

**Highgate Centre, 19 – 37 Highgate Road and
A&A Self-Storage, Former Lensham House, 19 Greenwood Place,
London NW5**

Mixed Use Redevelopment

Planning Statement

September 2016

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1. Introduction

1.1. This Statement has been prepared on behalf of Fortnum Developments Ltd in support of a planning application submission for comprehensive, mixed use redevelopment of the site.

1.2. The development for which planning permission is now sought can be described as,

Demolition of existing buildings and redevelopment of the site to provide two basement levels for Class B8 (self-storage) use and two buildings above ground; Building 1 over ground, first - fifth and part sixth floors for Class B8 (self-storage), Class B1 (office) and Class C3 (residential) uses; Building 2 over ground, first - fourth and part fifth floors for Class A3 (cafe) and Class C3 (residential) uses; creation of a pedestrian walkway running east-west between Buildings 1 and 2 linking Highgate Road with Greenwood Place; creation of a vehicular access from Greenwood Place and loading bay adjacent to Greenwood Place; provision of green/brown roofs and plant

1.3. This Statement addresses the land use and planning policy issues arising from the proposals. This Statement should be read alongside the following documents,

- Acoustic Report prepared by Hilson Moran
- Air Quality Assessment prepared by Hilson Moran
- Basement Impact Assessment prepared by CGL and Meinhardt
- Daylight and Sunlight Report prepared by Gordon Ingram Associates
- Design and Access Statement prepared by Squire and Partners
- Drainage Strategy prepared by Meinhardt
- Ecology Report prepared by Hilson Moran
- Energy Strategy prepared by Hilson Moran
- Flood Risk Assessment incl. SuDS prepared by Hilson Moran
- Heritage Statement prepared by Jon Dingle Ltd
- Historic Environment Assessment prepared by MOLA
- Statement of Community Involvement prepared by Polity

- Structural Concept Report prepared by Meinhardt
- Sustainability Statement prepared by Hilson Moran
- Transport Assessment prepared by Motion
- Travel Plans prepared by Motion

1.4. This Statement is set out under the following sections,

Section 2 analyses the site and its surroundings, planning history and the background to the application scheme

Section 3 describes the planning application proposals

Section 4 sets out a consideration of the relevant planning issues

Section 5 provides a conclusion

2. Site and Surroundings

- 2.1. The application site is located on the western side of Highgate Road, to the north of Kentish Town. The site comprises two buildings – the Highgate Centre (19 – 37 Highgate Road) and the former Lensham House, now the A&A Self-Storage building at 19 Greenwood Place.
- 2.2. The Highgate Centre, a two-storey, unattractive brick building, owned and operated by Camden Council, was built in the 1970s and currently provides services during the day relating to adult social care. A surface level car park for 10 spaces sits alongside the Highgate Centre.
- 2.3. The A&A Self-Storage building is an unattractive, two-storey warehouse which is predominantly in Class B8 (self-storage) use, but also provides small Class B1 (office) units. Parking is provided within the site on an area between the building and Greenwood Place.
- 2.4. The site is bounded by the Highgate Road to the east and Greenwood Place to the north and east. Vehicular access to both sites is from Greenwood Place. To the south, the site shares a boundary with the Christ Apostolic Church at 23 Highgate Road.
- 2.5. The area surrounding the site is varied in terms of its townscape and planning uses. To the north is Linton House, a Victorian warehouse which has been in office use, but is now in the process of being converted and extended to provide residential accommodation.
- 2.6. The Greenwood Centre (25-27 Greenwood Place) lies to the west of the site and was originally constructed in the 1960s as a single storey warehouse. The building is also owned and operated by the Council and was used for a number of years as a training centre (Class D1), although this use, along with the provision of hostel accommodation, ceased in 2008. Around half the building is occupied by the

Camden Society and Camden People First which run various day centre services for the Council, as well as their independent operation of people with learning disabilities.

- 2.7. It is understood that the buildings have been vacated and work to implement planning permission (2013/5947/P), starting with the building's demolition, will commence very shortly.
- 2.8. Beyond the Greenwood Centre lies the majority of the Kentish Town Industrial Area and although mixed in character, is characterised by office and warehouse buildings of up to 6-stories in height.
- 2.9. To the east of the site, opposite the site on the other side of Highgate Road, lies a block of residential units arranged over ground and three upper floors, whilst a fire station sits opposite the Church. Burghley Road is characterised by residential dwellings, whilst a mix of residential and commercial uses characterises the Highgate Road heading north from the site.
- 2.10. The site is highly accessible with a PTAL of 6a for the Highgate Centre. The Underground and Overground services from Kentish Town are both a short walk away, whilst the C2 and 214 buses stop immediately in front of the Highgate Centre on Highgate Road.

Planning Designations

- 2.11. The site is subject, in whole or in part, to a number of planning designations and these are summarised below.



Figure 1: Proposals Map 2010 (extract)

- i. Kentish Town Archaeological Priority Area
- ii. Designated View – Landmark Viewing Corridor – Kenwood to St Paul’s
- iii. Designated View – Lateral Assessment Area
- iv. Kentish Town Industrial Area

2.12. In addition, the site is situated in the vicinity of,

- i. Dartmouth Park Conservation Area (to the north)
- ii. Christ Apostolic Church, 23 Highgate Road (Grade II listed) (to the south)
- iii. Kentish Town Forum (Grade II listed) (to the south)

2.13. The application site is also included within the area identified as Site 39 within the Camden Site Allocations (September 2013), which covers 19-37 Highgate Road, Former Lensham House (A&A Self-Storage) and 25-37 Greenwood Place.



2.14. The site is identified for redevelopment which the designation stating,

Redevelopment of the site for mixed uses including replacement D1 community facilities, new flexible employment floor space and housing on appropriate parts of the site.

Development will be expected to:

- Optimise the potential of the site for a range of compatible uses.
- Optimise opportunities for residential accommodation, including affordable housing
- Contribute flexible employment floorspace that meets the modern needs of business.
- Seek to minimise the loss of community uses
- Support enhanced and more accessible replacement community facilities
- Contribute to improvements to the public realm and the pedestrian environment within and around the site
- Support the successful function of the Borough's designated Industrial Area
- Improve servicing and access arrangements to support new and existing occupiers
- Improve landscape quality and optimise amenity space for occupiers and users
- Enhance the setting of the nearby listed church
- Support the provision of active street frontages (particularly facing onto Highgate Road)
- Consider the setting of Hampstead Heath and associated views
- Connect to an existing local energy network where feasible

2.15. The supporting text also notes that,

the Council's Community Investment Programme includes the consideration of options for this site including opportunities for redevelopment to provide enhanced accommodation supported by new development.

The site has significant redevelopment potential and offers the opportunity for a more comprehensive redevelopment of the site to deliver a mix of uses. New development could provide complementary facilities from which a range of community and employment related opportunities and services could be delivered.

Redevelopment and reconfiguration of buildings and uses could open up new routes, improved access, external spaces, and landscaping (as well as offering the opportunity to create an enhanced townscape and setting of the adjacent listed church).

D1 and employment uses will be safeguarded and new provision would be supported in this location. Consolidated facilities could be delivered which could release the Highgate Day Centre site for residential and secondary uses. New employment floorspace and social enterprises that provide employment opportunities, advice and training would also be supported.

New development could include higher density development to optimise the development potential of the site. Any new development should be designed and located so it does not prejudice the operations of existing or future business occupiers by introducing inappropriate or conflicting uses. Redevelopment should minimise the loss of any floorspace in use class B1 - B8 and could be used to consolidate and improve the business environment, such as new modern floorspace and enhanced servicing.

Planning History

2.16. The site has the following planning history,

Ref	Description	Decision	Date
2013/5947/P	Demolition of existing buildings and redevelopment to provide: a new 3,228 sqm (GIA) Centre for Independent Living (CIL) (Class D1) comprising 3 storeys plus basement at Greenwood Place; a part 5 part 7 storey mixed-use development at Highgate Road comprising 42 residential units (including 8 supported affordable housing units) and 100 sqm (GIA) social enterprise in flexible retail, restaurant/café, office or community use (Classes A1/A3/B1/D1) at ground floor level; highway improvements to Greenwood Place, and associated plant, landscaping, servicing and disabled car parking	Approved	18/06/2014

2015/3151/P	Variation of condition 2 (approved plans) granted under reference 2013/5947/P dated 18/06/14	Approved	29/07/2015

2.17. The site, excluding the Former Lensham House, therefore has the benefit of an extant planning permission. It is understood that the Council is very close to commencing demolition of 25-37 Greenwood Place and implementing the permission.

2.18. The planning history of the nearby Linton House is relevant to the proposals and can be summarised as follows,

Ref	Description	Decision	Date
2014/6628/P	Part change of use for the basement and ground floors from business/office space (Class B1) to dance studio (Class D2) to gym (Class D2) and residential foyer facilities (Class C3); replacement of the existing ground floor windows and doors to match the upper floors and replacement of existing parapet	Approved	25/02/15
2014/4620/P	Change of use from offices (Class B1a) to residential use (Class C3) at 2 nd floor level to provide 13 units (5 x 1, 7 x 2, 1 x 3 bed units)	Prior Approval	08/09/14
2014/4619/P	Change of use from offices (B1a) to residential use (Class C3) at 4 th floor level to provide 12 units (4 x 1, 6 x 2, 2 x 3 bed units)	Prior Approval	08/09/14
2014/4618/P	Change of use from offices (B1a) to residential use (Class C3) at 1 st floor level to provide 13 units (5 x 1, 7 x 2, 1 x 3 bed units)	Prior Approval	08/09/14
2014/4616/P	Change of use from offices (B1a) to residential use (Class C3) at 3 rd floor level to provide 12 units (4 x 1, 6 x 2, 2 x 3 bed units)	Prior Approval	08/09/14
2013/3494/P	Erection of an additional floor at roof level to provide seven	Approved	03/03/14

	residential units (two x one-bed, four x two-bed, one x three-bed) and a ground floor rear extension to accommodate a new entrance, cycle and refuse storage and installation of condenser units and enclosures at roof level		

- 2.19. Work is currently taking place on site to implement the approvals listed above, and, as a result, Linton House will have been extended by one storey and brought predominantly into residential use.

Background to the Proposals

- 2.20. At the outset, it is relevant to note the context in which the proposals are coming forward. The Council have a programme to rationalise and enhance the adult social care services it provides to its residents. One element of this programme comprises the reworking of the properties in which the services are provided to ensure that the Council is making the very best use of its assets.
- 2.21. Planning permission (2013/5947/P) for the redevelopment of the Highgate Centre and Greenwood Centre forms part of this strategy and work on the creation of the new Greenwood Centre for Independent Living will commence very shortly.
- 2.22. The Council's Adult Social Care service has determined that in creating the Greenwood CIL, it would be highly desirable to include, if possible, the site occupied by the A&A Self-Storage scheme as part, along with the Highgate Centre, of a more comprehensive scheme. The inclusion of the A&A Self-Storage building would allow, amongst other things, the creation of a direct pedestrian access from Highgate Road to the new Greenwood CIL, avoiding the need for vulnerable pedestrians to use Greenwood Place, as well as allowing the Greenwood CIL to be visible from Highgate Road.
- 2.23. A Development Agreement has been signed between the Council and Fortnum Developments Ltd which includes the following principles,

- i. The Highgate Centre will be sold to Fortnum Developments Ltd for an agreed price upon the grant of planning permission;
- ii. The scheme proposed by Fortnum Developments Ltd shall include a number of elements required by the Council's Adult Social Care service – 8 assisted living units and a “community café” to be operated by the Council in association with the Greenwood CIL;
- iii. That should permission be granted, work on the approved scheme would commence only when the Greenwood CIL is completed and fully operational;

2.24. The application proposals now submitted can therefore be described as enabling development, allowing the Council to proceed with the construction of the Greenwood CIL and creating a form of development that is complementary to the CIL.

3. Proposal

Summary

- 3.1. The application provides for the demolition of the Highgate Centre and A&A Self-Storage buildings, the creation of a new storage facility in two basement levels below the site, two buildings above ground comprising a total of 63 residential units, Class B1 (offices) and a “community café” (Class A3). A walkway linking the future Greenwood CIL to Highgate Road is located between the two buildings.
- 3.2. The proposals provide for a doubling of the amount of B Class floorspace on site. The 8 assisted living units and the café would be provided, fully fitted-out, to the Council on a 125-year lease at a peppercorn rent.
- 3.3. Parking and servicing for the self-storage will be provided within the site, with access from Greenwood Place.

Pre-Application Consultation

- 3.4. The application proposals have been developed in close consultation with the Council officers, local residents and local groups.
- 3.5. Meetings with Council officers have been held on 25th June 2015, 7th September 2015, 13th November 2015, 24th November 2015, 8th December 2015, 20th January 2016, 2nd March 2016 and 5th July 2016.
- 3.6. A Development Management Forum, organised by Council officers was held on 8th March 2016.
- 3.7. The applicant organised a public exhibition which took place on 8th December 2015 at the Kentish Town library to display and explain the emerging proposals to local residents.

- 3.8. Meetings have also taken place with the owners/operators of the Kentish Town Forum and the Kentish Town Neighbourhood Forum on 3rd March 2016 and 14th April 2016 respectively.
- 3.9. Finally, the scheme was presented to Councillors and officers at a Developer's Briefing on 26th April 2016.

Floorspace and Units

- 3.10. The proposals include the following mix of uses and mix of residential units.

Floorspace (GIA sqm)

	Existing	Proposed	Change
A3	0	103	103
B1	748	1,803	1,055
B8	2,100	4,312	2,212
C3	0	7,031	7,031
D1	795	0	-795
Total	3,643	13,249	9,606

Residential Units

	Market	Assisted Living	Total
1 bed	16	8	24
2 bed	29	0	29
3 bed	7	0	7
Total	52	8	60

- 3.11. Other than the spaces required for the operation of the self-storage facility, no vehicular parking is provided for the residential units or commercial units. Cycle parking would be provided in accordance with the Council's standards.

Comparison with Approved Scheme

- 3.12. With work about to commence, the existing permission (2013/5947/P) is a material consideration in the determination of the application scheme. For ease of reference, along with the Greenwood CIL, the approved scheme would provide no employment space, but a total of 42 residential units, comprising 10 x 1 bed, 21 x 2 bed and 3 x 3 bed (34) market units, 8 x 1 bed assisted living units and 100 sqm "community café".

- 3.13. However, the approved scheme provided all the residential units in a single building fronting Highgate Road and, without the inclusion of the A&A Self-Storage building, was unable to create a link to the Greenwood CIL.
- 3.14. The 8 assisted living units would be located at ground floor level on Highgate Road, whilst the proposed scheme locates these units away from Highgate Road and provides them with a dedicated, secure access along the boundary with the Church, as well as private amenity space for each unit.

4. Planning Considerations

- 4.1. This section identifies the principal planning issues raised by the proposals. It then provides an assessment of these issues against the relevant policies of the Development Plan, as well as identifying any material considerations that should be taken into account when making a future planning decision.
- 4.2. Section 38 of the Planning & Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise. In this case, the Development Plan comprises the London Plan (March 2015), the Local Development Framework including Camden Development Policies (November 2010) and Camden Core Strategy (November 2010) and the Site Allocations Plan (September 2013).
- 4.3. The National Planning Policy Framework was published in 2012. This document sets out the Government's planning policies for England including the presumption in favour of sustainable development and is a material consideration in the determination of all applications. In addition, the National Planning Policy Guidance, published in March 2014, is also material to the consideration of any application.
- 4.4. Finally, the Kentish Town Neighbourhood Forum are in the process of preparing, with Camden, a Neighbourhood Plan (KTNP). A consultation draft version of the Plan was published in March 2015 and a referendum will be held on 9th June. Whilst it is not yet an adopted document, the application proposals have, nonetheless, been assessed against it.
- 4.5. The principal planning issues raised by the pre-application proposals can be identified as follows,
 - i. Land Use
 - ii. Affordable Housing

- iii. Unit Mix
- iv. Amenity
- v. Design and Heritage
- vi. Highways, Servicing and Parking
- vii. Other Issues

4.6. The issues can be considered as follows,

i. Land Use

- 4.7. The application proposals involve the loss of Class D1 space (the Highgate Centre) and an increase in the amount of Class B1 (office) and Class B8 (self-storage) space on the site. In addition, they would introduce residential units and a café onto the site for the first time.
- 4.8. The land use mix is considered to be in accordance with those identified in the Site Allocations Plan (Site 39), with the exception of the loss of the Highgate Centre. A mix of residential and employment uses is envisaged by the site allocation, with residential, office and self-storage all being compatible alongside one another.
- 4.9. Whilst the Highgate Centre is lost, the scheme will make a financial contribution to the creation of the Greenwood CIL and the provision of more Class D1 floorspace which will be brand new, purpose-built space. The table below sets out the existing D1 floorspace, along with the quantum of floorspace that will be delivered,

Floorspace (GIA sqm)

	Existing	Proposed	Change
Highgate Centre	795	0	-795
Greenwood Centre	1,872	3,228	1,356
Total	2,667	3,228	561

- 4.10. The Development Agreement with the Council requires the Greenwood CIL to be completed and operational before the Highgate Centre can be closed, so there will be a significant increase in the quantity and quality of Class D1 facilities overall, in accordance with the Site Allocations Plan (Site 39) designation.

- 4.11. In addition, the scheme proposes the creation of a café, to be transferred to the Council on a 125-year lease at a peppercorn rent, to provide training and employment in association with the Greenwood CIL.
- 4.12. It is relevant to note that, in respect of the approved scheme, the Officer's Report to 19th December 2013 Committee noted at paragraph 6.6 that,

Ideally the opportunity would be taken to include the A&A Storage building within a comprehensive redevelopment for a mixed use scheme including community and industrial use. However, the Council, unfortunately, does not own the A&A Storage Building and therefore has no control over this being brought forward as part of any comprehensive redevelopment package ...

- 4.13. The fact that the A&A Storage building is now coming forwards, in conjunction with the Highgate Centre, and in parallel with the development of the Greenwood Centre, can therefore be considered to be a significant planning benefit.
- 4.14. Policy SSP2 of the draft KTNP confirms that where appropriate, new development should deliver the re-provision of employment land and new residential development. The application proposals achieve both these aims.

ii. Affordable Housing

- 4.15. The National Planning Policy Framework notes that pursuing sustainable development requires careful consideration to viability and costs in decision-taking. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and a willing developer to enable the development to be delivered (paragraph 173).
- 4.16. The London Plan and Core Strategy are consistent with the approach to the delivery of affordable housing outlined by the Government in the Framework. LP Policy 3.12 notes that the maximum reasonable amount of affordable housing should be sought when negotiating on private residential and mixed use schemes having regard to,

amongst other things, the need to encourage rather than restrain residential development, and viability.

- 4.17. The scheme proposes 8 of the 60 units to be provided as affordable housing, in the form of 1 bed, assisted living units. These units would be provided to the Council on 125-year leases at peppercorn rents, for use in association with the Greenwood CIL. The units would be fitted out and fully wheelchair accessible. They would be provided with private amenity space and a dedicated access. However, the scheme proposes that only 13% of all the units will be affordable; 11% of the floorspace (GIA) would be affordable.
- 4.18. Policy DP3 (Contributions to the supply of affordable housing) notes that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing on the basis of a target of 50% of the total addition to housing floorspace. The policy notes that in negotiating the amount, the Council will have regard to the economics and financial viability of the development and any other planning objectives considered to be a priority for the site.
- 4.19. In support of Policy DP3, paragraph 3.30 confirms that,

The Council recognises that where it seeks other planning benefits from a development or seeks to meet other planning objectives, this may limit the potential of a site to provide affordable housing ... When negotiating the proportion of affordable housing, the Council will have regard to other benefits arising from a proposal. The Council will expect the costs associated with all aspects of a proposal to be included in any financial viability appraisal, including the costs and returns associated with non-residential spaces, and any expenditure required to meet the terms of a legal agreement.

- 4.20. Site Allocation 39 notes that one of the objectives for development proposals on the site is to “support enhanced and more accessible replacement community facilities”. The proposed scheme seeks to achieve this by providing a significant financial contribution to the Council to assist in funding the delivery of the Greenwood CIL.

The Development Agreement with the Council provides the mechanisms and confirms the timings for delivering this contribution.

- 4.21. The amount of affordable housing is delivered alongside the priority planning objective for the site, namely, the financial contribution to the delivery of the Greenwood CIL.
- 4.22. A financial appraisal of the scheme has been prepared by Allsop and is submitted in support of the application. The appraisal confirms that the amount of affordable housing has been maximised whilst ensuring that the scheme remains a realistic proposition.
- 4.23. The Development Agreement provides for a substantial payment to be made by the applicant to the Council upon the acquisition of the Council's land which would follow on from the grant of planning permission. In addition, the Development Agreement provides for an overage payment to be made by the applicant to the Council should residential sales values exceed a pre-determined level. The Agreement therefore has therefore made provision for a financial contribution prior to the commencement of any development and, potentially, in the future, should a specific level of residential sales values be reached.

iii. Unit Mix

- 4.24. Policy DP5 confirms that the Council will expect a mix of large and small homes in all residential developments and that the mix should reflect the Plan's Dwelling Size Priorities Table. The mix provided should also take account of the character of the development, the site and area in which it is located, the size of the scheme and its financial viability.
- 4.25. In support of Policy DP5, the Development Policies Document includes the following dwelling sizes priority table,

	1-bed	2-bed	3-bed	4+ bed	Aim
Social rented	lower	medium	high	very high	50% large
Intermediate	medium	high	high	high	10% large

Market	lower	very high	medium	medium	40% 2-bed
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4.26. The scheme proposes the following mix of market tenure units,

▪ 1 bed:	16 units	31%
▪ 2 bed:	29 units	56%
▪ 3 bed:	7 units	13%

4.27. The Council places a strong emphasis on the delivery of two-bedroom market units and the majority of proposed market units are of this size. The 9 x 3 bed units are considered to represent the maximum desirable number given the site's location and mix of units. The proportions of the market units within the scheme are therefore considered to be very much in line with the Council's policy guidance.

4.28. In terms of affordable housing, for the reasons set out above, the 8 units have been designed to meet the needs of the Adult Social Care service and to be used in conjunction with the Greenwood CIL which will be delivered on the adjoining site. In these specific circumstances, the mix of 8 x 1 beds is considered to be appropriate.

iv. Amenity

4.29. Policy DP26 confirms that the Council will protect the quality of life of occupiers and neighbours. In doing so, factors that will be considered include visual privacy and overlooking, overshadowing and outlook, sunlight and daylight and noise and vibration.

4.30. In terms of existing properties, the closest residential flats to the site are the Elsfield House flats and No. 28b Highgate Road, on the opposite side of Highgate Road. Privacy and noise are not considered to be significant issues because of the separation distances and presence of Highgate Road between the application site and existing residential properties.

4.31. The impact of the proposed scheme in terms of sunlight and daylight has been assessed by Gordon Ingram Associates.

- 4.32. In their assessment of the approved scheme (2013/5947/P), the officer's report noted that *"the properties assessed currently all receive very good levels of daylight and sunlight due to their open aspect onto the road, the existing low rise building of the Highgate Centre and its open car park. However, the Elsfeld House flats are very vulnerable to losing much of this light due to the presence of balconies affecting the ground and first floor levels. The presence of these overhead causes greater reliance on light being received from low in the sky opposite the window concerned rather than from above where the greatest concentration of light is available"* (paragraph 6.133).
- 4.33. The officer's report noted that the approved scheme would have impacts that were noticeable but not unreasonable given the presence of the balconies.
- 4.34. The GIA analysis shows that the proposed scheme has a very similar impact upon the surrounding properties to the approved scheme. The levels of daylight and sunlight received by the surrounding residential properties are either entirely consistent with BRE guidance or with a central London environment. Accordingly, the impact of the scheme upon amenity is considered to be acceptable.
- 4.35. The two buildings have been designed to maximise opportunities for south facing windows and terraced amenity spaces for the proposed residential units.
- 4.36. In Building 1, the accommodation is arranged over third – seventh floors, and over ground – fourth and set-back fifth floors in Building 2. The units have been designed to comply with Policy DP6, with all homes meeting lifetime homes standards, and 10% of the units meeting wheelchair housing standards. All the units exceed the Mayor of London's guidance on minimum sizes.
- 4.37. Each assisted living units has defensible private amenity space. The market units have external terraces which, on the upper floors of the two buildings, are very substantial. All the balcony or terrace areas either meet or exceed the London Housing Design Guide minimum depth of 1,500mm.

- 4.38. The scheme is considered to provide residential units which would have a very high quality of amenity. The scheme proposes to make best use of the site in a manner that is entirely consistent with its surroundings. It is considered to be compliant with the Development Plan in terms of amenity.

v. Design and Heritage

- 4.39. The design and heritage issues raised by the proposals have been considered in detail by Squire and Partners and MOLA in their respective reports. The scheme has been developed through discussion with Council officers, and in consultation with local residents and groups. The scheme's evolution is recorded by Squire and Partners in their Design and Access Statement.
- 4.40. The proposals are considered to comply with both Policy DP24 (Securing high quality design) and DP25 (Conserving Camden's heritage). The proposed buildings are firmly rooted in their context in terms of their setting, scale, form and materiality.
- 4.41. The buildings have been designed to relate successfully to their surroundings. In approving the previous scheme, the officer's report had noted that,

Ideally the opportunity would be taken to include the A&A Storage building within a comprehensive redevelopment for a mixed use scheme including community and industrial use. However, the Council unfortunately does not own the A&A Storage building and therefore has no control over this being brought forward as part of any comprehensive redevelopment package
(paragraph 6.6)

- 4.42. With the A&A Self-Storage site now part of the application site, it is possible for the proposed scheme to achieve a comprehensive development of the area identified by Site 39. The creation of the walkway to the Greenwood CIL is considered to be a very significant planning and urban design benefit and allows the three existing sites – Highgate Centre, A&A Self-Storage, Greenwood Centre – to be, in effect, developed as a comprehensive whole. The proposed scheme is also able to break up the mass by designing two separate buildings, and this was simply not possible with the approved scheme.

- 4.43. By including the A&A Self-Storage site, the proposed scheme is therefore able to deliver significant urban design benefits to the site and surrounding area.
- 4.44. In their assessment, MOLA have concluded that the proposed scheme would have a positive impact on the settings of the Christ Apostolic Church and The Forum, replacing the current low quality buildings with a high quality modern building of scale, massing and fabric appropriate to the context.
- 4.45. Policy SSP2 of the draft KTNP states that any development on land within the Kentish Town Industrial Area must not obscure the views currently enjoyed by residents and business occupiers. There are some very high profile and sensitive views which must be protected.
- 4.46. Squire and Partners have developed the height, mass and bulk of the scheme with Council officers using a number of local views. The analysis is included within the Design & Access Statement and demonstrates that the proposals will not have an adverse impact upon any high profile and sensitive views.

vi. Highways, Servicing and Parking

- 4.47. The highways, servicing and parking aspects of the proposals are considered in detail by Motion. The proposals have been developed in close consultation with Council Highway Officers and officers who are responsible for the delivery of the Greenwood CIL.
- 4.48. The proposals are located on a site with excellent public transport accessibility. The residential units will not be eligible to apply for resident parking permits.
- 4.49. The scheme makes provision for servicing and cycle parking for all the proposed uses.
- 4.50. The proposals are considered to comply with Development Plan Policies, 16, 17 and 18.

viii. Other Issues

- 4.51. The proposals also raise issues of air quality, sustainability and energy, flooding, basement impact, contaminated land, archaeology, planning obligations and CIL. Planning obligations and CIL are considered in this statement, but the other matters have been assessed in detail in other supporting reports.
- 4.52. In terms of air quality, Hilson Moran have concluded that with the implementation of suitable mitigation measures and good site practice, the effects from construction dust can be controlled and the residual effect is not considered significant. In addition, negligible residual NO₂ and PM₁₀ have been predicted to affect sensitive receptors and the predicated absolute concentrations fall within the UK air quality objective.
- 4.53. In terms of sustainability, the BREEAM pre-assessments have confirmed that the offices will achieve Excellent, whilst the self-storage will achieve the highest possible score of Very Good.
- 4.54. In terms of energy, the optimised Energy Strategy will allow the development to achieve an improvement in terms of carbon saving over Part L: 2013 of 16.3%.
- 4.55. A basement impact assessment has been carried out and subject to the appropriate measures being put in place, the proposals will not result in harm to the built or natural environment and local amenity, either through the construction process or when completed.
- 4.56. Finally, in terms of archaeology, MOLA have concluded that the site has a generally low potential to contain archaeological remains of any more than low significance and the development could therefore proceed.
- 4.57. In terms of the Community Infrastructure Levy, the Mayor of London adopted a £50 charge in April 2012. On 1st April 2015, the Council adopted their levy of £500 for residential and £25 for offices. The Council have published their Regulation 123 List and identified a wide range of infrastructure to which the money raised could be allocated.

- 4.58. Planning Guidance 8, published in February 2015, sets out the Council's position on planning obligations. Core Strategy Policy CS19 sets out the Council's position, and all obligations must comply with the three statutory tests of the CIL Regulations: that they are necessary to make the development acceptable in planning terms, they are directly related to the development, and fairly and reasonably related in scale and kind. Accordingly, Planning Guidance 8 confirms that planning obligations will be required to mitigate site specific impacts of development. These could include financial contributions as well as non-financial obligations.
- 4.59. In addition, the Government advises local planning authorities that where it is preferable to use a condition, rather than an obligation, to overcome a planning objection.
- 4.60. Against this background, it is anticipated that the planning obligations to be secured by a Section 106 Agreement would be,
- i. Assisted Living Units
 - ii. Construction Management Plan
 - iii. Energy Efficiency and Renewable Energy Plan
 - iv. Highway works
 - v. Permit free residential units
 - vi. Sustainability Plan
 - vii. Travel Plan
- 4.61. The detailed obligations will be discussed during the course of the consideration of the planning application.

5. Conclusions

- 5.1. The planning application seeks the comprehensive, mixed use redevelopment of the A&A Self-Storage and Highgate Centre sites. Their development enables the creation of a pedestrian walkway linking the new Greenwood Centre for Independent Living with Highgate Road.
- 5.2. The proposals have been developed in close consultation with Council officers, local groups and local residents. They will deliver two buildings above ground and a self-storage facility in two basement levels below the site. In all, 60 residential units are proposed, of which 8 will be provided as assisted living units and operated by the Council in association with the Greenwood CIL; a café on Highgate Road will be created and provided to the Council for use in association with the CIL.
- 5.3. The proposals will deliver an increase in office floorspace from 748sqm to 1,803sqm, and an increase in storage space of 2,212sqm.
- 5.4. In addition, the inclusion of the A&A Self-Storage site along with the Highgate Centre allows for the comprehensive development to take place alongside the creation of Greenwood CIL, and the creation of a dedicated pedestrian walkway running through the application site. This allows direct access to the Greenwood CIL from Highgate Road, and in doing so, separates pedestrians from the vehicles that will continue to use Greenwood Place.
- 5.5. The planning application proposals are therefore considered to deliver significant planning benefits and accord with the provisions of the Development Plan.