



Planning Statement

246-248 Kilburn High Road

London

NW6 2BS

Andmore Planning Ltd

May 2017

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1. Introduction

1.1.1 This Planning Statement had been prepared by Andmore Planning Ltd on behalf of Studio 246 Media Ltd and JD Viehof to accompany an application at 246-248 Kilburn High Road, for:

“Demolition of remaining building on site and erection of two buildings for residential use, providing 27 new units. Block A (street block) to be part-four, part-five storeys in height and Block B (courtyard block) to be part-five, part-six storeys in height. Associated landscaping, cycle parking and plant room.”

1.1.2 This application follows pre-application discussions with officers of the London Borough of Camden, including a meeting on site on 15th July 2016, and a follow-up letter dated 22nd August 2016. The pre-application enquiry (reference: 2016/3255/PRE) related to a very similar scheme which sought to make more efficient use of the site following a previous planning approval under reference 2014/2662/P dated 29th January 2015 for 14 residential units. This reconsideration of the approved development follows approval of a large development at the neighbouring site, 254 Kilburn High Road, which severely compromises the approved scheme on the site.

1.1.3 The principle of making a more efficient use of the site was supported by officers, and as such the proposal has been developed with input from a wide consultant team in order that it makes the most positive contribution to not only Camden’s housing targets but also the immediate local area.

1.1.4 This statement has the following format:

- Section two contains a description of the site and the surrounding area;
- Section three sets out proposed development;
- Section four outlines the relevant planning policies;
- Section five provides an assessment of the proposal against local characteristics and relevant planning policies;
- Section six serves as a conclusion to the statement.

1.1.5 In accordance with local and national validation requirements, and as a result of pre-application discussions, this application is accompanied by the following documents:

- Drawings (Inside Out Architecture);
- Design and Access Statement (Inside Out Architecture);
- Energy Statement (Fabric Building Physics);
- Daylighting Impact Assessment (Fabric Building Physics);
- Air Quality Assessment (AMEC FW);
- SUDS Strategy (Water Environment);
- Noise Impact Assessment (KP Acoustics);
- Financial Viability Assessment – CONFIDENTIAL (Douglas Birt Consulting);
- Arboricultural Survey (PJC Consultancy);
- Draft Construction Management Plan (Inside Out Architecture); and
- Phase 1 and 2 Site Assessment (KF Geotechnical).

1.1.6 With reference to the list of required documents in the pre-application response letter dated 22nd August 2016, details of refuse and recycling storage are included in the Design and Access Statement; and a brief statement relating to community engagement is included in this Planning Statement.

1.1.7 The application is submitted via the Planning Portal under reference: PP-05500872 where all forms and certificates have been completed. A fee of £10,395 has been paid by cheque to the London Borough of Camden. Neighbour consultation has also been undertaken by the applicant and adjacent residents have been informed of the proposals.

2. Site Description

- 2.1.1 The site is located on the eastern side of Kilburn High Road, adjacent to Kilburn Grange Park. The site is in the main vacant and comprises no built structures, save for the house at 246 Kilburn High Road which is a part 2-storey, part 3-storey live/work unit arranged as a single family-sized dwelling. The total floorspace provided by the unit is 381 sq m, with the upper floors (261 sq m) comprising the “live” element and the ground floor (120 sq m) being the “work” element, which was formerly in use as a photographic studio for personal use of the occupier above. There has been no “work” taking place at the house for many years as the owner has left the UK, therefore it is only the “live” element of the house that has been in use.
- 2.1.2 The site is accessed via a gated vehicular entrance at the south-eastern end from Kilburn High Road. It has an excellent PTAL rating of 6a, and is in a highly accessible location, within walking distance of Kilburn Underground Station and Brondesbury Overground Station, as well as numerous bus stops.
- 2.1.3 The application site is not located within a Conservation Area and the existing building is not listed. The site is located within the designated Town Centre of Kilburn. It is located opposite the boundary with the London Borough of Brent.

2.2 Planning History

- 2.2.1 The planning history for the site is set out in detail in the Committee Report for the previous application on this site (reference 2014/2662/P), which covers 248 Kilburn High Road, the front portion of the application site. In terms of immediate history, the most recent application gained approval for the erection of two buildings; one part-four, part-five storey, and the other part-two, part-three, part-five storey, to provide 14 self-contained flats, including vehicular access via an undercroft in the building roof terraces and landscaping.
- 2.2.2 The above application followed a previous similar application under reference 13/7487/P which was withdrawn by the applicant.

2.3 Surrounding Area

- 2.3.1 The surrounding area predominantly accommodates a combination of 3- and 4-storey buildings, in commercial use at ground floor and residential use at the upper floors. Beyond

the site, 244 Kilburn High Road is a 4-storey property with office accommodation at ground floor and residential above. Notably these offices have never been in use since the completion of the property in 2009. To the north-west of the site are 250-252 Kilburn High Road which comprise ground, and first to third floors with retail at ground floor level and residential accommodation above.

- 2.3.2 Providing important context to the site and the proposed development; further to the north is 254 Kilburn High Road, which was formally a marble mason's workshop comprising part single, part 2- and 3-storey buildings. This has now been demolished and construction works are underway for the approved scheme (reference: 2014/3244/P) comprising the erection of a 6-storey building to provide commercial space, 62 residential units, cycle parking, disabled car parking, and other ancillary improvements. This development builds right up to the common boundary with the application site, and the implication of this is assessed in this Planning Statement.

3. Proposal

- 3.1.1 This planning application seeks permission for a comprehensive redevelopment of the site which now includes the existing house at 246. This proposal builds upon the already approved scheme of 14 units (under planning reference: 2014/2662/P) by providing a building to the rear of the site that relates more appropriately to the existing building to the south and the approved building to the north. Given that the now approved development at 254 Kilburn High Road has a far greater bulk and massing than the existing house, this new proposal is more in keeping with the local context that is being created. The two buildings, as in the approved scheme, are known as Building A (front) and Building B (rear), and together provide a total of 27 units, an uplift of 26 additional dwellings on site. This represents 12 more dwellings than the existing house and the extant planning permission.
- 3.1.2 Building A is essentially the same as that approved under the above planning application and proposes 4 units over four-storeys. It proposes an infill of the high-street frontage to respond to the buildings either side on Kilburn High Road. The new element to the proposal is Building B. Building B has two main facades which have sensitively considered not only the neighbours but their setting. Privacy and overlooking has been a key consideration as has daylighting. The new façade facing the public park has been designed with private balconies for future occupants which meet the requirements set out in the London Plan.

3.2 Proposed Residential Units

- 3.2.1 A full schedule of accommodation proposed across the site, including formats and layouts, is included in the accompanying Design and Access Statement, however in summary, the proposal seeks to provide the following:

Building A (front)	
2-bed	4
Building B (rear)	
1-bed	9
2-bed	9
3-bed	5
Total = 27	

- 3.2.2 All units benefit from private amenity space, as well as use of the communal courtyard. 28 covered cycle parking spaces are provided, as well as refuse and recycling storage for each block. Biodiverse green roofs and Solar Photovoltaics are proposed on each block, as well as



a green wall along the inside of the boundary wall with number 244 Kilburn High Road as per the extant permission.

4. Relevant Planning Policy

4.1.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions are required to be made in accordance with the development plan for the area unless material considerations indicate otherwise. The statutory Development Plan for the site comprises the following:

- National Planning Policy Framework (March 2012);
- The London Plan (2016) and London Plan Housing SPG (2016); and
- Camden's Core Strategy and Development Policies (2010).

4.2 National Planning Policy Framework

4.2.1 The National Planning Policy Framework (NPPF) was published in March 2012 by the Department of Communities and Local Government. This is a new, simplified planning framework that better supports growth, helps create the homes and jobs and helps protect and enhance the natural and historic environment.

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

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

4.2.3 At paragraph 17 the NPPF sets out core planning principles which should underpin both plan-making and decision-taking. These principles include (among others):

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;

- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;
- support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources; and
- encourage the effective use of land by reusing land that has been previously developed (brownfield land).

4.2.4 The NPPF is clear that for delivering sustainable development there is a requirement for building a strong and competitive economy. To achieve this the NPPF states that the planning system should do everything it can to support sustainable economic growth and that planning should operate to encourage and not act as an impediment to sustainable growth.

4.2.5 Part 7 of the NPPF relates to “Requiring Good Design” and notes that this is a key aspect of sustainable development. It requires that Local Planning Authorities formulate policies which aim to ensure that developments “function well; optimise the potential of the site to accommodate development; reflect the identity of local surroundings and material; create safe and accessible environments; and are visually attractive as a result of good architecture”. These factors have been key in formulating the design of the proposed development, and will be explored in greater detail in Section 5.

4.2.6 In respect of affordable housing The NPPF promotes the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Where LPAs have identified that affordable housing is needed, they should 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.

4.2.7 The NPPF concludes that planning policies “should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities”. The NPPF supports development including more efficient use of land in accessible locations and the re-use of vacant, brownfield land. The NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development and that LPAs should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

4.3 Regional Planning Policy

4.3.1 The London Plan was adopted in July 2011, with Further Alterations (FALP) adopted in March 2015, and sets the context for decisions taken in London. The London Plan whilst providing a backdrop to Local Plan Policy is primarily related to strategic issues and therefore this proposal would not prejudice its implementation. As part of the FALP housing targets within the London Plan area have been increased to 42,000 homes per year to meet the current needs. At present the London Plan (FALP) target for Camden for 2015-2025 is 8,892 homes, with an annual monitoring target of 889. The proposed development will assist the Borough in achieving these targets.

4.3.2 In terms of specifics from the London Plan the following policies are relevant:

- Policy 3.3 Increasing Housing Supply: This policy highlights the pressing need for more homes in London and states that the Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target. By way of achieving housing supply the policy explains that the Boroughs should look to the potential of brownfield land, opportunity areas, intensification areas and growth corridors.
- Policy 3.4 Optimising Housing Potential: This policy explains that development should optimise housing output, taking into account local context and character, design principles and public transport capacity.
- Policy 3.5 Quality and Design of Housing Developments: This provides that housing developments should be of the highest quality; relating to their context and wider

environment. In terms of planning decisions taken by Local Authorities, new 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 spaces, taking particular account of the needs of children and older people'.

- Policy 3.8 Housing Choice: This policy seeks to ensure new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements.
- Policy 3.9 Mixed and Balanced Communities: This policy seeks to ensure communities are mixed and balanced by tenure and household income. It calls for a more balanced mix of tenures in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.
- Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed-Use Schemes: This Policy provides a framework for negotiating affordable housing in relation to development schemes. It explains that the maximum reasonable amount of affordable housing should be sought having regard to: current and future requirements for affordable housing at local and regional levels; the need to encourage rather than restrain residential development; the need to promote mixed and balanced communities; the size and type of affordable housing needed in particular locations; the specific circumstances of individual sites. Importantly, the policy explains that negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, and other scheme requirements.

4.4 Local Planning Policy

- 4.4.1 As indicated in the pre-application response letter dated 22nd August 2016, the application must be assessed on the Core Strategy and Development Policies (both adopted 2010). The Draft Local Plan has not yet been adopted (but is due for adoption during 2017), therefore policies within the Local Plan carry reduced weight against those in adopted documents. As such listed here are those that are those set out in the pre-application letter considered relevant to the proposed development:

Core Strategy:

CS5 Managing the Impact of Growth and Development

CS6 Providing Quality Homes
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
CS17 Making Camden a Safer Place
CS18 Dealing With Our Waster and Encouraging Recycling
CS19 Delivering and Monitoring the Core Strategy

Development Policies:

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 Units
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 Car 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
DP31 Provision of, and Improvements to, Public Open Space and Outdoor Sport

4.4.2 Regard has also been had to Camden's adopted Supplementary Planning Documents: CPG2 (Housing), CPG3 (Sustainability), CPG6 (Amenity), CPG8 (Planning Obligations); and other relevant guidance which will be assessed in the next section of this Statement.

5. Planning Assessment

5.1.1 As set out in Section 1 this proposal has been developed together with pre-application discussions and advice received from officers during the second half of 2016. Numerous detailed and technical surveys and assessments have been completed in accordance with validation requirements and the pre-application advice received, and the below sets out each aspect of the proposal and the associated Core Strategy and Development Plan policies to which they relate.

5.2 Land Use

5.2.1 Whilst the current use on part of the site has an element of employment, that use has not been in use for a number of years. As such it is not considered the “work” element of the site has provided any beneficial use to Camden’s range of business premises. Furthermore, the photograph studio on the site was built for personal use by the owner, so has never provided employment for more than one person. That was only ever used as a work studio by the initial person who built the house for the first 3 years. As such it cannot be seen as a valuable commercial use. Having said that, it is recognised that Policy DP13 (Employment Premises and Sites) seeks to protect business premises, including live/work units, therefore the contents of that policy have been assessed.

5.2.2 In terms of part (a), the live/work unit is no longer suitable for its business use as a photographic studio, as the owner has moved out of the country to continue that use elsewhere. As for part (b), the reuse of the work element of the property by another business use or operation is not possible since the live element of the house has been periodically occupied. The two elements are not distinguishable as differing Use Classes, and form one house as the development was not approved as a separate B Use Class or any other commercial operation. It would not be practical to let or sell the ‘work’ element as a separate operation to the house above nor in accordance with the planning permission. The principle of a wholly residential use has been accepted on the front part of the site under planning application 2014/2662/P, and this application is an extension of that approval, providing much needed, good quality housing in a sustainable location. The loss of the small element of office use on the front part of the site was considered acceptable at that time.

5.2.3 The site at 248 Kilburn High Road forms part of the Kilburn Town Centre, and site at 246 is unallocated, white land. It does not form part of an employment allocation, and does not

contribute to an overall critical mass of employment uses. Whilst there are incidental business premises along Kilburn High Road, few of the B uses are in meaningful use, and none would suffer from the loss of an element of business use in this live/work unit. As such is it considered that the overriding need for housing in this location outweighs any remaining benefits of retaining an unused photographic studio which forms part of a house. The principal of the provision of extra residential units has been accepted at pre-application stage. In this regard, Policy CS6 (Providing Quality Homes) and Policy DP2 (Making Full Use of Camden's Capacity for Housing) are of key importance here since this application seeks planning permission for 27 new, high quality homes.

5.3 Proposed Housing

- 5.3.1 Planning policy at national and regional level requires an efficient and effective use of land, particularly in respect of key urban sites. The proposed development represents a form and content of development that has been optimised as a response to planning policy and site specific considerations.
- 5.3.2 In accordance with Policy DP2, the proposed development maximises the delivery of homes on this site. Since the previous application gained planning permission for 14 homes on the front portion of the application site, the adjacent site at 254 Kilburn High Road gained planning permission for a very large residential-led development which presented a blank wall of 6-storeys in height right up to the common boundary. The effect of this on the approved scheme at this site would have been overbearing and unneighbourly. As such, the applicant sought to improve the residential amenity for future residents, by amending the scheme, and bringing the rear part of the site into the development. This has resulted in a much more meaningful application site which can provide almost double the number of residential units.
- 5.3.3 In terms of tenure, Policies CS6 and DP3, as well as Camden's CPG2 and relevant London Plan Policies require that affordable housing is provided on site. As such the maximum amount of affordable will be provided subject to viability. These will most likely be provided in the front block, as they were in the previous application. Further details relating to the provision of affordable housing can be found in the accompanying Financial Viability Assessment (Redacted Version).
- 5.3.4 Policy DP5 (Homes of Different Sizes) requires new developments to contribute to creating mixed and inclusive communities. The mix of dwelling sizes should take account of the

character of the development and of the local area, as well as demand for homes of different sizes. In accordance with the advice received at pre-application stage the mix of units is as follows:

- 1-bed = 9 units
- 2-bed = 13 units
- 3-bed = 5 units

- 5.3.5 19% of the proposed new units are suitable as family homes, being three-bedroomed, where 48% are two-beds, and 33% are one-beds. The Council's Dwelling Size Priorities Table under DP5 sets out the very high market demand for 2-bed units, with an aim for 40% of new units to be 2-bed, therefore 48% provision here meets that identified need. It should also be noted that more than half of the two-bed apartments are the larger four-person sized units and could reasonably be considered as acceptable for small families.
- 5.3.6 The full floorspace and format breakdown of each of the proposed units is included in the Design and Access Statement. In accordance with CPG2, the vast majority of units are London Plan-compliant, and as noted in the pre-application response letter, there is a minor variation from these standards on four of the 1-bed 2-person units, with remainder being comfortably over the standard in most cases. These very minor discrepancies represent a maximum of 2 sq m for each of the four units, which is an improvement over the scheme presented at pre-application stage. As such it is considered the provision of a good mix of units is achieved in accordance with the London Plan and with the essence of Camden's CPG2.
- 5.3.7 The proposed flats provide a good level of amenity to future occupiers in terms of light, aspect, internal space, external space and privacy. The majority of the flats are dual aspect, with a small number (5) being single aspect. These are the smaller 1-bed 2-person units, but whilst being single aspect, they are afforded good views either of Kilburn Grange Park, or of the courtyard. The single aspect units, as well as the dual aspect ones, will benefit from mechanical ventilation, so any reduced natural flow of air will not hinder resident's enjoyment of their homes as is sometimes the case with older developments.
- 5.3.8 A Daylight and Sunlight Assessment has been submitted, and demonstrates that all units achieve an Average Daylight Factor (ADF) above the BRE guidelines. Furthermore, in providing high quality living spaces, each unit benefits from provide amenity space in the form of a balcony or terrace (ranging from 4 sq m for the smallest 1-bed unit, to a 59 sq m

terrace for the largest 3-bed unit). These are all truly useable spaces designed in accordance with CPG2 and other relevant policies. All units will also have access to the communal courtyard.

- 5.3.9 All homes proposed on site meet the latest Building Regs Part M, where 10% are designed for wheelchair use. As such, three of the 27 units are for wheelchair use, and these will be located in the rear block at ground floor level in the form of one 3-bed 6-person unit, and two 2-bed 4-person unit.

5.4 Design

- 5.4.1 The NPPF reminds applicants and decision-makers that good design is indivisible from good planning. As such the applicants, in preparing the application, provided a very focussed brief to the design team. Since the positive pre-applications discussions have taken place with officers the design team have developed the scheme, and have specified a palette of high quality materials to complete the proposal. A greater level of detail on this point is appropriately contained within the Design and Access Statement.

- 5.4.2 This application proposes the demolition of the existing house towards the rear of the site. Whilst it is considered the house makes a positive contribution to the appearance of the site from Kilburn Grange Park, it is not in a conservation area, and it is proposed to be replaced with an equally high quality proposal. The full design evolution and rationale is included in the accompanying Design and Access Statement, however, a summary is included here.

- 5.4.3 The specific design provisions of Policy DP24 and the way in which the proposed development satisfies them is summarised below:

- a) The proposal has been designed to the highest standards incorporating principles of good design in consultation with officers throughout the pre-application process. The form of the neighbouring buildings and the context created by them has been considered in the evolution of the proposal. The building Block A to the front of the site has largely remained as already approved. In terms of bulk and massing the proposal is now for a separate building to the rear of the site arranged as a 6-storey building with the top floor as an 'attic storey' set back from the parapet. The neighbouring site at 254 Kilburn High Road similarly has approval for a 6-storey building with a set-back attic storey. To reflect the different character at the rear of the site, in contrast to the tight street setting at the front, the rear block has a prominent position on the edge of Kilburn

Grange Park. The scale of this principal elevation, including the floor to ceiling heights of the ground floor, have been amended following discussions with the Council's Design Officer.

- b) This proposal is not for an alteration or extension to an existing building.
- c) As detailed in the accompanying Design and Access Statement the use of high quality materials and finishes has been adopted across the site. Since the two proposed blocks address different contexts, they are expressed as two pieces of a whole. This is achieved using white brick on both blocks and a series of related, but different details, creating the sense of a familial relationship between the two blocks. The proposed material palette for the larger courtyard block would consist of exposed concrete, denoting the floor slabs, with articulated brickwork panels using the same white and textured water-struck brick.
- d) The street block presents a visually interesting frontage to the street on Kilburn High Road, with a rhythm to the façade which can be read alongside the existing traditional building along the street.
- e) In terms of building services, a plant room and double-height cycle storage is proposed in the courtyard, with refuse storage at the rear of the front block where it is closest to the street for collection.
- f) A tree survey report is included with this application and demonstrates that the one existing landscape feature, albeit outside the application site – a yew tree – is to remain on site and be protected during construction. The site at 805 sq m, does not present any specific topographical features.
- g) Landscaped patios are provided where appropriate for ground-floor units, along with planting on upper floor terraces, and a hard-landscaped courtyard for use by all residents. The boundary wall is to be re-built where appropriate.
- h) As above, a policy-compliant level of private and communal amenity space is provided for all units. A breakdown of areas is included in the Design and Access Statement.
- i) In order that the proposed residential units are accessible to all, as noted above, three of the units will be wheelchair adaptable, and all will be built in accordance with Building Regs Part M. Both buildings will have level access, with no raised thresholds to any parts of the development.

5.4.4 In pure design terms the proposal represents genuine quality, and makes a positive contribution to its local area. The layout of the development is inclusive and will function well, creating a safe and accessible environment. The pattern of buildings and the materials

chosen have been designed to create a strong sense of space. This ensures that the development gives more than it takes away from its surroundings. It is considered that the key parts of Policies CS14, DP25 and CPG1 are covered in the above assessment.

5.5 Proposed Courtyard

5.5.1 As set out above, a communal courtyard is proposed, as well as private balconies, patios and terraces. Each of these landscaped areas provides an opportunity for encouraging biodiversity in accordance with Policy CS15. Along with appropriate planting in these areas, a green wall, and biodiverse green roofs proposed on both buildings, the proposal will enhance the local landscape for wildlife, encouraging use by birds and bees. Whilst all units have access to private and communal amenity space, clearly residents have the benefit of Kilburn Grange Park to the rear of the site as well.

5.6 Amenity of Neighbours

5.6.1 Policy DP26 seeks to manage the impact of development on occupiers and neighbours. The proposal has been built with neighbouring residents in mind, and considers their amenity alongside that of future occupiers. The majority of these factors are covered in the accompanying Daylighting Impact Assessment which analyses the neighbouring building's Vertical Sky Component (VSC) for the windows in those buildings surrounding the proposal. Detailed drawings showing the location of the windows for the properties on Kilburn High Road and Grangeway are included in the statement and the results show that any reductions in VSC are considered to be within acceptable limits.

5.6.2 In addition to the VSC analysis the amenity of neighbours has also been considered using a No Sky Line Assessment. It is therefore demonstrated that the development proposals are of a scale and massing that is consistent with the local context.

5.6.3 In terms of noise and vibration, a noise Impact Assessment has been undertaken and is submitted with the application. Having assessed background noise levels, a specification for the construction of the new buildings has been suggested and incorporated into the design. Given the background noise levels at the site being related to the road traffic noise from Kilburn High Road the assessment has considered the external building fabric specification for non-glazed and glazed elements. This has assessed the specification for windows and construction methods and it is concluded that the proposal will not attract any concerns relating to noise impact. Triple glazing is proposed which goes beyond the British Standards recommended and no further mitigation is required.

5.6.4 The proposed development has been assessed against strict air quality criteria. The site is located within an Air Quality Management Area (AQMA) which covers the whole of the borough. The dispersion modelling carried out in the accompanying Air Quality Assessment, particularly focussing on traffic activity on Kilburn High Road, results in a recommendation that the development should be designed with a ventilation system to draw air from areas with lower NO₂ concentrations than the roadside. It is also recommended that a Mechanical Ventilation with Heat Recovery (MVHR) system equipped with NO₂/NO_x filters is installed. The AQA concludes that as the Proposed Development is car-free, there is no energy centre planned on site, the centralised boiler in the plant room will have emissions of NO_x below 40mg/kWh, the Proposed Development is considered to be air quality neutral for both building emissions and transport emissions. As a result of the above, air quality should not be considered as a constraint to the proposed redevelopment of the site.

5.7 Transport and Highways

5.7.1 A number of Camden's local planning policies have been assessed in formulating the proposals. The key policies, CS11 and DP18 both promote a similar message: *"The Council will seek 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 of Camden Town, Finchley Road/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport."* (DP18)

5.7.2 In light of the above, the proposal is to be "car free", with no parking provided on site. Instead, 28 cycle spaces are provided in an accessible location in a double-height covered cycle store in the landscaped courtyard, amongst areas of new soft landscaping and tree planting. As noted at 2.4.2 above, the location attracts a PTAL rating of 6a – excellent – and there are no barriers to walking or cycling the vicinity of the site. As such it is considered that the transport aspect of the site and the proposed development meets all policy requirements.

5.8 Refuse and Recycling

5.8.1 Refuse and recycling storage is provided on site in accordance with Chapter 10 of CPG1 and Policy CS18. The requirements for a proposal of this size have been provided by the Council's Principal Environmental Services Officer and comprise:

- 2 x 1,280 litre bins for waste

- 2 x 1,100 litre bins for recycling
- 2 x 240 litre bins for food waste

5.8.2 The waste storage provision is located at the base of the street-facing block, where it is closest to the street and therefore optimal for refuse collection purposes.

5.9 Security

5.9.1 The proposal will have a secure front door to both blocks, and the communal courtyard would benefit from passive surveillance. Those units at the rear of Block B will also provide passive surveillance of Kilburn Grange Park on a larger scale than currently provided by the single family dwelling. The site is secured by an entrance gate, as are the refuse stores. Cycles will be individually secured in the covered cycle parking area.

5.10 Sustainability

5.10.1 The proposed development has targeted sustainability throughout the lifetime of the buildings. In particular, energy efficiency measures are integral to the buildings' design and specification. These include high thermal performance building fabric, passive and active measures to reduce the demand for energy, and photovoltaic panels. As such the proposal accords with London Plan Policy 5.2 and corresponding Core Strategy Policy CS13 and CPG3.

5.10.2 Importantly to not only this policy, but also numerous national and regional policies the proposal is on previously developed land. The energy efficiency strategy proposed by the fabric and building services specification (Be Lean & Be Clean) incorporates high levels of insulation, airtightness, MVHR and triple glazing. This achieves a reduction in annual regulated emissions representing a 25.7% improvement compared to the Building Regulations minimum requirements.

5.10.3 The provision of a minimum of 13KWp of roof mounted PV panels will then provide the additional 20% reduction in regulated emissions from on-site renewables. This requirement equates to 4 PV panels located on the front block and 9 on the rear block. The combined reductions from efficiency measures and on-site renewables will be a scheme with a 41% reduction in regulated carbon emissions compared to the statutory requirements of the Building Regulations. Further details on the sustainability credentials of the proposal are included in the submitted Energy Statement and as such are not repeated here.

- 5.10.4 An intrusive exploration of the ground conditions has been undertaken as part of the extant permission. A Phase 1 and 2 Geo-technical survey has been carried out with boreholes drilled around the accessible parts of the site. The part of the site that currently accommodates the existing house had previously been assessed as suitable for residential occupation. No conditions were imposed on the planning permission for the original house in 2001 (ref: PWX0103302) nor the extant permission in 2015 and it is not anticipated that further remediation is required.
- 5.10.5 In terms of Sustainable Drainage, Policy DP23 requires developments to incorporate water efficient features and equipment (a) and to limit the amount and rate of runoff and waste water (b). As such the courtyard is paved in permeable materials, and rainwater is caught and slowed from reaching the storm water and sewer network on both green roofs. This can be achieved by constructing a drainage blanket beneath the porous paving for the area of central courtyard. This would provide 13m³ of storage. This means the site can achieve the three times Greenfield post development runoff rate with a green roof. The benefits of this in terms of runoff rates are set out in the accompanying SUDS Strategy (Water Environment).

6. Conclusion

- 6.1.1 It has been demonstrated above that the proposed development of 27 new homes on previously developed land complies with local, regional and national planning policy. Each tier of the development plan has been considered throughout the scheme development, and the proposal has been designed to accord with every aspect. This application also follows a pre-application submission and an extant planning permission (ref: 14/2662/P) for 14 new homes on part of the application site.
- 6.1.2 The principle of a residential use on the site was established through the above planning application, and the loss of the small element of business floorspace (an unused former photographic studio) is justified in Section 5 above. The vast majority of unit and room sizes meet or exceed the required London Plan and CPG2 standards and private and communal amenity spaces are provided to accord with those standards.
- 6.1.3 The full package of technical reports and assessment which accompany the application test the proposal against the relevant policies and guidance in relating to ground conditions, daylight and sunlight, air quality, noise impact, and energy. A detailed SUDS Strategy has been submitted to ensure the proposal does not increase the risk of flooding either on site or elsewhere. As such the amenities of existing residential properties adjacent to the site and future residents of the development have been considered in the design of the proposal.
- 6.1.4 The proposal would enable the delivery of a significant and sustainable residential development within the borough, which would make a considerable contribution towards meeting housing targets for the area in the short term, in accordance with the aims of the NPPF. Furthermore, the proposal accords with the strategic objective at CS6 of the Core Strategy, as well as DP2 which requires the Council to “seek to maximise the supply of additional homes in the borough”. Currently the site accommodates one residential unit; with the extant permission the site can accommodate 15. However, this application proposes to make the most efficient use of the land by providing 27 new homes.
- 6.1.5 The proposal represents genuine quality, and makes a positive contribution to its local area. The layout of the development is inclusive and will function well, creating a safe and accessible environment. The pattern of buildings and the materials chosen have been

designed to create a strong sense of space. This ensures that the development gives more than it takes away from its surroundings.

- 6.1.6 In light of the above, it is considered that the proposal accords with Camden’s Core Strategy and Development Policies as well as regional guidance contained within the London Plan. Therefore, the determination of this application to a great extent centres on the simple statement from the Government that Councils should take a presumption in favour of sustainable development, and “approve development proposals that accord with the development plan without delay” (NPPF, para 14).