



48 – 56 BAYHAM PLACE

Planning Statement

May 2017

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CONTENTS

1. INTRODUCTION	3
2. SITE AND SURROUNDING AREA	5
3. PLANNING HISTORY	7
4. PROPOSED DEVELOPMENT	9
5. CONSULTATION.....	11
6. PLANNING POLICY FRAMEWORK.....	12
7. PLANNING ASSESSMENT	23
8. CONCLUSION.....	33

1. INTRODUCTION

- 1.1. This planning statement has been prepared by DP9 Ltd on behalf of Summer Butterfly Limited ('the Applicant') in support of an application for full planning permission at 48-56 Bayham Place. The site is located within the Regents Park Ward within the London Borough of Camden ('LBC').
- 1.2. This full planning application seeks permission for "*Erection of a single storey extension at 3rd floor level plus double roof extension to provide 9 self-contained units, rear extension at second floor level and associated works.*"
- 1.3. This document will provide an overview of the site and the Proposed Development, considers the relevant planning policies and sets out a justification for the development.
- 1.4. The planning statement should be read in conjunction with the other supporting information submitted in support of the application which comprises;
- **Planning application forms and Certificates** prepared by DP9 Ltd;
 - **Planning Application Drawings** (existing and proposed) prepared by Ambigram Architects;
 - **CIL information form** on behalf of the Applicant prepared by DP9 Ltd;
 - **Design and Access Statement** prepared by Ambigram Architects;
 - **Energy & Sustainability Strategy** prepared by CarbonPlan;
 - **Daylight and Sunlight Assessment** prepared by Point 2 Surveyors;
 - **Environmental Noise Survey** prepared by Sandy Brown; and
 - **Townscape Visual Impact and Heritage Assessment** prepared by Peter Stewart Consultancy.
- 1.5. The following sections of the report are structured as follows; -
- **Section 2:** Site and Surrounding Area – describes the location, character and physical features of the site.
 - **Section 3:** Planning History – sets out the relevant planning history of the site
 - **Section 4:** Proposed Development – describes the application proposal.

- **Section 5:** Consultation – describes the consultation that has been undertaken on the Proposed Development prior to the submission of the planning application.
- **Section 6:** Planning Policy Framework – sets out the relevant planning policy associated with the site.
- **Section 7:** Planning Assessment – assesses the proposals against the provisions of the Development Plan and other planning policy and material considerations
- **Section 8:** Conclusion – draws together the Statement into a set of conclusions.

2. SITE AND SURROUNDING AREA

The site

- 2.1. The site covers an area of approximately 0.03 hectares and is situated in the Regents Park Ward of the LBC. The application site is located on the north side of Bayham Place, to the west of Bayham Street and the east of Camden High Street.
- 2.2. The site is currently occupied by a ground plus 2 storey residential building which comprises 13 x studio apartments. The building was previously used as an office up until 2014 at which time it was converted under permitted development to residential accommodation. The building itself is not listed but is identified within the Camden Town Conservation Area as being a positive building. The planning history of the site can be found in chapter 3 of this report.
- 2.3. The site is located in an area with a Public Transport Accessibility Level ('PTAL') rating of 6b, demonstrating an excellent level of public transport as calculated using the Transport for London ('TfL') PTAL calculation methodology.
- 2.4. Mornington Crescent Station (Northern Line services) and Camden Town (Northern Line services) are both located within a short walking distance of the site to the north and west respectively. The site is also located within easy access to frequently used bus routes.

The Surrounding Area

- 2.5. The area is characterised by a variety of building sizes and uses, including mixed use (business, retail and residential) buildings of up to six storeys. Historically, this part of Bayham Place has been characterised by small employment uses such as offices, back of house storage uses and as a service road to the buildings fronting onto Camden High Street.
- 2.6. Immediately to the east of the site lies nos. 3 to 7 Bayham Street which back onto the site boundary. No. 3 is a three bay house with a central entrance, and nos. 5 and 7 are a pair of terraced houses. They are all 3 storeys high and all have shallow front light-

wells and stucco faced ground floor frontages to Bayham Street. These properties have recently been granted planning permission (ref: 2016/6394/P) for mansard roofs with dormer windows, which will raise the overall height to four storeys.

- 2.7. Beyond the yard to the west of the site are the rear elevations of no. 2 to 6 (4 storeys high) and no. 8 to 12 (6 storeys high) Camden High Street, two post-war commercial buildings identified in the Council's Appraisal as negative buildings. The latter has a modern roof extension.
- 2.8. To the south, on the opposite side of Bayham Place to the site, is the rear utilitarian elevation of Koko (former Camden Palace Theatre; listed Grade II) and at the junction with Bayham Street, no. 2 Bayham Street is an altered and extended 19th century mews building with a modern mansard roof and large windows. There has been a planning application submitted (ref: 2016/6959/P) for a substantial rear extension to Koko. The application shows plans to extend the buildings which front Bayham Place, opposite the Site. If approved this will increase the height and massing of the buildings in this block, creating a three storey frontage onto Bayham Place with a stepped back fourth storey.
- 2.9. To the north of the site are nos. 7a and 7b Bayham Street, a mix of modern and converted 1 and 2 storeys high commercial buildings (identified in the Council's Appraisal as making a neutral contribution to the significance of the conservation area).

3. PLANNING HISTORY

- 3.1. Planning Permission (2016/4116/P) was granted in October 2016 for the erection of a part single, part double roof extension to provide 3 self-contained units (Class C3), two rear extensions at first and second floor level and associated external alterations.
- 3.2. Prior approval (2015/4598/P) was granted in August 2015 for the change of use from office (Class B1a) to residential (Class C3) comprising 13 x studio flats.
- 3.3. Prior approval (2015/2021/P) was granted in April 2015 for the change of use from office (Class B1a) to residential (Class C3) comprising 25 x studio flats.
- 3.4. Prior approval (2014/6652/P) was granted in October 2014 for the change of use from office (Class B1a) to residential (Class C3) comprising 29 x studio flats.
- 3.5. Prior approval (2013/7117/P) was granted in November 2013 for the change of use from office (Class B1a) to residential (Class C3) comprising 9 x 2 bedroom residential units.
- 3.6. Planning permission (PEX0200987) was refused by LBC in December 2002 for the proposed erection of a single storey roof extension above existing workshops/offices for the provision of 1 x 1 bedroom and 1 x 2 bedroom flats, and the provision of open plan offices at ground to second floors. The application was refused on the grounds of scale and massing and impact on neighbouring residents amenity.
- 3.7. Planning permission (PEX0200986) was refused by LBC in December 2002 for the proposed erection of two additional storeys above existing offices for the provision of 3 x 1 bedroom and 1 x 2 bedroom flats. Development included internal alteration to existing offices and new doors at ground floor level. Application included options for a 4 or 3-unit scheme. The application was refused on the grounds of scale and massing and impact on neighbouring residents amenity.
- 3.8. Planning permission (32878) was refused by LBC in August 1981 for alterations to the front and side elevations of the existing building.

- 3.9. Planning permission (32764) was conditionally approved in September 1981 for the renewal of planning permission for offices for a further 18 months.

4. PROPOSED DEVELOPMENT

4.1. The application seeks permission for:

“Erection of a single storey extension at 3rd floor level plus double roof extension to provide 9 self-contained units, rear extension at second floor level and associated works.”

4.2. The proposals seek to extend above the existing residential accommodation (13 units) to create additional high quality residential accommodation. The proposed scheme will accommodate 4 x 1 bed, 4 x 2 bed and 1 x 3 bed dwellings.

4.3. The scheme also proposes a small rear extension at second floor level. This is an opportunity that has been identified to improve the existing residential accommodation and layout of the building. The proposals are discussed in further detail within the accompanying Design and Access Statement.

4.4. The increase in residential floorspace is approximately 726.7 sqm (GIA) and 799.7 sqm (GEA). A breakdown of the increase per floor is set out in the below table.

Floor	Increase in sqm (GIA)	Increase in sqm (GEA)
Ground	0	0
First	0	0
Second	8.2	10.2
Third	270.3	293.4
Fourth	252.7	277.4
Fifth	195.5	218.7
Total	726.7	799.7

Table 1: Proposed Increase in Residential Floorarea

4.5. The area is characterised by a variety of building sizes and uses, including mixed use (business, retail and residential) buildings of up to six storeys. The scheme has been designed in a modern architectural manor so that there is a clear visual difference between the existing building and the later addition.

- 4.6. There are no car parking spaces proposed as part of the development.
- 4.7. In accordance with London Plan Policy, 14 additional cycle spaces will be provided within the existing cycle store located at ground floor level and at third and fourth floor.
- 4.8. The existing access to the site would be retained for use by pedestrian and delivery vehicles. The new residential accommodation will be accessed by the main entrance via the lift and/or stair core.
- 4.9. The existing residential refuse store located at ground floor level has sufficient capacity to accommodate the additional residential units. A managed collection system will operate whereby bins are moved from the storage areas to the pick-up point within an acceptable distance to the public highway. The proposed refuse and servicing strategy is outlined further within the Design & Access Statement.

5. CONSULTATION

- 5.1. No consultation has been undertaken due to the similarities between the 2016 planning permission and the proposals set out within this planning application.

6. PLANNING POLICY FRAMEWORK

6.1. This section of the statement reviews relevant planning policy in relation to the Proposed Development

National Planning Policy Framework (NPPF)

6.2. The National Planning Policy Framework (‘NPPF’) was published on 27 March 2012 and supersedes previous national planning guidance setting out the Government’s economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system. The NPPF sets out key policies on delivering sustainable development, which include:

- Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.
- Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- Housing applications should be considered in the context of the presumption in favour of sustainable development. Local Planning Authorities (‘LPA’) should normally approve applications for change to residential use and any associated development from commercial buildings, provided that there are not strong economic reasons why such development would be inappropriate.
- Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. 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. Planning policies and decisions should

address the connections between people and places and the integration of new development into the natural, built and historic environment.

Development Plan

- 6.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan for the area consists of the London Plan 2016, and the London Borough of Camden Core Strategy and Development Plan Policies Documents (2010). In addition, further guidance is provided in the form of the Council's and Mayor's Supplementary Planning Guidance ('SPG') or Supplementary Planning Documents ('SPD') as well as Camden Planning Guidance notes ('CPG').
- 6.4. Between 30 January and 13 March LBC consulted on the Main Modifications to the Local Plan. These changes are being proposed in light of the inspector's comments during the examination, public representations made about the Plan and discussions at the public hearings. Given the abovementioned timings we believe that the Local Plan is anticipated to be adopted by Summer 2017 and therefore full consideration has been given to the adopted and emerging policies.

London Plan (2016)

- 6.5. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Within the London Plan, the site lies within the Inner London area.
- 6.6. The London Plan contains a number of key policies relevant to the development proposals including: -
- London Plan Policy 3.3 seeks to increase housing supply and the Mayor recognises the pressing need for more homes in London in order to promote

opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford;

- London Plan Policy 3.4 requires housing development to take into account local context and character amongst other design principles and optimise housing output through new development;
- Policy 3.5 examines the quality and design of housing developments and states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The design of all new housing development should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open space;
- London Plan Policy 3.8 concerns housing choice in London and 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;
- London Plan Policy 6.1 seeks to reduce the need to travel while Policy sets out the requirements in relation to cycle parking;
- London Plan Policy 7.2 relates to an inclusive environment that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design; and
- London Plan Policy 7.4 relates to local character and states that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive

elements that can contribute to establishing an enhanced character for the future function of the area.

LB Camden Core Strategy (November 2010)

6.7. The Core Strategy sets out the Council's spatial vision, strategic objectives and spatial strategy on how the borough should develop. Key policies within the document relevant to the development proposals are as follows:

- Policy CS1 aims to focus Camden's growth in the most suitable locations while achieving sustainable development, and providing in the region of 12,250 additional homes between 2011/11 and 2024/25;
- Policy CS3 notes that the Council will promote appropriate development in the highly accessible areas of central London and town centres such as Camden Town. These areas are considered to be suitable locations for the provision of homes, shops, food, office, community and entertainment uses;
- Policy CS5 aims to manage the impact of growth and development in Camden by ensuring that development meets the full range of objectives of the Core Strategy and other Local Development Framework documents;
- Policy CS6 of the Core Strategy relates to housing and has the key aim to provide quality homes within Camden. Housing is regarded as a priority land use within the Local Development Framework;
- Policy CS13 will require all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation;
- Under Policy CS14 the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by requiring development of the highest

standard, seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;

- Policy CS17 aims to make Camden a safer place by ensuring to work with their partner to tackle crime and anti-social behaviour and to encourage appropriate security and community safety measures. Camden requires development to demonstrate that they have incorporated the Design principles which contribute to community safety and security, particularly in areas with relatively high levels of crime, in particular Camden Town, King's Cross, Bloomsbury, Covent Garden and Kilburn; and
- Under Policy CS18 the Council will seek to make Camden a low waste borough and make sure that developments include facilities for the storage and collection of waste and recycling.

LB Camden Development Policies Document (November 2010)

6.8. The DPD supports the Core Strategy and London Plan, setting out the detailed policies for managing development within the borough. Key policies relevant to the development proposals are considered to be:

- Policy DP2 aims to make full use of Camden's capacity for housing and seeks to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing. The Council will expect the maximum appropriate contribution to the supply of housing and resist alternative development of sites considered particularly suitable for housing;
- Policy DP3 demonstrates that the Council will expect all residential developments with a capacity for 10 or more additional dwellings and/or a floorspace of 1,000 sqm (gross) to make a contribution to the supply of affordable housing. The Council will expect the affordable housing contribution to be made on site, but where it cannot practically be achieved on

site, the Council may accept off-site affordable housing, or exceptionally a payment-in-lieu;

- Policy DP5 states that the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. Development should meet the priorities set out in the Dwelling Size Priorities Table (below), which includes a mix of large and small home sin all residential development;

	Studio / 1-bed	2-bed	3-bed	4-bed	Aim
Social Rent	Lower	Medium	High	Very High	50% Large
Intermediate	Medium	High	High	High	10% Large
Market	Lower	Very High	Medium	Medium	40% 2-bed

Table 2: Policy DP5 Dwelling Size Priority Table

- Policy DP6 states that all housing development should meet lifetime homes standards and that 10% of homes developed should meet either wheelchair housing standards, or be easily adapted to meet them;
- Policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. The Council will resist development that fails to assess and address any need for movements to, from and within the site and additional transport capacity off-site where existing or committed capacity cannot meet the additional need generated by the development;
- The Council will promote walking, cycling and public transport use under Policy DP17 and development should make suitable provision for pedestrians, cyclists and public transport use. The Council will resist development that would be dependent on travel by private motor vehicles;

- Policy DP18 seeks to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area, the town centres (Camden Town) and other areas within controlled parking zones. Development should comply with the Council's parking standards as set out within the Development Policies Document;
- Policy DP22 requires developments to incorporate sustainable design and construction measures by incorporating green or brown roofs and green walls wherever suitable;
- Policy DP24 requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider a variety of factors such as the quality of materials to be used, the appropriate location for building services equipment and the provision of appropriate amenity space;
- Policy DP25 seeks to conserve the heritage of Camden. Development affecting conservation areas should take account of conservation area statements and will only be permitted if it preserves and enhances the character of the conservation area. It seeks to preserve trees and garden spaces which contribute to the character of the conservation area;
- Policy DP26 aims to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity such as visual privacy, overshadowing, noise & vibration and microclimate. The Council will also require developments to provide an acceptable standard of accommodation (dwelling and rooms' sizes etc), facilities for the storage of waste, bicycle storage and outdoor space for private or communal amenity space wherever practical; and

- Policy DP28 seeks to ensure that noise and vibration is controlled and managed across the borough. The Council will only grant planning permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed the Council's noise thresholds. Further, the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development.

Camden Draft Local Plan (2017)

6.9. As noted previously, LBC are currently in the process of finalising their draft Local Plan for adoption. As such, LBC will now give significant weight to the policies within the draft Local Plan when assessing planning applications. The following draft policies are relevant to this planning application:

- Policy H1 states that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2015/16 – 2030/31, including 11,130 additional self-contained homes;
- Policy H4 seeks a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The Council will seek a sliding scale target for development that provide one or more additional homes and have capacity for fewer than 25. Starting at 2% for one home and increasing by 2% for each home added to capacity. An affordable housing target of 50% applies to development with capacity for 25 or more additional dwellings. For development with capacity for 10 or more additional dwelling, the affordable housing should be provided on site;
- Policy H6 seeks to secure high quality accessible homes in all developments that include housing. The Council will expect all homes to meet the nationally described space standards, require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building

Regulations M4(2); require 10% of new-build self-contained homes to be easily adaptable for wheelchair users in accordance with Building Regulations M4(3);

- Policy H7 aims to secure a range of homes of different sizes that will contribute to create a mixed, inclusive and sustainable community. The Council will seek to ensure that all housing contributes to meeting the priorities set out in the dwelling size priorities table and includes a mix of large and small homes;

	Studio / 1-bed	2-bed	3-bed	4-bed
Social Rent	Lower	High	High	Medium
Intermediate	High	Medium	Lower	Lower
Market	Lower	High	High	Lower

Table 3: Policy H7 Dwelling Size Priority Table

- Policy A1 seeks to protect the quality of life of occupiers and neighbours. The Council will grant permission for development unless this causes unacceptable harm to amenity;
- Policy A4 seeks to ensure that noise and vibration is controlled and managed. Developments should have regard to Camden's Noise and Vibration Thresholds;
- Policy D1 seeks to secure high quality design in development. Developments should respect local context and character, preserve or enhance the historic environment and heritage assets. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions;
- Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their setting, including conservation areas, listed buildings and archaeological remains;

- Policy CC1 requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation;
- Policy CC4 ensures that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough;
- Policy T1 promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Provide cycle parking facilities that exceed the minimum standard set out within the London Plan and design requirements outlined within Camden Planning Guidance 7: Transport; and
- Policy T2 sets out to limit the availability of parking and requires all new development in the borough to be car-free. On-site parking will be limited to disabled bays and essential operational or servicing needs.

Camden Planning Guidance 1: Design (2015)

- 6.10. This Planning Guidance has been prepared to support the policies in Camden’s Local Development Framework (‘LDF’). It is consistent with the Core Strategy and the Development Policies document, and forms a Supplementary Planning Document which is an additional “material consideration” in planning decisions.
- 6.11. The guidance contained within this section therefore considers a range of design related issues for both residential and commercial property and the spaces around them.

Camden Planning Guidance 2: Housing (2015)

- 6.12. This guidance note provides information on all types of housing development within the borough including affordable housing, student housing, residential space standards and lifetime homes and wheelchair housing. It provides further detail on how the Council will deal with the delivery of affordable housing and the use of affordable housing credits.

Camden Planning Guidance 3: Sustainability (2015)

- 6.13. This guidance provides information on ways to achieve carbon reductions and more sustainable developments. It also highlights the Council's requirements and guidelines which support the relevant LDF policies.

Camden Planning Guidance 6: Amenity (2011)

- 6.14. This guidance is intended to provide information on all types of amenity issues including, daylight/sunlight, overshadowing, construction management plans and open space facilities. The guidance provides details on the level of contributions required where public open space is not provided on site.

Camden Planning Guidance 7: Transport (2011)

- 6.15. Camden faces considerable transport challenges including congestion and poor air quality and this guidance contains information on a variety of transport issues including travel plans, car free development, vehicle access, public spaces and cycling facilities.

7. PLANNING ASSESSMENT

- 7.1. This section assesses the proposals against the Development Plan and other relevant Planning Policy at national or local level.

Principle of Development

- 7.2. The NPPF seeks to significantly boost the supply of housing. Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Paragraph 50 supports the delivery of a wide choice of high quality homes, widening opportunities for home ownership and the creation of sustainable, inclusive and mixed communities.
- 7.3. London Plan Policy 3.3 highlights the pressing need for more homes in London and states that local planning authorities should seek to achieve and exceed the relevant minimum borough annual average housing target. By way of achieving housing supply the policy explains that local planning authorities should look to the potential of brownfield land, opportunity areas, intensification areas and growth corridors.
- 7.4. London Plan Policy 3.3 seeks to achieve provision of at least 42,000 net additional homes each year across London. Table 3.1 identifies that LBC has a target to provide 889 net additional homes annually and 8,892 homes between the ten-year period 2015-2025. Over a five-year period required by the NPPF, this equates to 4,445 new homes. As required by the NPPF, LBC has also included an additional buffer of 5% to the five-year housing target, which overall equates to a target delivery of 4,668 new homes.
- 7.5. Housing is regarded as the priority land-use within the LDF and a residential development which seeks to maximise the supply of additional homes in the borough should therefore be supported. Policy DP2 outlines that the Council will seek to maximise the supply of additional homes in the borough and expects the maximum appropriate contribution to supply of housing on sites that are underused, taking into account any other uses that are needed on the site.

- 7.6. The priority of residential delivery is further expressed in Camden’s emerging Local Plan by Policy H1 which seeks to maximise the housing supply by exceeding a target of 16,800 additional homes from 2015/16 – 2030/31. The policy also noted that the Council will monitor the delivery of additional housing against the housing target and will seek to maintain supply at the rate necessary to exceed the target,
- 7.7. In 2015, the site obtained prior approval for the change of use (application ref: 2015/4598/P) from office (Class B1a) to residential (Class C3) for 13 studio units which has been completed. In October 2016 planning permission was granted by LB Camden under ref: 2016/4116/P for the erection of a two storey roof extension, side and rear extension and other associated works. The 2016 planning permission has been implemented and the side and rear extensions constructed. This planning application seek to supersede the 2016 planning permission by adding an additional 9 units to the 2015 prior approval scheme.
- 7.8. The principle of extending the building to increase the residential use has already been secured on site by the aforementioned prior approval and planning permission. This planning application seeks to deliver additional, much needed, housing in the borough through the provision of 9 additional units.
- 7.9. Therefore, given the above, it is considered that the Proposed Development meets the requirements of, and accords with, the NPPF, London Plan, Camden’s Development Plan Policy DP2 and emerging Policy H1.

Affordable Housing

- 7.10. Policy DP3 of the Council’s Development Policies document sets the threshold of 10 units (1000sq.m gross residential floorspace) at which the requirement for affordable housing provision is triggered. The Development Policies document states that the Council’s target of 50% of total additional housing floorspace as affordable housing operates on a sliding scale, subject to the financial viability of the development, with a norm of 10% for 1,000sq.m of additional housing and 50% for 5,000sq.m of additional housing, on sites with a capacity of 10 dwellings and 50 dwellings respectively.

- 7.11. The Proposed Development includes the addition of 9 residential units (799.7 sqm GEA). This falls below the threshold requirements of Policy DP3 and therefore no affordable housing is applicable in this case.
- 7.12. Emerging Policy H4 notes that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA or more. This emerging policy position will be monitored and discussed with the Council during the planning application process.

Residential Unit Mix

- 7.13. The NPPF encourages the delivery of a wide choice of high quality homes, based on current and future demographic trends, market trends and the needs of different groups in the community.
- 7.14. London Plan Policy 3.9 and Core Strategy Policy SO8 seek new development to contribute towards the creation of mixed and balanced communities. London Plan Policy 3.8 states that Londoners should have a genuine choice of homes that meet their requirements for different sizes and types of dwellings in the highest quality environments.
- 7.15. Policy DP5 states that the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes, that are appropriate to the development and the area.
- 7.16. The application proposes a total of 4 residential units. The proposed mix is set out in table 4 below.

Residential Unit	Proposed
1-bed	4
2-bed	4
3-bed	1

Total	9
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Table 4: Proposed Residential Unit Mix

- 7.17. The proposed mix broadly accords with the aspirations of the Dwelling Size Priorities Table within the Development Policies document, which seeks a “very high” (40%) proportion of 2 bedroom units. The proposed residential mix also broadly accords with the emerging Local Plan Policy H7 which identifies a priority for “high” levels of 2 bedroom units within the market tenure.

Residential Quality & Amenity

- 7.18. London Plan Policy 3.5 sets out that LDFs should incorporate minimum space standards including those set out in Table 3.3 of the London Plan and have adequately sized rooms with convenient and efficient room layouts.
- 7.19. All residential units in the Proposed Development have been designed to meet or exceed the London Plan minimum space standards and aspire to meet all space planning criteria outlined in the Housing SPG where possible.
- 7.20. In accordance with London Plan Policy 3.8 and emerging LBC Local Plan Policy H6, the Proposed Development meets Building Regulation requirements M4 (2).
- 7.21. Policy DP26 also states that the Council will protect the quality of/life of occupiers and neighbours by only granting planning permission for development that does not cause harm to amenity.
- 7.22. The Proposed Development has been designed to avoid any potential overlooking into nearby properties. Where overlooking may occur, perforated metal screens are proposed to mitigate against any potential overlooking. Windows to the proposed scheme will need to be treated sensitively in order to avoid overlooking to neighbours and to protect the neighbouring residential amenity. The material and elevational treatments have been chosen and designed to be sympathetic to neighbouring properties.

- 7.23. The development has, in line with Policy DP26 and CPG 6 and emerging Policy A1, been designed to protect the privacy of both new and existing dwellings.

Impact on Amenity

Daylight & Sunlight

- 7.24. In accordance with Policy DP26, a Daylight, Sunlight and Overshadowing Report has been undertaken by Point 2 Surveyors in support of this application to consider the sunlight and daylight impact on neighbouring buildings.
- 7.25. The daylight and sunlight report prepared is based on the methods laid out in the BRE guidelines to determine the acceptability of daylight and sunlight using a detailed 3D computer model of the site and its surroundings.
- 7.26. The daylight and sunlight results show full BRE compliance with all of the surrounding residential properties meeting the BRE guidelines recommended criteria and compliant with planning policy.
- 7.27. For further detail in this regard please refer to the accompanying Daylight, Sunlight and Overshadowing Report prepared by Point 2 Surveyors.

Noise

- 7.28. A noise assessment has been carried out by Sandy Brown that assesses the suitability of the site for residential development. Environmental noise surveys that have been undertaken as part of the assessment to identify the level of exposure to noise have demonstrated that the noise levels are commensurate with those expected for an urban location. Subject to adequate mitigation measures being put in place, the internal noise level within the new residential dwellings can be reduced.
- 7.29. The plant noise assessment indicates that the proposed plant located at roof level should be capable of achieving policy required levels at the nearest noise sensitive residential façade without the need for further mitigation.

- 7.30. The noise assessment prepared by Sandy Brown provides further information on level of exposure to noise, internal noise levels for residential areas and the external building fabric performance requirements.

Design and Layout

- 7.31. Policy at national, regional and local level are relevant to determining the design of the proposal and its contribution to the surrounding townscape.
- 7.32. The design principles of the Proposed Development are closely aligned with the architecture of the existing building. A study of the existing building reveals that it is historically comprised of two adjoining buildings which have merged into a single building block. The design aspiration is to enhance the existing historic features of the industrial building, but to have a clear differentiation between the original industrial building and the rooftop extension. This has been achieved through design and the architectural treatment of the extension.
- 7.33. The change of use from office to residential under permitted development rights restored and re-introduced some of the original architectural features of the existing building. Such as, removing the white rendered ground floor façade to reveal the original brick face. In October 2016 planning permission (ref. 2016/4116/P) was granted by LBC for the erection of a part single, part double roof extension to the building to provide four self-contained units (Class C3), two rear extensions at first and second floor level and associated external alterations. Since the approval of the planning application in October 2016 the applicant has constructed the rear extensions at first and second floor level to allow the occupation of these floors. This application seeks an additional floor at third floor level and to replicate a similar two storey roof extension as approved under planning permission ref. 2016/4116/P. The scheme also includes a rear extension at second floor level.
- 7.34. The third floor sheer extension will match the design and materials of the host building. The fourth and fifth floor volume has been designed to be visually different.

- 7.35. The Proposed Development comprises of 9 additional residential units proposed within the three storey extension. These units are accessed by the main ground floor entrance and building core.
- 7.36. The additional height sought from the October 2016 planning permission is a direct response to the changing heights within the vicinity of the site, such as the extensions at 3-7 Bayham Street and the redevelopment proposals at the neighbouring Koko site.
- 7.37. Due to the proximity of the surrounding buildings, careful consideration has been taken to ensure that there are no overlooking/privacy issues arising from the development, in particular 3-7 Bayham Street. The aim has been to minimise any loss of daylight caused by the development on the amenity of existing occupiers and ensure sufficient daylight to occupiers of the new dwellings in line with current policy.
- 7.38. The proposed palette of materials has been carefully chosen to complement the existing building and the Conservation Area. Anodised aluminium was deemed an appropriate façade material due to its industrial aesthetics and the lightness that it achieves. Further details of the design and layout of the Proposed Development can be found within the accompanying Design and Access Statement.

Townscape and Conservation

- 7.39. The existing building is not listed but does lie within the Camden Town Conservation Area. As such, the design proposals have taken into account the view of the Proposed Development from within the Conservation Area and its impact on any surrounding listed buildings.
- 7.40. DP25 outlines that in order to maintain the character of Camden's Conservation Areas the Council will not permit development that causes harm to the character and appearance of that conservation area. This is also reflected in emerging Policy D2.
- 7.41. The Proposed Development is of a high quality of design and appropriate to the host building. The scheme is well considered and relates well to both the site and its context.

- 7.42. In architectural terms, the Proposed Development is of a distinctive modern character that is well positioned in its own right and respect the rhythm and articulation of the elevations below. The articulation of the massing and the detailed design of the extension will provide a positive new addition to the local townscape.
- 7.43. The Heritage and Townscape Assessment concludes that the Proposed Development is a well-considered design with appropriate scale and architectural approach which is sympathetic to the host building and area. The complementary distinctive modern character of the architecture of the upper two floors will provide an interesting intervention which will add to the rich architectural character of the area, the new third floor will match the design of the host building. The Townscape, Visual Impact and Heritage Assessment identifies views of the Proposed Development from the specific location within the local area. It is noticeable from these views that the Proposed Development will not be visible from Camden High Street. Where visible, the Proposed Development will be a positive component in those views which enhance the quality of the townscape. The Proposed Development will enhance the significance of the Camden Town Conservation Area and will not harm the setting of any listed buildings in the area.
- 7.44. It is considered that the proposal provides a scheme of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively to the Conservation Area in accordance with the NPPF, Policy DP25 and emerging Policy D2.

Transport, Parking and Servicing

- 7.45. The Proposed Development will not provide any car parking on site. Residents would not be permitted to apply for on-street car parking permits for themselves or visitors in line with Policy DP18 and emerging Policy T2.
- 7.46. The Proposed Development will provide cycle parking in accordance with the latest London Plan (2016) cycle parking standards – applying the residential standards of 1:1 for studio and 1 bed residential units and 2:1 for 2+ bed residential units.

- 7.47. Secure cycle parking will be provided on-site. A two-tier cycle rack for 20 bikes already exists at ground floor level and will be used as the main store. Wall anchors will be provided under the main communal stair, and several vertical-mounted wall locks provided at third and fourth floor. Further details are provided within the Design and Access Statement.
- 7.48. The refuse store is located at ground floor level at the rear of the property with direct street access. Adequate space has been designed into the building for the storage and collection of house waste. A service contract will be in place for the property to ensure the communal bins are managed on collection days and maintained. Further details of the waste management strategy can be found within the Design and Access Statement. The waste strategy accords with Policy CS18 and DP26.

Sustainability and Energy

- 7.49. The NPPF states that local planning authorities should approve planning applications if their impacts are (or can be made) acceptable in sustainability terms. Policy 5.2 of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy; 1) Be lean: use less energy 2) Be clean: supply energy efficiently 3) Be green: use renewable energy.
- 7.50. An Energy and Sustainability Statement has been prepared to detail how Lean, Clean and Green measures have been considered to reduce carbon emissions.
- 7.51. The conclusions of the Energy Strategy are listed below:
- The Proposed Development includes a 24.87% reduction in regulated CO₂ emissions over the Part L1A 2013 baseline from fabric specifications, energy efficient services and the implementation of Low & Zero Carbon technologies.
 - The Proposed Development includes a 5.17% reduction in all site CO₂ (regulated & unregulated) emissions from the Part L1A 2013 from improved fabric specification before any Low & Zero Carbon technologies.

- The Proposed Development includes 20.78% reduction in regulated emissions from Solar Photovoltaic Panels (PV) in line with the Camden policy.
- The Proposed Development includes a 12.38% reduction in all site CO2 emissions from improved fabric specifications and Low & Zero Carbon technologies compared to the Baseline emissions, includes both regulated CO2 emissions (those measured for Part L) and the unregulated CO2 emissions (those attributed to cooking & appliances as calculated by SAP).

7.52. The conclusions of the Sustainability Statement are listed below:

- The new dwellings will be constructed to Part L 2013 Building Regulations;
- Water efficiency measure and devices will be installed to achieve a maximum daily water usage of 110 litres/person/day (including an allowance of 5 litres of less per day for external water consumption);
- Recycling facilities will be provided for domestic and construction related waste;
- The use of sustainable transport modes will be encourage with cycle storage provision;
- Where practical, building materials will be sourced locally to reduce transportation pollution and support the local community. Materials will be selected based on their environmental impact, with a preference to A+ or A rated materials from the BRE Green Guide to Specification where possible;
- Sound insulation values will target an improvement on Building Regulations Part E;
- New homes will be designed to minimise the risk of overheating where possible and;
- The development will be registered with the Considerate Constructors Scheme.

7.53. For further information on the energy strategy please refer to the Energy and Sustainability Strategy prepared by CarbonPlan.

8. CONCLUSION

- 8.1. DP9 Ltd have been appointed to submit a full planning Application for a three-storey extension to create 9 new residential dwellings.
- 8.2. The proposals have been designed to be in keeping with the character and appearance of the Camden Town Conservation Area. The proposals seek to increase the residential floorspace in this central location to increase the supply of high quality accommodation in Camden and London.
- 8.3. The works will not harm the character and appearance of the Camden Town Conservation Area and the setting of the neighbouring listed building. For the above reasons, and those set out in this statement, planning permission is sought for the Proposed Development.
- 8.4. The planning statement has assessed the proposed scheme against the provisions of the Development Plan and other material considerations relevant to the determination of the application. It is considered that the proposal accords with the Development Plan, is a sustainable scheme and in accordance with the National Planning Policy Framework.