

Transport Assessment Map

Key

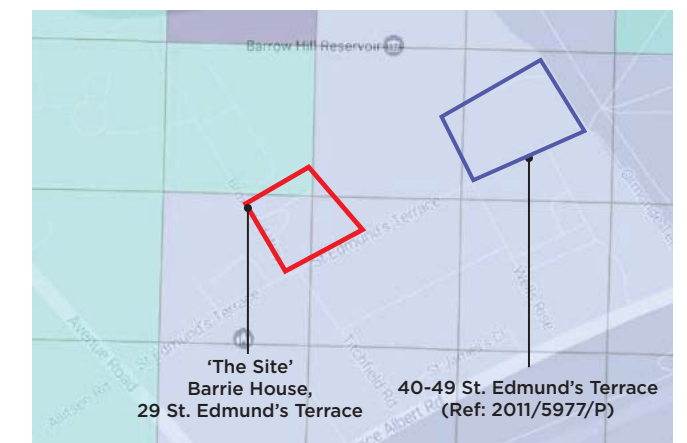
- Major Bus route (274, 187, 46)
- Cycle Hire Stations
- Underground Station



1.7 Transport Assessment

- i. According to the WebCAT Planning Tool (TfL), the Application Site falls within a Public Transport Accessibility Level (PTAL) of 1b ('Very Poor') and 2 ('Poor'). This section looks to demonstrate why we believe the site should be considered as having a PTAL rating of 2.
- ii. As the diagram to the left demonstrates, the Application Site at Barrie House benefits from a number of nearby transport links. Just a few minutes walk from the site is a major bus route which connects Primrose Hill to Hyde Park (West) and Angel (East). Within a 13 minute walk is St. John's Wood Underground station which provides access to the Jubilee Line.
- iii. There are a number of cycle hire stations along Prince Albert Road and within walking distance to the application site. Further, the proposed scheme meets the requirements of planning policy in terms of cycle provision by over-providing the required number of cycle spaces for future residents and visitors in a secure cycle-store on site.
- iv. It is noted in CS11 of Camden's Core Strategy that as part of its approach to minimising congestion and addressing the environmental impacts of travel, the Council will look favourably on developments that minimise the provision for private car-parking. Camden's Development Policy DPI8 further notes that 'The Council will seek to ensure that developments provide the minimum necessary car parking provision.' Aside from providing existing residents off-street parking spaces and disabled parking provision, the proposed scheme looks to support Camden's policy regarding car-free development by restricting eligibility for future residents' parking permits.
- v. Furthermore, following planning permission on 09/10/2012, the site at 40-49 St Edmund's Terrace was redeveloped for a high density housing scheme to create 38no residential dwellings. According to WebCAT planning tool, the site also has a PTAL rating of 1b. However, the development benefited from a PTAL 2 rating and therefore a density range of 200-450 habitable room per hectare, according to the application submitted and permitted by Camden Council (ref: 2011/5977/P).
- vi. Mayer Brown have been appointed to investigate the PTAL rating of the site. The findings of the study indicate that the site should be considered as a PTAL Rating 2. The detailed Transport Assessment has been appended to this document (Appendix B).

\* Walking times obtained from Transport for London's website.



WebCAT Planning Tool - PTAL Map (Approx. site outlined in red)

Key

- PTAL 1b ('Very Poor')
- PTAL 2 ('Poor')



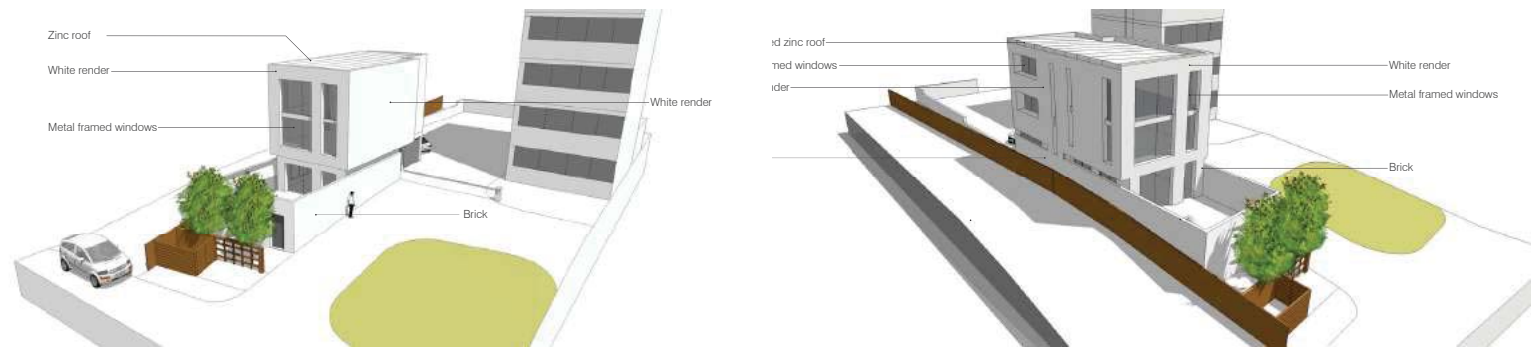


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SECTION 2.0

# PLANNING POLICY





**2.1 Planning History**

i. All relevant planning history at the Property address available online is listed below:

**2011/6179/P (08/12/2012)**

Consent granted (now expired) for 'Erection of 3-storey building with basement (following demolition of Porters Lodge) for use as a single-family dwellinghouse (Class C3).'

**2010/2808/P (16/06/2010)**

Consent granted for 'Non material amendments to planning permission dated 12/10/2009 (ref: 2009/3559/P for 'alterations to existing residential building including replacement of all windows, installation of bathroom and kitchen extractors on north east elevation and replacement of panels on the south west, north west and north east elevations'). Amendments relate to alterations to windows to central staircase on south east and south west elevations, and replacement of solid lower panels with glass at 6th and 7th floor levels on the south west, north west and north east elevations.'

**2009/3559/P (12/10/2009)**

Consent granted for 'Alterations to existing residential building including replacement of all windows, installation of bathroom and kitchen extractors on north east elevation and replacement of panels on the south west, north west and north east elevations.'

**PWX0302120 (08/04/2003)**

Consent granted for 'The erection of a glass reinforced plastic shroud to enclose telecommunications antenna at rooftop plant room level, as shown on drawing numbers; 10151A-S001/A; S002/C; S003/C; S005/D; S006/B; and supporting statement dated 10 February 2003; and 4 x unnumbered A3 sheets of photomontage.'

ii. A number of properties in the surrounding area have been granted similar developments in recent years, including:

**40-49 St Edmund's Terrace, NW8**

**09/10/2012 (2011/5977/P)**

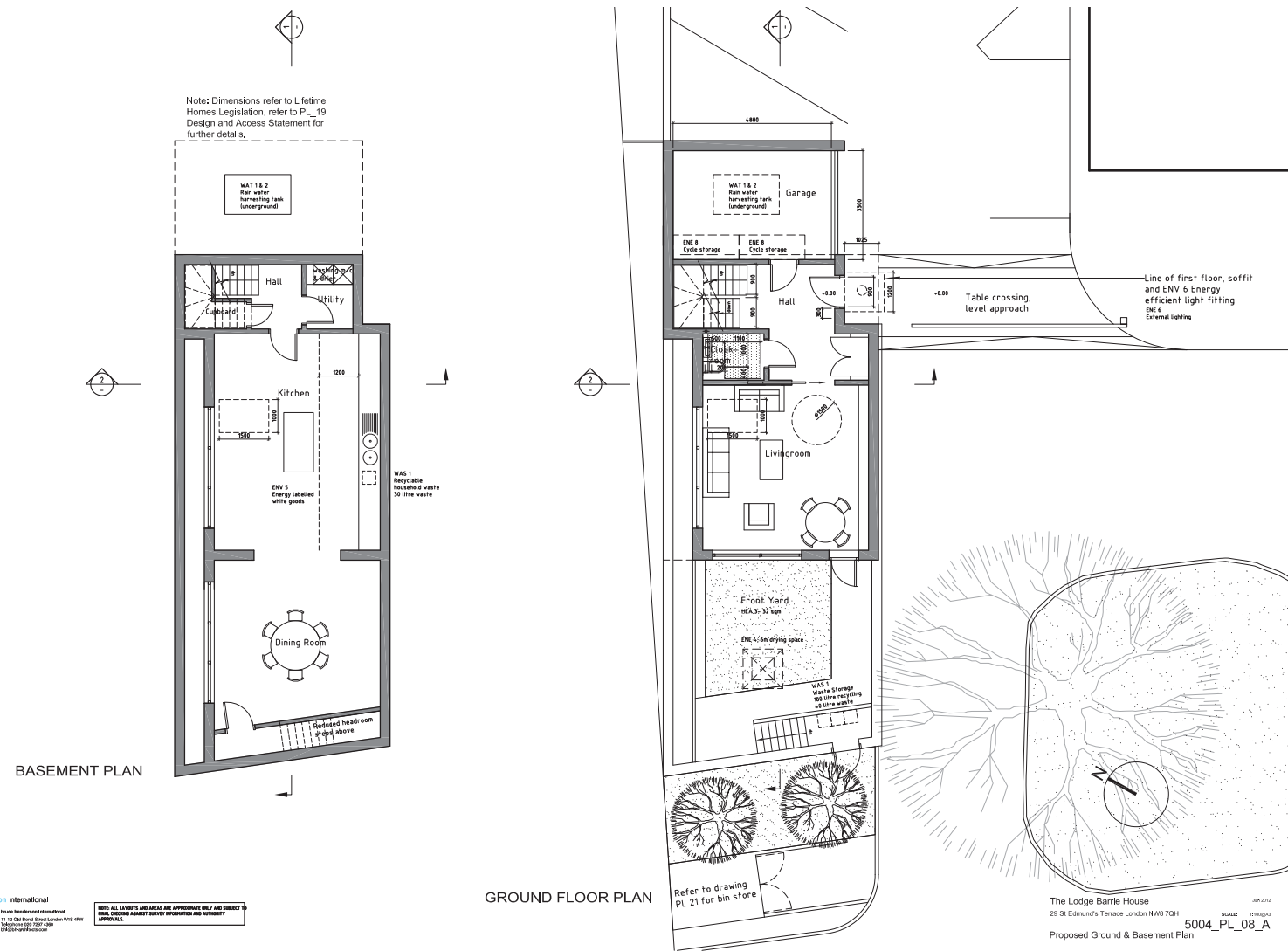
Consent on Appeal for the 'Erection of three blocks of flats (two 6-storey blocks and one 5-storey block) with basement to provide 36 private tenure residential units (Use Class C3) and erection of 2 storey dwelling with basement (Use Class C3), following demolition of existing 8 flats and 2 houses.'

**Guinness Court, St Edmund's Terrace, NW8**

**13/12/2010 (2010/4850/P)**

Consent granted for the 'Erection of two buildings (4-storeys and 6-storeys) with basement to provide 64 (28 private and 36 affordable) residential units (2 x 4-bedroom, 15 x 3-bedroom, 19 x 2-bedroom, and 28 x 1-bedroom) with 29 car parking spaces (19 underground and 10 surface level), 71 cycle parking spaces, and associated landscaping (following demolition of all existing buildings on site).'

iii. The similarity of the applications listed above suggest the proposals outlined in this document would be deemed acceptable (in principle) in planning terms. The policy implications of these proposed changes are considered on the following page.



**brucehenderson International**  
 Bruce Henderson International  
 1 City Road, London EC1Y 1BB  
 Tel: +44 (0)20 7460 1000  
 www.brucehenderson.com

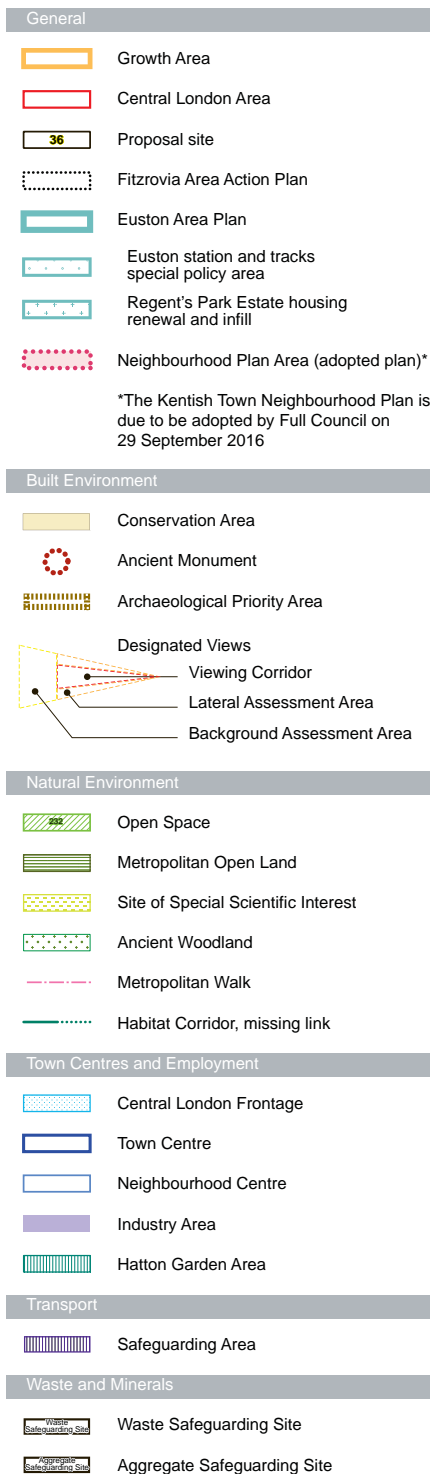
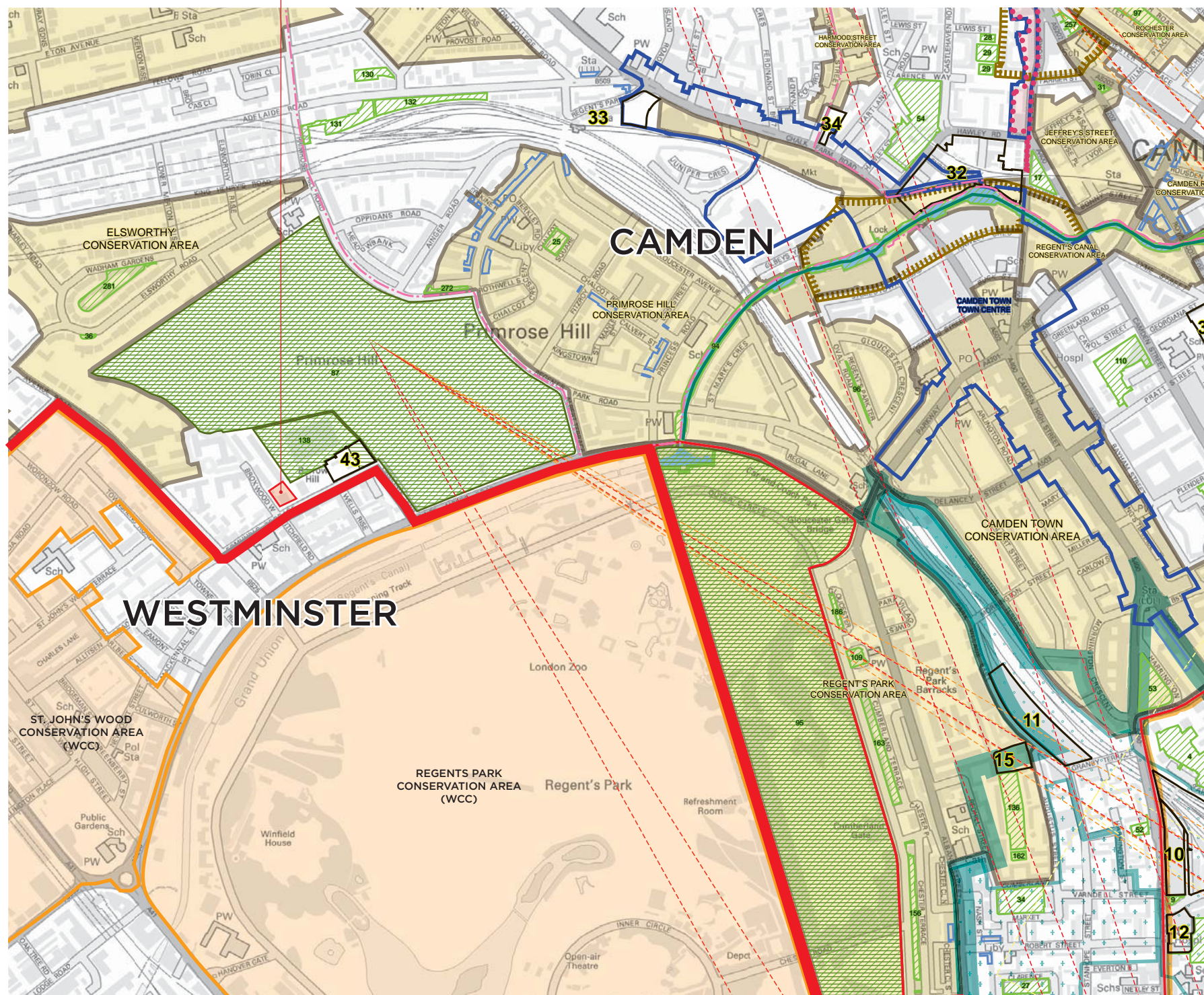
**NOTE: ALL DRAWINGS AND DETAILS ARE APPROVED ONLY AND SUBJECT TO THE CONDITIONS AND LIMITS OF THE CONTRACT AND ANY SUBSEQUENT AMENDMENTS.**

The Lodge Barrie House  
 28 St Edmund's Terrace London NW8 7QH  
 SCALE: 1:1000  
 5004\_PL\_08\_A  
 Proposed Ground & Basement Plan

**Barrie House, St. Edmund's Terrace**  
 Existing & Consented Drawings (REF: 2011/6179/P)



'The Site'  
Barrie House,  
29 St. Edmund's Terrace



2.2 Planning Policy

i. Policy DP2 of the Camden Development Policies states that 'The Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing, by: a) expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site.' (p.22)

ii. Policy DP27 covers basements and lightwells, noting that the Council will not permit basements which include habitable accommodation in areas prone to flooding, or resulting in the loss of more than 50% of front garden and amenity area. The site is located outside of Flood Zones 2 or 3 and therefore not in an area at risk of flooding.

iii. In light of the above, we believe that the proposed development provides an opportunity to increase the number of homes on a currently underused site, which is a positive move towards meeting Camden's housing supply. 'Section Two' of this report covers the proposed design changes related to this redevelopment.

Camden Policies Map  
Local Development Framework (2016)



- Transport
- Sustainability and climate change
- Air quality
- Nature conservation and biodiversity
- Trees and landscaping
- Community safety
- Waste
- Play and open space
- Planning obligations
- CIL

**Principle of development**  
The proposal includes 12 self-contained residential flats. The provision of additional residential floorspace within the Borough is strongly supported by policy H1, which highlights the need to maximise the supply of housing.

① The principle of building an extension and/or a new building on the northern side of the site is considered acceptable, subject to its overall height, massing, form, scale, footprint and detailed design that will be addressed below.

**Design, Conservation and Heritage**  
The original scheme has been revised to reduce the footprint of the building to make it the same as the south wing. This has been achieved by reducing its length by 2.7m at the rear, 1.2m at the front and reducing its width by 0.9m. The height has been reduced from 5 storeys to 4 storeys. While the reduction in height is a positive move generally, the design changes are not considered to go far enough and the proposal is considered too tall in terms of its height and too large in terms of its footprint in relation to the existing post-war residential block on the site. It is considered that the existing building sits comfortably on the site (which includes an historic domestic garden on its eastern side, which forms a green 'breathing' gap in the streetscape). The proposed extension would remove the breathing gap to the north between the existing site and the neighbouring Council estate block known as Kingsland. As a point block, the building was designed to offer high-rise residential accommodation with substantial open space around it.

The original scheme raised concerns that the flank wall of the proposed extension would read as a dominant feature in the surrounding area, most notably in the view down the 'urban street' which is the central feature of the public housing accessed from Boxwood Way to the immediate north of the site abutting Primrose Hill. Although the existing residential block is clearly visible in the line of vision along this thoroughfare, an additional large building immediately adjacent to this development would be too dominant and provide an excessive sense of enclosure. The revised scheme still reads as a dominant feature, particularly at the lower levels.

② The proposed building envelope and its design are taking cues from Barrie House tower. However this has not been successfully achieved by the amended design which now looks like a 1980's housing block with no strong articulation on the front elevation thereby weakening the scheme. In order to resolve these issues it may be necessary to remove a further floor from the building to restrict its height to three storeys. Its footprint should be reduced to push the extension further back from the Broxwood Way elevation.

PRE-APPLICATION ADVICE (P.1/12)

- ① Noted.
- ② Noted.
- ③ Noted; footprint and height has been reduced.
- ③p MWA note that the 'breathing gap' has been increased compared to the existing condition.
- ④ Noted; see point 3.1 above.
- ⑤ Noted; consideration has been given to the design to create a stronger articulation of the front elevation.
- ⑥ Noted; number of units reduced to enable the reduction of height of the development and to push the footprint back from the Broxwood Way elevation.

Concerns were previously raised by the detailed design of the original proposal. The submitted visuals indicated a facade design which reads as a separate building in its own right from the existing block with an arguably stronger architectural hierarchy and vocabulary than the host building (including the highly articulated ground floor colonnade and tall floor to ceiling heights of the upper floors).

The detailed design has been amended to mirror the design of the existing tower with what appears to be similar floor to ceiling heights (albeit no section drawings have been submitted to confirm this). It is considered that the articulation of the facades is out of scale with the existing building. The revised scheme waters down the robustness of the building by introducing windows on the side elevations. You may like to examine this aspect of the proposal to remove these windows or confine them to small slot windows that are present in southern side elevation of Barrie House.

⑥ I would strongly encourage you to explore other options for development of this part of the site as the current proposal does not satisfactorily address the Council's concerns. You may wish to consider removing the glass infill extension that adjoins the northern side elevation of the existing building and create a stand-alone building rather than an extension. You could also consider the townscape sensitivities and explore the option of providing town houses on the site which would help to break down the height and footprint of any new development here.

⑦

⑧ Given the nature of the proposal, we consider this scheme would be required to be presented to the Council's Design Review Panel; but that this should only be undertaken when a more suitable design has been put forward.

**Housing Mix, Unit Size and Quality of Accommodation**

Housing mix  
Policy H6 (Housing choice and mix) advises that the Council seeks to secure a variety of housing suitable for existing and future occupiers across development in the Borough. Policy H7 seeks to provide a range of unit sizes to meet demand across the Borough. For market units, table 1 of this policy considers 1-beds/studios to have a lower priority, 2 bedroom units to be of high priority, 3-bed units high priority and 4-beds (or more) a lower priority. Social-affordable rented units have a lower priority for 1-beds/studios, high priority for 2 and 3 bedroom units and a medium priority for 4 bedroom (or more). For intermediate affordable there is a high priority for 1-beds, a medium priority for 2-beds and a lower priority for 3-bed and 4-bed (or more).

⑨ All the flats within the proposed development would be exclusively 2 bed room 3 or 4 person flats. This does not provide a choice and mix of homes in line with policy H7 and would be unacceptable. I strongly suggest that this element of the scheme be reviewed to provide a better housing mix, including more 3 bed flats.

Unit size  
⑩ The proposed dwellings would be designed to meet and exceed the London Plan (2016) and the Nationally Described Space Standards (2015) standards in terms of size and layout for 2 bed 3 person and 2 bed 4 person units.

Quality of accommodation  
⑪ Six of the new flats would be located within the newly extended basement. Two of these flats would be single aspect and would have windows opening out onto a lightwell. It is considered

PRE-APPLICATION ADVICE (P.2/12)

- ⑥ Noted; an alternative facade treatment has been developed.
- ⑥p Noted.
- ⑦ Noted.
- ⑧ Noted.
- ⑨ Noted; unit mix amended.
- ⑨p Noted; see above.
- ⑩ Noted; all dwellings will meet London Plan (2016) and Nationally Described Space Standards (2015) in terms of size and layout.
- ⑪ Noted; the revised proposal has fewer basement units and these are now the lower ground levels to the proposed duplex apartments.

that the outlook from these flats would be severely restricted by the 2m high wall and railing that lies within 1.1m of the full height glazed window openings. This would compromise the prospective occupiers' outlook and quality of natural light. The remainder of the flats would have windows in the side elevations as well as the front and rear elevations. This would provide a more acceptable standard of living accommodation by creating dual aspect units; however, installing windows in the southern side elevations of the existing building and the northern side elevation of the proposed new build may prejudice future development opportunities of neighbouring sites and would be strongly discouraged. The removal of windows in the side elevations of the basement levels of the existing building and the proposed extension may affect the quality of the flats. Due to possibility that the flats may become single aspect, with deep floor plans, the daylight and sunlight into these flats may be severely compromised. A daylight and sunlight assessment would be required to analyse the internal light levels into the new flats as well as neighbouring properties that may be affected by the new extension (Barrie House itself and neighbouring properties in Kingsland).

⑫

⑬

Layout and ceiling heights  
⑭ The ceiling heights of the residential spaces should comply with the 2.5m standards within emerging local guidance (CPG2 (Housing)) and the Mayor's minimum space standards for new build dwellings.

Amenity space  
⑮ Private external amenity space in the form of balconies would be provided for all the units and they should meet the minimum requirements of the London Plan.

Access and inclusive design  
⑯ New build residential developments must comply with the access standards in Part M of the Building Regulations. This includes parts 1 (Visitable dwellings), 2 (Accessible and adaptable dwellings) and M4 (3) wheelchair user dwellings. The Council expects all new build housing development to go above the minimum mandatory Building Regulations with a requirement to meet Building Regulations part M4 (2); and in this case for 10% of the units to meet part M4 (3) (wheelchair housing). This is applied to new build housing providing 10 or more units as required by policy H6 and London Plan policy 3.8 (Housing Choice). The Council would seek to explore provision of a social-affordable rent wheelchair user dwelling, designed and conditioned to meet the requirements of Building Regulation Part M4(3)(2)(b) (subject to requirements outlined in the affordable housing section below). An access statement would be required to be submitted to show how the flats will meet this requirement.

Noise  
⑰ A Noise Impact Assessment would be required to be submitted to assess proposed internal noise levels for prospective occupiers and should meet the minimum requirements for internal noise levels.

Affordable Housing  
⑱ Policy H4 of the Local Plan seeks to maximise the supply of affordable housing, in line with aiming to exceed the Borough wide strategic target of 5,300 affordable homes from 2016/17-2030/2031. Policy H4 has a sliding scale target that requires an additional 2% affordable housing per capacity for each additional home. Capacity for one additional home is defined within the Local Plan as the creation of 100m<sup>2</sup> of additional residential floorspace (GIA). In assessing capacity, additional residential floorspace is rounded to the nearest 100m<sup>2</sup> (GIA). The affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings.

PRE-APPLICATION ADVICE (P.3/12)

- ⑫ Noted.
- ⑬ Noted; a full DLSL analysis and report will be submitted.
- ⑭ Noted; the ceiling heights will be minimum 2.5m.
- ⑮ Noted; balconies will be provided to all units.
- ⑯ Noted; the dwellings have been designed to meet Doc M4(2) where possible.
- ⑰ Noted; a noise impact assessment will be submitted.
- ⑱ This development has less than 10 units; no on-site affordable housing provision will be required.

2.3 Pre-application Advice & Response

i. Pre-planning advice was received from Elaine Quigley (Planning Officer) of (Camden Council) (ref: 2017/2019/PRE), submitted on 17.05.2017. The main points of this response have been numbered and highlighted in green with analysis and comment by MW-A below.

ii. The recommendations contained in the letter, have been considered in M-WA's development of this proposal and are summarised as follows:

- Number of units reduced.
- Removal of the previously proposed fourth floor level to reduce the height of the building.
- Footprint reduced and moved away from Broxwood Way.
- Further consideration has been given to the facade treatment to create a stronger articulation of the elevations.
- All basement units amended to duplexes.
- Windows to side elevations have been reduced in number & size to protect privacy of adjacent properties.

iii. The amendments listed above suggest the proposals outlined in this document would be deemed acceptable (in principle) in planning terms.



The proposal includes 12 self-contained private residential flats with an additional uplift in floorspace of 1,102.3 sq. m (GIA). The existing and proposed area schedule included in the addendum pre-application document does not specifically refer to the Porter's Lodge, although the original pre-application document indicates that it is in C3 residential use. From the site visit this building appeared to be vacant however the occupancy of the Porter's Lodge should be confirmed as this area of floorspace may be required to be included in the calculations for the affordable housing capacity.

The quantum of new residential housing floorspace is 1,102.3 sq. m (GIA) which equates to a capacity for 11 units and an on-site affordable housing target of 22% (i.e. 2% per unit). Therefore, on-site affordable housing would be provided as part of the proposal. Currently, no affordable housing is proposed, which does not comply with policy, and this equates to a shortfall in affordable housing provision of 242.5 sq. m which equates to approximately 3-4 flats.

There would appear to be scope for affordable units to be located on the ground floor of the extension, each with an individual entrance that could be set away from the main core of the building. This would serve to keep service charges to a minimum. It is noted that at present the ground floor units are duplexes, and that only one has an individual access at ground floor. It would be necessary to re-design the ground floor to ensure that the ground floor units each have their own individual access away from the main core to the upper floors, whilst retaining a core for access to the upper floors.

In terms of potential tenures of the affordable housing units the Council would look to secure units in line with the identified housing need, which is to secure larger family sized units in the social rented tenure as a priority. It is recognised that there are particular challenges associated with providing a smaller number of social rented units, and as such the Council would be open to providing solely intermediate rent units here, on the basis that they are in accordance with its Intermediate Housing Strategy. In effect this means that the units would be available at rents that are affordable to those people on incomes of between £30,000 - £40,000pa. Providing intermediate rent is also likely to make the units more attractive to a Registered Provider (RP). Shared ownership would not be welcome in this location.

The applicants should explore these options in consultation with the Council and a RP. There is now an Approved Strategic Provider List, from which an RP can be selected from. In addition to this the Mayor's Housing and Viability SPG (August 2017) suggests engaging with Registered Providers at an early stage. The Council can provide full details of the necessary contacts but at this stage the applicant would be advised to contact those RPs who have experience of delivering affordable housing on smaller schemes in Camden such as Origin and Innisfree.

In the event that on-site provision is demonstrably not possible, the applicant would be required to fully explore all options for off-site provision. Please be advised that payments in lieu of affordable housing will only be considered as an exception where all other options for the delivery of affordable housing have been fully explored. This evidence would be required to be submitted as part of any future planning application.

**Basement works**  
It is proposed to excavate below the existing basement level of Barrie House that is currently used for storage purposes to create 3 no. new residential units. A basement level would also

PRE-APPLICATION ADVICE (P.4/12)

19 be created within the new extension to accommodate 3 no. residential units. Any form of basement level development would need to be supported with a Basement Impact Assessment. This is in line with A5 of the Camden Local Plan 2017. This is supported by CPG4 (Basement and Lightwells) and Arup guidance for subterranean development 'Camden geological, hydrogeological and hydrological study'.

- As the site is located within an area of concern regarding slope stability a full basement impact assessment will be required and will require independent verification that will be funded by the applicant.

19 Detailed guidance is available within CPG4, which is available to view on the Council's website. In particular, it is imperative that the BIA is carried out by suitably qualified professionals and is fully comprehensive of stages 1-4 of the BIA process.

**Neighbouring Amenity**  
You are advised to ensure that the proposed development would not impact on the amenity of neighbouring occupiers with regards to daylight, sunlight, outlook and privacy. This would include the existing occupiers of Barrie House. There are particular issues that are raised below in relation to this however this is not an exhaustive list and would be fully assessed on the submission of a planning application. Detailed analysis and commentary would be expected by the applicant to fully assess the impact of the proposal.

**Overlooking**  
The visuals included in the addendum document appear to show the installation of window openings on all floors on the southern side elevation of the new extension. CPG6 (Amenity) states that there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other to ensure privacy. These windows would be within 15m of the windows on the northern side elevation of Barrie House and would result in direct overlooking of the windows of the existing occupiers within Barrie House. This element of the scheme should be revised (potentially to omit window openings on the side elevations) to ensure that there is no direct overlooking of any existing window openings within Barrie House.

**Daylight and sunlight and outlook**  
The new four storey extension would be within 11m of the southern part of the adjoining residential estate at Kingsland particularly nos. 37 to 72 Kingsland, Broxwood Way and 15m of the southern tower of Barrie House itself. Due to the height of the extension (4 storeys) and its close proximity to the boundary with Kingsland and relationship with the southern tower of Barrie House there may be a material loss of daylight, sunlight and outlook to the habitable rooms within these properties.

21 The applicant would be required to submit a daylight and sunlight assessment to provide an assessment of the potential impact of the development of the sunlight, daylight and overshadowing to the neighbouring residential properties based on the approach set out in the Building Research establishment's (BRE) 'Site, Layout, Planning for daylight and Sunlight: A Good Practice Guide (2011)'. The assessment should take account of all surrounding residential properties that face onto the new extension.

21 During the site visit it was noted that there are single window openings on each of the floors in the side elevation of the northern part of Barrie House. The proposed four storey extension would result in the blocking up of four of these windows from ground to third floor levels. You

PRE-APPLICATION ADVICE (P.5/12)

- 19 Noted; a BIA will be submitted.
- 19 Noted.
- 20 Noted; all facing windows are separated by more than 18m or privacy louvres.
- 20 Noted; windows to the side elevations are now reduced in number and size. Opaque glazing will be used to protect privacy.
- 21 Noted; see point 13 above.
- 21 Noted; see point 13 above.
- 21 Noted; the use of the rooms will be identified in the Daylight Sunlight report.

are advised that these windows are secondary windows that are already served by windows on the front and rear elevations of this block. It would be necessary to submit floor plans of Barrie House identifying what each of the rooms are used for as part of any future planning application. This issue will obviously raise significant concerns from the local residents who live in this part of the block.

**Transport**

**Car parking:**  
22 Policy T2 of the Local Plan requires developments to be car free. There are currently 15 off-street parking spaces on the site. From details contained within previous submissions to the Council it would appear that 8 of the existing car parking spaces are used by the residents of the flats of Barrie House who are permit holders and two of these have been sold on a long lease to two of these residents. The proposal would include 4 off-street parking spaces and 1 disabled car parking space. The Council would expect any future application to include information about the net change in the number of on-site car parking spaces to ensure that any reduction in car parking spaces off-street for existing occupiers does not adversely affect parking on the highway.

Part b of policy T2 limits on-site parking to spaces that are designated for disabled people, where necessary, and/or that are essential for operational or servicing needs. The scheme should be revised to remove the four off-street car parking spaces and retain the space designated for disabled people in line with this policy. The new flat owners/occupiers would be restricted in their ability to apply for an on-street parking permits and this would be secured by s106 planning obligation.

**Cycle parking**  
Policy T1 promotes accessible, secure cycle parking facilities as well as the provision of facilities including changing rooms, showers and lockers. The London Plan provides guidance on minimum cycle parking standards and these are outlined in Table 6.3 of the London plan. Based on the number of bedrooms within each of the flats (all 2 bedrooms) a minimum of 24 cycle parking spaces would be required to be provided on-site. The ground floor plans show a secure cycle store area for 26 cycle parking spaces. The cycle stands should be provided as Sheffield Stands or similar. These will need to be designed in accordance with CPG7 (Transport), which provides details on the design and layout that Camden expects for cycle parking. Full details of the proposed stands are expected as part of any submission.

**Construction management plan (CMP)**  
Policy A1 (Managing the impact of development) and T4 (Sustainable movement of goods and materials) states that Construction Management Plans (CMP) should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A CMP would be required to be secured as a s106 planning obligation for this development and a draft document (using the Council's pro-forma) would be required with the submission.

PRE-APPLICATION ADVICE (P.6/12)

- 22 Noted; the new development will be car free.
- 22 A transport statement incorporating a parking survey and analysis will be submitted.
- 23 Noted; Cycle provision has reduced in line with the fewer (9no.) units being proposed.
- 24 Noted; a CMP will be submitted.

A financial contribution would also need to be secured to cover the costs of reviewing the CMP. This would also need to be secured by a s106 planning obligation.

**Highways works**  
The Local Plan states, under policy A1, that '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 and reinstate all affected transport network links and road and footway surfaces.' Any damage to facilitate the development would need to be repaired. A highways contribution (estimate would be confirmed by the Council's Engineering Service following the submission of any future planning application) for any repair, repaving and tying in works created by the development and would be secured by s106 planning obligation.

25

**Sustainability and climate change**  
The Local Plan requires development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Policy CC2 of the Local Plan requires development to be resilient to climate change through increasing permeable surfaces and using Sustainable Drainage Systems, incorporating bio-diverse roofs/green and blue roofs/green walls where appropriate and including measures to reduce the impact of urban and dwelling overheating.

26

27 To comply with the London Plan the proposal must secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L of the Building Regulations 2013. Where the London Plan carbon reduction target cannot be met on-site, the Council may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £90/tonne CO2/year over a 30-year period) to secure the delivery of carbon reduction measures elsewhere in the borough.

28 The applicant will be expected to submit an Energy Statement showing how the development will meet the following policy requirements:

- Follow the hierarchy of energy efficiency, decentralized energy and renewable energy technologies set out in the London Plan (2011) Chapter 5 (particularly Policy 5.2) to achieve:
- a.) the fullest contribution to CO2 reduction within refurbished parts of the building. GLA guidance on preparing energy assessments and CPG3 should be followed. In particular, improvements should be sought on the minimum building fabric targets set in Part L of the building regulations.
- b.) Zero carbon in the new build areas, with a minimum of 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013 achieved on site and any remainder offset. Please visit this page for more information about carbon offsetting GLA guidance on preparing energy assessments and CPG3 should be followed.

NOTE: Decentralised Energy Priority Areas are shown on this [map](#).

- CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement (where achieving this target is not feasible, full justification must be provided)

PRE-APPLICATION ADVICE (P.7/12)

- 25 Noted; planning consultant will liaise with Camden.
- 26 Noted; an Energy and Sustainability report will be submitted.
- 27 Noted; as above.
- 28 Noted; as above.





**Sustainability statement**

29 The applicant will be expected to submit a Sustainability Statement as the development involves 5 or more residential units - the detail of which to be commensurate with the scale of the development showing how the development will:

- Consider the sustainable design principles as noted in policy CC2 from the start of the design process
- Achieve a BREEAM Domestic Refurbishment 'Excellent' rating (minimum) and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%) where applicable.
- The applicant may also want to consider Home Quality Mark certification.
- The development will be also expected to incorporate a green roof/s where feasible (see Nature Conservation and Biodiversity point below)
- The applicant should clearly outline how the Mayor's cooling hierarchy has been followed to minimize risk of overheating.

30 **Sustainable drainage and flooding**

The applicant will be expected to achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in existing run off rates. Please note: this is 50% of all peak storm events up to and including the 1:100 year storm event. Where variable discharge rates are not achievable then the applicant will be required to target 50% of the 1:1 year peak storm event. Volumes will need to be constrained for the 1 in 100 year (plus climate change) 6 hour storm event. This should be achieved through implementing SuDS unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014).

The Council expects design of the drainage system to the 20% climate change allowance on top of the 1 in 100 year storms. Then a sensitivity test against the 40% allowance to ensure that the additional runoff is wholly contained within the site and there is no increase in the rate of runoff discharged from the site safe. This is to understand any implications to people from increased flood hazard (e.g. depths, velocities of surface water runoff) and to ensure that under the 40% scenario the development is safe and does not contribute to an increased flood risk to third parties elsewhere.

When designing SuDS the development should follow the drainage hierarchy in policy 5.13 of the London Plan below:

- store rainwater for later use
- use infiltration techniques, such as porous surfaces in non-clay areas
- attenuate rainwater in ponds or open water features for gradual release
- attenuate rainwater by storing in tanks or sealed water features for gradual release
- discharge rainwater direct to a watercourse
- discharge rainwater to a surface water sewer/drain
- discharge rainwater to the combined sewer

30 This information above should be provided in the form of a Surface Water Drainage Statement. The applicant should submit full details, including drainage plans (showing location and extent of SuDS, invert levels, site levels and exceedance flow routes). Microdrainage modelling results (modelling the whole drainage system) evidencing that no flooding occurs in the proposed system up to and including the 1:100 year + climate change 6 hour storm event, and

PRE-APPLICATION ADVICE (P.8/12)

- 29 Noted; see point 26.
- 30 Noted.
- 30 Noted.
- 30 Noted; a Surface Water Drainage Statement will be submitted.

**maintenance plans (including maintenance activity, frequency, responsibility and access requirements).**

The applicant should also refer to the [SERA](#) when completing Surface Water Drainage Statements and undertaking Flood Risk Assessments.

**Air Quality**

31 The Local Plan requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality. The applicant will be required to submit an Air Quality Assessment (AQA). We recommend that developers follow the [EPUK Land-Use Planning & Development Control: Planning For Air Quality Guidance](#) when doing an AQA. The AQA will need to clearly outline the methodology and include

- an assessment of the impact of the development on local air quality during operation (Air Quality Neutral Assessment). All developments are expected to meet the Mayor's Air Quality Neutral requirements.
- an assessment of the impact of the development on local air quality during construction. We expect developers to follow The Mayor's SPG on Control of Dust and Emissions, in their AQAs and Construction Management Plans (CMP). Mitigation measures appropriate to the identified level of risk should be included and stated within the AQA. These will then be secured through the CMP.
- Detailed dispersion modelling may also be required if it looks like air quality objectives are potentially breached and the development requires mitigation to be suitable for occupants. Also, if CHP is proposed then detailed dispersion modelling will be required showing pre-development pollutant levels and post development pollutant levels, and the CHP will be required to meet the standards set out in the Mayor's Sustainable Design and Construction SPG. We will also look to see stack heights and locations are carefully designed to limit sensitive receptor exposure and that any other relevant mitigation measures are put in place.

The LAQM website includes our AQ progress reports from monitoring as well as the AQ action plan. These should be used to inform all AQAs.

**Nature conservation and biodiversity**

32 All developments in the Borough should be compliant with the ecology, nature conservation and biodiversity requirements of the London Plan, as well as Camden's Local Plan policies, and comply with the mitigation hierarchy (information, avoidance, mitigation, compensation, additional benefits) set out within these policies. CPG3 provides further guidance on how these policies should be met. The text below summarises the key policy requirements but the policy documents should be referred to for full detailed requirements.

- All Major developments are required to submit an Ecology Scoping Study ("Ecological Appraisal") unless previously agreed with Nature Conservation officer.
- Any development on or adjacent to designated sites (SINCS, SSSI, Local Nature Reserves (LNR), Habitat corridors and Habitat Corridor – missing links) should receive special attention proportionate to the weight afforded by these designations.
- CPG3 trigger list on p101 outlines which developments will require a protected species survey.
- Proposals should demonstrate:

PRE-APPLICATION ADVICE (P.9/12)

- 31 Not applicable; revised proposal is for a minor development.
- 32 Not applicable; revised proposal is for a minor development.

- how biodiversity considerations have been incorporated into the development;
- if any mitigation measures will be included; and
- what positive measures for enhancing biodiversity are planned.

Further advice on landscaping for biodiversity can be found in CPG 3 and Camden's Biodiversity Action Plan - Appendix 5.

Lighting can have particular negative impacts on biodiversity. Unnecessary lighting should be avoided. Where lighting may harm biodiversity, timers or specific coloured lighting will be required to minimise any disturbance.

The Council will expect all developments to incorporate brown roofs, green roofs and green walls unless it is demonstrated this is not possible or appropriate. This includes new and existing buildings. Special consideration will be given to historic buildings to ensure historic and architectural features are preserved. See CPG3 and Camden's Biodiversity Action Plan - Appendix 4 for further advice on green roof and living wall design.

Finally, as the development will be within the B-Line for London route, we would suggest that it becomes involved in the project and incorporates biodiversity enhancements which provide habitats for pollinators (e.g. providing pollinator friendly planting, green walls etc.)

**Trees and Landscaping**

The site is surrounded by trees and soft landscaping and several of the trees are protected by Tree Preservation Orders (TPO's). A letter from John Cromar's Arboricultural Company was included in appendix C of the original pre-application document. It confirmed that the advice was provided following a desk-top assessment of the proposed plans and a site visit had not been undertaken. Given that no arboricultural report or survey has been submitted with the pre-app all statements are based on assumption. The Tree officer has advised that it is not possible to fully assess the scheme from an arboricultural perspective without an arboricultural report in line with BS5837:2012. As general advice, the Council would seek the retention of all significant trees on site where possible.

33 A landscaping plan would be required to be submitted showing the existing and proposed hard and soft landscaping details.

**Community Safety**

35 Policy C5 requires developments to demonstrate that they have incorporated design principles that contribute to community safety and security. A Crime Prevention Statement should be submitted as part of the Design and Access Statement, which should be created in consultation with the Council's Designing Out Crime Officer.

**Waste**

36 Details of waste storage should be provided as part of any future planning application including location, design and method of waste storage and removal including recycled materials for the new residential flats.

**Play and Open Space**

The Local Plan requires an 'appropriate contribution' to open space, with priority given to publicly accessible open space. Policy A2 gives priority to securing new public open space on-site, with provision of space off-site near to the development acceptable where on-site provision is not achievable. If there is no realistic means of direct provision, the Council may

PRE-APPLICATION ADVICE (P.10/12)

- 33 Noted; an Arboricultural Survey and Report will be submitted.
- 34 Noted; a Landscaping Plan will be submitted.
- 35 Not applicable; revised proposal is for a minor development.
- 36 Noted; details of waste storage (including capacity requirements and frequency of collections) will be included in the Design and Access Statement submitted.

37 accept a financial contribution in lieu of provision. There is currently no public open space on the site and it is not considered feasible to provide any. External amenity spaces in the form of balconies would be provided for the residential flats.

37 The scheme provides 12 residential units with an uplift of 1,102 sq. m of floor space. Based on the increased demand for open space from the uplift in residents occupying the site, provision of open space may be expected. As there is no realistic means of direct provision a financial contribution would be secured by planning obligation for local open space provision.

**Planning obligations**

CPG8 on planning obligations provides full details of planning obligations which would be likely as a result of the development, to mitigate its impact. At this stage, the following section 106 planning obligations would be likely to form part of any future planning permission:

- Affordable housing
- Contribution towards affordable housing (if applicable)
- Construction management plan (including monitoring)
- Car free development for new users
- Highways contribution
- Pedestrian, cycling, environmental and public realm improvements
- Basement construction plan (if applicable)
- Public open space contribution
- Sustainability plan
- Energy efficiency and renewables plan

**Community Infrastructure Levy (CIL)**

The proposal would be liable for both the Mayor of London's CIL and Camden's CIL due to the significant net increase in floorspace and creation of residential units. The Mayoral CIL rate in Camden is £50 per m<sup>2</sup> and the Camden CIL tariff (based on the site being in Zone C (Highgate, Hampstead) would be £500 per residential unit. The amount payable would be calculated by Camden's CIL team.

**Planning application process and supporting information**

In the event of submitting a full planning application, please ensure that you submit all the required information in accordance with the validation checklist, details of which can be obtained from the council's website:

<http://camden.gov.uk/ccm/navigation/environment/planning-and-builtenvironment/planning-applications/making-an-application>

In order to ensure your application is valid, the following information will be required to support the planning application:

- Completed and signed planning application forms for Full Planning Permission An ordinance survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Design and Access Statement;

PRE-APPLICATION ADVICE (P.11/12)

- 37 Noted; external amenity space will be provided in the form of balconies.
- 37 Scheme is now 9 units. Planning Consultant will liaise with Camden to confirm financial contribution.



- Planning Statement;
- Draft Construction Management Plan - pro forma;
- A full Basement Impact Assessment;
- Sustainability Statement;
- Energy Statement;
- Ecology scoping statement and a protected species survey (or justification for why they aren't required);
- Crime impact assessment;
- Daylight and sunlight assessment;
- Noise Assessment (by an acoustic engineer);
- Sustainable Drainage Systems report;
- Transport Assessment;
- Waste storage and collection plan;
- The appropriate fee (dependent on the floorspace and number of units proposed)

#### Conclusion

Based on the information received and the advice given Officers can confirm that there are still outstanding major design concerns relating to the proposal. The height of the extension together with the footprint and detailed design remain unresolved. I understand that you are keen to submit an application in the very near future for this site but I would strongly encourage you to work with us to try to work towards an acceptable solution that can be supported by Officers prior to the submission of any planning application. The design development could be undertaken through a number of informal design workshops with informal responses provided. This would require a separate fee outside of this pre-application. Other matters include the lack of affordable housing as part of the proposal. This needs to be addressed prior to the submission of any planning application. Concerns have also been raised to the quality of the residential accommodation within the basement due to the depth of the floor plate of the flats, their single aspect and poor level of outlook. In addition, the new extension could harm the living conditions of the prospective occupiers within the development as well as Barrie House itself. Regard should be had to the development potential of the Council estate at Kingsland to the north that is likely to be prejudiced with the side windows in the northern block. Amenity issues of the existing occupiers of Barrie House to the south and Kingsland to the north should be given significant attention. A daylight/sunlight assessment would be required with any future planning submission.

Based on the outstanding issues above further pre-application advice is suggested along with a Planning Performance Agreement (PPA). Any PPA would start as an extension to this charged pre-application advice and continue through to the determination of an application. Please note that a PPA does not give any guarantees to the outcome of a planning application. It is purely to assist the project management and process of communication between the Council and the applicant and builds in added flexibility to properly address any issues or problems prior to the Council making its decision.

- 36 A planning application would need to be decided at the Development Control Committee in the event of a positive recommendation by Officers. This is due to the proposal involving a major development involving the construction of more than 10 new dwellings (more than 100 sq. m of residential floorspace).

#### PRE-APPLICATION ADVICE (P.12/12)

- 36 Not applicable; revised proposal is for a minor development.



Planning Policy Matrix		
Planning Category	Planning Policy	Proposed Scheme
<b>Housing Design &amp; Density</b> (Habitable Room per Hectare): Policy DP24 (p.93) & London Plan Housing SPG Table 3.2	Appropriate density ranges in Camden for 'Urban' sites with PTAL 2-4 and 3.8-4.6 HR/Unit will normally be: - 200-450 Habitable rooms per Hectare	Proposed scheme: - 388 Habitable room per Hectare ✓
	The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:	✓
	the character, setting, context and the form and scale of neighbouring buildings;	✓
	- the quality of materials to be used;	✓
	- the provision of visually interesting frontages at street level;	✓
	- the appropriate locations of building services equipment;	✓
	- existing natural features such as topography and trees;	✓
	- the provision of appropriate hard and soft landscaping including boundary treatments;	✓
	- the provision of appropriate amenity space;	✓
- accessibility.	✓	
<b>Housing Mix: Policy DPS</b> (p.32)	We will seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table = 40% 2-Bed.	2-Bed = 78% 3-Bed = 22%

<b>Parking Standards - Policy DP18 (p.70) &amp; London Plan Chapter 6: Transport - Table 6.2 (p.274)</b>	The Council will seek to ensure that developments provide the minimum necessary car parking provision.	Development is car free; existing residents' parking has been relocated on site.
<b>Cycle Provision - London Plan Chapter 6 - Transport: Table 6.3 (p.276)</b>	Residents - 1 space per studio and 1-bed units, 2 spaces per all other dwellings.	Required = 20no. cycle spaces have been provided (18no. resident parking & 2no. visitor parking).
<b>Private Amenity - CPG 2 - Housing (p.67)</b>	All new dwellings should provide access to some form of private outdoor amenity space, e.g. balconies, roof terraces or communal gardens;	✓
	Private gardens should be allocated to family dwellings;	All 3 bed (family) units have private terraces/garden.
	Where provided, gardens should receive adequate daylight, even in the winter;	All private amenity East and West facing.
	Balconies should have a depth of not less than 1.5 metres and should have level access from the home;	Balconies at 1.2m reduced size mitigated by proximity to Regnets Park & Primrose Hill.
	Balconies and terraces should be located or designed so that they do not result in the loss of privacy to existing residential properties or any other sensitive uses;	✓
Balconies should preferably be located next to a dining or living space and should receive direct sunlight.	✓	

2.7 Planning Policy Matrix

i. This document has been compiled following thorough investigation of the history of the site and surrounding area, recently consented developments close to the application site, and all relevant local and national planning policy. We believe that by adopting a sensitive and considered approach, the proposals outlined in this document represent an opportunity to create a high-quality residential development, without impacting the amenity or character of the surrounding area.







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SECTION 3.0

# DESIGN STRATEGY & PROPOSALS



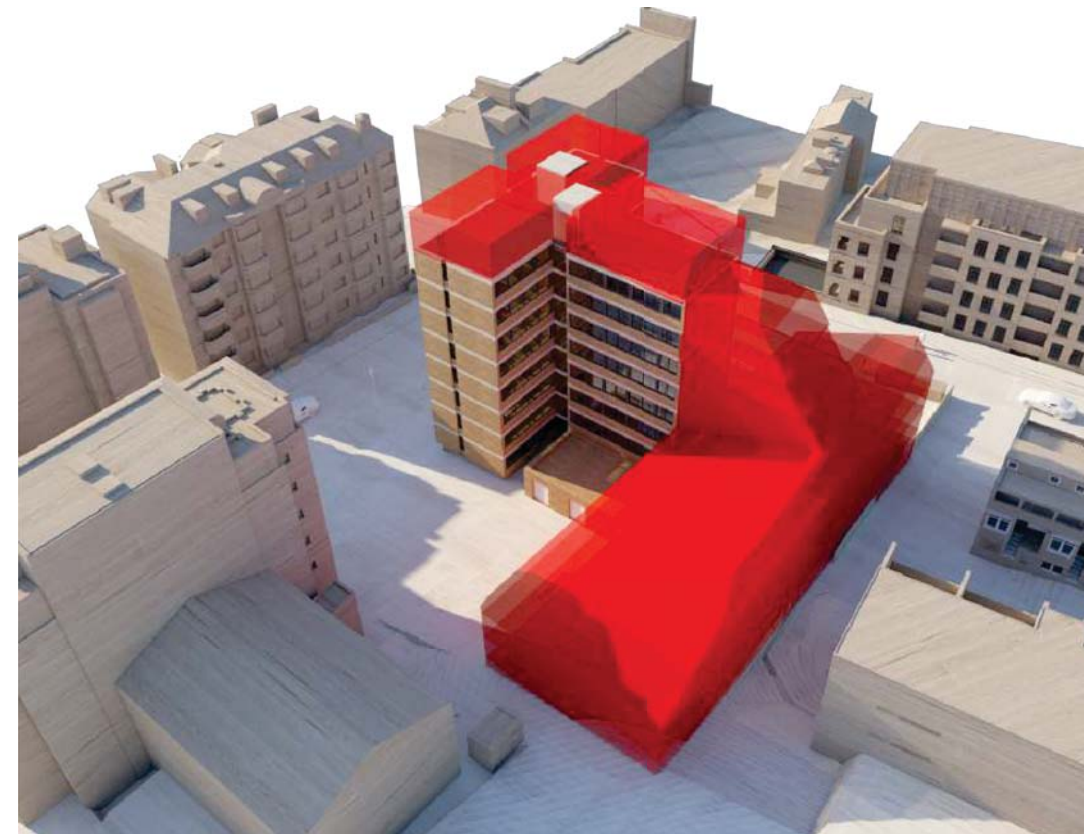








Daylight Envelope View 01  
As Existing

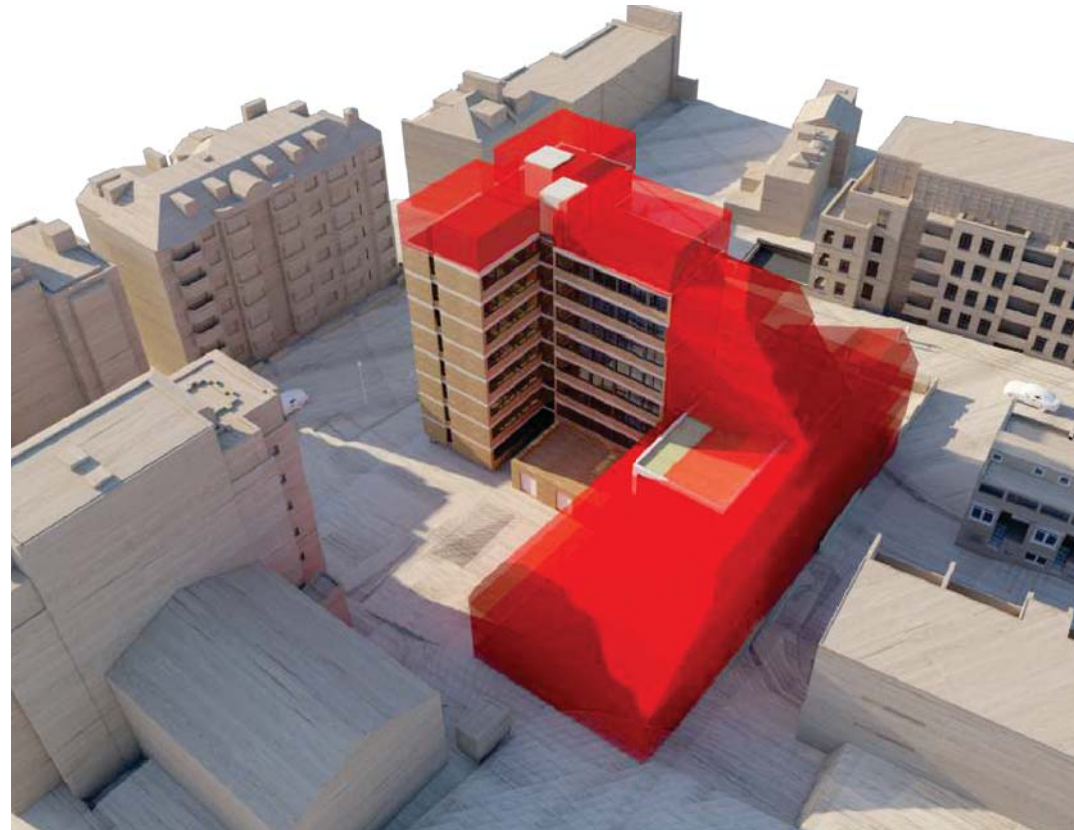


Daylight Envelope View 02  
As Existing





Daylight Envelope View 01  
As Proposed



Daylight Envelope View 02  
As Proposed

**3.2 Daylight Envelope & Proposed Massing**

**3.2.1 Daylight Envelope**

- i. Malcolm Hollis were appointed to undertake a daylight sunlight appraisal for the surrounding context. The results of this test would confirm the appropriate level of development the application site could accommodate without causing unacceptable injury to neighbouring properties and the existing residents of Barrie House.
- ii. The results of these studies are shown in the diagrams to the left. The daylight and sunlight envelope that is described by Malcolm Hollis is shown in red and the proposed massing by MWA sits well within this envelope.

**3.2.1 Proposed Massing**

- i. The proposed massing by MW-A sits within the envelope defined by Malcolm Hollis.
- ii. The impact of our proposals have been summarised by Malcolm Hollis in their documentation appended with this application.

**Key**

■ Denotes Daylight / Sunlight Development Envelope

