

Delegated Report		Analysis sheet	Expiry Date:	21/12/2017
		N/A / attached	Consultation Expiry Date:	01/12/2017
Officer			Application Number(s)	
Robert Lester			2017/3675/P	
Application Address			Drawing Numbers	
181-183 York Way & 282A Camden Road London			See Draft Decision Notice	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Construction of roof extension and 3 storey rear extension to provide 5 x 1 bedroom self-contained flats and external alterations including the formation of steps to corner retail unit, provision of 2 new windows to 1st & 2nd floor corner elevation to replace existing blank window features, construction of boundary wall at corner and along Camden Road frontage in place of existing car parking spaces and associated removal of 4 car parking spaces/hardstanding.				
Recommendation(s):	Refuse planning permission			
Application Type:	Full Planning Permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	0	No. of responses	4	No. of objections	4
Summary of consultation responses:	<p>A site notice was erected at the site between the 10/11/2017 – 01/12/2017 and a press notice was advertised between the 09/11/2017 – 30/11/2017.</p> <p>4 objection letters were received with the following points of objection:</p> <ul style="list-style-type: none"> • Prior to 1996 the building line on the site was in-line with the terrace on Camden Road. The existing building on the site projects forward of this line which is unfortunate. • The mansard extension would be inappropriate and would erode the consistency of York Way. Previously applications for roof extensions to this terrace have been rejected. Any roof extension over the part of the structure projecting in front of the Camden Road frontage would be doubly inappropriate. • The awkward small gap between the proposed rear extension and 282 Camden Road would cause huge practical problems for the maintenance of the side elevation of no. 282 Camden Road. • The relatively recent taller structure on the diagonally opposite corner of Camden Road and Brecknock Road (in Islington's Hillmarton Conservation Area) shows the damage done to the streetscape by allowing an 'extra' storey. • The set-back rear infill extension should not project beyond the building line on Camden Road and should leave a gap with the detached 282 Camden Road. The current proposal with a projection would harm the Conservation Area. • There would be enormous negative impact of the proposed development on adjacent buildings 282 Camden Rd and 179 York Way and in general to the Camden near properties and Conservation area. • The loss of parking is concerning as the nearest parking is at the Eastern End of Camden Mews which is already at capacity. The development should be secured as a car free development. • The proposal for increased greenery is welcome but the implementation of this should be conditioned and enforced. • The construction of the development would generate noise and disturbance to the detriment of local amenity. Considerate working hours and practices of any building works are also required. • The external patios would generate noise and overlooking and should be removed. 129 Camden Mews to the rear was refused permission to use their flat roof at the rear of their property as terrace. • More architectural detail is required in terms of actual quality and materials is needed before final approvals <p><i>Case Officer's Response: The following reports considers a response to all of these points.</i></p>					

**Camden Square
CAAC**

Objection

The drawings are technically inadequate and further elevation and sectional information is required.

- It is unclear from the drawings what the side elevation of the neighbouring building at number 282 Camden Road is like. On the plan there are two recesses, but in reality there are 2 x chimney breasts projecting.
- The proposed extension will leave a small, inaccessible gap between the buildings.
- The neighbouring building at number 179 York Way is not shown on the plans or elevations, and therefore the impact of the proposed extension cannot be assessed against this.
- There are small patios proposed to the three flats in the extension. At ground floor level this would be a small, airless space enclosed on all sides and overhead by the terrace above. It is not possible to tell the nature of this space from the drawings provided.
- There is a discrepancy in the number of existing and proposed units as described on the application form. The application form is inaccurate in stating that there are 4 existing 2 bed and 5 proposed 1 bed when there are in fact a total of 9 flats (5 x 1 bed and 4 x 2 bed) in the final scheme.

The height and volume of the proposal in relation to neighbouring buildings give concern

- The proposed top floor, 'mansard' type roof extension to the main building, although set behind the existing parapet, still dominates in the small views provided in the design access statement. These views are shown as "existing" and "proposed" but are not from the same viewpoint so do not offer a direct comparison.
- The roof extension further erodes consistency in York Way and runs counter to Camden's established position of rejecting applications for roof extensions in this terrace. Moreover, any roof extension over the part of the structure projecting in front of the Camden Road frontage would be doubly inappropriate.
- Whilst mimicking a mansard-type roof construction, the metal-clad construction is entirely vertical giving a boxy appearance to all elevations. Comparisons are drawn with the building diagonally opposite (outside the conservation area and in Islington borough), claiming to be a preferable version, however mimicking the boxy top storey is not a favourable precedent to follow.
- It should also be noted that the Islington development, by allowing an 'extra' storey, even though the consistent setback in Camden Road was maintained, significantly damaged the streetscape.
- The proposed set-back rear infill extension should not project beyond the unifying line of the Camden Road frontages and should leave a reasonable gap to the Victorian 282 Camden Road, which has always been a detached building. The current proposal with a canted projection would add a further local 'feature' which would compound the harm the current 181-183 York Way structure does to Camden Road and the Conservation Area. In addition, the awkward small gap between the proposed rear extension and 282 Camden Road would cause significant practical problems for maintaining the side elevation of No. 282.

More information on the materials, window colour and a coloured elevation would aid assessment. There is no reference to the proposed materials in

the application apart from describing the cladding as mid-grey zinc and dark-grey zinc and the metal windows as powder-coated (no colour specified).

More information is required in relation to the patios to avoid a totally enclosed space at ground floor level.

Although a daylight assessment has been submitted with the application, the poor quality of the scan makes it impossible to assess the block model diagrams provided within this.

The removal of existing car parking spaces (specified as to remain under a previous planning condition) would be acceptable so long as a Car-Free Agreement for the development is put in place – as per Camden policy. Although the rearrangement of the internal planning of the existing flats results in an improvement in the quality of the spaces it should be noted that

- The proposed extension results in a reduction in quality of light and aspect to bedroom 2 in flat 2 on the first floor of the host building - where previously this room had large sash windows looking out over flat roof and open space beyond, it now has a blank brick wall some 2m opposite.
- The rear patios to the extension flats are of questionable quality.

The current proposal has a number of significant deficiencies

- The mansard type roof extension is inappropriate
- There are issues with the set-back rear infill extension
- The negative impact of the development on adjacent buildings – 282 Camden Road and 179 York Way
- Lack of information about the proposed materials
- To assist in this process, it is noted that there is information contained within the design and access statement and other supporting reports to suggest that a 3D massing model and photomontages have been produced. It is suggested that this information should be submitted at a sufficiently large scale and in colour, to assess the impact of the scheme. Existing and proposed views should be from the same viewpoint for ease of comparison.

Case Officer's Response: The following reports considers a response to all of these points.

Site Description

The application site is located at 181-183 York Way & 282A Camden Road. This site is in the north east corner of the Camden Square Conservation Area and is adjacent to the borough boundary with London Borough of Islington.

This corner site contains a 3 storey mid and end of terraced building which was constructed in the 1990s to match the design of the adjacent Victorian terrace. The site contains a restaurant at ground and basement levels at 181 York Way, a retail unit at ground and basement levels at 183 York Way and 4 x 3 bed flats at first and second floor levels accessed off Camden Road (282a Camden Road). The site contains a parking area to the rear accessed off Camden Road. The site is identified as making a neutral contribution to the conservation area.

The site is located at a busy junction with Camden Road (A503) and York Way (A5200).

The adjacent detached Victorian villa at 282 Camden Road is located to the rear (west) of the site.

Relevant History

- 8701133 - Demolition of existing building and the erection of a basement and four-storey building comprising three ground-floor retail units and six office suites above including provision of three car parking spaces Refused 07/01/1988.
- 8903727 - Redevelopment by the erection of a basement and three storey building comprising retail use (Use Class A1) on part ground and basement floors office use (Class A2) on part ground and basement office use (Class B1) and two residential flats on first and second floors Refused - 12/09/1990.
- 9401695 - Redevelopment of the site by the erection of a basement and 3-storey premises comprising Class A1 retail Class A2 financial and professional on the ground floor and 4 self-contained residential flats above Granted - 25/05/1995.
- PE9800193R1 - Submission of details of proposed fenestration and shopfronts, cornices and balconies, details of hard and soft landscaping and means of enclosure, pursuant to additional conditions 05 and 06 of the planning permission dated 25 May 1995 Granted 05/06/1998.
- 2016/3674/P - Change of use of ground floor and basement from internet cafe (A1) to restaurant/ cafe (A3) with ancillary shisha cafe use, replacement of existing marquee with single storey smoking shelter with green roof, retention of decking and alterations to railings – Refused 30/09/2016.
- 2016/3675/P - Variation of planning conditions 3 & 4 of planning application ref: 9401695 to allow for the removal of the car parking spaces/turning area approved on that application and the provision of 2 car parking spaces for the existing on site commercial use Refused 04/10/2016
- 2016/6853/P - Change of use from A1 (internet cafe) to A3 (cafe) at ground floor and basement levels, construction of rear chimney containing a kitchen extract flue, removal of marquee seating area and the reinstatement and reconfiguration of the car/cycle parking area to the rear and the removal of external decking seating area to the front (part retrospective) - Granted - 30/06/2017

Relevant policies

National Planning Policy Framework (2012)

The London Plan (2016)

Camden Local Plan (2017)

G1 Delivery and location of growth
H1 Maximising housing supply
H3 Protecting existing homes
H4 Maximising the supply of affordable housing
H6 Housing choice and mix
H7 Large and small homes
C5 Safety and security
C6 Access for all
A1 Managing the impact of development
A3 Biodiversity
A4 Noise and vibration
D1 Design
D2 Heritage
D3 Shopfronts
CC1 Climate change mitigation
CC2 Adapting to climate change
CC3 Water and flooding
CC4 Air quality
CC5 Waste
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development
T3 Transport infrastructure
T4 Sustainable movement of goods and materials
DM1 Delivery and monitoring

Camden Planning Guidance (CPG)

CPG1 (Design) – Sections 2, 3, 4, 5, 6 and 10
CPG2 (Housing) – Sections 2, 4 and 5
CPG3 (Sustainability) – Sections 2, 3, 4, 6, 7, 8, 12 and 13
CPG6 (Amenity) – Section 4, 6, 7 and 8
CPG7 (Transport) – Sections 5 and 9
CPG8 (Planning obligations) – Sections 5, 6, 7, 8 and 9.

Camden Square Conservation Area Appraisal and Management Plan 2011

Assessment

1. The proposal

1.1 The development proposes the construction of roof extension and 3 storey rear extension to provide 5 x 1 bedroom self-contained flats and external alterations including the formation of steps to corner retail unit, provision of 2 new windows to 1st & 2nd floor corner elevation to replace existing blank window features, construction of boundary wall at corner and along Camden Road frontage in place of existing car parking spaces and associated removal of 4 car parking spaces/hardstanding.

1.2 The main issues to assess on this application are :

- the principle of development,
- housing
- design and conservation impact
- amenity impact
- housing quality
- transport and

- energy & sustainability

1.3 It is noted that the plans submitted with the application lack detail (including clear annotations on materials) and that the application has not been submitted with an energy statement or air quality assessment.

2. Principle of Development

2.1 The proposed development would provide 5 additional residential flats at the site and would therefore increase housing supply in the borough in accordance with policy H1. The development would also not result in the loss of existing flats on the site in accordance with policy H3. While there is a need for additional housing in the borough and the general principle of adding to the housing stock is supported, there are significant concerns regarding the scale and design of the roof extension and infill building, which are discussed in detail in the design section below.

3. Housing

Affordable housing

3.1 The development would provide over 100 sq m of additional housing floorspace and is therefore required to make a payment in lieu (PIL) towards off-site affordable housing in the borough in accordance with policy H4. In accordance with policy H4 a 2% contribution is required for each 100 sq m of housing floorspace provided (rounded up).

3.2 The affordable housing contribution is calculated as follows: The development would provide 226m² GIA of additional residential floorspace, therefore the percentage target would be 4%. The proposed increase of floorspace in GEA is 257m². The existing PIL figure is £2,650 per m², based on GEA. The GEA floorspace target is 4% x 257 m² = 10.28 m². The financial contribution is therefore calculated as 10.28m² x £2,650 per m² = £ 27,242, which would have been secured via a Section 106 legal agreement had the development otherwise been acceptable.

Housing Mix

3.3 The existing site contains 4 x 3 bed flats at first and second floor levels. The development would provide an additional 5 x 1 bed flats within the proposed roof extension and infill building to the rear. The flats within the existing building would be changed to 4 x 2 bed flats.

3.4 Local Plan Policy H7 states that the Council will aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The Council will seek to ensure that all housing development, including the conversion of existing homes and non-residential properties contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and includes a mix of large and small homes. The Dwelling Size Priorities Table is based on the Camden Strategic Housing Market assessment (SHMA) and sets out the priority need for 2 and 3 bed market units in the borough. Large homes are defined in the policy as homes with 3 bedrooms or more; small homes are studio flats, 1-bedroom and 2-bedroom homes.

3.5 The proposed development would provide 5 x 1 bed flats and would therefore provide no larger units within the proposed housing mix. In addition, the development would also change the existing 4 x 3 bed flats on the site to 4 x 2 bed flats, resulting in the loss of these large family sized units. It is therefore considered that the proposed development, by virtue of the proposed mix of units which fails to provide an appropriate mix of large and small units, would fail to contribute to the creation of mixed, inclusive and sustainable communities contrary to Policy H7 of the Local Plan 2017.

4. Design and Conservation Impact

4.1 Camden Local Plan (2017) Policy D1 requires development to be of the highest standard of design that respects local context and character, and policy D2 requires development to preserve or

enhance the character and appearance of a conservation area.

4.2 The Camden Square Conservation Area Appraisal and Management Plan (CSCAAMP) states that care is needed to ensure sensitive and unobtrusive design to visible roof slopes. Alterations such as raising the roof ridge and the steepening of the roof pitch to the front, side or rear slopes is unlikely to be acceptable. The CSCAAMP) also states (para 7.4) that:

“gaps between buildings represent an important established feature of relief in an otherwise densely developed environment, where the buildings are generally arranged in terraces 3 storeys in height. The Council will resist development in gaps where they are formed :

- *between semi-detached and detached properties and*
- *garden development, where it can be seen from the public realm, will be resisted, in order to preserve green gaps within streetscapes and views along rear vistas.”*

4.3 The London Plan (2016) Policies 7.4, 7.6 and 7.8 and the National Planning Policy Framework (2012) are also relevant to the assessment of the application.

Roof Extension

4.4 The proposed roof extension would be formed of vertical elevations set behind the existing parapet with a flat roof above, constructed from mid-grey zinc cladding. The extension would have a height of 2.8 m (1.8 m above parapet level), a depth between 8.5-12.5 m and a width of 13m.

4.5 The site terminates the terrace at 155-183 York Way, which is a 3 storey Victorian terrace where the buildings mainly have inverted butterfly-style roofs set behind the parapets. The buildings at either end of the terrace at 155 and at 181-183 have flat roofs, but these are still set behind the parapets. The only building on the terrace which has a roof extension that is visible above the parapet is the property at no. 169 in the middle of the terrace which has a mansard roof extension. The site is also located on a prominent corner site at the edge of the Camden Square Conservation Area. The building is therefore also a part of the streetscene along the south side of Camden Road, which is mainly characterised by 3 storey plus semi-basement detached or semi-detached Victorian villas with low-pitched hipped roofs.

4.6 The Council’s Design Guidance in CPG1 states that roof alterations or additions are likely to be unacceptable in the following circumstances: where there is likely to be an adverse affect on the skyline, the appearance of the building or the surrounding street scene: where there is an unbroken run of valley roofs or complete terraces or groups of buildings have a roof line that is largely unimpaired by alterations or extensions.

4.7 The terrace at 155-183 York Way is a complete group of buildings which has a roof line that is largely unimpaired by alterations or extensions, as defined in CPG1. The fact that the terrace is largely unimpaired by alterations or extensions is an important part of its character. The proposed design, materials and form of roof extension are all uncharacteristic of this location and appear to take little account of the local context. The proposed roof extension to the site by reason of its height, scale and detailed design would be a prominent and incongruous addition to the terrace which would result in an adverse affect on the skyline, the appearance of the building and the streetscene contrary to CPG1. The design of the proposed roof extension would also be out of character with the adjacent Victorian villas on the south side of Camden Road, which have shallow pitched hipped roofs. The development would therefore be contrary to Local Plan policy D1 which states that development should be in keeping with the local character and would also harm the character of the conservation area contrary to Local Plan policy D2.

4.8 It is noted that no. 169 has a roof extension, however this was granted in 1983 prior to the current policy and conservation area controls. The roof extension at 169 is also considered to detract from the character of the terrace and is not considered to form a precedent for the further deterioration of the

roofscape of the terrace. It is also noted that the 5 storey building on the north eastern side of the junction off Brecknock Road (within LB Islington) has a different site context. The whole building is treated in a contemporary design and is not considered to set a precedent for the development of the application site.

Rear Infill Development

4.9 The proposed infill development would be a 3 storey building sited on the rear car park facing onto the Camden Road site frontage. This building would be constructed from zinc cladding with a flat roof and a projecting/angled/part glazed front element. This building would have a height of 8.3 m, a depth of 9.3 and a width of 5.6 m.

4.10 This proposed 3 storey infill development would be sited in the gap between the terrace on York Way and the adjacent detached villa at 282 Camden Road (the proposed building would be sited 0.2 m from the side elevation of 282 Camden Road at its closest point). This gap is considered to provide an important break in the built development between the terrace on York Way and buildings on Camden Road. It is also noted that there are regular gaps between the detached and semi-detached villas on the south side of Camden Road which are part of the character of the streetscene. As set out above the Camden Square Conservation Area Appraisal states that the gaps between buildings represent an important established feature of relief in an otherwise densely developed environment and the Council will resist development in gaps where they are formed between semi-detached and detached properties, in order to preserve gaps within streetscapes.

4.11 The proposed infill building would project forward of the established building line on Camden Road. It is acknowledged that the front wing of the existing building projects forward of this building line, but this is set-away from the adjacent building at 282 Camden Road and provides a bookend at the junction with York Way. The proposed infill building would be sited directly adjacent to the building at 282 Camden Road, where the impact of the projection beyond the building line would be greater. The design of the infill building, which would be constructed from zinc cladding with a projecting glazed element would also not be in keeping with the character and appearance of the existing building on the streetscene along this section of Camden Road, which have a traditional Victorian design and use of materials.

4.12 Overall, the proposed infill building, by reason of its layout, height, scale, materials and detailed design which would infill the gap and project forward of the established building line on Camden Road would be a prominent and incongruous addition to the building and the streetscene, to the detriment of the character and appearance of the host building, the streetscene and the wider Conservation Area contrary to Policies D1, D2 of the Local Plan.

Other Minor Alterations

4.13 The development also proposes some other minor alterations including the removal of the vehicle access from Camden Road to the rear of the site, the provision of a new boundary wall fronting Camden Road, the landscaping of the remaining rear parking area, the modification of the raised area at the corner of Camden Road and York Way and the installation of sash windows in the blocked up openings in the chamfered corner section of the building.

4.14 The proposed boundary alterations at the rear of the site facing Camden Road would involve the replacement of the existing high red-brick wall and access gate with a lower 1.2 m high wall topped with 0.4 m high railings and an adjoining section of wall and railings measuring 1.6 m high. The properties along this section of Camden Road are mainly characterised by low brick boundary walls, with higher brick piers, without railings. This low-level boundary treatment allows views through to landscaped gardens beyond. It is acknowledged that the site has poor quality boundary treatment at present, however the proposed replacement boundary treatment should be in keeping with the prevalent character along Camden Road. It is also noted that the adjacent building at 282 Camden Road has 1.8 m high railings along its frontage, however this boundary treatment is also considered to be out of character with the streetscene on Camden Road and should not set a precedent for this

development. Overall, it is considered that the proposed boundary treatment by reason of its height and design would be an incongruous addition which would fail to harmonise with the prevalent character of the front boundaries along Camden Road, to the detriment of the character and appearance of the streetscene and the wider Conservation Area contrary to Policies D1, D2 of the Local Plan.

4.15 The other proposed minor alterations including the installation of steps, a handrail and planter to the corner of Camden Road and York Way and the proposed new windows in the corner elevation to match the existing windows would not harm the character and appearance of the building and site and are supported.

Design conclusion

The host building is a 1990s replacement of an earlier development on the site. It has been executed with mixed success and is not noted as a positive contributor to the Conservation Area. It occupies a prominent corner location at the junction between two strongly defined and consistent townscape characters: a terrace with a largely unimpaired roofscape along York Way and pairs of villas with shallow hipped roofs along Camden Road. Neither townscape character lends itself to straight forward roof extensions, and as set out above development on the host building site must respond to both contexts. Officers therefore consider that there may be no opportunity to add a roof extension to this site.

The development proposals also include a significant and singular extension in the gap between the building and the neighbouring villa on Camden Road. Notwithstanding the side/rear location of the extension relative to the host building, the front elevation of the extension would be a prominent addition to the townscape along Camden Road. The extension completely removes any sense of the important gap that exists between the existing buildings and its materials and form are a jarring and incongruous addition which appears to take no account of the local character or context. Officers consider that there is limited prospect of adding any significant floorspace in this location.

The alterations to the boundary contribute further harm caused by the development by enclosing the site behind an uncharacteristic boundary treatment.

5. Amenity Issues

5.1 The proposed 3 storey infill development would be sited directly to the rear of the existing building. This new building would completely enclose the rear terraces to existing flats and would be sited only 1.8 m from the rear facing windows onto these terraces which provide light and outlook to habitable rooms. It is therefore considered that this would result in an unacceptable loss of outlook, light, and increased enclosure of the terraces and rooms within the existing building to the detriment of the amenity of the occupiers.

5.2 The proposed 3 storey infill development to the rear would be sited on the boundary with no. 179 York Way to the side/rear. This 3 storey development would project directly beyond the rear elevation of 179 which has windows and terraces to residential flats at first floor level. The upper floor rear elevation of 179 already faces onto the side elevation of 282 Camden Road, so the development would result in the enclosure of this rear elevation on two sides. It is considered that this would result in an unacceptable loss of light, and increased enclosure of the terraces and rooms at 179 to the detriment of the amenity of the occupiers and the application is therefore refused on this basis. A Daylight and Sunlight Assessment has been submitted, but this is a very basic document and does not include an assessment of the impact on adjacent properties using Vertical Sky Component (VSC) or Average Daylight Factor (ADF), nor does the document include any calculations or evidence base for its conclusions.

5.3 The proposed 3 storey infill development to the rear would contain terraces at the rear which would have some outlook over the rear yards/gardens of 177-179 York Way (commercial use) and the adjacent residential property at 282 York Way. However, it is not considered that this level of

overlooking would result in a material harm to amenity. It is also not considered that the terraces would generate unreasonable levels of noise.

6. Housing Quality

6.1 The development would provide 5 x 1 bed flats (3 within the rear infill building and 2 within the roof extension). The proposed units in the roof extension would be 1 bed/2 person units with a floorspace of 50 sq. m in accordance with the national minimum floorspace standards. The 3 units in the rear infill extension would be 1 bed/1 person units with a floorspace of 37 sq. m in accordance with the national minimum floorspace standards. The development would provide a reasonable standard of accommodation in other respects.

7. Transport

Car free housing

7.1 In accordance with Policy T2 the Council will limit the availability of parking and will require all new developments in the borough to be car-free. The Council will not issue on-street parking permits in connection with new developments and will use a s.106 legal agreement to ensure that future occupants are aware that they are not entitled to on-street parking permits. Had the development been acceptable in all other respects the proposed flats would have been secured as a car free by s.106 agreement. As the application is to be refused on other grounds this would be added as a reason for refusal which could be overcome at appeal through a s.106 agreement.

7.2 The removal of the existing 4 car parking spaces and associated vehicle which were provided as a part of application ref: 9401695 dated 25/05/1995 is supported. Had the development been otherwise acceptable the existing flats in the building would have also been secured as car free units.

Construction management

7.3 In accordance with Policy A1 the Council will protect the quality of life of occupiers and prevent unacceptable harm to amenity with consideration given to impacts during the construction phase, including the use of Construction Management Plans (CMPs) to reduce the impact of demolition, excavation and construction works on local amenity and highway safety. CMPs can be required where developments have poor or limited access on site and, developments that could cause significant disturbance due to their location. The development proposes a roof extension and rear infill extension which would have an impact on the local area and highway network due to construction vehicle movements and noise and disturbance. The site is in a constrained location on a TfL Red Route and the access to the site is off a busy road and junction. Had the development been acceptable in all other respects a CMP would have been secured by s.106 legal agreement. As the application is to be refused on other grounds this would be added as a reason for refusal which could be overcome at appeal through a s.106 agreement.

Highway works

7.4 In accordance with Policy A1 development-requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping. The construction of the development would be likely to cause damage to the public highway directly adjacent to the site from construction vehicles, plant and machinery. The development would also require off-site highway works to remove the vehicle access crossover via Camden Road and reinstate the pavement. Had the development been acceptable in other respects a highway contribution would have been secured by s.106 legal agreement. This contribution would be a bond which would be refunded to the developer if no damage is caused to the highway as a result of the development. As the application is to be refused on other grounds this would be added as a reason for refusal which could be overcome at appeal through a s.106 agreement.

Cycle parking

7.5 Policy T1 states that the Council will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning document Camden Planning Guidance 7. The development therefore requires a minimum of 5 CPG7 compliant long stay cycle parking spaces which should meet the design and layout requirements in CPG7. The submitted plan shows the location for some cycle parking, no details of the number or design of the cycle parking has been provided. The development would therefore fail to provide adequate cycle parking facilities and would fail to promote cycling as a healthy and sustainable way of travelling in this accessible location.

8. Energy & Sustainability Issues

8.1 The development needs to incorporate sustainable design and construction measures in accordance with policies CC1 and CC2 and London Plan Policy 5.2. Development is expected to follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies to achieve the fullest contribution to CO2 reduction. All developments involving five or more dwellings will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction. All new residential development will also be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). This can be demonstrated through an energy statement or sustainability statement.

8.2 The Council will expect developments of five or more dwellings and/or more than 500 sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible. This is in line with stage three of the energy hierarchy 'Be green'. The 20% reduction should be calculated from the regulated CO2 emissions of the development after all proposed energy efficiency measures and any CO2 reduction from non-renewable decentralised energy (e.g. CHP) have been incorporated.

8.3 Camden Planning Guidance (CPG) 3 states that measures to tackle climate change are integral in the development process and are a priority of the Council, therefore, they should not be seen as 'add-ons'. They are an essential element of sustainable development. CPG 3 states that in some circumstances, a Section 106 agreement may be required to secure a sustainability plan to provide and maintain the highest environmental standards of development. CPG 3 goes on to state that the following design features may be specified through a sustainability plan required to be submitted as part of a section 106 Agreement:

- energy efficient design measures;
- renewable energy facilities;
- waste and recycling storage facilities;
- water retention and recycling facilities;
- heating or cooling systems;
- internal water consumption levels; and
- materials sourcing proportion

Policy CC3 requires development to incorporate water efficiency measures. Development should demonstrate that the residential development is capable of achieving a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use).

8.4 The development has not been submitted with any details of sustainability, energy efficiency, renewable energy measures or water use contrary to policies CC1 and CC2. In the absence of details of energy efficiency, renewable energy and sustainability and due to the absence of a legal agreement to secure any of the above, the development would fail to meet the required environmental and sustainability standards to minimise the effects of climate change contrary to policies CC1 and

CC2.

9. Air Quality

9.1 Policy CC4 states that the Council will ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of the exposure of occupants to air pollution. The Council requires a basic air quality assessment for all newly erected buildings/substantial refurbishments and changes of use where occupants will be exposed to poor air quality (due to its location next to a busy road, diesel railway line or in a generally congested area).

9.2 The site is located adjacent to the busy Camden Road (A503) which has poor air quality to which the future residents of the development would be exposed. The development has not been submitted with any details of air quality mitigation measures contrary to policies CC4. In the absence of details of air quality and suitable mitigation the development would fail to meet the required air quality standards and would expose future residents to poor air quality contrary to policy CC4.

10. Impact on Trees

10.1 Policy A3 states that the Council will protect, and seek to secure additional, trees and vegetation. The Council will resist the loss of trees and vegetation of significant amenity value including proposals which may threaten the continued wellbeing of such trees and vegetation and will require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout. This policy also expects developments to incorporate additional trees and vegetation. The application has been submitted with a Tree Survey which indicates that the development would not impact on the existing Birch tree at the front of the site and that tree protection measures would be put in place during construction.

11. Conclusion

11.1 Overall, the development has been assessed by the Council and is unacceptable on a number of principle grounds. The design of the roof and side extensions and the boundary treatment fails to take account of the local context and would result in harm to the host building, local townscape and conservation area. The proposed mix of units would result in the loss of large flats and would contribute a poor mix of unit sizes to the housing stock. The side/rear extension to the building would result in harm to neighbouring amenity and the proposals have not demonstrated that adequate consideration has been given to the air quality amenity of future occupiers or to matters of environmental or transport sustainability. In the event that these issues were overcome the impact of the development would need to be mitigated by car-free, CMP and affordable housing measures, secured by legal agreement. The absence of an agreement to secure these measures is the basis for further reasons for refusal.