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13491 Haverstock Hill  
Cambridge Gate Properties

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Planning Statement  
CBRE

July 2016

Piercy & Company

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# **5-17 HAVERSTOCK HILL**

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# 1.0 Introduction

- 1.1 This Planning Statement has been prepared by CBRE Planning on behalf of the applicant, Cambridge Gate Properties, to accompany the submission of an application for full planning permission for the redevelopment of the site at 5-17 Haverstock Hill, Camden.
- 1.2 The description of development is as follows:  
*“Demolition of existing building at 5-17 Haverstock Hill and construction of a part-seven, part-six storey residential-led mixed-use building and all associated works comprising 77 residential units (8 x studio, 18 x 1 Bed, 32 x 2 Bed, and 19 x 3 Bed units)(Use Class C3) including affordable housing and the provision of 284sqm of retail (Use Class A1-A5) at ground floor with associated cycle parking, amenity space, refuse and recycling storage”*
- 1.3 The site is located within the London Borough of Camden, and is bounded by Haverstock Hill to the north and Adelaide Road to the South. The Site is immediately west of Camden Town. The site is predominantly occupied by a singular building built to the boundary of the neighbouring Chalk Farm Underground Station (Grade II Listed).
- 1.4 The site currently comprises a purpose-built six storey car garage constructed in the 1930s, which is known as ‘Eton Garage’. The building was constructed for the purpose of providing a motor showroom and petrol station (no longer on site) with a small retail parade at ground floor level fronting Adelaide Road.
- 1.5 The building has been in continual use, with the British Transport Police occupying the building from c.1956- 18<sup>th</sup> July 2014. The British Transport Police utilised the property for the storage of vehicles involved in crime (Appendix A contains an article relating to the loss).
- 1.6 A full review of the site and surrounding area is provided within Section 2.0 of this report with Section 3.0 providing a full planning history review.
- 1.7 This planning application relates to comprehensive redevelopment of the site to provide up to 77 residential units and the provision of retail at ground floor fronting Adelaide Road which is a re-provision of some of the existing retail at ground floor level. The proposals are detailed in full in Section 4.0 of this Planning Statement.
- 1.8 On behalf of the applicant, the design team has undertaken a series of pre-application meetings and discussions with the London Borough of Camden in relation to the proposed development. The details of discussions are included in Section 5.0 of this Planning Statement.
- 1.9 The proposed development accords with the key relevant planning policies and guidance at a Local, Regional and National level, full details of the proposals are contained within Section 6.0 and details of how they accord with policy is included within Section 7.0.

## Scope of Submission

- 1.10 This Planning Statement should be read in conjunction with other documents which have formed this planning submission specifically:
  - Completed Planning Application Form, completed Certificate A
  - Completed CIL Additional Information Form
  - Drawing Package, which includes site location plan, existing and proposed plans, elevations and sections prepared by Piercy and Co.
  - Design and Access Statement (Prepared by Piercy and Co.)
  - Access Statement (Prepared by HADA)

# Introduction

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- Air Quality Assessment Report (No.70016149) (Prepared by WSP|Parsons Brinckerhoff)
- Arboricultural Report Addendum (Prepared by J.A. Consulting)
- Daylight and Sunlight Report (Prepared by Point2Surveyors)
- Draft Construction Management Plan (Prepared by CBRE)
- Energy Statement (No.54359) (Prepared by Chapman BDSP)
- Flood Risk Assessment and Sustainable Drainage Strategy (Prepared by Conisbee)
- Landscape Planning Statement (Prepared by LUC)
- Nocturnal Emergence Bat Survey (Prepared by Middlemarch Environmental);
- Noise and Vibration Planning Report (Prepared by Sandy Brown)
- Scheme Internal Daylight Report (Prepared by Point2Surveyors)
- Site Investigation and Basement Impact Assessment Report (Prepared by Geotechnical and Environmental Associates Limited)
- Statement of Community Involvement (Prepared by Quatro)
- Sustainability Statement (No.54359) including BREEAM New Construction (2014) Ecological Assessment (Prepared by Chapman BDSP and Middlemarch Environmental)
- Townscape, Heritage and Visual Assessment (Prepared by Richard Coleman)
- Transport Assessment (Prepared by Steer Davies Gleave)

## 2.0 Site and Surroundings

### The Site

- 2.1 The proposed redevelopment site is located at 5-17 Haverstock Hill within the Haverstock Ward in the London Borough of Camden. The redevelopment site occupies an area of 0.207ha and is located at the northern end of Chalk Farm Road.
- 2.2 The site is bound to the north by Haverstock Hill; Chalk Farm Underground Station is located immediately to the east. To the south of the site is Adelaide Road, with the western boundary abutting residential properties known as 'Eton Mansions'. The site is located at the intersection of Chalk Farm Road, Haverstock Hill and Adelaide Road.
- 2.3 The site is currently occupied by a vacant purpose-built six storey car garage constructed in the 1930s, which is known as 'Eton Garage'. The building was constructed for the purpose of providing a motor showroom and petrol station (no longer on site) with a small retail parade at ground floor level fronting Adelaide Road.
- 2.4 'Eton Garage' was purpose built in the 1930s and was in use as a car storage facility by the Metropolitan Police until summer 2014 when they vacated the property. The existing property was originally designed to look residential in nature to tie in with the mansion block building to the west.
- 2.5 The site is located at a transitional point at the end of Chalk Farm Road, immediately to the east is Camden Town Centre which has a commercial and town centre emphasis. To the west of the site there is a predominance of residential properties in a range of styles, and typologies as the area transitions into Belsize Park and Primrose Hill.
- 2.6 The main access to the site is located on the western boundary of the site with vehicular and pedestrian access off Adelaide Road, adjacent to the existing retail parade. Pedestrian access to the site is also gained from Haverstock Hill.
- 2.7 The site is not located within a Conservation Area; however it is in close proximity to adjacent Conservation Areas. The site is immediately adjacent to and abuts Chalk Farm Underground Station which is a Grade II Listed building.
- 2.8 The site is well connected and has a PTAL level of 6a (excellent). It is located immediately adjacent to Chalk Farm Station which is serviced by the Northern Line (Edgware Branch). There are bus stops on both Haverstock Hill and Adelaide Road, which are immediately adjacent to the existing property.

### Site Context

- 2.9 The site is located within the Haverstock Ward at a transitional point between Camden Town and Belsize Park/Primrose Hill. At this point there is no dominant land use.
- 2.10 To the east of the site is Camden Town Centre, which is a key transport hub and has a wide range of land uses, including retail, leisure, and commercial. To the west of the site, leading into Primrose Hill and Belsize Park there is a predominance of residential uses.
- 2.11 Immediately opposite the site across Haverstock Hill is the Haverstock School and The Salvation Army building.
- 2.12 There is no dominant land use, or style immediately surrounding the site with a great level of variance in terms of design, style, building heights and uses.
- 2.13 To the east of the site within Camden Town there is very little green space, however the site is conveniently located in close proximity to Primrose Hill (2 minute walk south of the site)

## Site and Surroundings

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and is within a 5-10 minute walk of Regent's Canal which is part of the London Blue Ribbon Network.

## 3.0 Planning History

- 3.1 This section provides an overview of the application site's planning history and any notable relevant developments within the immediately surrounding area.

### The Site

- 3.2 The online search facility for the Camden Council archives provides a record of planning applications post 1947. As noted the building occupying the site of 5-17 Haverstock Hill was constructed in the 1930s. Thus there are no records of the initial planning consent on Camden's Planning Register.
- 3.3 There is a limited planning history for the site, with very little development taking place on site since the original construction.
- 3.4 Permission was granted in 1968 for the erection of gates and railings on new brick piers on both the Adelaide Road and Haverstock Hill frontage.
- 3.5 The last applications (H10/2/A/17619) for the construction of a new layby adjacent to the site and (H10/2/A/26780) to provide three new windows within the building, relate to two historic applications from 1973 and 1978 respectively. For both historic applications, the site is defined as Chalk Farm garage and no specific use class is detailed for the site. Therefore, we assume the site is treated as Sui Generis.
- 3.6 There have been no other applications on the site.

### Surrounding Sites

- 3.7 Camden Town and the surrounding area is undergoing significant change, with numerous applications and proposals being approved for development in the immediate vicinity of the site. A review of the immediate area has been undertaken and the applications which are considered to be of relevance are detailed below.

### Chalk Farm

- 3.8 The site at 4-8 Haverstock Hill (Marine lces) (2015/0487/P) has been given a resolution to grant conditional permission subject to a s106 legal agreement being signed. This application was discussed at Committee in October 2015. The proposals are for the complete redevelopment of the site to include a building of part 4/part 5 storeys inclusive of 19 residential units, a cinema and ancillary restaurant and bar. At the time of writing the s106 agreement is still awaiting signing.
- 3.9 Following a resolution to grant consent in June 2015 the redevelopment of the vacant site on Crogsland Road (2015/0921/P) was granted permission on July 7<sup>th</sup> 2016. The development proposed the redevelopment of the vacant site to comprise the erection of a 6 storey Extra Care (Use Class C3) residential building with ancillary ground floor community use (Class D1).
- 3.10 In March 2015, the redevelopment of the One Housing building at 100, 100A and 100B Chalk Farm Road (2013/5403/P) was granted consent, the development proposals include the redevelopment of the site to include a mixed use development of 57 market flats and 6 affordable units, retail and restaurant uses.
- 3.11 In March 2009, the redevelopment of 158 Prince of Wales Road was granted consent for the erection of a 7 storey plus basement (for use as a flexible class A1/A2/B1) use at basement and ground floor levels and 9 self-contained residential units above.



## Planning History

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- 3.12 Another key scheme in the vicinity, which was granted consent subject to a S106 Legal Agreement in January 2015 included the erection of a 5 storey commercial building together with a ground floor storage use, in association with the use of the Roundhouse.

### **Camden Town**

- 3.13 In 2013 a major redevelopment scheme was granted consent (2012/4268/P) at Hawley Wharf for the comprehensive redevelopment of the site comprising 9 new buildings ranging from 3-9 storeys in height to provide a mix of uses including 170 residential units, retail, cinema and education.
- 3.14 Camden Town will also see significant change following the grant of planning permission for the redevelopment of Camden Lock Market (2015/4774/P) this application includes the demolition of the existing buildings and the construction of new pavilions and buildings for flexible market uses and exhibition/events space.
- 3.15 In May 2014, permission was granted for the redevelopment of 79 Camden Road (2013/7646/P) to create 164 residential units within a 5-7 storey building inclusive of associated public realm works and landscaping.

## 4.0 The Proposals

### Overview

- 4.1 The planning application proposes the comprehensive redevelopment of the site, including the demolition of the existing building and its redevelopment to provide a mixed use building including residential accommodation and the re-provision of retail at ground floor.
- 4.2 The application seeks permission for:
 

*“Demolition of existing building at 5-17 Haverstock Hill and construction of a part-seven, part-six storey residential-led mixed-use building and all associated works comprising 77 residential units (8 x studio, 18 x 1 Bed, 32 x 2 Bed, and 19 x 3 Bed units)(Use Class C3) including affordable housing and the provision of 284sqm of retail (Use Class A1-A5) at ground floor with associated cycle parking, amenity space, refuse and recycling storage”*
- 4.3 The proposals comprise the following:
  - The redevelopment of a currently vacant car parking facility which is redundant and no longer creates an active use for the site;
  - The provision of 17 high quality affordable housing units, inclusive of 8 social rented properties and 9 intermediate rent units;
  - The provision of 60 market residential units;
  - The part re-provision and improvement of retail floorspace within a designated neighbourhood parade.
  - A high quality, contemporary mansion block which will create a feature building at the terminus of Chalk Farm Road;
- 4.4 This section details the current proposals, whilst Section 5.0 discusses them in the context of current planning policy.

### Residential

- 4.5 The proposed development comprises the complete demolition of the existing property. This will result in the loss of the existing floorspace. The Council have confirmed that the use of the property is Sui Generis, the demolition does however result in the loss of a small area of retail floorspace.
- 4.6 The development proposals comprise the construction of a 7 storey, and 6 storey with setback 7<sup>th</sup> floor mixed use residential-led building with ancillary retail. Table 4.1 provides a breakdown of the existing and proposed floorspace.

**Table 4.1 Floorspace Breakdown**

USE	EXISTING FLOORSPACE (SQM)		PROPOSED FLOORSPACE (SQM)		DIFFERENCE (GIA) (SQM)
	GEA	GIA	GEA	GIA	
Sui Generis	7,158sq,	6867	0	0	-6867sqm
Retail (Use Class A1 -A5)	-	406	-	284	-122
Residential (Use Class C3)	0	0	8786	8072	+8072sqm

- 4.7 The proposals are for a residential led development, with the provision of 77 residential units. The proposals are inclusive of 17 affordable units. The affordable units are provided

# The Proposals

as 8 intermediate rent units and 9 social rented properties which accounts for 20% of the overall development on a Gross External Area (GEA) floorspace basis.

- 4.8 The residential accommodation is distributed across all 7 storeys of the development and is predominantly single storey apartments. There are 10 duplex units proposed. Within the development 8 duplex units which are located at ground and first floor of the development fronting Haverstock Hill and the rear of the site. 1 no duplex is located over second and third floors and 1 no. duplex located over fourth and fifth.
- 4.9 The residential development includes a mix of dwelling sizes across all tenures. Table 4.2 provides a breakdown of the proposed residential mix.

**Table 4.2 Residential Mix**

	MARKET	INTERMEDIATE	SOCIAL RENT	TOTAL
Studio	6	2	0	8
1Bed	14	4	0	18
2Bed	28	2	2	32
3Bed	12	0	7	19
Total	60	8	9	77

- 4.10 It is proposed to include 7 wheelchair adapted or adaptable units across the development this equates to a provision of 9%.
- 4.11 There are three proposed residential access points. The affordable properties are accessed at first floor level to the rear of the site. The market units are accessible from both Haverstock Hill and Adelaide Road. These two access points converge in a residential foyer area at ground level.

### Retail

- 4.12 The proposals include the demolition of the existing building. This is inclusive of the existing retail parade on Adelaide Road.
- 4.13 The proposals include three retail units, which will provide 284sqm of retail floorspace (Use Classes A1-A5). The retail units are located on Adelaide Road in the same location as existing. The current proposal subdivides the retail floorspace into three units. However the exact configuration of this space is to be confirmed.

### Access

- 4.14 There is no vehicular access proposed for the development site.
- 4.15 Pedestrian access to the building is gained from Adelaide Road and Haverstock Hill. There is no through route proposed.

### Amenity Space (Including Children’s Play space)

- 4.16 The proposals include 71.3sqm of children’s play space. This is to be located at ground level to the rear of the building. The play space is accessible to all residents and is accessed via the pedestrian access on Adelaide Road.
- 4.17 The proposed development includes 1081sqm of private amenity space. This is provided in the form of private balconies, and four small gardens for the duplex apartments to the rear of the site. All proposed residential units of 1 Bed and above are inclusive of a private balcony or terrace.

# The Proposals

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## Landscaping

- 4.18 The Landscaping Planning Statement includes all details of the landscaping proposals for the development. The proposals include the provision of private gardens, private garden terraces and the green roof space. The strategy is also inclusive of the landscaping for the communal play space adjacent to Eton Place.
- 4.19 The proposals include a softworks and hardworks strategy.

## Transport

- 4.20 The proposal does not include any car parking.
- 4.21 The proposals include the provision of 134 residential cycle parking spaces. 114 of these will be located internally at ground floor level. 20 spaces will be located externally adjacent to the proposed pedestrian access from Adelaide Road. These external spaces will be accommodated in a secure and covered cycle storage area.
- 4.22 The re-provision of the retail requires 10 cycle parking spaces. These will be provided on-street; the proposals include 5 cycle stands adjacent to existing on-street cycle parking spaces on Adelaide Road.
- 4.23 Overall 144 cycle parking spaces will be provided.
- 4.24 A transport assessment has been submitted in support of this application and provides the full details of the transport requirements and impacts of the scheme.

## Sustainability and Energy

- 4.25 The design of the scheme has holistically incorporated sustainability principles. The building has been designed to incorporate an optimised energy efficient design which will reduce the energy demand of the development.
- 4.26 The proposed building fabric will include the use of local and sustainable materials which will be of the highest quality.
- 4.27 The proposals include the addition of a gas Combined Heat and Power (CHP) system and Photovoltaics (PVs) which will seek to further reduce the CO<sub>2</sub> emissions of the scheme.
- 4.28 The proposals further incorporate green roofs; the green roof will assist with sustainable drainage, overheating and air quality. The proposed green roof has been selected for its high ecological and biodiversity credentials.
- 4.29 The BREEAM New Construction pre-assessment shows a rating of 'Excellent' being targeted for the residential elements of the scheme with a targeted score of 72.9% achieved through the design.

## Refuse and Recycling

- 4.30 Residential bin stores are provided internally for the development. One store will serve block B and contains two general waste bins, three recyclable waste bins and one organic waste bin. The store is located internally and accessed via a ventilated lobby. Store two serves Blocks A and C and contains four general waste bins, three recyclable waste bins and two organic waste bins.
- 4.31 For the market units (Blocks A and B) the store is accessed internally via a ventilated lobby located adjacent to the main stair core. Block C residents would access the store by exiting reception which the store sits adjacent to. From here the bins would be taken to a collection point (less than 10m away) on Adelaide Road.

## The Proposals

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- 4.32 The retail units are served from the third store which is accessed from Adelaide Road; this contains two general waste bins, two recyclable waste bins and one organic waste bin.
- 4.33 The waste collection and storage strategy has been designed in line with Camden’s CPG 1 on Design. The bin stores have been located close to Adelaide Road and Haverstock Hill and are therefore located within 10 metres of a space for a waste collection vehicle to stop.
- 4.34 The waste storage and collection strategy has been discussed with Ann Baker (LBC) who has confirmed that these are acceptable for the development.
- 4.35 Residential waste is to be collected once per week, commercial waste will be collected via a contract agreement with Camden. Commercial waste is likely to be collected twice a week.
- 4.36 The Facilities Management team will take residential waste from the stores to a suitable road site location for collection.

### **Servicing**

- 4.37 The servicing arrangements will remain as existing with the retail units being serviced on – street. The Servicing Management Plan confirms that the servicing movements can be safely accommodated on-street without detriment to the operation of the local highway network.

### **Construction Management Plan**

- 4.38 A draft Construction Management Plan has been submitted in support of this application. The applicant is willing to accept an appropriately worded condition in relation to the Management Plan with respect of securing the delivery of the CMP.

### **Flood Risk**

- 4.39 The site is located within Flood Risk Zone 1 and is therefore at minimal risk of flooding. It is considered that any potential flood risk on site can be managed.
- 4.40 A surface water drainage scheme will be implemented in order to provide a robust and sustainable drainage regime.

## 5.0 Pre-Application Advice and Consultation

- 5.1 The applicant has undertaken comprehensive pre-application consultation with both the London Borough of Camden Design and Planning Officers and the surrounding community, including Ward Members.
- 5.2 The scheme design has evolved in view of the comments and advice received during the consultation process.
- 5.3 Formal pre-application advice is detailed below along with the key comments received from the public consultation events, alongside commentary on how the design team have responded to the feedback.

### Formal Pre-Application

- 5.4 The following dates constitute the key milestones in the pre-application process. The following dates were formal pre-application meetings that took place with the design and planning officers at the London Borough of Camden;

- 17<sup>th</sup> April 2015 (*Pre-Application meeting undertaken with Dexter Moran Architects*)

*All subsequent meetings were held with Piercy and Co. Architects.*

- 22<sup>nd</sup> September 2015
- 21<sup>st</sup> October 2015
- 9<sup>th</sup> December 2015
- 17<sup>th</sup> February 2016
- 13<sup>th</sup> April 2016

- 5.5 A copy of the final pre-application response is contained within Appendix B.
- 5.6 The pre-application advice resulting from the meetings have been detailed below along with the subsequent design team response:

COMMENT	RESPONSE
The lower affordable housing provision would be contrary to policy and unlikely to be acceptable without robust justification. You are advised to increase the level of affordable housing provision. Any lower provision would need to be justified in a financial appraisal.	A comprehensive financial viability appraisal of the scheme has been undertaken by James Brown which justifies the lower provision of affordable housing.
Care should be taken to identify the significance of each heritage asset and the proposal should respond positively to its significance.	The site is significantly constrained and these proposals make effective use of the constrained site and it is therefore considered that the proposed level of affordable housing is commensurate with the site proposals.  Piercy and Co. architects have sought advice from Richard Coleman on the proposals and their heritage impact. This report reviews the significance of the neighbouring Conservation Areas and the adjacent listed building.
The difficult task is retaining the tube station as the predominant landmark particularly given its scale, form and bold oxblood colour.	The materials and the design of the building have been carefully considered to be subservive to the Grade II Listed Building and not to dominate the landscape.  A comprehensive Townscape, Heritage and Visual Impact Assessment has been undertaken by Richard Coleman.
The scale, resulting from the height and mass of the development,	A comprehensive Townscape, Heritage and Visual Impact Assessment has been undertaken by Richard Coleman.  The proposed design at submission stage has been reduced

## Pre-Application Advice and Consultation

<p>is considered to unduly compete with the Roundhouse. The team are strongly advised to address the unacceptable scale and design.</p>	<p>significantly in height. At each pre-application stage there has been a reduction in the storey height on both Adelaide Road and Haverstock Hill.</p> <p>The design has developed to include two elegant street facing blocks with a lower block to the rear; this design development has significantly reduced the massing impact of the proposals.</p>
<p>Any planning application submitted would need to be accompanied by a BRE Sunlight and Daylight Assessment</p>	<p>Point2Surveyors have undertaken an Internal Daylight/Sunlight Assessment and an assessment of Daylight/Sunlight impacts on neighbouring units.</p>
<p>The proposal should be re-designed to maximise the number of dual aspect units on the site.</p>	<p>Piercy and Co. architects have revised the scheme to reduce the number of proposed single aspect apartments. These have been designed to ensure maximum daylight levels can be achieved. The remainder of apartments are a mix of dual and triple aspect.</p>
<p>All the proposed residential units should be designated as car free.</p>	<p>There is no proposed car parking included in the development proposals.</p>
<p>Design of the building should take cues from the nearby mansion blocks found in Belsize Park and Eton Place.</p>	<p>Piercy and Co. Architects have reviewed the design of the proposals alongside a comprehensive Mansion Block Study. This study is contained in part within the Design and Access Statement.</p> <p>The proposals have taken cues from nearby Mansion Blocks in the form of their decorative and detailed elements which can be seen on the proposed elevations. The building design has also taken cues from the industrial past of Camden and the building is considered to marry the two histories of Camden in one design.</p>
<p>The proposals should include a meaningful gap between blocks to allow a view of the Church of St Saviour's.</p>	<p>The proposals have been revised and they no longer include a design of four overlapping masses. The proposals include two elegant street facing blocks which allow a visual through to the Church of St Saviour to the rear.</p>
<p>Concerns raised regarding the amenity of ground floor residential on Haverstock Hill</p>	<p>The proposals include 10 no. Duplex Units. 8 of these units are located at Ground and First floor. The ground floor is proposed to raised to ensure heightened privacy levels.</p> <p>The duplex apartments at raised ground floor and first floor levels facing Haverstock Hill are entered on their top floor. They all feature generous first floor living spaces with inset balconies. Bedrooms are located below on the raised ground floor.</p> <p>By lifting up the ground floor from street level and sandblasting or acid etching the lower level of the bedroom windows an appropriate level of privacy is achieved to these rooms.</p>
<p>Concerns raised over the accessibility to the Children's play space currently located at Ground Floor Level.</p>	<p>The Children's playspace is directly accessible from Block C, and is directly accessible from Adelaide Road.</p> <p>Should residents from Blocks A and B require access they can exit the building through the Adelaide Road entrance and it is a short walk to the playspace.</p>
<p>Additional Cycle parking is required for the re-provided retail units.</p>	<p>The Transport Consultants have identified an area in front of the retail</p>

# Pre-Application Advice and Consultation

<p>This is suitable to be located off-street.</p>	<p>units on Adelaide Road which can accommodate the required number of cycle parking spaces for the retail units.</p>
<p>An assessment of the impact of the traffic and railway noise on future occupiers is required.</p>	<p>WSP have conducted an independent noise and vibration assessment which provides a full overview of the scheme and the impacts that have been considered.</p>
<p>Concerns were raised over the overlooking and privacy requirements of the proposed residential units that are located facing the courtyard.</p>	<p>Overlooking issues around the central courtyard have been mitigated through carefully locating the window positions to avoid direct window to window views.</p> <p>Obscured glazing in certain locations allows light into the apartments while maintaining privacy for the occupants. The landscaped courtyard acts a buffer, providing visual stimulus for each occupant of the apartments.</p> <p>The average separation distance is 11m.</p>
<p>The refuse strategy should be discussed with the team at Camden.</p>	<p>The refuse strategy has been discussed with Ann Baker and has been confirmed as acceptable.</p>

Table 5.1 Pre-application comments and responses

### Public Consultation

- 5.7 A two day public consultation event was held on June 9<sup>th</sup> 2016 and on June 11<sup>th</sup> 2016. The consultation event was held at the Haverstock School which is located opposite the site. The event was well attended, and the full details of this are contained within the Statement of Community Involvement (Quatro).
- 5.8 Across the two consultation events 27 local residents attended with 11 residents leaving feedback on the proposals. Out of those who left formal feedback on the proposals 55% of the feedback was positive and supportive of the proposals.



## 6.0 Planning Policy Overview

- 6.1 The Town and Country Planning Act 1990 ('the 1990 Act') and the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') establish the legislative basis for town planning in England and Wales. Together these acts establish a "plan led" system which requires planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act). The National Planning Policy Framework (NPPF) (March 2012) is a material consideration in the determination of planning applications.
- 6.2 In assessing and determining development proposals, the NPPF sets out that Local Planning Authorities (LPAs) should apply the presumption in favour of sustainable development.

### Development Plan

- 6.3 In London the development plan for Camden comprises the London Plan alongside the statutory documents prepared by the London Borough of Camden.
- 6.4 This section identifies the key planning policies that are applicable to this application and the principal material considerations.
- 6.5 The statutory development plan for the site comprises:
- The London Plan (As amended March 2016);
  - London Borough of Camden Core Strategy (November 2010); and
  - London Borough of Camden Development Policies (November 2010);
- 6.6 Where there is a conflict between policies in the development plan, Section 38(5) of the 2004 Act provides that the most recently adopted policy takes precedence. As the NPPF and London Plan are the most recently adopted of the policy documents detailed above, where there is a difference the NPPF or the London Plan takes precedence.

### Other Material Considerations

- 6.7 As set out in paragraph 6.1 the NPPF forms a material consideration in the determination of planning applications. Other material considerations include (inter alia) at the National, Regional and Local levels:
- Planning Practice Guidance (PPG);
  - Mayor of London Housing SPG (March 2016)
  - GLA Accessible London: Achieving and Inclusive Environment (October 2014);
  - GLA Shaping Neighbourhoods: Character and Context (June 2014);
  - GLA Sustainable Design and Construction (April 2014);
  - Camden Council CPG1: Design (July 2015);
  - Camden Council CPG2: Housing (July 2015);
  - Camden Council CPG3: Sustainability (July 2015)
  - Camden Council CPG6: Amenity (July 2015);
  - Camden Council CPG7: Transport (July 2015);

### Emerging Development Plan

- 6.8 Any emerging policies also have the ability to be considered as a material consideration in the planning process. This is largely dependent on the stage the document has reached in the adoption process.

# Planning Policy Overview

- 6.9 The GLA amended the London Plan in early 2016 with amendments being made to policies relating to Housing and Parking standards. Where relevant revisions to these policies have been included within the following section of this report.
- 6.10 At the local level LBC are in the process of re-consulting on their Local Plan. The consultation period for their Local Plan Pre-Submission Draft closed on April 4<sup>th</sup> 2016. The plan and other relevant documents has been submitted to the Secretary of State for Examination. The submission of documents took place on 24<sup>th</sup> June 2016.
- 6.11 The examination timetable at the time of submission has not yet been published. As this Local Plan review is at an advanced stage in the adoption process, policies have been considered within this submission.

## CENTRAL GOVERNMENT GUIDANCE

### National Planning Policy Framework (NPPF)

#### Presumption in Favour of Sustainable Development

- 6.12 National planning guidance is contained within the National Planning Policy Framework (NPPF) (March 2012). It introduced a presumption in favour of sustainable development where development proposals that accord with up-to-date development plan should be approved without delay (Para 14). There are three dimensions of sustainable development, economic, social and environmental, which cannot be delivered in isolation
- 6.13 It sets out the core planning principles that underpin the planning system (Para 17), which include:
  - Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.
  - Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
  - The effective use of land should be encourage by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental quality; and,
  - Conserving heritage assets in a manner appropriate to their significant, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

#### Ensuring the Vitality of Town Centres

- 6.14 Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period (Para 23). They should
  - Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
  - Recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites;

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## Promoting Sustainable Transport

- 6.15 Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, LPAs should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport (Para 30).

## Delivering a Wide Choice of High Quality Homes

- 6.16 Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a five-year supply of deliverable housing sites (Para 49).
- 6.17 To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, LPAs should:
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
  - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
  - Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 6.18 Para 51 states that LPAs should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.

## Requiring Good Design

- 6.19 It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Para 57).
- 6.20 Para 60 states that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

## Conserving and Enhancing the Historic Environment

- 6.21 Where a planning application will impact upon heritage assets, LPAs require the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (Para 128). The level of detail provided should be proportionate to the

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assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 6.22 LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal (Para 129).
- 6.23 Great weight should be afforded to the significance of a designated heritage asset, and the asset’s conservation when considering the impact of a proposed development (Para 132).
- 6.24 Para 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

## STATUTORY DEVELOPMENT PLAN

### The London Plan (As Amended March 2016)

- 6.25 The London Plan was adopted in March 2011 and subsequent to this has undergone alterations. The first of which were adopted in October 2013 as part of the Revised Early Minor Alterations. In March 2015 further alterations to the plan were adopted followed by revisions to the Housing and Parking Standards in March 2016. All relevant amendments have been included within this statement.
- 6.26 The London Plan is a statutory document that sets out the Mayor’s vision for London until 2031 to ensure that London will continue to:
 

*“excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21<sup>st</sup> century, particularly that of climate change”.*
- 6.27 The objectives of the London Plan are to ensure that London is:
  - A city that meets the challenges of economic and population growth;
  - A city of diverse, strong, secure and accessible neighbourhoods;
  - A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities;

#### London’s Places

- 6.28 The Mayor will work to realise the potential of Inner London, in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities (Policy 2.19).

#### London’s People

- 6.29 The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding the opportunities for all Londoners. (Policy 3.1).
- 6.30 The Mayor recognises the pressing need for more homes in London. Working with relevant partners, the Mayor will seek to ensure the housing need is met (Policy 3.3). Table 3.1 of the London Plan sets out the annual and ten year minimum targets for housing delivery

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across London. The London Borough of Camden has a housing delivery target of 889 dwellings per annum which equates to a total of 8,892 dwellings over the plan period (2015-2025).

- 6.31 Housing developments within London should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies (Policy 3.5). The design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density, tenure and land use mix.
- 6.32 Policy 3.5 (as revised 2016) sets out the requirement for all new dwellings to take account of factors relating to 'arrival' at the building and 'home as a place of retreat'. New homes in London should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose.
- 6.33 This policy also stipulates that LPAs should incorporate requirements for accessibility, adaptability and minimum space standards. Policy 3.5 sets out that the Mayor will, and all boroughs should, seek to ensure that new developments reflect these standards.
- 6.34 Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme (Policy 3.6).
- 6.35 The London Plan states that proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility (Policy 3.7).
- 6.36 Policy 3.8 states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. This policy states that new developments are expected to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.
- 6.37 The Mayor will, and boroughs should seek to maximise affordable housing provision (Policy 3.11).
- 6.38 Where proposals include residential development the maximum reasonable amount of affordable housing should be sought having regard to the current and future requirements for affordable housing at Local and Regional levels (Policy 3.12). Regard should also be had to the need to encourage rather than restrain residential development and the need to promote mixed and balanced communities.
- 6.39 Policy 3.13 identifies that Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes.

## London's Response to Climate Change

- 6.40 The Mayor's energy hierarchy is to:
  - be lean, use less energy;
  - be clean, supply energy efficiently; and,
  - be green, use renewable energy (Policy 5.2).
- 6.41 The Mayor has set targets for carbon dioxide emissions reductions. Between 2013-2016, a 40 per cent improvement on 2010 Building Regulations will be sought residential buildings (Policy 5.2). Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions are to be met within the framework of the energy hierarchy.

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- 6.42 Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a payment in lieu.
- 6.43 Targets are proposed for minimum improvements over the Target Emission Rate: 44% improvement on 2006 Building Regulations (residential and domestic buildings between 2010-2013). Where targets cannot be met on site any shortfall can be provided offsite or through payment in lieu.
- 6.44 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3).
- 6.45 The Mayor's objective is that 25% of energy supply should be decentralised by 2025 (Policy 5.5). Boroughs are encouraged to undertake energy masterplanning and development of networks for development to connect to.
- 6.46 A Minor Alteration to the London Plan proposed alterations to Policy 5.2; the alterations includes a requirement to achieve (2014-2016), a 35% minimum improvement on 2013 Building Regulations, however this was not adopted and standards revert to the adopted 2011 policies which require new residential buildings between 2013-2016 to achieve a 40% improvement on 2010 Building Regulations. . In line with the energy hierarchy, this reduction target should be met through a combination of energy efficiency measures on-site and low and zero carbon infrastructure, either on or off-site.
- 6.47 The requirement for achieving zero carbon on developments from 2016 onwards remains intact.

### London's Transport

- 6.48 The Mayor will encourage closer integration of planning and development and will encourage development that reduces the need to travel and encouraging walking by improving the urban realm (Policy 6.1).
- 6.49 Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3).
- 6.50 Developments should provide secure cycle facilities (Policy 6.9). Maximum parking standards are set out in within the London Plan Table 6.3.
- 6.51 Maximum car parking standards are set out in London Plan Table 6.2. In addition, developments must ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.

### London's Living Places and Spaces

- 6.52 Policy 7.1 states that development should enable people to live healthy, active lives; should maximise the opportunity for diversity, inclusion and cohesion.
- 6.53 The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood (Policy 7.1).
- 6.54 All new development in London is required to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that all developments can be used safely, easily and with dignity by all (Policy 7.1).
- 6.55 Developments should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating (Policy 7.3).

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- 6.56 Policy 7.4 states that Buildings, streets and open spaces should provide a high quality design response that:
  - Has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
  - Contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
  - Is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
  - Allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
  - Is informed by the surrounding historic environment.
- 6.57 Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way (Policy 7.5). Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context (Policy 7.6).
- 6.58 Policy 7.8 states that development affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- 6.59 Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be “air quality neutral” and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.
- 6.60 Existing and potential adverse noise impacts should be minimised in development proposals, separating new noise sensitive development from major noise sources and promoting new technologies and improved practices to reduce noise at source (Policy 7.15).
- 6.61 Standard 29 of the London Mayor’s Housing Design Guide states that developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.

## LONDON BOROUGH OF CAMDEN LOCAL DEVELOPMENT FRAMEWORK

### Site Allocations and Designations

- 6.62 The site is not subject to any specific site development allocations within the existing or emerging Local Plan.
- 6.63 The retail parade fronting Adelaide Road is a designated Neighbourhood Centre. The site is also adjacent to two Conservation Areas (Eton and Regent’s Canal).

### Relevant Policies

- 6.64 The relevant policies from LBC Core Strategy (2011) comprise:
  - Policy CS1 Distribution of growth;

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- Policy CS3 Other highly accessible areas;
- Policy CS5 Managing the impact of growth and development
- Policy CS6 Providing quality homes
- Policy CS7 Promoting Camden’s centres and shops
- Policy CS8 Promoting a successful and inclusive Camden economy
- Policy CS10 Supporting community facilities and services
- Policy CS11 Promoting sustainable and efficient travel
- Policy CS13 Tackling climate change through promoting higher environmental standards
- Policy CS14 Promoting high quality places and conserving our heritage;
- Policy CS15 Protecting and improving our parks and open spaces and encouraging biodiversity
- Policy CS17 Making Camden a safer place;
- Policy CS18 Dealing with our waste and encouraging recycling;

6.65 The relevant policies of the London Borough of Camden’s Development Policies include:

- Policy DP2 Making full use of Camden’s capacity for housing;
- Policy DP3 Contributions to the supply of affordable housing;
- Policy DP5 Homes of different sizes;
- Policy DP6 Lifetime homes and wheelchair homes;
- Policy DP10 Helping and promoting small and independent shops;
- Policy DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses
- Policy DP13 Employment sites and premises
- Policy DP16 The transport implications of development;
- Policy DP17 Walking, cycling and public transport;
- Policy DP18 Parking standards and limiting the availability of car parking
- Policy DP19 Managing the impact of parking
- Policy DP20 Movement of goods and materials
- Policy DP21 Development connecting to the highway network
- Policy DP22 Promoting sustainable design and construction
- Policy DP23 Water
- Policy DP24 Securing high quality design;
- Policy DP25 Conserving Camden’s heritage
- Policy DP26 Managing the impact of development on occupiers and neighbours
- Policy DP27 Basements and lightwells
- Policy DP28 Noise and vibration



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- Policy DP29 Improving access
- Policy DP30 Shopfronts
- Policy DP31 Provision of, and improvements to, open space, sport and recreation
- Policy DP32 Air quality and Camden’s clear zone;

## Principle of Development

- 6.66 The Council will focus Camden’s growth in the most suitable locations and manage it to make sure that its opportunities and benefits are delivered and that it is sustainable (Policy CS1). The Council will seek to promote the most efficient use of land and buildings by seeking development that makes full use of the site, taking into account the quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. The Council will expect a provision of a mix of uses in suitable schemes, including an element of housing where possible.
- 6.67 The Council will promote appropriate development in the highly accessible town centres including appropriate edge of centre locations (Policy CS3). The site is located on the edge of Camden Town Centre within a Neighbourhood Parade. These areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel.

## Housing

- 6.68 The Council aims to meet and secure housing delivery in accordance with current targets for the Borough and they will aim to ensure that housing is the priority land-use within the Borough (Policy CS6).
- 6.69 The Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing, by expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant (Policy DP2).
- 6.70 Policy CS6 states that the Council will aim to secure high quality affordable housing by seeking to ensure that 50% of the borough-wide target for additional self-contained homes is provided as affordable housing and through seeking to negotiate affordable housing contributions from specific proposals based on the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development.
- 6.71 It is expected that on development sites of 10 or more dwellings developments should contribute to the supply of affordable housing (Policy DP3). The provision is expected to be on-site unless it cannot practicably be achieved.
- 6.72 Development sites are expected to provide 60% social rented housing and 40% intermediate affordable housing (Policy CS6). This policy was adopted in advance of the introduction of the ‘affordable rented’ housing product. Therefore, Camden Council follows the approach of the London Plan with regard to this product in that they consider social rent and affordable rent together as “social-affordable rented housing”.
- 6.73 Affordable rented housing is indicated in the NPPF as being a product where rents should not exceed 80% of market rents.
- 6.74 The Council expects development to deliver a range of housing products with regard to the different dwelling size priorities for social rented, intermediate affordable and market homes, and will take into account the character of the development, the site and the area,

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including the impact of the mix on child density and the site size, and any constraints on including homes of different sizes (Policy DP5).

- 6.75 The Council will seek a diverse range of housing products in the market and affordable sectors to provide a range of homes accessible across the spectrum of household incomes; including a range of self-contained homes of different sizes to meet the Council's identified dwelling-size priorities and through seeking a range of housing types suitable for different housing needs (Policy CS6).
- 6.76 All housing development should meet lifetime homes standards. 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them (Policy DP6).

### Retail

- 6.77 The Council will seek to protect and enhance their retail centres across the borough within the hierarchy set out in the Core Strategy. The Council is seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located. The Council will protect small and independent shops and retailers within the Borough (Policy CS7).
- 6.78 The Council will encourage the provision of small and independent shops (Policy DP10).

The supporting text to Policy CS7 states that the Council will take into account the individual character of the centre when assessing development proposals but, as a guide, the Council will in general resist schemes that would result in less than half of ground floor premises in a neighbourhood centre being in retail use or in more than three consecutive premises being in non-retail use.

### Design and Heritage

- 6.79 The Council will require all developments, including alterations and extensions to be of the highest standard of design (Policy DP24). LBC will expect developments to consider:
  - a. Character, setting, context and the form and scale of neighbouring buildings;
  - b. The character and proportions of the existing building, where alterations and extensions are proposed;
  - c. The quality of materials to be used;
  - d. The provision of visually interesting frontages at street level
  - e. The appropriate location for building services equipment;
  - f. Existing natural features, such as topography and trees;
  - g. The provision of appropriate hard and soft landscaping including boundary treatments;
  - h. The provision of appropriate amenity space; and
  - i. Accessibility.
- 6.80 Policy CS14 identifies that the Council will ensure that the buildings within Camden are attractive, safe and easy to use. The Council requires that development is of the highest standard and respects the local context and character of the area. Developments should respect Camden's rich and diverse heritage assets and their settings, including Conservation Areas and Listed Buildings (Policy CS14).
- 6.81 Policy DP25 states that the Council will resist proposals which it considers would cause harm to the setting of a Listed Building.

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- 6.82 The Council will seek to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities. They will expect all buildings and places meet the highest practicable standards of access and inclusion (Policy DP29).
- 6.83 Developments within Camden should identify and demonstrate design principles which contribute to community safety and security, ensuring Camden is a safe place to live (Policy CS17).

### Open Space

- 6.84 Camden Council will seek to protect and improve Camden’s parks and open spaces. The Council will secure from developments that create an additional demand for public open space, where opportunities arise, improvements to open spaces, including to the facilities provided, such as play and sports facilities, access arrangements and the connections between spaces (Policy CS15).

### Impact on adjacent occupiers

- 6.85 Protecting high standards of amenity is a key element in maintaining Camden’s attractiveness as a place to live and work. The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity (Policy DP26). The factors for consideration include visual privacy and overlooking, sunlight, daylight and artificial light levels and noise and vibration levels. Developments are also required to provide:
  - a. Facilities for the storage, recycling and disposal of waste;
  - b. Facilities for bicycle storage; and
  - c. Outdoor space for private or communal amenity space, wherever practical.
- 6.86 Policy DP28 states that the Council will seek to ensure that noise and vibration is managed and control. The Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these cases are likely to cause harm, condition and planning obligations may be used to minimise impact.

### Transport

- 6.87 As part of minimising the impact of transport on the environment the Council will minimise provision for private parking in new developments, in particular through car free developments in the borough’s most accessible locations (Policy CS11).
- 6.88 The Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links (Policy DP16 and DP17). Safe pick-up and drop-off areas as well as waiting areas should be provided where this activity is likely to be associated with the development.
- 6.89 The Council will seek to ensure that developments in town centres are car free (Policy DP18). For car free proposals the Council will limit onsite parking to spaces for disabled people and operational or servicing needs. Developments will also be expected to meet the minimum standards for cycle parking.

### Sustainability and Energy

- 6.90 The Council will require all development to take measures to minimise the effects of and adapt to climate change (Policy CS13). All development is encouraged to meet the highest feasible environmental standards that are financially viable during construction and occupation.

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- 6.91 The Council will require development to incorporate sustainable design and construction measures, they must demonstrate how sustainable development principles. The Council will promote and measure sustainable design and construction by expecting new build housing to meet Code Level 6 (zero carbon) by 2016 (Policy DP22).
- 6.92 Camden expects developments to target at least a 19% reduction in carbon dioxide emissions through the installation of on-site renewable energy technologies (policy CS13).
- 6.93 It is considered that Policy DP22 has been superseded by policies contained within the London Plan.

### **Waste and Recycling**

- 6.94 Developments within Camden are expected to demonstrate and include facilities for the storage and collection of waste and recycling (Policy CS18).

### **Basements and Lightwells**

- 6.95 Where proposals are inclusive of the provision of basements and lightwells or other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate (Policy DP27).
- 6.96 The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability (Policy DP27).

## 7.0 Planning Assessment

- 7.1 This section of the Planning Statement provides an assessment of the development proposals against the Planning Policies set out in Section 6.0 of this report. The section addresses the pertinent planning issues associated with the development of the site at 5-17 Haverstock Hill.
- 7.2 It is considered that the key planning issues pertinent to the redevelopment arising from pre-application discussions and public consultation are as follows:
- Principle of Redevelopment;
  - Principle of Land Uses;
    - Housing
    - Retail
  - Residential
  - Conservation and Heritage;
  - Design;
  - Amenity and Playspace;
  - Impact on Adjacent Occupiers;
  - Transport and Highways;
  - Energy and Sustainability;

### Principle of Redevelopment

- 7.3 The site is an existing vacant car garage (Sui Generis), with a parade of partially occupied retail units at ground floor along Adelaide Road (A1-A5). The main property (car garage) has been vacant since the British Transport Police departed in Summer 2014. At ground level there are six retail units (two units have been amalgamated to provide for the café) of these six units, four are currently occupied (with the Café unit having recently been vacated).
- 7.4 The building was purpose-built as a car garage for the neighbouring Eton residential complex (the residential mansions blocks to the north) in 1939. As well as a garage, the building originally provided a motor showroom and petrol station (now gone) and shops on at ground floor level on Adelaide Road.
- 7.5 The elevations are designed as though they are in use as flats and are suggestive of residential character rather than a car garage. However, the interior comprises a series of staggered floor levels (ten) with spiral ramps provided for independent up and down traffic.
- 7.6 The building was occupied by the British Transport Police from c. 1956, until the summer of 2014, for the storage of vehicles involved in crime (see Appendix 1).
- 7.7 The building includes a limited amount of office space, This is ancillary to the main building operations and could not operate in isolation to the main building.
- 7.8 It is understood that during the British Transport Police operation (over 50 years) the facility employed circa. six employees (see Appendix 1).
- 7.9 The site therefore has a low employment density, limited ancillary office space and, as a purpose built car garage, would not easily be convertible to modern employment floorspace. It is not therefore considered that the building should be treated as employment floorspace and any application would not be subject to the tests of Camden Policy DP13.

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- 7.10 In their pre-application response LB Camden have agreed that:  
*“The building would not fall within the definition of ‘employment floorspace’ as set out in Policy DP13”.*
- 7.11 Car storage and parking building and it is not considered to be able to be re-used as its current purpose (see Design and Access Statement).
- 7.12 The property is in a state of decline and is currently a poor neighbour to the Grade II Listed station which sits immediately adjacent to the property. The property cannot be used in its existing condition nor can the building be refurbished for another purpose due to its purpose built nature.
- 7.13 The building is vacant and has been confirmed through pre-application discussions as a building in lawful Sui Generis Use. Therefore there is no resistance to the loss of the building or the floorspace provided within it.
- 7.14 Section 2 of this Statement set out that the site benefits from excellent public transport accessibility (PTAL 6a) to provide access to jobs within Central London and beyond, proximity to local education, health and other local services within the immediate neighbourhood, as well as shopping and leisure facilities within Camden Town and the parade of local shopping fronting Adelaide Road.
- 7.15 By virtue of its characteristics and location the site is considered entirely appropriate for redevelopment, in accordance with the NPPF (Paragraph 37), the strategic policies of the London Plan and Camden’s spatial policies (Policy CS1 and CS4).
- 7.16 Moreover, the proposed development will contribute to the NPPF’s economic, social and environmental sustainable development objectives (as detailed at Paragraph 7), through bringing a site back into active use and helping to address London and Camden’s local housing need.
- 7.17 The re-use of the site is in accordance with NPPF policies, London Plan Policies and Camden Policies which state that brownfield sites, and sites within the Borough should be used effectively. Policy CS1 of the Camden Core Strategy identifies that the Council will seek to promote the most efficient use of land and buildings by seeking development that makes full use of the site, taking into account the quality of design and its surroundings.
- 7.18 It is therefore considered that the principle of redeveloping the site has been established and the loss of Sui Generis floorspace will not be resisted.

## Proposed Land Uses

### Housing

- 7.19 The redevelopment of the site will result in the delivery of 77 residential units (Use Class C3). The redevelopment will provide 60 market units and 17 affordable properties, in both intermediate and social rented tenures. This would result in the delivery of 22% affordable housing (based on GEA floorspace basis) across a range of unit sizes which has been informed by Camden’s latest dwelling size priorities which we understand have been altered since the Development Management Policies were adopted.
- 7.20 The delivery of housing within this location is considered to be consistent with Policies contained within the Local and Regional plan. The delivery of housing will contribute significantly to housing numbers and will assist the Borough in meeting their housing target.

# Planning Assessment

- 7.21 The proposed redevelopment of the site for housing is in accordance with the Boroughs land use priorities as set out in the Core Strategy.
- 7.22 The proposed delivery of 77 residential units will assist in the delivery of the target number of dwellings for Camden, the Borough is expected to deliver 889 residential units per annum and the delivery of this development will contribute towards this in accordance with Policy 3.3 of the London Plan.

### Retail

- 7.23 The ground floor Adelaide Road elevation is a designated Neighbourhood Parade, which provides 406sqm of retail (Use Classes A1-A5) across six units (note: two units in the parade have been amalgamated).
- 7.24 The proposals will re-provide 284sqm of retail at ground floor, which is an overall loss of 122sqm of retail floorspace, this equates to 30% reduction in retail floorspace). The proposals include the provision of three units with reconfigured servicing space. The proposed retail units will be purpose built and high quality, meeting modern standards.
- 7.25 Policy CS7 seeks to protect and promote small and independent shops and the Council will resist the loss of shops where this would harm the character and function of the centre. The Neighbourhood Parade is located on the fringe of the main Camden/Chalk Farm Parade.
- 7.26 The supporting text and the CPG5 documentation states that the Council will take into account the individual character of the centre when assessing development proposals. It sets out that Camden will resist schemes that would result in less than half of ground floor premises in a neighbourhood centre being in retail use or in more than three consecutive premises being in non-retail use.
- 7.27 The entire Adelaide Road frontage will remain in retail use in the proposals, presenting a consecutive retail façade to Adelaide Road and would therefore be in accordance with the abovementioned details. In addition to this the re-provision results in the loss of 30% of the retail floorspace within the frontage, which will ensure that existing tenants have the opportunity to return.
- 7.28 The proposals are considered to accord with Policy CS7 and CPG5.

### Residential

#### Residential Mix

- 7.29 The proposal provides 77 residential units across the following tenure and size mix;

**Table 7.1 Proposed Residential Mix**

	MARKET	INTERMEDIATE	SOCIAL RENT	TOTAL
Studio	6	2	0	8
1 Bed	14	4	0	18
2 Bed	28	2	2	32
3 Bed	12	0	7	19
Total	60	8	9	77

- 7.30 Existing Policy DP5 outlines that the dwelling size priorities for the Borough are for larger units in both the affordable and intermediate properties. The proposals will provide 24% of dwellings with 3Bedrooms, within this seven units (77%) are social rented properties which

# Planning Assessment

accords with the dwelling size priorities set out in DP5. There is also a high provision of 2 bedroom market properties, which is as required.

- 7.31 Emerging Policy H7 (which replaces DP5) differs from the currently adopted requirements in that it requests an increased provision of social rented 2 bedroom properties and a higher provision of small intermediate units. The proposed development is considered to still respond to these revised requirements in that it provides a genuine mix of dwellings. In addition the policy wording stipulates that development should contribute to meeting the priorities and should include a mix of large and small homes. The proposed residential dwelling mix is considered to be in accordance with the abovementioned policies.
- 7.32 In particular, the applicant has revised the unit mix through the scheme evolution to provide a higher proportion of family social rented units.
- 7.33 The provision of a mix of units in tenures and sizes is in accordance with Policy 2.19 of the London Plan where it states that the Mayor will support and sustain existing and new communities.

## Affordable Housing

- 7.34 The site will provide 17 affordable homes on-site nine social rent and eight intermediate units. On a floorspace basis this provision equates to 22% affordable housing.
- 7.35 A Viability Assessment has been submitted (confidentially) for independent review by LB Camden. This demonstrates that the current proposed scheme falls short of being viable when viewed against the Existing Land Value (EUV) and therefore the provision of affordable housing as proposed is considered to be the maximum viable amount that can be provided on site.
- 7.36 It is considered that the proposals whilst falling below the requirement of 50% affordable housing create a development which will utilise a currently redundant brownfield site in Central London. Due to the nature of the site and the inherent site constraints the proposals provide the maximum amount of affordable floorspace of both social and intermediate rent.
- 7.37 The policy has been developed to have regard to policies within the London Plan and the development is considered to be acceptable given the specific circumstances of the site. In addition, should additional affordable housing be required it is considered that the scheme would not be viable and would therefore restrain residential development contrary to Policy 3.12 of the London Plan.

## Residential Quality

- 7.38 It is proposed to include ten duplex units, of these, eight duplex units are proposed to be located at ground and first floor of the development fronting Haverstock Hill and the rear of the site. One duplex is located over second and third floors and one duplex located over fourth and fifth.
- 7.39 The proposed units which are located on Haverstock Hill have a raised ground floor to ensure the protection of residential amenity. Inherent design features such as the raising of the ground floor, the main entrance point being at first floor level and the provision of bedroom accommodation at raised ground are considered key elements which will protect and ensure residential amenity. These apartments also feature generous first floor living spaces with inset balconies providing high levels of residential amenity.



## Planning Assessment

- 7.40 In addition it is proposed to sandblast or etch the lower level glazing; this will further the high levels of residential privacy which have been afforded to these apartments.
- 7.41 The proposed residential units have been designed to ensure the maximum levels of privacy. Specific consideration has been given to ensuring that the duplex units on Haverstock Hill will not be compromised due to their location and will achieve maximum levels of privacy for residents.
- 7.42 The proposals have been designed with both Local and Regional policies in mind and specifically it is considered that the proposals are in accordance with Standard 28 of the London housing SPG, which sets out that design proposals should ensure that each dwelling is provided with an adequate level of privacy in relation to both neighbouring properties and the street.

### Unit Sizes

- 7.43 All of the proposed units meet and exceed the minimum size standards set out in the national technical space standards and London Plan (as amended).
- 7.44 Policy 3.5 and the associated tables state that all new dwellings should have adequately sized rooms which are convenient and efficient in terms of their room layout, all new dwellings should be functional and fit for purpose (Policy 3.5).
- 7.45 It is considered that the proposals, given that they meet the required size standards for new residential development are in full accordance with Policy 3.5.

### Access

- 7.46 The units have been designed to comply with the access standards set out in part M4(2) of the Building Regulations as set out in Standard 11 of the London Housing SPG.
- 7.47 A specific 'Access Statement' has been prepared by HADA which provides full and comprehensive details regarding the requirements and the proposals. This details that there is step-free access to all entrances to the proposed development, and that 90% of dwellings will be designed to be accessible and adaptable.
- 7.48 9% of the proposed dwellings will be designed to be easily adaptable to meet the needs of a wheelchair user.
- 7.49 This figure has been revised to reflect the specific requirements of the London Borough of Camden. Following discussions with the Case Officer it was confirmed that there was a requirement for an additional 2 bedroom dwelling and the requirement was greater for this than the originally proposed adaptable 3 Bed.

### Aspect

- 7.50 Within the development 46 apartments are single aspect units none of the proposed single aspect units are north facing with 15 of these apartments being south facing units.
- 7.51 The proposed single aspect units are distributed across the site, and include 7 of the proposed 10 duplex apartments.
- 7.52 It is considered that due to the nature of the site, in that it is a deep site with constraints from the neighbouring listed property, the provision of this limited number of single aspect apartments would be commensurate with the requirements of both the Local and Regional Plans.

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- 7.53 In accordance with Standard 29 of the London Mayor’s Housing Design Guide states that where developments include single aspect units they should be avoided where there are three or more bedrooms. The proposed development is inclusive of 46 single aspect units, 37 of these units (81%) of these units are smaller dwellings being that they provide 2Bed apartments or less and therefore accord with this element of Standard 29.

## Privacy

- 7.54 In the central courtyard area apartment layouts have been carefully designed to minimise overlooking and privacy issues.
- 7.55 Specific pages within the Design and Access Statement provide additional details in relation to the enhanced privacy of the units overlooking the central courtyard. This is developed further in the below section.

## Design and Conservation

### Design

- 7.56 This is a key site within Camden and is located at a key intersection and is the focal site in a zone of transition. The plot is constrained and the design has been developed to respond to these issues. The proposed design makes reference to the mansion block typology which extends to the northwest of the site and reflects the industrial nature of Camden Town.
- 7.57 The proposal is organised into two c.10m wide blocks: one orientated to the north east and the other facing south. A central element, overlooking the landscaped courtyard, stretches between the blocks on the rear boundary of the site.
- 7.58 The inner courtyard will reflect the materials of the Grade II Listed Station by including a light coloured polished façade.
- 7.59 The proposed entrances from Adelaide Road and Haverstock Hill converge into an entrance foyer at ground floor, natural light to this area is gained through a roof light which opens into the podium floor above.
- 7.60 The proposals include high quality materials and will reflect the materials found in the immediate vicinity of the site. Details on the proposed materiality can be found in the supporting Design and Access Statement.
- 7.61 The proposals for 5-17 Haverstock Hill provide a high quality residential development which sits in context with the site and will enhance the quality of the local area, taking into account the physical environment and local character in accordance with Policy 3.5 of the London Plan.
- 7.62 The design team have developed the proposals for 5-17 Haverstock Hill to be in accordance with Policy DP24 of the Camden Development Management Policies. It is considered that the proposed development provides a building of the highest standard of design, inclusive of the provision of high quality materials, and the additional provision of landscaping and amenity space. Further to this the development will ensure the provision of a visually interesting and high quality street frontage which is in line with Policy DP24.

### Conservation and Heritage

- 7.63 The site of 5-17 Haverstock Hill is not located within a Conservation Area nor is the Building listed. The adjacent property (Chalk Farm Station) is Grade II Listed, and therefore consideration needs to be given to the status of this property.

## Planning Assessment

- 7.64 A Heritage and Townscape Report has been submitted in support of this application to address the heritage assets which are adjacent to the site.
- 7.65 The design rationale has been developed to ensure that the proposed development is designed to a high standard and quality whilst not dominating the townscape or the Grade II Listed station.
- 7.66 The internal courtyard of the proposals takes design cues from Chalk Farm Station in that it includes a polished façade which will reflect light within the courtyard and mimics the glazed tiling on the façade of the station.
- 7.67 The Townscape, Heritage and Visual Impact Assessment (prepared by Richard Coleman; City Designer) submitted with this application concludes that the proposed development would contribute to the distinct character of the area and would provide a new context for the area, one of much higher design quality than the existing building, setting a new design standard.
- 7.68 The submitted documentation provides greater detail with regards to these detailed design elements, however the proposals are considered to accord with Policy 7.8 of the London Plan in that they have considered the significance of neighbouring heritage assets and the proposals are sympathetic towards their form, scale, materials and architectural details.
- 7.69 It is considered that, in accordance with Camden Policies DP24 and DP25 there will be no significant harm to the adjacent Listed Building or the listed properties in the vicinity of the site and will deliver a development of the highest design quality (Policy DP24).

### **Access**

- 7.70 Access to the market units is provided from both Haverstock Hill and Adelaide Road. The two access points will converge at a central atrium to be used by residents of the market units.
- 7.71 The access to the affordable housing is via a landscaped courtyard off Adelaide Road, the landscaped courtyard will be gated and has been designed by LUC Landscape Architects.
- 7.72 Access to the residential and retail properties will be level and accessible for all. The proposals are in full accordance with Policy 7.1 of the London Plan which requires that all new developments should achieve the highest standards of design and inclusivity and should seek to ensure that all developments can be used safely, easily and with dignity by all.

### **Secure by Design**

- 7.73 The proposed development includes measures to ensure that development is secure and safe for residents. The proposals include secure residential and retail entrances which will be controlled by FOB access. There is also proposed to be a 24/7 concierge which will act as a second secure checkpoint for residents and visitors.
- 7.74 Mail deliveries will be controlled via FOB access and would for blocks A and B would be distributed through the concierge.
- 7.75 Each of the retail units has an individual single public access point at street level; each unit will have their own security measures.
- 7.76 The proposals were discussed with Adam Lindsey (Designing out Crime Officer) in March 2016.

## Planning Assessment

- 7.77 The proposals include measures which will seek to reduce opportunities for criminal behaviour and will contribute to a sense of security in the areas without being overbearing or intimidating in accordance with Policy 7.3 of the London Plan.

### Residential Amenity

#### Daylight and Sunlight

- 7.78 An Internal Daylight and Sunlight Assessment has been undertaken by Point2Surveyors to assess the quality of daylight and sunlight into the new residential units. The Report is submitted as part of the planning application package.
- It concludes that the scheme demonstrates good levels of compliance with BRE Guidance in terms of internal daylight amenity. There are only 4 incidences of marginal derogations from guidance across all units across the whole scheme, with a majority of the rooms achieving and greatly improving on BRE target values.
- 7.79 The proposals have been developed in accordance with Policy DP26 of the Camden Development Management Polices and have taken into account daylight and sunlight in respect to the quality of life of future occupiers.

#### Aspect

- 7.80 Forty-six of the apartments are single aspect, fifteen dual-aspect and sixteen triple aspect.
- 7.81 In accordance with Standard 29 of the Mayors Housing Design Guide the number of single aspect units have been minimised throughout the development and where proposed are not solely north facing and include amenity space, and sufficient glazing to provide high levels of daylight and sunlight.
- 7.82 Seven of the proposed single aspect units are duplex units, which benefit from two storeys of habitable accommodation and in some instances a private landscaped garden.
- 7.83 None of the proposed single aspect dwellings are solely north facing, with a small minority of the units being north-east facing. The proposed north-east facing dwellings are not significantly impact by nature of being single aspect as the proposals include a high quality of design which will ensure maximum levels of daylight and sunlight to each of the apartments.

#### Privacy

- 7.84 In the central courtyard area apartment layouts have been carefully designed to minimise overlooking and privacy issues.
- 7.85 Overlooking in the central courtyard has been mitigated through carefully locating the window positions to avoid direct window to window views. Obscured glazing in certain locations allows light into the apartments while maintaining privacy for the occupants. The landscaped courtyard acts a buffer, providing visual stimulus for each occupant of the apartments. Based on the Internal Daylight Assessment, the scheme demonstrates a good level of compliance with BRE guidance.
- 7.86 These measures ensure that the proposals are fully compliant with Policy DP26 (Managing the Impact of Development) and Standard 28 of the Mayors Housing Design Guide.
- 7.87 Although there is a typical standard set out in the Mayors Housing Design Guide of 18-21m between facing homes (Para 2.3.36) the guidance states that by rigidly sticking to these measures there can be a limit on the variety of urban spaces used for residential and housing types across the city and sets out that it will often be beneficial to provide a buffer.

## Planning Assessment

As set out in Para. 7.80 the courtyard space has been designed with buffer landscaping to ensure that privacy is maintained where the separation distance falls short of the 18m.

### Amenity Space, Play Space and Open Space

- 7.88 A holistic and co-ordinated landscaping scheme has been prepared for the development. LUC landscape architects have prepared a scheme which has been submitted in support of this application.
- 7.89 The affordable housing is accessed via a landscaped courtyard, this will include both hardscaping and soft landscaping, providing a landscaped route to the proposed play space.
- 7.90 The proposals include the provision of 71.3sqm of play space located accessibly at ground floor off Adelaide Road.
- 7.91 Camden's Supplementary Planning Document: Amenity CPG6 states that 2.5sqm of play space should be provided per expected child. On this basis the provision of 71.3sqm of play space exceeds the requirement to provide 58.1sqm in accordance with Camden Planning Policies. This is based on an anticipated child yield for the development of 23 (based on final unit numbers and mix). The provision of open space and recreation facilities is in accordance with Policy DP31.
- 7.92 The proposals have been developed to ensure compliance with Policy 3.6 as the proposals have considered the expected child yield and have provided outdoor space sufficient to meet Local standards.
- 7.93 All the apartments feature amenity space, either in the form of inset balconies or, in the case of the duplex units at lower ground/ first floors, small gardens.
- 7.94 External amenity areas are provided for all the units (except studios). The majority have large (typically 2.2m x 3.7m) inset balconies. Units on the upper levels open out onto landscaped roof spaces.
- 7.95 The landscaped podium level has been designed as a non-accessible space. This is due to the privacy and overlooking issues. This will be visible from courtyard apartments and from the main street views.

### Impact on Adjacent Occupiers

- 7.96 A Daylight and Sunlight Assessment has been undertaken by Point2Surveyors. The Report is submitted as part of the planning application package.
- 7.97 It concludes that overall the scheme will relate well to the neighbouring residential properties in terms of daylight and sunlight amenity. Where there are derogations from BRE guidance these are considered minor, and largely due to the boundary proximity of certain windows/ rooms which have low baseline daylight amenity values in the existing situation.
- 7.98 The impact on neighbouring occupiers has been assessed with due consideration to Policy DP26 of the Camden Development Management Policies. It is considered that the development will not cause harm to neighbouring amenity including elements such as noise, vibration, daylight and sunlight levels.

### Basement

- 7.99 The proposals include the excavation of a basement under part of the site. In accordance with Policy DP27 and guidance contained within CPG4 this submission is accompanied by a Stage 1 Basement Impact Assessment,

# Planning Assessment

- 7.100 The Basement Impact Assessment conducted by GEA has not indicated any concerns with regards to the effects of the proposed basement on the site or the surrounding area. The impacts assessed included, the impact on trees, groundwater flow, highways damage and impacts on the Northern Line Underground Tunnel.
- 7.101 The report concludes that the impacts which have been identified can be mitigated appropriately through appropriate design and standard construction practices.

## Transport and Highways

- 7.102 The site benefits from a PTAL of 6a, and is located immediately adjacent to Chalk Farm London Underground Station; the site is also in close proximity to two bus stops with Central London services. In addition the site is within a five minute walking distance of Camden Town and the additional transportation services that this area provides.
- 7.103 The proposals are designed to be car free according with London Plan standards and with Camden Policy CS11, DP16 and DP17.
- 7.104 The proposed development includes designated cycle parking for the residential units and the proposed retail units on Adelaide Road.
- 7.105 In total, 144 secure cycle spaces will be provided within the development envelope. This includes the provision of 134 residential cycle spaces in two storage areas at ground floor level and 10 cycle spaces dedicated to the retail units. These are proposed to be located in front of the retail units on Adelaide Road.
- 7.106 The provision of cycle spaces is in full accordance with the current cycle parking standards contained within the London Plan (As amended).

## Waste and Servicing

- 7.107 The provision of bin stores has been outlined in the previous section; the provision has been designed in accordance with Camden CPG 1 (Design) which sets out the specific requirements for the provision of waste storage and collection.

## Ecology, Trees and Landscaping

- 7.108 A holistic and co-ordinated landscaping scheme has been prepared by LUC Landscape Architects. This includes the provision of private amenity space, children's play space and biodiverse roofs.
- 7.109 The provision of a high quality landscape reflects the requirements of Policy CS14, and Policy DP24.

## Noise, Air Quality and

- 7.110 In accordance with Policy DP28 and Camden's CPG6 (Amenity), the issue of noise has been carefully considered in the design of the proposed scheme. In particular, regard has been had to the daytime and evening noise period levels across the site which are presently dominated by traffic noise from Haverstock Hill and Adelaide Road.
- 7.111 Consideration has also been given to the noise and vibration emanating from the London Underground Lines which run in close proximity to the site. The Noise and Vibration statement assesses the degree to which the proposed development will be affected by tactile vibration and also re-radiated structure-borne noise resulting from train movements along the London Underground Northern line, which passes below the site.
- 7.112 The report prepared by Sandy Brown and supporting this submission concludes:

## Planning Assessment

- An initial facade assessment has been carried out. The results of which indicate that the facades with direct line of site to the roads will require sealed facades and high performance glazing within bedrooms in order to control maximum levels during the night.
  - Tactile vibration is not considered to be an issue on this site - measurements suggest that vibration mitigation will be required in order to reduce structure borne noise from underground trains
- 7.113 In accordance with Camden Policy DP32 an Air Quality Report accompanies the planning submission. This assesses the existing air quality at the site, the potential impacts of construction and the mitigation required to ensure suitable standards for future residents of the development
- 7.114 The report which supports this submission and has been prepared by WSP|Parsons Brinckerhoff concludes:
- The Proposed Development is considered to be a Medium Risk Site for dust deposition and Low Risk Site for Particulate matter concentrations. Through good site practice and the implementation of suitable mitigation measures, the effect would be significantly reduced. The residual effects are considered to be negligible.
  - The results of the Air Quality Neutral Assessment indicate that the proposals will be deficient in terms of building emissions and the building is better than neutral.

### Contaminated Land

- 7.115 GEA undertook an investigation of the site and found that there was no information or records held regarding any fuel storage tanks below the site. In addition it was found that within the immediate surrounding area there was not a particularly contaminative history and there has been no identification of soil gas.
- 7.116 Contamination testing on the site identified elevated levels of some contaminants on the site. However, testing undertaken and recommendations identify that the end users of the site will be isolated from direct contact with the identified contaminant.
- 7.117 Within the proposed soft landscaped areas, some form of remedial measures will be required.
- 7.118 Overall there is not considered to be a risk to developing this land from a contaminated land perspective.

### Flood Risk

- 7.119 The site is located in Flood Risk Zone 1 and thus is assessed as having a less than 1 in 1000 annual probability of river or sea flooding (minimal).
- 7.120 Notwithstanding this a Flood Risk Assessment has been prepared to accompany the planning application and to meet BREEAM requirements.
- 7.121 The existing site comprises an impermeable surface over the entirety of the site.
- 7.122 The proposals will incorporate sustainable surface water drainage measures including, subsurface storage and blue and green roofs.
- 7.123 The proposals will provide a robust and sustainable drainage regime and will not increase flooding at the site or elsewhere. Fully according with Development Management Policy

# Planning Assessment

DP23 (Water) and Core Strategy Policy CS13 (Tackling Climate Change through promoting higher environmental standards).

## Energy and Sustainability

- 7.124 The submitted energy statement sets out the key areas of policy compliance for the proposed development at Haverstock Hill. The reduction of energy is embedded within the scheme with optimisation of the façade and a high standard of sustainable construction.
- 7.125 The proposals include the introduction of a Combined Heat and Power Plant (CHP) which will aid in the reduction of Carbon emissions from the development. The inclusion of the CHP plant will result in reduction in Carbon Dioxide emissions by 26.5% for the whole development.
- 7.126 Photovoltaic Panels are considered to be the most suitable renewable technology due to practical constraints on site. The installation of 150sqm of Photovoltaic Panels on site will achieve a further 4.3% reduction in the Carbon Dioxide Emissions over Building Regulations.
- 7.127 Overall the cumulative savings for the scheme equate to 36.9%.
- 7.128 The optimised energy strategy of 5-17 Haverstock Hill development, will allow the development to achievement an improvement over Part L2A:2013 and Part L1A:2013 of 36.9% exceeding the requirement of the London Plan.
- 7.129 Camden Policy CS13 requires that all new developments achieve a 20% reduction in Carbon Dioxide emissions from on-site renewable energy. Chapman BDSP have undertaken a review of renewable technologies and have confirmed that the site would be suitable for the installation of Photovoltaics (PVs).
- 7.130 Other renewable technologies, including: Ground Source Heat Pumps, Solar Thermal Hot Water Panels, the use of Bio-fuels and Wind-Turbines have also been assessed and it has been concluded that these methods would not be feasible on this specific site. Therefore in accordance with para 13.11 of Policy CS13 it is considered that although the savings on site fall short of the 20% reduction there are no other viable renewable options for this development.
- 7.131 The scheme is designed to achieve BREEAM 'Excellent' on the retail units.

## Planning Obligations and Community Infrastructure Levy

- 7.132 The proposals are accompanied by a proposed package of planning obligations which will be secured through a legal agreement between the Council and the Applicant. These obligations will secure improvements to the area, which are directly linked to the redevelopment of the site. The development also qualifies for Community Infrastructure Levy payments.
- 7.133 A summary of the S106 Heads of Terms is provided below:
- Car Free Development for all uses
  - Delivery and Service Management Plan
  - Demolition and Construction Management Plan
  - Sustainability and Energy Requirements
  - Employment and Local Procurement



## Planning Assessment

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- Affordable Housing – Review Mechanism and Contribution
  - Highways Contribution to cover any repair works and improvements to the local highway required;
  - Public Open Space Contribution
  - Retail Cycle Parking provision on the pavement area outside the application site boundary;
- 7.134 These proposals qualify for Community Infrastructure Levy payments for both the London Mayor and the Camden Council Community Infrastructure Levy Tariff.
- 7.135 The Mayor has a standard tariff which is set at £50per sqm for development within the London Borough of Camden.
- 7.136 The London Borough of Camden requires a levy of £500per sqm for residential developments.
- 7.137 The requisite CIL form will be submitted with the application, which confirms the position on CIL payments.

## 8.0 Conclusion

- 8.1 This Planning Statement sets out the case for the redevelopment proposals at 5-17 Haverstock Hill, Chalk Farm.
- 8.2 It has assessed the proposals against the National Planning Policy Framework (NPPF), the London Plan, Camden’s adopted and emerging Local Development Framework and the Mayor and Camden’s Supplementary Planning Guidance.
- 8.3 The applicant and their design team have developed a high quality scheme, that respects and responds to the surrounding local context, in particular the Grade II listed Chalk Farm station, and delivers new housing, including affordable, for Camden and London. The team have engaged with the London Borough of Camden at length through the pre-application process, with the design several design amendments, iteration and revisions having taken place to reflect the feedback from officers.
- 8.4 This Statement and the accompanying planning application documents clearly demonstrate that the scheme accords with national planning policy and the statutory development plan. In particular, the scheme will bring the following benefits:
- The redevelopment of a vacant, underused brownfield site within Central London. The redevelopment will bring the site back into active use, including an improved active frontage on Adelaide Road;
  - In accordance with National and London Plan policy the redevelopment proposals will optimise the site, making efficient use of a site in a highly sustainable location (PTAL 6a) to help meet London and Camden’s ambitious housing targets;
  - Significant regard has been given to the context of the site and the required approach in order to ensure a sensitively designed building, which enhances and retains the importance of the adjacent Grade II listed building;
  - The delivery of 77 residential units (of which 22% will be affordable). The delivery of these homes across a mix of private and affordable tenures and unit sizes appropriate to the needs and setting of the area, contributing to the achievement of London and Camden’s ambitious housing supply targets;
  - Re-provision of a significant proportion of high quality retail space on Adelaide Road to be made available for small business, retaining and improving the character of the Neighbourhood Centre;
  - Create a high quality development that respects the prevailing pattern, density and scale of the surrounding built form, including the neighbouring heritage assets, whilst remaining respectful to existing rhythms, symmetries and uniformities in the townscape;
  - Produce aesthetically pleasing external facades of high quality design, utilising a range of materials that both feature in the surrounding material palette whilst also offering a degree of uniqueness and interest adding to the vitality of the streetscape. The chosen materials are sustainable and environmentally friendly with robust properties that will wear and weather appropriate to the setting; and
  - Incorporate principles of sustainable design and construction and energy, water and waste reduction measures.
- 8.5 In conclusion, the proposed development substantially accords with the aims and objectives of the NPPF, in particular paragraphs 22, 37 and 51 and the relevant LB Camden Local Development Framework policies and other material considerations.

## Conclusion

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- 8.6 In accordance with the NPPF 'Presumption in Favour of Sustainable Development' it is respectfully considered that the application should be approved without delay.

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# APPENDICES

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# Appendix A

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MOTORCYCLE NEWS

# SPORT Stolen vehicle squad saved

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Published 13 January 2012

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One of the country's last remaining police stolen vehicle squads has been saved from closure (<http://images.mcn.bauercdn.com/upload/286671/images/stolen-bikes-recovered.jpg>)

One of the country's last remaining police stolen vehicle squads has been saved from closure.

The Met's stolen vehicle unit, which has worked to jail organised bike thieves with undercover stings and long-running investigations, had been earmarked for closure in police budget cuts.

But the unit is now to remain open, sources have confirmed.

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Met bosses have told the squad it will remain operational after April 2012 – the date it was due to close – but staff will be reduced from 10 to six.

A source within the unit told MCN it mean the two officers currently dedicated to tackling bike theft may also have to focus on cars.

(4) He said: "We have been given a reprieve but at this stage we don't know whether or not we'll have two dedicated people looking at bikes. We're still pushing for it."

He said stories in MCN about the squad's threatened closure had helped its case.

"Ultimately it was a management decision," he added. "We put forward our case on what we do. We've had to rebrand as part of the process."

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<http://www.motorcyclenews.com/2012/01/13/stolen-vehicle-squad-saved/>  
(LORRY\_DATA\_TYPE=BRANDED)

A recent investigation by the squad led to six convictions over £100,000-worth of stolen bikes.  
(NEW RIDERS (/NEW-RIDER/))

Our source said publicity over the threatened closure could prove useful to investigations because organised thieves may have "let their guard down".  
(http://www.motorcyclenews.com)



By Steve Farrell

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# Appendix B

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**Date:** 16 May 2016  
**Our Ref:** 2015/5798/PRE  
**Contact:** Michael Cassidy  
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Dear Rachel,

**Re: 5 - 17 Haverstock Hill, London, NW3 2BP**

I refer to your request for pre-application advice at the above address for:

*'Redevelopment of the 'Eton Garage' site to provide 77 residential units in a 6-storey block with retail units at ground floor level fronting Adelaide Road and a 7-storey block fronting Haverstock Hill'.*

The comments below are based on the proposals set out within the Additional Information booklet submitted on 29<sup>th</sup> March 2016 and Design Report, dated April 2016, presented at the last pre-application meeting on 13<sup>th</sup> April 2016. This letter sets out a detailed note of the principal issues regarding the proposal.

### **Site Description**

The site is located directly to the north of Chalk Farm Underground Station (Grade II listed), at the junction of Chalk Farm Road, Adelaide Road and Haverstock Hill. It is predominantly occupied by a 6-storey brick building, known as 'Eton Garage', built up to the boundary of the underground station with street elevations facing onto Adelaide Road and Haverstock Hill. There are 6 ground floor retail units along the Adelaide Road frontage. An element of hardstanding is located to the rear of the site, with vehicle entrances provided from Adelaide Road and Haverstock Hill.

The building occupying the site appears to have been purpose-built as a private car garage in the 1930's originally providing a motor showroom and petrol station (now gone) and shops at ground floor level on Adelaide Road. The elevations are designed as though the building is in use as flats and are suggestive of residential character rather than a car garage. However, the interior comprises a series of 10 staggered floor levels with spiral ramps provided for independent up and down traffic.

From our discussions and the evidence provided, the building was occupied by the British Transport Police from circa 1956, until the summer of 2014, for the storage of vehicles involved in crime. From the limited planning history available and the evidence provided it therefore appears that the existing lawful use of the site is as a car garage (Sui Generis) with ancillary office space linked to this operation. It is understood that during the British Transport Police operation (over 50 years) the facility employed approximately 6 employees.

The surrounding townscape is varied with this particular part of Haverstock Hill being residential in character on its western side with a series of 7-storey 1930's residential mansion blocks known as 'Eton Place' and dominated by the 3-storey Haverstock School with a large footprint and set in open space on its eastern side. Adelaide Road offers a short stretch of continued retail parade with residential use beyond.

The site is not within a conservation area but would affect the setting of the nearby Eton and Regents Canal Conservation Areas.

### **Proposal**

The proposal is for the redevelopment of the site to provide 77 residential units (8 x studio; 18 x 1-bedroom; 34 x 2-bedroom and 17 x 3-bedroom) within a 6-storey block with 3 retail units (300sq.m GEA) at ground floor level fronting Adelaide Road and a 7-storey block fronting Haverstock Hill.

The proposal includes 17 affordable housing units (8 intermediate and 9 social rent) and 133 cycle parking spaces provided within 3 store areas at ground floor level.

### **Planning Policy**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that developments must be determined in accordance with the development plan unless material considerations indicate otherwise.

The documents which make up the development plan are the London Plan and the London Borough of Camden's Local Development Framework (LDF). There are a number of documents making up the LDF, but those primarily of concern in this instance are the Core Strategy (2010) and the Development Policies (2010). Other documents which are of relevance include the Proposals Map and the Camden Planning Guidance (CPG).

The National Planning Policy Framework (NPPF) is also an important consideration. A list of relevant policies is provided below.

### **Relevant Policies**

#### **Camden Core Strategy 2010-2015:**

- CS1 (Distribution of growth)
- CS3 (Other highly accessible areas)
- CS5 (Managing the impact of growth and development)
- CS6 (Providing quality homes)

CS7 (Promoting Camden's centres and shops)  
CS8 (Promoting a successful and inclusive Camden economy)  
CS10 (Supporting community facilities and services)  
CS11 (Promoting sustainable and efficient travel)  
CS13 (Tackling climate change through promoting higher environmental standards)  
CS14 (Promoting high quality places and conserving our heritage)  
CS15 (Protecting and improving our parks and open spaces and encouraging biodiversity)  
CS16 (Improving Camden's health and well-being)  
CS17 (Making Camden a safer place)  
CS18 (Dealing with our waste and encouraging recycling)  
CS19 (Delivering and monitoring the Core Strategy)

Camden Development Policies (Adopted 2010):

DP2 (Making full use of Camden's capacity for housing)  
DP3 (Contributions to the supply of affordable housing)  
DP5 (Homes of different sizes)  
DP6 (Lifetime homes and wheelchair homes)  
DP10 (Helping and Promoting Small and Independent Shops)  
DP12 (Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses)  
DP13 (Employment premises and sites)  
DP16 (The transport implications of development)  
DP17 (Walking, cycling and public transport)  
DP18 (Parking standards and limiting the availability of car parking)  
DP19 (Managing the impact of parking)  
DP20 (Movement of goods and materials)  
DP21 (Development connecting to the highway network)  
DP22 (Promoting sustainable design and construction)  
DP23 (Water)  
DP24 (Securing high quality design)  
DP25 (Conserving Camden's heritage)  
DP26 (Managing the impact of development on occupiers and neighbours)  
DP28 (Noise and vibration)  
DP29 (Improving access)  
DP30 (Shopfronts)  
DP31 (Provision of, and improvements to, open space and outdoor sport and recreation facilities)  
DP32 (Air quality and Camden's Clear Zone)

Camden Planning Guidance (Sections and paragraphs are quoted within the report where appropriate):

CPG1 (Design) 2015  
CPG2 (Housing) 2015  
CPG3 (Sustainability) 2015  
CPG5 (Town Centres, Retail and Employment) 2013  
CPG6 (Amenity) 2011  
CPG7 (Transport) 2011  
CPG8 (Planning Obligations) 2015

Eton Conservation Area Statement (2002)  
Park Hill and Upper Park Conservation Area Appraisal and Management Strategy (2011)  
Regent's Canal Conservation Area Appraisal and Management Plan (2008)

Emerging Planning Policy:

Camden Local Plan Submission Draft 2016 – public examination to be held by a Planning Inspector over the summer this year.

**Considerations**

The following issues are material considerations with regards to your proposal:

- Principle of land use
- Residential mix
- Viability and affordable housing
- Design and scale
- Standard of accommodation and residential amenity
- Sustainability
- Transport
- Refuse and Recycling
- Security
- Conclusion
- Community Infrastructure Levy
- S106 legal agreement
- Planning application process and supporting information

**Principle of land use**

No objection is raised to the loss of the existing car garage (Sui Generis) use and its replacement with a mixed-use development comprising re-provided retail use on part of the ground floor and 77 new residential units on the remainder of the ground floor and above. The site has a low employment density, limited ancillary office space and, as a purpose built car garage, could not easily be converted to modern employment floorspace. It is therefore accepted that the building would not fall within the definition of 'employment floorspace' as set out in Policy DP13.

Policy CS7 states that the Council will protect and promote small and independent shops and resist the loss of shops where this would harm the character and function of the centre. The neighbourhood parade, forming part of the site, is located on the fringe of the main Camden/Chalk Farm town centre. The supporting policy text and CPG5 recognise that the Council will take into account the individual character of the centre when assessing development proposals but, as a guide, will resist schemes that would result in less than half of ground floor premises in a neighbourhood centre being in retail use or in more than three consecutive premises being in non-retail use.

The entire Adelaide Road frontage would continue to be occupied by retail, however, within the proposal it is proposed that the quantum will reduce from circa 406sq.m to 300sq.m (GEA) with 3 units being retained. Given that more

than 50% of the floorspace is to remain in retail use and the re-provided units are of a feasible size to allow the opportunity for some of the existing tenants to return, the proposal would be in accordance with policy CS7 and CPG5.

The principle of additional residential floorspace within the Borough is strongly supported by the NPPF, Policy 3.3 of the London Plan and Camden Policies CS6 and DP2, which identify housing as the priority land use for the Borough and highlight the need to maximise the supply of housing.

The site is in a sustainable location, with an 'excellent' PTAL level 6 and access to local services and amenities. The development proposes the re-use of an existing underutilised site, making the best use of the Borough's limited land. This approach accords with the core principles of the NPPF, which encourages the re-use of previously developed land, and Policy DP2.

### **Residential mix**

Policy DP5 requires that all residential development provide an appropriate mix of dwelling sizes, with a strong preference for 2-bedroom dwellings and a higher percentage of large (3 bedrooms or more) versus 1-bedroom units.

The 77 unit proposal would provide an appropriate mix of units (8 x studio units (10.4%), 18 x 1-bed units (23.4%), 34 x 2-bed units (44.2%) and 17 x 3-bedroom units (22%)) to meet a variety of demands across the Borough in accordance with London Plan Policy 3.8 and Camden Policies CS6 and DP5. In particular, it would respond to the Dwelling Size Priority Table accompanying Policy DP5, which identifies two bedroom market units as being of 'Very High Priority' (the aim is identified at 40% - the scheme meets this at 44.2% provision) and would provide a higher percentage of large family sized units rather than smaller 1-bedroom units.

### **Viability and affordable housing**

Policies CS6 and DP3 and CPG2 and CPG8 require a contribution towards affordable housing in development schemes providing 10 or more units. Policy DP3 also states that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace, on sites of 50 units or more. The split of the affordable housing provided should be 60% social rented and 40% intermediate. The Council, in considering the contribution to affordable housing, will take into account the economics and financial viability of the development including any particular costs associated with it.

Policy 3.12 of the London Plan seeks the maximum reasonable amount of affordable housing when negotiating on individual housing schemes but states that the objective is to encourage rather than restrain residential development. Paragraph 173 of the NPPF imposes an obligation on Councils to ensure viability when setting requirements for affordable housing.

The proposal would provide a split of 78:22 (Market: Affordable) with 60 market units (6 x studio; 14 x 1-bedroom; 29 x 2-bedroom and 11 x 3-bedroom) and 17 affordable units (2 x studio; 4 x 1-bedroom; 5 x 2-bedroom and 6 x 3-bedroom) proposed of which 9 would be social rent (3 x 2-bedroom

and 6 x 3-bedroom) and 8 would be intermediate housing (2 x studio; 4 x 1-bedroom and 2 x 2-bedroom).

The lower affordable housing provision (22%) proposed would be contrary to policy and unlikely to be acceptable without robust justification. You are therefore advised to increase the level of affordable housing provision proposed in line with Council policy. Any lower provision would need to be justified in a financial appraisal accompanying any future planning application.

### **Design and scale**

The NPPF (paragraphs 56 and 57), the London Plan (Policies 7.1 to 7.8) and Camden's Core Strategy (Policies CS14, CS17), Development Policies (DP24) and Camden Planning Guidance 1 (CPG1) place great emphasis on the importance of good design. CPG1 seeks "excellence in design" in Camden. Policy at all levels requires buildings, streets and spaces to respond in a manner which promotes inclusive and sustainable development and contributes positively to the relationship between urban and natural environments and the general character of the location.

The NPPF also states that, in determining planning applications where heritage assets are involved, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, as well as the desirability of new development making a positive contribution to local character and distinctiveness. The London Plan also requires, at Policy 7.8, that development affecting heritage assets conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Camden Policy DP25 also seeks to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

The existing building is neither statutorily nor locally listed and does not fall within a Conservation Area. It is, however, near to the Regent's Canal Conservation Area and the Eton Conservation Area and will affect their setting. The site also adjoins the Grade II listed Chalk Farm underground station and is in close proximity to the Grade II listed Roundhouse and listed residential villas on Provost Road and will impact on their setting.

The building itself is extraordinarily a car park which has been disguised as a mansion block which matches, and appears to have been contemporaneously built with the Cross shaped Edwardian mansion blocks of Eton Place and Hall located to the north of the site. The building is considered to be thoughtfully conceived and designed to be viewed from public vantage points as 2 residential blocks which follow Adelaide Road and Haverstock Hill. Having said that the building is outside a conservation area and is of limited architectural merit. Its demolition is unlikely to be resisted subject to a suitable replacement being agreed.

The site sits between a variety of character areas, namely the commercial and transport dominated area of Camden town to the south and the largely residential areas of Belsize Park and Primrose Hill to the north and west. The proposal therefore seeks to establish a transitional building that mediates between the adjoining character zones.

The site marks the entrance to the north, rather than the exit of Camden town which is arguably achieved by The Roundhouse. As such, development should respond to the 'mansion block' style architectural typologies prevalent to the north along Haverstock Hill. The design of the proposal marries a large scale brickwork facade inspired by the buildings of Camden with more refined, detailed and decorative elements which reference the mansion block typology to the northwest.

In addition, the site proposal presents an opportunity to re-establish a sense of place within the immediate nodal junction points which co-joins to the northern edge of Camden town and the southern part of Haverstock Hill. This has been achieved through a contextual high quality design response which speaks to the area as well as allows the grade II listed underground station to remain the prominent building in views from the south. Creating a U-shaped block has a three-fold benefit which primarily allows light and aspect from the south. The space over the top of Chalk Farm underground station allows the listed station to be better appreciated and recognised and allows the site to be split thereby reducing the mass and aligning the blocks with the Haverstock Hill and Adelaide Road. In turn, the blocks have the correct scale and proportion to be read as mansion blocks.

The overall scale of the development is considered to be consistent with the mansion block typology. The block fronting Haverstock Hill (Block H) would be a shear storey higher than the block on Adelaide Road (Block A) which incorporates a setback upper floor. Block H does not block the view of The Roundhouse when travelling south and the upper parts respond to the general scale of development on the eastern side of Chalk Farm Road when travelling from the South.

Block A is lower to allow long range view of the Spire of St Peters Church from the South. The additional scale of this block compared with the existing building is considered to be relatively inconspicuous from Adelaide Road. The height of the blocks does not respond to the gradual reduction in height from north to south until you reach The Roundhouse as you would expect to see because of the gradient of the land. However, it is considered that the overall scale of the proposal is satisfactory for the reasons set out above and it is acknowledged that the scheme would not appear overwhelming or dominant in views from the South. The proposal is therefore not considered to harm the setting of The Roundhouse or Chalk Farm Underground Station in this respect.

The proposal would provide a contemporary interpretation of a mansion block which also responds to the more commercial/industrial areas which also border the site. The grouping of window and use of high quality materials and detailing will allow the overall concept to be successfully achieved. The success of the development is considered to very much depend on the appropriate use of high quality materials, detailed design and finished appearance. In this regard, it is strongly advised that full detailing, including typical bay; junctions; window and doors and façade details, be included as part of the planning drawings to give the Council confidence that the delicate and restrained facades will provide the level of detail and quality not seen at a scale of 1:50 and so these architectural elements cannot be removed or easily engineered out of the scheme at a later date.



## **Standard of accommodation and residential amenity**

New development should conform to the minimum space standards set out in the national technical space standards and CPG2. Policy 3.8 of the London Plan further recognises that a genuine choice of homes should be provided in terms of both tenure and size and provision should also be made for affordable family housing, wheelchair accessible housing. This is reflected in Camden Policies CS6, DP6 and DP29, which seek a diverse range of housing products to provide a range of homes accessible across the spectrum of household incomes and the promotion of inclusive design.

The proposal would meet the minimum space standards set out in the national technical space standards. The units would also need to be designed to comply with the access standards set out in part M4 (2) of the Building Regulations.

Policies CS5, DP26 and CPG6 also require that the amenity impact on neighbouring properties be fully considered. Policy DP26 seeks to ensure that the amenity of occupiers of neighbouring properties is protected. It states that planning permission will not be granted for development that causes harm to the amenity of occupiers and neighbours in terms of loss of daylight, sunlight, outlook and privacy.

Any planning application submitted would need to be accompanied by a BRE Sunlight and Daylight Assessment together with a Noise Assessment. The assessments would need to fully consider the impact of the proposals on existing neighbouring residential properties together with the impact of traffic and railway noise on future occupiers and their access to light.

The proposal has been re-designed to maximise the number of dual aspect units on the site. Careful consideration will, however, need to be given to the proposed layout of the units to reduce possible instances of overlooking between residential units, from rooms and/or external balconies/terraces. This is particularly the case for units located within the courtyard area where the distance between windows appears to be only 9.8m at its closest point on the lower residential floors. The layout of each individual unit would need to be carefully designed to minimise such instances. In terms of the balconies/terraces, the provision of privacy screens should be minimised where possible, owing to the visual amenity harm that they often cause. Good standards of daylight and sunlight would be required for the new units.

Satisfactory outlook and privacy would also need to be maintained for existing neighbouring residential properties. At present, the proposal would be approximately 11.7 metres at its closest point from the nearest residential properties, Nos.1-118 Eton Place, to the north west of the site. As a standard, the Council would normally require an 18 metre separation distance between existing and proposed directly facing habitable room windows to ensure that no undue overlooking or loss of privacy would occur.

Of the 77 units proposed, 9% would be wheelchair adaptable. This level of provision is considered to be acceptable.

The units should also be designed to provide satisfactory amenity space for future occupiers in accordance with CPG2 and the Mayor's Housing Supplementary Planning Guidance, which recommends that within all new

housing developments, where site constraints do not prohibit it, units should have access to private amenity space, such as private landscaped courtyard, private roof terraces and balconies, with a minimum of 5sq.m of private outdoor space for each 1-2 person dwellings and an extra 1sq.m for each additional occupant being provided.

The proposal provides private amenity space for each of the units in accordance with the above guidance. A dedicated child's playspace of circa 70sq.m would also be provided to the benefit of future occupiers. Any future application should demonstrate the quality of this area and provide full details of planting and landscaping proposed on the site.

An Air Quality Assessment will also need to be provided given the site's location on a busy, urban street junction and living spaces and bedroom windows being proposed that face directly onto the street. The assessment should set out full details of any mechanical ventilation required and assess air quality for future occupiers.

### **Sustainability**

Policy DP22 states that the Council will require development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Energy efficient design requires an integrated approach to solar gain, access to daylight, insulation, thermal materials, ventilation, heating and control systems. These should be considered in relation to each other when designing a scheme. The Council's sustainability requirements set out in CPG3 (Sustainability) should be complied with.

Any formal planning application would require a sustainability statement providing details of sustainable design and construction measures showing how it is proposed to reduce energy, water and materials in accordance with policies CS13, DP22 and DP23.

As the development would include more than 5 dwellings, the Building Research Establishment Environmental Assessment Method (BREEAM) would apply. Any scheme would be expected to meet excellent.

An application should also be accompanied by an energy statement demonstrating how the development has followed the energy hierarchy. London Plan policy 5.2 expects major developments to demonstrate CO2 emission reductions of 35% over Part L of the Building Regulations. Camden expects developments to target at least a 19% reduction in carbon dioxide emissions through the installation of on-site renewable energy technologies (policy CS13).

When assessing the feasibility and viability of renewable energy technology, the Council will consider the overall cost of all the measures proposed and resulting carbon savings to ensure that the most cost effective carbon reduction technologies are implemented in line with the energy hierarchy.

The residential part of the development will be required to demonstrate that it is capable of achieving a maximum internal water use of 105 litres per person/day, with an additional 5 litres person/day for external water use.

Please see our website for further information:

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/sustainability-statements-design-and-construction/>

With respect to nature conservation and biodiversity, as this is a major development, the submission of an ecology scoping statement and a protected species survey will be required unless otherwise agreed with the Council's Sustainability Officer.

The Council will also require the development to reduce the pressure on the combined sewer network and the risk of flooding by sustainable urban drainage systems (SUDS). The volume and rate of run-off from heavy rainfall can be reduced through the use of SUDS including green and brown roofs, pervious paving and detention ponds or tanks. A Surface Water Drainage Proforma ([found here](#)) will need to be submitted as part of any application. SUDS strategies should be designed in accordance with NPPF policy (and written Ministerial Statement) and London Plan policy 5.13 (SUDS hierarchy) to reduce run-off rates to greenfield rates. Where reasonably practicable, run off volumes should be constrained to greenfield run off volumes for the 1 in 100 year 6 hour event.

## **Transport**

Policies DP16, DP17, DP18 and CPG7 are relevant with regards to transport and highways issues.

### **Car-free**

The site has a PTAL of 6 and is well served by public transport being located next to Chalk Farm underground station with bus stops directly outside the site. As such, all the proposed residential units would be designated as car free, i.e. the future occupants will be unable to obtain on-street parking permits from the Council in accordance with policy DP18. This arrangement would be secured by means of a Section 106 Agreement.

### **Cycle Parking**

Policy DP18 also requires development to sufficiently provide for the needs of cyclists, which are contained in Appendix 2 of the Development Policies document. The London Plan 2015 requires the provision of 2 long stay spaces for A1 (Food) and A2-A5 and 1 long stay for A1 (non-food); and 1 short-stay space per 40sqm of A1 (Food) and A2-A5. For the residential part of the proposal, 1 space per 1 bedroom unit and 2 spaces per each 2+ bedroom unit (long-stay) and 1 space per 40 units (short-stay) is required which equates to 122 cycle spaces.

Two tier Josta stands or Sheffield stands are considered acceptable. Semi-vertical or vertical (hook and hang) stands are not compliant with Camden policy. You should ensure that there is enough room in the cycle stores to

manoeuvre bicycles efficiently. Details of the cycle parking facilities, access routes and cycle store would need to comply with the guidance provided within CPG7 and should be submitted to Transport Strategy for consideration. CPG7 is available on the Council's website at the hyperlink below:  
<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

The drawings submitted indicate that 135 cycle spaces would be provided at ground floor level within the development with an additional 6 Sheffield stands provided on the pavement area outside the re-provided retail units on Adelaide Road. This level of cycle parking provision for the retail and residential elements of the proposal would be in accordance with Council policy. A financial contribution to secure the provision of the retail cycle parking on the pavement area outside the application site boundary would need to be secured by way of a S106 legal agreement.

### Construction Management Plan

Policy DP20 states that Construction Management Plans (CMP) should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Policy DP21 relates to how a development is connected to the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a CMP.

The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A CMP would need to be secured by way of a Section 106 legal agreement for this development and a draft document would be required on submission. Please use the link for the Council's pro forma:

[http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=3418568](http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3418568)

### Highway works

The summary page of policy DP21 states that 'the Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'. The footway directly adjacent to the site on Haverstock Hill and Adelaide Road could be damaged as a direct result of the proposed works.

The Council would therefore need to secure a financial contribution for highway works by way of a Section 106 legal agreement if planning permission is granted. A quote of the works will not be requested until the submission of a formal planning application.

### Refuse and recycling

Policies CS18 and CPG1 are relevant with regards to refuse and recycling storage. Any future application should fully detail where refuse and recycling

would be stored and what the strategy would be for collection. This would be set out within a Delivery and Servicing Management Plan.

Two refuse storage areas for the residential part of the proposal, accessed from Adelaide Road and Haverstock Hill respectively, and a refuse storage area for the retail part, accessed from Adelaide Road, is shown on the drawings submitted.

You are advised to discuss refuse store arrangements with Ann Baker in the Environmental Services Section (Ann.Baker@Camden.gov.uk or 020 7974 8998). Separate recycling storage areas should also be provided.

### **Security**

Policy CS17 and CPG1 (Design) are relevant with regards to secure by design. It would need to be demonstrated as part of any future application that the proposal was safe and secure and met the requirements of 'Secured by Design'.

### **Conclusion**

The principle of a mixed use retail and residential development on the site is strongly supported within this sustainable location close to local services and amenities. The development would provide an appropriate re-provision of retail use and mix of dwelling sizes and would be designed to meet the minimum space standards set out in the national technical space standards. The units would all benefit from external amenity space which would meet the London Plan standards for amenity space. The units would also need to comply with the access standards set out in part M4 (2) of the Building Regulations.

The lower affordable housing provision proposed, however, would be contrary to policy and would need to be robustly justified in a financial appraisal accompanying any future planning application.

The proposed mass and design of the development would sit comfortably with the listed underground station, which would remain the prominent building in views from the south. The proposed blocks would have the correct scale and proportion to be read as mansion blocks and would not block views of The Roundhouse when travelling South or long range views of the Spire of St Peters Church from the South. As such, the proposal is therefore not considered to harm the setting of The Roundhouse or Chalk Farm Underground Station.

The overall scale of the proposal is considered to be acceptable and would not appear overly dominant within the streetscene. The proposal would provide a contemporary interpretation of a mansion block which also responds to the more commercial/industrial areas which also border the site and would sit comfortably with surrounding properties. Its design and the use of high quality materials and detailing will allow the overall concept to be successfully achieved and overall the proposal would respect both the character of Camden Town to the South and Haverstock and Belsize to the North.

The proposal has been re-designed to maximise the number of dual aspect units on the site and would be 'car free' Any planning application submitted would need to demonstrate that a satisfactory standard of accommodation was provided for future occupiers and that the proposal would have no adverse impact on residential amenity and highway safety.

### **Community Infrastructure Levy (CIL)**

The proposal by its size and land use type will be liable for the London Borough of Camden's Community Infrastructure Levy (CIL) introduced on the 1<sup>st</sup> April 2015 to help pay for local infrastructure and the Mayoral CIL which helps fund Crossrail introduced on 1st April 2012. Further details on CIL and how it is charged can be found on our website:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/community-infrastructure-levy/>

The Mayoral CIL charge would be £50 per sq.m for both the retail and residential floorspace. As the development is within Zone B (rest of Camden), the Camden CIL charges would be £25 per sq.m for the retail and £250 per sq.m for the residential elements of the proposal.

### **S106 Obligations**

The following matters would normally be secured by way of a S106 legal agreement in any planning permission granted:

- Car free development for all uses
- Delivery & Service Management Plan
- Demolition & Construction Management Plan
- Sustainability and energy requirements
- Employment & Local Procurement
- Affordable Housing – review mechanism & contribution
- Highways Contribution to cover any repair works and improvements to the local highway required.
- Public Open Space contribution.
- Retail cycle parking provision on the pavement area outside the application site boundary.

It is likely that these heads of terms would be attached to any new permission.

### **Planning application process and supporting information**

In the event of submitting a full planning application, please ensure that you submit all the required information in accordance with the validation checklist, details of which can be obtained from the council's website:

<http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application>.

In order to ensure your application is valid, the following information will be required to support the planning application:

- Completed and signed planning application forms for Full Planning Permission;
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Design and Access Statement;
- Planning Statement;
- Draft Construction Management Plan - [pro forma](#);
- Sustainability Statement;
- Energy Statement;
- Ecology scoping statement and a protected species survey (or justification for why they aren't required);
- Crime impact assessment;
- Daylight and sunlight assessment;
- Noise Assessment (by an acoustic engineer);
- Surface Water Drainage Pro-forma;
- Transport Assessment;
- Landscaping plan;
- Air Quality Assessment;
- Waste storage and collection plan; and
- The appropriate fee – (dependant on level of floorspace/number of units proposed).

**Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.**

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 5666.

It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete one of our [surveys](#). We will use the information you give us to monitor and improve our services.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Michael Cassidy  
Principal Planning Officer