

KALEMINSTER LIMITED

**BARRIE HOUSE,
29 ST. EDMUND'S TERRACE,
LONDON, NW8 7QH**

PLANNING STATEMENT

APPLICATION FOR PLANNING PERMISSION

FEBRUARY 2018

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1.0 INTRODUCTION

- 1.1 This Planning Statement (“the / this Statement”) has been prepared by Montagu Evans LLP as part of an application for planning permission (“the / this Application”) by Kalemminster Limited (“the Applicant”) for the extension (“the Proposed Development” / “the Scheme”) of Barrie House, St Edmund’s Terrace, London, NW8 7QH (“the Site”).
- 1.2 The Proposed Development involves the redevelopment of an existing porter’s lodge and surface level car park to provide an extension on the northern elevation of the building, to accommodate additional residential dwellings.
- 1.3 The Application seeks planning permission for the following description of development:

“Redevelopment of existing porter’s lodge and surface level car park to provide a part four, part five storey extension (LG, G + 3) to Barrie House comprising nine residential units, cycle parking, refuse and recycling stores, hard and soft landscaping and relocated car parking spaces.”

- 1.4 Planning permission has previously been granted (on 8 November 2012) for the development of a three storey building to be used as a family dwelling house, in the location of the existing porters lodge (ref. 2011/6179/P) (hereafter referred to as the “2012 Permission”).
- 1.5 Full details of the Proposed Development are set out in the Design and Access Statement, prepared by Marek Wojciechowski Architects (“MWA”), which forms part of this Application.

Pre-application Engagement

- 1.6 Pre-application consultation has been undertaken with the London Borough of Camden (LBC) which has informed the design of the scheme, which has been revised to address comments raised during this process.
- 1.7 Pre-application advice was sought by the Applicant in April 2017 for a range of development including the extension of the building at both the northern elevation and at roof level, and the creation of lower ground residential units within Barrie House.
- 1.8 A site visit was undertaken on 20 June 2017 and formal written pre-application advice was subsequently received on 25 October 2017 from LBC case officer, Elaine Quigley (ref. 2017/2019/PRE). A number of revisions to the Pre-application proposals were made between the site visit and issuing of the formal advice.
- 1.9 The amendments to the scheme has resulted in the removal of the rooftop extension and basement units from the Proposed Development. This formed the basis of a

meeting, held under a Planning Performance Agreement (PPA) agreed between the applicant and LBC, on 20 December 2017.

- 1.10 In addition to the above, the Applicant met with existing residents within Barrie House on 6 December 2017. Residents of seven of the existing flats attended the consultation event which was held on-site, within Flat 20. A number of exhibition boards were presented, with a question and answer session.
- 1.11 The residents expressed support for the proposals, especially for the need for more housing, in line with the London Plan. The removal of the derelict lodge, the proposed landscaping and erection of a boundary wall, that would increase security, were all well received.
- 1.12 The Applicant has also considered other points raised by residents, including improved accessibility in terms of the external pathways to the buildings and in reducing potential conflict between existing and proposed dwellings in terms of overlooking and amenity issues. The Applicant team has sought to amend the Scheme where possible to reflect the comments raised.
- 1.13 The Applicant will continue to engage with the planning officers and residents through the PPA process and throughout the determination of the Application.

Purpose and format of the Planning Statement

- 1.14 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.
- 1.15 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This assessment brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning judgement on the merits of the proposals.
- 1.16 The scope of supporting information has been established with regard to the national and local list requirements, alongside feedback during the course of pre-application engagement with LBC officers. The schedule of documents is set out in **Table 1.1** below.

Table 1.1 – Schedule of Application Submission Documents

Title	Author
Schedule BH-1: Documents Submitted	Montagu Evans
Cover Letter	Montagu Evans
Application Form (including Ownership Certificates)	Montagu Evans
Schedule BH-2: Drawings Schedule	Montagu Evans
Location Plan (@1:1250)	MWA

Existing, Demolition and Proposed Application Drawings (inc. elevations, floor plans, sections).	MWA
Design and Access Statement	MWA
Planning Statement	Montagu Evans
Landscape Proposal	Exterior Architecture
Transport Statement	Mayer Brown
Energy Assessment	Eight Associates
Sustainability Assessment	Eight Associates
Daylight and Sunlight Report	Malcolm Hollis
Draft Construction Management Plan (inc. Pro Forma)	RPS
Noise Survey	Emtec
Arboricultural Report	John Cromar
SUDS Assessment	Motion
Basement Impact Assessment	Parmarbrook
Air Quality Assessment	Air Quality Consultants
CIL Form	Montagu Evans

1.17 This Planning Statement demonstrates that the Scheme would:

- Deliver sustainable development of brownfield land within London, in line with the overarching approach to development outlined in the NPPF;
- Deliver a development that would contribute positively to the delivery of the vision for Camden and its strategic objectives;
- Apply a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building;
- Deliver a design of high quality architecture that would be well-related to the surrounding context and the host building itself;
- Allow the development of nine high quality residential units, consistent with the strategic objectives of all tiers of planning policy, promoting residential development within accessible locations;
- Provides an opportunity to maximise the residential potential for the site, developing an area of underutilised land, within the existing site boundary; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which promotes sustainable means of travel such as cycling and walking.

1.18 **Section 2** of this Statement provides background information on the Site including its planning history. **Section 3** sets out details of the Proposed Scheme. **Section 4** summarises the planning policy relevant to the Site, and the proposals are assessed against these policies in **Section 5**. Summary and conclusions are contained within **Section 6**.

2.0 SITE LOCATION AND PLANNING HISTORY

Application Site

- 2.1 The Site is situated within the administrative area of the London Borough of Camden (LBC) and comprises a site area of approximately 0.227 ha (2268 sqm). A site location plan is enclosed with the application submission.
- 2.2 The Site is located within the Primrose Hill area of London, occupying a corner plot which is bounded by St Edmund's Terrace to the south and Broxwood Way to the west. It is on the edge of London Borough of Camden, with the City of Westminster boundary located along St Edmund's Terrace.
- 2.3 The Site is currently occupied by Barrie House, a nine storey building (LG, G + 7), arranged in a 'T-shape', which comprises 24 residential units, the majority of which are currently in occupation. The building appears to date from the 1960s.
- 2.4 The main building is situated centrally within the plot, which is surrounded by hard and soft landscaping. Soft landscaping is most notable along the eastern part of the Site, comprising a landscaped garden, with a number of mature trees, also located along the southern boundary.
- 2.5 An area of hardstanding is located to the north of Barrie House, which is currently used for car parking. This is location of the proposed extension. The car parking area currently accommodates a total of 14 spaces, although their dimensions fall short of recognised standards. Around 10 of these are currently used by existing tenants.
- 2.6 A two storey 'porter's lodge' is also situated on the Site, along the north western boundary, which is vacant (and has been since at least 1987) and now derelict.
- 2.7 Access into the Site is afforded through a pedestrian gate on St Edmund's Terrace and a double 'in and out' vehicular driveway from Broxwood Way.
- 2.8 The Site has a number of easements which create restrictions on the land, including a lease of land from Thames Water, along the eastern boundary and restrictive covenants on the western boundary with Broxwood Way.
- 2.9 The existing buildings are not listed and nor is the Site located within a conservation area.
- 2.10 There is a total of 2,547.5 sq m (GIA) of existing floorspace on the Site, of which 2,491.2 sqm is within Barrie House and 56.3 sq m is the porter's lodge.

Surrounding Area

- 2.11 St Edmund's Terrace is characterised by a number of large residential properties with buildings occupying the majority of their plots, including Parkwood Point and St

Edmund's Court. The majority of the surrounding uses are residential, although the Site is in close proximity to public open spaces, including Primrose Hill and Regent's Park.

2.12 Adjoining the Site to the:

- North is the Kingsland estate, which comprises two rows of linear buildings, of three to four storeys, comprising residential accommodation. A paved central courtyard runs between the two buildings. Beyond this is Primrose Hill;
- East is no.35 St Edmund's Terrace, a seven storey residential apartment block. Adjacent to this is a new apartment complex, built in 2016. To the north east is Barrow Hill Reservoir, an early 19th Century reservoir, which was last used in 2002;
- South is St Edmund's Terrace, a tree lined street, opposite which are Parkwood Point and St Edmund's Court, which are 6-7 storey residential blocks. Approximately 120m to the south is Regent's Park. The borough boundary with the City of Westminster runs along the road; and
- West is Broxwood Way, on the opposite side of which is a modern residential development, known as Regents Gate, which was completed in 2014-2015 and comprises a number of buildings of up to six storeys.

2.13 The surrounding area therefore comprises mainly residential uses, although public open space also forms a main feature for the area.

2.14 As noted above, the Site is not located within a conservation area. The nearest conservation area is Elsworthy (within LB Camden), located to the west and north of Primrose Hill. There are no conservation areas on the other Site of the borough boundary, designated by Westminster.

2.15 There are no listed buildings immediately adjacent to the Site. Within 250m of the Site, the following are located:

- No. 25 Avenue Road (Grade II);
- Regent's Park (Grade I Park and Garden); and
- Primrose Hill (Grade II Park and Garden).

2.16 In addition to the above, we note that the adjacent Barrow Hill Reservoir was subject to a Certificate of Immunity from listing (COIL) which was in place from 2012 to 2017.

2.17 A more detailed description of the Site and surrounding area is provided in the Design and Access Statement prepared by MWA.

Accessibility

- 2.18 The Site has a Public Transport Accessibility (PTAL) of 1b which is categorised as being at the lower end of the accessibility scale. However, we consider, through professional judgement and an assessment of the Site's context, that a PTAL rating of 2 would be more appropriate in this instance. This is discussed further below and within the Transport Statement.

Rail Accessibility

- 2.19 The nearest London Underground station is St John's Wood, located approximately 1025m to the west (approximately 13 minutes walking time) providing services on the Jubilee line.
- 2.20 The PTAL calculation does not take into account, the Underground and bus services at St John's Wood as it falls marginally outside of the maximum walking distance (960m) (by 64 metres. Reasonably, however, residents are likely to walk this additional distance to St John's Wood (less than 1 minute) to access public transport links.

Bus Accessibility

- 2.21 The Site is accessible to London's bus network. The nearest bus stop is situated 290m from the site, at Prince Albert Road and Avenue Road which serves Route 274, which runs from Angel Islington to Lancaster Gate.
- 2.22 As noted above, further bus services are located at St John's Wood to the west of the Site, with six further services.

Site and Planning History

- 2.23 The following section provides a review of the planning history associated with the Site.
- 2.24 Most notably, planning permission was granted on 8 November 2012 for the demolition of the existing Porters Lodge and the erection of a three storey building with basement as its replacement, for use as a single family dwellinghouse (Class C3) (ref. 2011/6179/P).
- 2.25 The principal of creating a new dwellinghouse and maximising the supply of housing, in place of the derelict porter's lodge building was considered acceptable.
- 2.26 We understand that the planning permission was not implemented, and it therefore expired in November 2015.
- 2.27 The only other noteworthy application, was for alterations to the existing Barrie House building to replace all windows and the majority of panels on the façade. This application was approved (ref. 2009/3559/P) on 12 October 2009. Subsequently, a

non-material amendment to the permission was granted on 16 June 2010 (ref. 2010/2808/P). This has been implemented and completed.

- 2.28 The majority of other applications relating to the Site involve works to trees within or adjoining the boundary of the Site, which are subject to Tree Preservation Orders (TPOs).

3.0 DEVELOPMENT PROPOSALS

3.1 As set out in **Section 1** of this Statement, the Application proposes the redevelopment of an existing porter's lodge and surface level car park to provide an extension on the northern elevation of the building, to provide additional residential dwellings.

3.2 The Scheme involves the retention of the existing Barrie House building, the demolition of the porter's house, only. Excavation of a basement level underneath the new extension, is proposed.

3.3 During the pre-application stage, a number of comments were made by LBC officers and subsequent amendments were made to the design of the development, which are identified within the Design and Access Statement. These can be summarised as follows:

- Removal of previously proposed fourth floor level to extension;
- Footprint of extension reduced and moved away from Broxwood Way;
- Further consideration to façade treatment and articulation of elevations;
- Lower ground and ground floor residential units combined to create duplex units;
- Windows and side elevations reduced in number and size to protect privacy of adjacent properties;
- Removal of penthouse extension to Barrie House;
- Removal of excavation under Barrie House to provide lower ground floor units; and
- Overall reduction in number of units proposed from 15 to nine.

3.4 The existing Barrie House and porter's lodge comprises 2,547.5 sq m sqm of floorspace (GIA).

Residential Accommodation

3.5 The Scheme proposes a total of nine residential units, located across all floors of the new extension (lower ground through to third floor levels, i.e. five floors).

3.6 A mix of units are provided, including 7 x 2 bed and 2 x 3 bedroom units. Flats 1 to 4 are duplex units located at lower ground and ground floor levels, two of which are the three bedroom units being proposed. Two lateral apartments are located on both the first floor and second floor levels. At third floor, the building is set back from the front elevation and a single lateral apartment is provided. The majority of flats have aspect from more than two sides.

3.7 All of the proposed units exceed the minimum space standards, ranging from 70 sqm to 90 sqm for the two bedroom units and 94 sqm and 101 sqm for the three bedroom units, respectively. The proposed apartments would provide spacious and high quality dwellings for future occupants.

- 3.8 All of the proposed dwellings are provided with private amenity spaces, in the form of terraces. The three bedroom units are provided with larger rear gardens.
- 3.9 The Proposed Development comprise 856.4 sqm (GIA) of new build floorspace, which is an uplift of approximately 800 sqm following the demolition of the porter's lodge.

Proposed Extension

- 3.10 The proposed extension to Barrie House, comprises a five storey structure (LG, G + 3), which steps down to three storeys on the western, front-facing façade. A sedum roof is proposed on both flat roof areas, above second and third floors. This would not be used as roof terraces.
- 3.11 It is four storeys lower than the existing residential block. The height of the building has been developed in the context of the surrounding context, including the existing residential block and the Kingsland Estate buildings.
- 3.12 The extension does not extend further than the front or rear elevation of the existing Barrie House.

Parking, Access and Storage

- 3.13 Vehicular access to the Site is maintained via Broxwood Way. Pedestrian access is also maintained via both Broxwood Way and the entrance on St Edmund's Terrace. A low wall is, however, proposed along Broxwood Way, to improve site security, which was a request of existing Barrie House residents.
- 3.14 The main entrance to the extension is to be provided through a new entrance doorway. The Barrie House entrance will be retained for existing residents. The entrance leads to an entrance foyer which includes stair and lift access to other levels.
- 3.15 Some car parking spaces are to be relocated to the western boundary of the Site, close to the main vehicular entrance / exit. There will be a total of 10 spaces, which are to be solely used by the existing Barrie House residents.
- 3.16 Cycle storage is to be provided at ground level, within Barrie House. In total, 22 spaces are provided, in the form of Sheffield stands. There will be 18 spaces within a cycle store, which will be accessible, step-free, secure and covered. A further four spaces (within Sheffield stands) are located externally.
- 3.17 The Scheme provides waste and recycling facilities in line with the current requirements. Existing waste facilities serving existing residents are located beside the porter's lodge.

- 3.18 Existing bin storage will be relocated to the north western edge of the Site, adjacent to Broxwood Way. Additional storage will be provided for the new residents. Access for collection from the street would be via the adjacent vehicular gate. The strategy for waste storage and collection is detailed within the Design and Access Statement.
- 3.19 Facilities have been provided in each of the apartments for storage, before being moved to the communal storage for collection. At least three containers will be provided within each dwelling.

Hard and Soft Landscaping

- 3.20 The Proposed Development also provides a comprehensive landscape design. The Scheme seeks to reduce the amount of hardstanding and any retained or new areas of hardstanding are proposed as permeable paving to improve the sustainable drainage within the Site.
- 3.21 Planting zones are proposed along the boundary walls, and to the front of Barrie House, whilst soft landscaping will be improved, where possible. In total the area of permeable land will increase from 50% to 68%, as a result of the Proposed Development.
- 3.22 A number of trees are proposed to be removed, although none of these are subject to TPOs and all are either dead, infested or of poor quality. In addition, a number of replacement trees are proposed to be planted along the boundaries of the Site.

4.0 PLANNING POLICY FRAMEWORK

4.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 5** provides an assessment of the Application against the policies and guidance contained within these documents.

National Guidance

4.2 The National Planning Policy Framework (the "NPPF") was published on 27 March 2012 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government's approach to planning matters, and is a material consideration in the determination of planning applications.

4.3 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through decision-taking (paragraph14). This paragraph goes onto state that:

"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."*

4.4 In March 2014, the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level.

Statutory Framework

4.5 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

4.6 The Statutory Development Plan for the Site comprises:

- London Plan (consolidated with Alterations since 2011) (2016); and
- LB Camden Local Plan (July 2017).

Emerging Policy

London Plan Alterations

- 4.7 The current plan was produced in 2011 and has been subject to numerous 'Alterations', most recently in 2016. These alterations have refined policy on housing and parking standards, but not revised the strategic objectives of the plan.
- 4.8 On 1 December 2017, the Mayor produced a Draft London Plan for consultation until 2 March 2018. Once adopted, this version will supersede the 2016 consolidation plan.
- 4.9 The Draft London Plan is currently a material consideration in planning decisions, and will gain more weight as it moves the process to adoption. The current timetable anticipates Examination in Public in Autumn 2018 with the final adoption in Autumn 2019.

Regional Guidance

- 4.10 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:
- SPG: Affordable Housing & Viability (August 2017);
 - SPG: Crossrail Funding (March 2016);
 - SPG: Housing (March 2016);
 - SPG: Accessible London: Achieving an Inclusive Environment (October 2014);
 - SPG: The Control of Dust and Emissions During Construction and Demolition (July 2014);
 - SPG: Shaping Neighbourhoods: Character and Context (June 2014);
 - SPG: London Planning Statement (May 2014);
 - SPG: Sustainable Design and Construction (April 2014);
 - SPG: Play and Informal Recreation (September 2012);
 - SPG: Land For Industry and Transport (September 2012);
 - SPG: London View Management Framework (LVMF) (March 2012); and
 - SPG: Planning for Equality and Diversity in London (October 2007).

Local Guidance

- 4.11 LB Camden has a number of adopted supplementary planning documents (SPDs) and other documents which are a material consideration in respect of the Application, including:
- CPG1: Design;
 - CPG2: Housing;
 - CPG3: Sustainability;
 - CPG4: Basements and lightwells;

- CPG6: Amenity;
- CPG7: Transport; and
- CPG8: Planning obligations.

4.12 LBC is currently undertaking a review of the CPGs to ensure that they reflect the new updated policies within the Camden Local Plan. Consultation on a number of draft documents was ongoing until 12 January 2018. This included a partial review of the Housing CPG and revised versions of the CPGs on Basements and Amenity, among others.

Site Specific Designations

4.13 The Camden Planning Policy Map does not identify the Site as having any planning land use designations.

4.14 The Site is noted to be adjacent to the Barrow Hill Reservoir, which is designated as both Open Space and Metropolitan Open Land. The same designations are afforded to Primrose Hill.

4.15 As previously noted, the Site does not contain a listed building and is not located within a conservation area.

5.0 PLANNING POLICY ASSESSMENT

5.1 Within the section, we assess the component parts of the Proposed Development against the statutory development plan and other material considerations as outlined in **Section 4**.

Principle of Development

5.2 The Proposed Development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is a priority land use in Camden.

5.3 Housing delivery is also one of the core NPPF objectives and it advocates policy that seeks to significantly boost the supply of housing (paragraph 47). Furthermore, the NPPF states that *“housing applications should be considered in the context of the presumption in favour of sustainable development”*.

5.4 Paragraph 47 of the NPPF also requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market.

5.5 London Plan Policy 3.3 (Increasing Housing Supply) states that there is a *“pressing need for more homes in London”*. Part D of the policy states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets through the intensification of brownfield housing sites and mixed use redevelopment, including of surplus commercial capacity.

5.6 Table 3.1 of the London Plan identifies an annual target of 889 new homes per annum in Camden (8,892 in total from 2016 to 2025). The Draft London Plan (Table 4.1) seeks to increase this figure to 1,086 new homes per annum (10,860 in total from 2019/20 to 2028/29).

5.7 Emerging Draft London Plan Policy H2 (Small sites) states that small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through planning decisions. This will:

- significantly increase the contribution of small sites to meeting London's housing needs;
- diversify the sources, locations, type and mix of housing supply;
- support small and medium-sized housebuilders; and
- support those wishing to bring forward custom, self-build and community-led housing.

- 5.8 Table 4.2 of the Draft London Plan sets out an annual target of 376 new homes within Camden to be provided on small sites. Emerging Policy H2(D) states that boroughs should apply a presumption in favour of the small housing development which provide less than 25 homes, on infill development and underused sites.
- 5.9 At the local level, Policy H1 (Maximising housing supply) aims to secure a sufficient supply of homes and maximise the supply of housing to exceed the target of 16,800 additional homes between 2015/16 and 2030/31 (including 11,130 additional self-contained homes).
- 5.10 Policy H1 states that self-contained housing is the priority land use of the Local Plan. The policy also states that LBC will resist alternative development of sites already identified through a current planning permission, unless it is shown that it is no longer developable for housing. Furthermore, where sites are underused or vacant, the maximum reasonable provision of housing will be expected.
- 5.11 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.
- 5.12 It is noted that LBC Policy T2 (Parking and car-free development) supports the redevelopment of existing car parks for alternative uses.
- 5.13 As noted above, the Site has already benefitted from a planning permission, granted in 2015, for the development of an additional self-contained dwelling. The Proposed Development seeks to increase the residential capacity of the Site, to provide an additional nine apartments.
- 5.14 The provision of nine units on Site is considered to fully accord with the aims of the development plan and would assist LBC in meeting its targets for housing delivery. The location of residential development in this location, close to other residential uses should be supported.

Residential Density

- 5.15 London Plan Policy 3.4 (Optimising Housing Potential) seeks to optimise housing density, having regard to local context, design principles and public transport accessibility.
- 5.16 The optimum density ranges are set out within London Plan Table 3.2, known as the 'sustainable residential quality density matrix'. The Site has a Public Transport Accessibility Level of 1b, although we consider the more appropriate assessment of the Site would be as PTAL 2. The density matrix sets out that the appropriate range should be between 200-450 habitable rooms per hectare and 45-170 units per hectare.

- 5.17 Emerging Draft London Plan Policy D6 (Optimising housing density) states that proposals must make the most efficient use of land and be developed at the optimum density, which should be design-led, taking account of the site context, connectivity and accessibility, and capacity of surrounding infrastructure. The Plan proposes to remove the density matrix.
- 5.18 The GLA Housing SPG (2016) requires the density of new residential development in accordance with the London Plan.
- 5.19 Policy G1 (Delivery and location of growth) supports development that makes best use of its site and resists development that makes inefficient use of the land.
- 5.20 The existing Site contains 16 residential units, on a site which is 0.2268 hectares (i.e. density of 71 units per hectare). The addition of nine dwellings within the Proposed Development would increase the density to 110 units per hectare. Using the adopted density matrix, both the existing and proposed density would be within the appropriate range. This is consistent with the appropriate density set out within the London Plan.
- 5.21 The Proposed Development has been carefully designed to optimise the density of development in line with planning policy objectives, whilst ensuring that it does not represent overbearing or dominating development.
- 5.22 Having regard to the tests of local context, design and public transport accessibility, the proposed density would be wholly appropriate in consideration of the London Plan density matrix. It also accords with the objectives of the new Draft London Plan, which seeks to optimise density on small sites and brownfield land.

Housing Mix

- 5.23 National planning policy contained in the NPPF requires new development to deliver sustainable, inclusive and mixed communities in accessible locations. To achieve mixed communities, the NPPF advises that a variety of housing should be provided in terms of size, type, tenure and price and also a mix of different households such as families with children, single person households and older people.
- 5.24 Policy 3.8 (Housing Choice) of the London Plan seeks to ensure that new residential developments comprise a mix of unit sizes to address the housing needs of the local area. The policy does not, however, specify a precise mix of housing types.
- 5.25 Emerging Draft London Plan Policy H2 (Housing size mix) requires a consideration of the appropriate mix based on a number of qualitative criteria. This includes the need to deliver a range of affordable homes, the nature and location of the site, the aim to optimise housing potential and the role of one and two bedroom units in freeing up family housing.

- 5.26 Local Plan Policy H7 (Large and small homes) aims 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.
- 5.27 All housing development should contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which identifies a high priority for two and three bed market units. However, Policy H7 also states that LBC will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number of considerations.
- 5.28 The Proposed Development provides a 7 x 2 and 2 x 3 bedroom development. This has been formulated in consideration of the character of the development, the Site size and the viability / demand of certain homes.
- 5.29 Overall, this meets the aim of Policy H7 with regard to the provision of high priority housing in the form of two and three bedroom units. This is appropriate, given the Site's context and design of the development.

Housing Design

- 5.30 London Plan Policy 3.5 (Quality and Design of Housing Developments) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The policy adds that the design of new dwellings should take account of "factors relating to 'arrival' at the building and the 'home as a place of retreat', have adequately sized rooms and convenient and efficient room layouts".
- 5.31 The policy also states that LDFs should incorporate minimum space standards that generally conform to Table 3.3 of the London Plan, which is comparative to the Nationally Described Space Standards, introduced by the Government.
- 5.32 Emerging Draft London Plan policy H2 states that "new build homes on sites capable of accommodating less than ten units, which are on the ground floor should meet M4(2) standard for 'accessible and adaptable dwellings' and provide step-free access. New build homes on these sized sites that are not on the ground floor do not need to meet M4(2) standards and can comply with the M4(1) standard, which does not require step-free access."
- 5.33 Local Plan Policy H6 (Housing choice and mix) seeks to secure high quality accessible homes in all developments that include housing, and will:
- a) *expect all homes to meet the nationally described space standard;*
 - b) *require 90% of new-build homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2);*

- c) *require 10% of new-build homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3); and*
- d) *where the full requirements of Building Regulation M4(2) and M4(3) cannot be secured, seek design of 10% of homes in each development to meet M4(3) requirements as far as possible, and for any homes in the development that are not broadly consistent with M4(3), seek design to meet M4(2) requirements as far as possible."*

- 5.34 The accommodation schedule showing the size of each unit is outlined in the Design and Access Statement, in accordance with the NDSS and London Plan.
- 5.35 All of the proposed units exceed the minimum space standards, ranging from 70 sq m to 90 sqm for the two bedroom units and 94 sqm and 101 sqm for the three bedroom units, respectively. The proposed apartments would provide spacious and high quality dwellings for future occupants.
- 5.36 The Design and Access Statement shows that all units have been designed to meet as many of the Part M criteria as possible. Flats 3 to 9 are compliant with Doc M4(2), whilst flats 1 and 2 are 90% compliant with Doc M4(2), providing entrance level WCs in compliance with Doc M4(1). All flats are provided with level thresholds, with compliant lift, stairs, doorways and corridor widths.
- 5.37 Access from the flats is through the main door into the protected core and then in the occupants will congregate in the car park the event of a fire or similar emergency.
- 5.38 Additionally, the Mayor's Housing SPG (2016) sets out a requirement for a minimum of 5 sqm of private outdoor space that should be provided for 1 – 2 person dwellings and an additional 1 sqm for each additional occupant (Standard 4.10.1). Emerging Plan Policy D4 seeks to move this into the Draft London Plan as policy.
- 5.39 Each of the proposed residential units are provided with private amenity space. The two bedroom units are provided with terraces, at a minimum of 7.8 sq m. The three bedroom units are provided with larger garden spaces, far exceeding the minimum guidance. The two bed flat on the third level is also provided with a spacious terrace.

Affordable Housing

- 5.40 Paragraph 50 of the NPPF states that local planning authorities should, where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities.

- 5.41 Policy 3.11 in the London Plan requires Boroughs to set an affordable housing target having regard to housing need assessments and a realistic assessment of supply.
- 5.42 Policy 3.12 in the London Plan emphasises that a range of factors must be considered when assessing the level of affordable housing on a particular proposal. It states that:
- “A) the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:*
- a) current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 and 3.10 and 3.11*
 - b) affordable housing targets adopted in line with Policy 3.11*
 - c) c) the need to encourage rather than restrain residential development (Policy 3.3)*
 - d) d) the need to promote mixed and balanced communities (Policy 3.9)*
 - e) the size and type of affordable housing needed in particular locations*
 - f) the specific circumstances of an individual site.”*
- 5.43 Local Plan Policy H4 (Maximising the supply of affordable housing) seeks to provide 5,565 additional affordable homes from 2015 to 2030 and aims for an appropriate mix of affordable housing types. LBC expects a contribution to affordable housing from all developments that include housing and provide one or more additional home.
- 5.44 The guideline mix, as set out in Policy H4 is 60% social-affordable rented housing and 40% intermediate housing and targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing is generally considered to create capacity for one home. The Policy identifies:
- “a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;*
 - an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;*
 - where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;”*
- 5.45 The Proposed Development provides nine residential units at 856.4 sqm (GIA), and therefore has a capacity for nine homes based on the calculation set out in Policy H4. A payment-in-lieu of affordable housing is therefore acceptable on this Site and no affordable housing is provided on site.

Design Principles

- 5.46 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 7 of the NPPF outlines the requirement for good design and sets out that development should:
- *“Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
 - *Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
 - *Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
 - *Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
 - *Are visually attractive as a result of good architecture and appropriate landscaping.”*
- 5.47 Chapter 7 of the London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces. Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve the highest standards of accessible and inclusive design, while Policy 7.4 (Local Character) 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”. Part D of Policy 7.6 (Architecture) states that buildings and structures should “not cause unacceptable harm to the amenity of surrounding land and buildings”.
- 5.48 The Draft London Plan sets out its policies regarding design in Policies D1 to D4. This includes Policy D2 (Delivering good design).
- 5.49 LBC’s Local Plan Policy D1 (Design) seeks to secure high quality design in development and requires development to:
- a. *“respects local context and character;*
 - b. *preserves or enhances the historic environment and heritage assets...;*
 - c. *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
 - d. *is of sustainable and durable construction and adaptable to different activities and land uses;*
 - e. *comprises details and materials that are of high quality and complement the local character;*

- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g. is inclusive and accessible for all;*
- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. incorporates outdoor amenity space;*
- m. preserves significant and protected views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.”*

5.50 The GLA has also published Supplementary Guidance to the London Plan. SPG: Achieving an Inclusive Environment provides detailed advice and guidance on providing inclusive design in London.

5.51 Local Plan Policy C5 (Safety and security) requires developments in the Primrose Hill area to demonstrate that they have incorporated design principles which contribute to community safety and security.

5.52 Local Plan Policy C6 (Access for all) seeks to promote fair access and expects all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely and easily and with dignity by all. The Council seeks to ensure that development meets the principles of lifetime neighbourhoods.

5.53 As noted in **Section 3**, a number of design changes were made as a result of comments received during the pre-application stage, including:

- Removal of previously proposed fourth floor level to extension;
- Footprint of extension reduced and moved away from Broxwood Way;
- Further consideration to façade treatment and articulation of elevations;
- Lower ground and ground floor residential units combined to create duplex units;
- Windows and side elevations reduced in number and size to protect privacy of adjacent properties;
- Removal of penthouse extension to Barrie House;
- Removal of excavation under Barrie House to provide lower ground floor units; and
- Overall reduction in number of units proposed from 15 to nine.

5.54 A comprehensive Design and Access Statement prepared by MWA is submitted as part of the Application. This document sets out in detail an evaluation of the Scheme's

design and the manner in which this has progressed as a result of the consultation undertaken. It also provides precedent imagery in terms of the materials, which provides a strong presence of brickwork and render banding, complemented by lime-washed brickwork and stone features.

- 5.55 The massing of the Proposed Development has been developed in the context of the surrounding development (most notably Kingsland) and the existing Barrie House. In addition, the bulk of the Scheme has been developed in consideration of the impact on the daylight and sunlight currently enjoyed by surrounding residents.
- 5.56 The scale has been reduced during the design of the Scheme to split the mass into two connected blocks, with the front and rear blocks reflecting the townhouse nature of Kingsland. As noted in the Design and Access Statement, the landscaping to the north of the Site will emphasise the existing breathing space between blocks.
- 5.57 Through the redevelopment of the existing hardstanding car park area and the improved permeability of other hardstanding areas, the area of permeable land within the Site is due to increase by 11%, whilst retaining a similar area of green amenity space.
- 5.58 The Landscaping Proposal document, prepared by Exterior Architecture provides full details of the proposed landscaping within the development, including sketch plans, details of materials, planting and management and maintenance of the landscape.
- 5.59 Overall, the landscaping has been developed to have a minimal impact on the existing residents, whilst providing an enhanced and more enjoyable and useable space. The permeability of the Site will be improved, as would the arrival sequence for pedestrians and visitors and improved boundary treatment.

Residential Amenity

- 5.60 At the local level, Camden Local Plan Policy A1 (Managing the impact of the development) seeks to protect the quality of life of occupiers and neighbours and will grant planning permission for development unless this causes unacceptable harm to amenity. The Policy states that LBC will:
- a) *“seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
 - b) *seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
 - c) *resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
 - d) *require mitigation measures where necessary.”*

- 5.61 The factors considered as part of the Policy include:
- e) visual privacy, outlook;
 - f) sunlight, daylight and overshadowing;
 - g) artificial lighting levels;
 - h) transport impacts;
 - i) impacts of the construction phase
 - j) noise and vibration levels;
 - k) odour, fumes and dust;
 - l) microclimate;
 - m) contaminated land; and
 - n) impact upon water and wastewater infrastructure.

Daylight and Sunlight

- 5.62 The Application is supported by a Daylight and Sunlight Report, prepared by Malcolm Hollis, which provides an assessment of the impact of development upon the daylight and sunlight amenity of surrounding buildings. The assessment has been undertaken in accordance with the BRE's '*Site Layout Planning for Daylight and Sunlight – a Guide to Good Practice (2011)*'.
- 5.63 The assessment of the impact on daylight has shown that 214 of the 216 surrounding windows tested pass the BRE tests (i.e. 99%). Two windows in question were located within 1-45 Searle House and Barrie House, respectively, although neither are the principal windows of the property and the latter has another window serving the same room, which will not be affected.
- 5.64 In the sunlight assessment, all of the 55 windows tested will continue to meet the target values set out in the BRE guidelines.
- 5.65 An internal daylight and sunlight assessment has also been undertaken for the Proposed Development. For internal daylight, 28 out of 29 of the habitable rooms within the proposed extension (96%) would pass the average daylight factor criteria. The assessment also highlights that the Proposed Development meets the BRE criteria with regard to internal sunlight, with each flat having a main room which receives a 'reasonable amount' of sunlight.
- 5.66 Overall, the Proposed Development is considered to have a very minor effect on the daylight and sunlight amenity currently enjoyed by surrounding residential properties, and in the context of the existing condition and BRE guide, the impacts are acceptable overall.

Construction

- 5.67 A draft Construction Management Plan has been produced to demonstrate how construction impacts will be minimised. Further details of this are set out below and contained within the document, produced by RPS.

Noise

- 5.68 A 24-hour noise level survey has been carried out by Emtec and submitted as part of this Application. The report assesses the nearest properties that might be affected by plant within the new extension and recommend noise limits and any mitigation measures required.
- 5.69 It is proposed to install external air cooled condensing units on each of the terraces to the front and rear of the properties. The nearest noise sensitive windows will be the properties within Broxwood Way. On this basis, a recommended design rating level has been proposed and it is likely that some form of noise control measures will be required. This can be analysed further once the external plant has been finalised and a condition can be applied to guarantee this.

Overlooking and Privacy

- 5.70 The design of the fenestration has been carefully considered to prevent any occurrences of overlooking between the extension and other surrounding dwellings, including Barrie House and Broxwood Way.
- 5.71 The distance between the proposed extension and the southern wing of Barrie House is approximately 16 metres. Nevertheless, windows on this elevation have been minimised and the internal layout designed to include bedrooms, rather than living rooms along this elevation. Windows on the northern elevation have also been minimised, and will likely be screened by landscaping.
- 5.72 Overall, the Proposed Development is considered to be acceptable in terms of maintaining the existing amenity enjoyed by existing residents, as well as ensuring that the amenity of future residents is also protected. There should be limited instances of overlooking or loss of privacy.

Transport

- 5.73 Section 4 of the NPPF sets out the Government's policies with regard to transport. Paragraph 32 sets out the requirement for all developments that generate significant amounts of movement to be supported by a Transport Statement. It is also stated (paragraph 34) that:

“plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”.

- 5.74 Chapter 6 of the London Plan provides the regional guidance for transport. Policy 6.1 (Strategic Approach) seeks to encourage the “*closer integration of transport and development*”, while supporting “*development that generates high levels of trips at locations with high public transport accessibility and/or capacity*”.
- 5.75 Policy 6.10 aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.
- 5.76 At the local level, Local Plan Policy T1 (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 5.77 As part of this Application, a Transport Statement has been produced by Mayer Brown which assesses the Proposed Development in terms of its transport impact.
- 5.78 The report sets out that the additional units are likely to generate approximately 1-3 person movements during the weekday morning peak and around 21 movements during the entire day, with the majority of the trips completed via public transport modes and on foot.
- 5.79 Overall, the Proposed Development is unlikely to have an impact on the transport network given the relatively small change in trip generation. The development is considered to be fully in accordance with the policy at national, regional and local level.

Car Parking

- 5.80 The NPPF requires Local Authorities to consider parking provision within new developments, based upon the accessibility of the development and the opportunities for public transport, whilst recognising that there is a need to reduce the use of high emissions vehicles.
- 5.81 Policy 6.13 (Parking) of the London Plan aims to achieve an appropriate balance between promoting new development and preventing excessive car parking provision.
- 5.82 Local Plan Policy T2 (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be car-free. It is noted that the policy also supports the redevelopment of existing car parks for alternative uses. Car parking will be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.

- 5.83 The Policy also states that on-site parking permits in connection with new developments will not be issued to future residents. On-site parking will be limited to spaces designated for disabled people or essential operational or servicing needs.
- 5.84 The existing car parking area comprises 14 sub-standard parking spaces which are not large enough and do not provide sufficient manoeuvring room. However, only 10 of these spaces are currently used by the existing residents of Barrie House.
- 5.85 The proposed extension is intended to be 'car free' with new residents restricted from obtaining a parking permit. However, the overall proposals do involve the re-provision of car parking for the existing residents. A total of 10 off-street parking spaces are to be reorganised and provided on the western part of the Site.
- 5.86 The Proposed Development therefore offers an improvement to the existing situation by removing inappropriate and unused parking and replacing this with a useable car park and maintaining area for servicing by delivery vans.

Cycle Parking

- 5.87 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 5.88 London Plan Policy 6.9 encourages new development to contribute to the increase of cycling through the provision of cycling parking facilities. The cycling parking requirements seek 2 spaces per dwelling for two bedroom units and above. In addition to the above, there should be 1 space per 40 units for visitors.
- 5.89 To promote cycling in the borough and ensure a safe and accessible environment for cyclists, LBC will seek to ensure that development:
- provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; and
 - makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.
- 5.90 The Proposed Development provides a total of 22 cycle parking spaces, which exceeds the London Plan minimum requirement for 19 spaces.
- 5.91 The cycle store is located within the lower ground floor level, underneath Barrie House. An unused storage room at this level is to be converted into bike storage. A new access stair is to be provided close to the main entrance, behind the new landscaping

area. Additional storage is located externally, the form of hoops, which will be close to the bin storage.

Energy and Sustainability

- 5.92 The NPPF seeks to ensure the delivery of renewable or low carbon energy developments in order to address Climate Change and achieve environmental sustainability through improving biodiversity and minimising waste.
- 5.93 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green' energy hierarchy. It seeks for residential development to be zero carbon from 2016 to 2031. However, these targets primarily apply for major developments and therefore are not necessarily relevant in the context of this application.
- 5.94 At the local level, Camden Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 5.95 LBC promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.
- 5.96 Local Plan Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measures such as:
- a. *"the protection of existing green spaces and promoting new appropriate green infrastructure;*
 - b. *not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;*
 - c. *incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and*
 - d. *measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy."*
- 5.97 An Energy Assessment and Sustainability Assessment has been prepared by Eight Associates as part of this Application. The reports provide the baseline energy requirements for the Proposed Development and identify the reduction in energy demand as a result of energy efficiency measures.
- 5.98 The Proposed Development complies with 2013 Building Regulations Part L and the minimum energy efficiency targets have been followed to ensure that the actual dwelling CO2 emissions rate (DER) is no greater than the notional building CO2 target emissions rate.

- 5.99 As a result of following the GLA's Energy Hierarchy, the Proposed Development would achieve 20.2% carbon emissions savings over Part L of the Building Regulations 2013. Approximately 7.7% of this will be from fabric energy efficiency measures, with the remainder coming from the further inclusion of low and zero carbon technologies (i.e. PVs).
- 5.100 The Sustainability Assessment sets out the energy efficiency measures which have been included within the design and specification of the Scheme, including:
- A water consumption target of 105 litres/person/day through implementation of water efficiency and reuse measures;
 - A sustainable materials procurement policy and an efficient waste strategy on site including at least 85% of waste to be diverted from landfill;
 - Protection and enhancement of ecology on site and the appropriate actions to ensure protected species; and
 - An emphasis on local supply and labour to encourage employment opportunities and to offer a diverse, self-sustaining environment.
- 5.101 The Proposed Development would have a net neutral impact on the impermeable area of ground at the site, as the proposed extension would be located on the existing hardstanding car park area and the loss of the small grassed area within the existing access road at the front of the site would be re-provided by new soft landscaping and planting areas surrounding the Scheme.
- 5.102 Sustainable Urban Drainage Systems (SUDS) would be introduced as part of the development. Existing hardstanding will be replaced by permeable paving, to overall increase the permeable land on the Site. Raised planters would act as bio-retention systems, slowing down runoff and attenuating surface water drainage.
- 5.103 Additional planting and landscaping proposals will provide further assistance in terms of drainage.

Subterranean Works and Construction

- 5.104 Local Plan Policy A5 (Basements) states that basement development will only be permitted where it is demonstrated to its satisfaction that the proposal would not cause harm to:
- a) *“neighbouring properties;*
 - b) *the structural, ground, or water conditions of the area;*
 - c) *the character and amenity of the area;*
 - d) *the architectural character of the building; and*
 - e) *the significance of heritage assets.”*

5.105 The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- f) *“not comprise of more than one storey;*
- g) *not be built under an existing basement;*
- h) *not exceed 50% of each garden within the property;*
- i) *be less than 1.5 times the footprint of the host building in area;*
- j) *extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;*
- k) *not extend into or underneath the garden further than 50% of the depth of the garden;*
- l) *be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and*
- m) *avoid the loss of garden space or trees of townscape or amenity value.”*

5.106 Extensive guidance is provided in Camden Planning Guidance 4 (CPG4) on Basements and Lightwells which was produced in July 2015. An updated draft version was released for consultation in November 2017.

5.107 The Proposed Development, which includes a single level basement, meets the criteria identified in Policy A5, above. It is proposed to excavate a single level basement underneath the proposed extension, as well as extending the existing tank room below the main Barrie House building, utilising existingcroft.

5.108 In determining proposals for basements, LBC requires an assessment of a scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and, where appropriate, a Basement Construction Plan.

5.109 Parmarbrook has produced a Basement Impact Assessment which forms part of this Application and is in accordance with LBC's requirements and policies on this matter. The report is supplemented by a number of appendices which provides additional detailed information regarding the basement construction and assessment.

- A detailed Desk Study including site history, utilities, and existing buildings and structures.
- A summary of the site-specific Site Investigation including geology, hydrogeology, and hydrology.
- An appraisal of the impact of the proposed underground structures with the locality.
- An appraisal of the existing structure as it relates to the works and the final proposal.
- Illustrative and quantitative details of the proposed structure to be further developed in the Detailed design phase.
- Outline construction sequence to be further developed by the Contractor.

- Predicted ground movements, discussion of the implications, proposed monitoring regime, and movement trigger levels.
 - The Proposed Structural Drawings.
 - CGL Site Investigation Report.
 - Results of the Thames Water Asset Search.
- 5.110 The report provides a screening exercise in accordance with Camden's Planning Guidance, which identifies the key issues. Parmarbrook has then undertaken a scoping exercise, which reviews the potential impacts of the basement development and identified the required actions to be undertaken, including ground investigations.
- 5.111 The results of the screening exercise has shown that the groundwater levels across the site have been found to be variable, although with the proposed development not increasing the proportion of hardstanding on site, it is not anticipated to impact the amount of surface water able to drain into soils.
- 5.112 The proposed development is not anticipated to affect the shrink/swell capacity of the London Clay Formation. The Proposed development will not increase the proportion of hardstanding on site and impact on surface water run-off or surface water attenuation characteristics is assessed negligible.
- 5.113 It is expected that the cumulative impact from the construction of the basement will be negligible. Based on the distance to neighbouring properties the ground movements are anticipated to have a negligible impact on the neighbouring structures.
- 5.114 We understand that LBC will use its independent consultants to assess the Basement Impact Assessment, and the project team will provide further information, as necessary, if requested by LBC / independent consultant.

Trees

- 5.115 The NPPF states, at Paragraph 118, that developments should aim to conserve and enhance biodiversity by applying a number of principles, and avoiding significant harm. It states that planning permission should be refused for development that results in the loss of aged or veteran trees found outside ancient woodland, unless the need for, the and benefits of, the development in that location clearly outweigh its loss.
- 5.116 London Plan Policy 7.21 (Trees and Woodlands) states that existing trees of value should be retained and any loss as the result of development, should be replaced. Where appropriate, additional trees should be planted.
- 5.117 LBC Policy A3 (Biodiversity) seeks to protect and secure additional trees and vegetation by resisting the loss of trees and vegetation of significant amenity, historic, cultural or ecological value and requiring retained trees to be protected during demolition and construction of the development. Developments should incorporate additional trees and vegetation wherever possible.

- 5.118 The Application includes a Report on the Impact of Trees, prepared by John Cromar's Arboricultural Limited which assesses the existing amenity value of trees and the impact of the Proposed Development.
- 5.119 There are a number of trees within the Site boundary, which are subject to Tree Preservation Orders (TPOs), although the majority of these are located away from the existing car park, on the eastern and southern parts of the Site. Whilst the majority of these trees are assessed to be of low value or poor quality, all TPO trees are to be retained.
- 5.120 A number of trees are proposed to be removed, many of which are either dead, infested or of poor quality. A number of replacement trees are proposed, primarily along the boundaries of the Site, including a new tree in the location of the new car parking area, fronting Broxwood Way.
- 5.121 The report concludes that the Proposed Development, subject to a number of implemented precautionary measures will not be injurious to the retained trees and will not require unreasonable numbers of trees of public amenity value to be removed. Any trees losses are to be addressed by replanting.

Construction Management Plan

- 5.122 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan (CMP) Pro Forma has been drafted and submitted with this application by RPS. This is accompanied by a draft version of the CMP.
- 5.123 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 5.124 We note that this draft document will be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

Refuse and Recycling

- 5.125 Camden Local Plan Policy CC5 (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 5.126 The Proposed Development encourages the reduction of waste and promotes recycling within dwellings. Each apartment is proposed to be fitted with an three waste and recycling containers within the kitchen unit.

5.127 In addition to the integrated storage within kitchen units, the Scheme provides a new secure storage facility, accessed via Broxwood Way. The existing waste and recycling storage capacity (2 x 1100L) would be relocated and an additional 2 x 110L and 2 x 240L bins would be provided, to serve the additional nine residential units. It is proposed for occupants to bring their waste from the dwellings to the communal bin store to be collected.

Community Infrastructure Levy

5.128 Within this assessment, consideration is given to the Mayoral CIL requirements which came into effect on 1 April 2012. The rate for LB Camden is set at £50 per sqm for all development types.

5.129 We note that the Mayor is currently undertaking a review of the Mayoral CIL charging schedule and consulting on an increase to the rate for all London Boroughs. For LBC, there is a proposed increase to £80 per sqm. Higher rates are proposed in Central London for office, retail and hotel use.

5.130 In addition to the above, LB Camden adopted its Community Infrastructure Charging Schedule in March 2015 which has applied since 1 April 2015. This outlines a rate of £500 per sqm rate for residential developments (Class C3) in the North area ('Zone C') of the Borough, if less than 10 dwellings (or 1,000 sqm) are proposed.

5.131 A CIL Form has been submitted with this Application which outlines the relevant information for the Scheme.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 The Proposed Development seeks the extension of Barrie House to provide an additional nine residential units.
- 6.2 The Planning Statement has assessed the proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 6.3 The Scheme has been formulated in accordance with the NPPF, the adopted London Plan, the LBC Local Plan. The emerging Draft London Plan has also been taken into consideration.
- 6.4 The Proposed Development would accord with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 6.5 The Scheme has been developed as part of pre-application discussions with LB Camden and consultation with local residents. As a result, scheme changes have been incorporated to respond to comments received.
- 6.6 The Site had previously benefited for a planning permission for a single family dwelling house in place of the porter's lodge. The Proposed Development seeks to intensify the residential use of the Site and maximise its residential potential, which is a key priority at all tiers of planning policy.
- 6.7 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Successfully delivering sustainable development of brownfield land within London, in line with the overarching approach to development outlined in the NPPF;
 - Delivering a development that would contribute positively to the delivery of the vision for Camden and its strategic objectives;
 - Seeking to apply a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building;
 - Delivering a design of high quality architecture that would be well-related to the surrounding context and the host building, Barrie House;
 - Allowing the development of nine high quality residential units, consistent with the strategic objectives of all tiers of planning policy, promoting residential development within accessible locations, and in providing a mix of unit sizes and types;

- Providing an opportunity to maximise the residential potential for the site by optimising density in line with the objectives of LBC and the Mayor;
- Contributing to the sustainable travel objectives of national, regional and local planning policy, by reducing the amount of car parking on the Site and promoting sustainable means of travel such as cycling and walking. The proposed extension is intended to be 'car free';
- Protecting the amenity of existing residents in the neighbouring buildings, and providing high quality spaces with excellent amenity for new residents, including large amenity spaces and living areas; and
- Enhancing the quality of landscaping on Site, by removing poor quality trees, replanting and providing landscaped areas. The permeability of the Site is also to be improved.

6.8 In light of the above, we respectfully request that LBC grants planning permission for this Scheme.