 CPG3 requires that new housing developments are designed to ensure no loss of privacy to occupiers or neighbouring occupants.
- 6.33 The proposed development layout has been designed to ensure that there are no directly facing habitable room windows within the residential element of the scheme, and there are no habitable room windows in the proposed development facing the rear habitable rooms of the residential properties nos. 1-7 or at the rear of the pub. Therefore there will be no loss of privacy.
- 6.34 In addition, all of the rear gardens proposed are enclosed, and the roof terraces have brick parapets and obscure glazed panels providing privacy for residents, and preventing overlooking to neighbouring properties.

Daylight and Sunlight

- 6.35 Local policy requires that proposed development will not cause harm to the amenity of neighbouring occupiers, and the new residential development provides a good level of

amenity to future occupants including sufficient levels of daylight and sunlight.

- 6.36 The report assessing the light levels to the proposed development demonstrates that all of the windows will meet or exceed the BRE standards for daylight and sunlight.
- 6.37 The report assessing the potential impact on neighbouring development demonstrates that the proposed development will have minimal impact on the daylight and sunlight levels received by neighbouring properties, with the majority of windows passing the BRE standards. Where the reduction in daylight or sunlight levels falls below the standards, this is minimal, and is largely due to the fact that little light is received at these windows currently. Similarly, the overshadowing assessment demonstrates that there is a minor reduction in light levels to neighbouring gardens, which are already very low.
- 6.38 The report concludes that the BRE standards are intended as guidance, and are intended to be used flexibly. Therefore, it is considered that the development will have a low impact on the light receivable by its neighbouring properties, and that there will be no material impact which would prevent planning permission from being granted for this scheme.

Heritage Impact

Listed Buildings

- 6.39 Policy DP25 seeks to protect the borough's heritage by ensuring development is not permitted where it would harm the setting of a listed building. Section 12 of the NPPF requires that development proposals should consider the significance of any nearby heritage assets in order to determine the potential impact of the proposals on those heritage assets.
- 6.40 In accordance with Historic England advice, the applicant sought to have the design audited to ascertain the heritage impact of the scheme. This advice is available in a separate report, but concludes:

In summary, the application proposals will preserve the significance of all the designated

heritage assets described above and provide a small enhancement to the setting of 1-7 (odd) Highgate Road.

Archaeology

- 6.41 The application site is also situated within an Archaeological Priority Zone, which is also considered a designated heritage asset in the NPPF. It is the Council's policy to protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting. As required by policy, and following initial consultation with the Greater London Archaeological Advisory Service (GLAAS), an Archaeological Desk-Based Assessment has been produced by L-P: Archaeology, to consider the potential for archaeological artefacts at this site.
- 6.42 The assessment considers that there is low to moderate potential for archaeological artefacts, and that the historic significance of any artefacts found on the site would likely be local. It is extremely unlikely that there will be any nationally important remains found on the site. The assessment concludes that the proposed development would have limited impact on any potential remains, and no further investigative work is required at this stage of the planning process. Should the Council consider it necessary, further works can be secured by way of a planning condition.

Parking and Refuse

- 6.43 Policy DP18 states that the Council will expect car-free development in areas of high accessibility, and particularly in town centres. The site has the highest PTAL score of 6a and is located within Kentish Town town centre. Furthermore, given the narrow access and site constraints such as size, the site is not easily accessible and therefore no on-site car parking is provided in association with the proposed development, either for the residential or the commercial elements of the scheme, complying with the Council's policies.
- 6.44 Cycle parking is provided on-site. Camden policy requires a minimum of 1 cycle parking

space per residential unit to be provided, and the London Plan requires a minimum of 1 cycle space per 1-/2- bedroom unit, and a minimum of 2 cycle spaces per 3-bed+ unit. Each of the proposed units is provided with a secure cycle parking space

6.45 In terms of cycle parking space provision for the B1 space, local policy requires provision of 1 parking space per 250sqm of floorspace, for B1 units of 500sqm or more. Whilst the proposed commercial floorspace does not meet this threshold, 2 cycle parking spaces are in to be provided.

6.46 In terms of refuse and recycling storage for the proposed development, each of the dwellings has an internal storage area as well as space within an enclosed storage area is provided in the courtyard, close to the gated entrance, meeting the Council's guidance on refuse and recycling storage provision. A separate secure storage area for the office unit is provided adjacent to the gate to the residential development. The location of these storage areas provides the shortest collection distance from Highgate Road.

Energy and Sustainability

6.47 Please see the Build Energy report for compliance

7 Conclusion

7.1 This Planning Statement is submitted in support of a planning application to the London Borough of Camden for the redevelopment of the site at 1A Highgate Road, Kentish Town, NW5.

7.2 National, strategic and local planning policies all place strong emphasis on the need to re-cycle urban land in order to safeguard Greenfield sites and land in other sensitive areas. The proposed development successfully achieves a balance between the potentially competing objectives of development and the conservation of the environment, and thereby satisfies the goal of "sustainability". They properly maximise the use of this central

"brownfield" site without giving rise to any planning problems – in particular, by avoiding compromising the living and working of adjoining residents and businesses.

7.3 It is considered that the proposal is acceptable in land use terms and it:

- Re-uses previously developed land
- Will deliver a land use that will benefit from the Site's excellent level of accessibility to public transport infrastructure
- Optimises the use of the Site, by providing a high density and quality of development in a location that benefits from an excellent level of public transport facilities
- Encourages the use of public transport and energy-efficient transport
- Promotes reduced levels of car parking
- Provides a safe, accessible, efficient connection to the local area and pedestrian network
- Assists in meeting the recognised Borough and London need for housing including mix
- Will result in clear benefits to the local community, via the inclusion of office units to provide job opportunities

7.4 A design-led approach has been undertaken that has considered the local context, setting, and accessibility of the Site. The proposal would not have a significant effect on the residential amenity of adjoining occupiers in terms of loss of light, outlook or privacy and would be of an acceptable visual appearance in terms of design, scale and massing.

7.5 In providing a building of appropriate scale and mass, the proposal would preserve the setting of the adjacent Listed Building.

7.6 In accord with the development plan, the LPA's priority is for the provision of permanent housing, and this scheme achieves that laudable aim. The proposal is therefore the epitome of compliance with the Development Plan and it deserves the presumption in favour of its approval

