

181-183 YORK WAY & 282A CAMDEN ROAD

CAMDEN, LONDON N7

PROPOSED CONSTRUCTION OF ROOF EXTENSION

TO PROVIDE TWO SELF-CONTAINED FLATS

AND THREE STOREY REAR EXTENSION

TO PROVIDE THREE SELF-CONTAINED FLATS

PLANNING STATEMENT

1 INTRODUCTION

- 1.1 This application seeks full planning permission for an extension to the roof to provide two self-contained flats, the construction of a rear extension, fronting Camden Road, to provide three self-contained flats and the carrying out of associated alterations and works including landscaping of the site.
- 1.2 The application premises consist of a three-storey building occupying a prominent corner site at the junction of York Way (A5200) and Camden Road (A503). The property was built in about 1996 under planning permission 94/01695 for the redevelopment of the land with a mixed use of two commercial units at ground-floor and basement level and four self-contained flats on the first and second floors. Currently, the commercial units consist of a Class A1 shop and a Class A3 food and drink use.
- 1.3 The site lies within, and at the northern apex of, the Camden Square Conservation Area. The property is not a statutory listed building and there are no listed buildings in the immediate vicinity. The surrounding area is predominantly residential in character but includes a number of commercial enterprises such as the public house on the opposite site of Camden Road.

- 1.4 The site has good access to public transport facilities (PTAL rating of 4), including Caledonian Road and Camden Town underground stations (which are about 0.7 kilometre and 1.0 kilometre away, respectively) and several bus services operating along Camden Road.
- 1.5 This Planning Statement, which addresses the planning merits of the proposal in the context of the relevant local and national planning policies, should be read in conjunction with the Design, Access and Heritage Statement prepared by the project architects, Inhouse Design Associates.

2 LEGAL FRAMEWORK

- 2.1 The application property is an unlisted building within the Camden Square Conservation Area. The relevant legislative requirements are summarised below.
- 2.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with adopted development plan policies, unless material considerations indicate otherwise.
- 2.3 The site is in a designated conservation area and the Council will be aware of the duty imposed by section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to ensure that new development should preserve or enhance the character or appearance of the Conservation Area.

3 PLANNING POLICIES

- 3.1 The development plan consists of:
 - . The London Plan 2016; and
 - . Camden Local Plan 2017.

3.2 Also of relevance is the guidance in the following documents:

- NPPF 2012;
- Planning Practice Guidance: Conserving and Enhancing the Historic Environment;
- Mayor of London's Supplementary Planning Guidance: Housing 2016;
- Technical Housing Standards – nationally described space standard (DCLG 2015); and
- Camden Square Conservation Area Appraisal and Management Strategy 2011.

3.3 I set out below a summary of the local policies that I consider relevant to this proposal.

The London Plan

3.4 *Policy 3.3 – Increasing Housing Supply*

This policy confirms "the pressing need for more homes in London" and urges the boroughs "to achieve and exceed the minimum borough annual average housing target in Table 3.1". The policy notes, in particular, the potential to realise brownfield housing capacity through suitable intensification of development. The housing provision target for Camden is given as 8,892 additional dwellings, or 889 per annum.

3.5 *Policy 3.4 – Optimising Housing Potential*

This policy states that development should optimise housing output for different types of location within the relevant density range shown in table 3.2. (The application of density guidelines is of limited relevance to the extension of an existing building).

3.6 *Policy 3.5 – Quality and Design of Housing Development*

This requires new housing developments to enhance the quality of local areas taking into account context, character, density and land-use mix, and recommends that housing should conform to minimum space standards set out in table 3.3.

3.7 *Policy 6.13 – Parking*

This policy requires developments to comply with the maximum (not minimum) parking standards set out in table 6.2. Paragraph Eb of the policy states:

“In locations with high public transport accessibility, car-free developments should be promoted.”

3.8 *Policy 7.4 – Local Character*

Policy 7.4 requires new buildings to provide a high quality design that has regard to the existing urban grain in terms of scale, proportion and mass, and makes a positive contribution to the character of the area.

3.9 *Policy 7.6 – Architecture*

This requires that buildings:

- be of the highest architectural quality;
- use design and materials that complement, not necessarily replicate, local character;
- not cause unacceptable harm to the amenity of neighbouring buildings in relation to privacy and overshadowing;
- provide high-quality indoor space and integrate well with surrounding streets; and
- optimise the potential of sites.

3.10 *Policy 7.8 – Heritage Assets*

This policy seeks to sustain and enhance the significance of heritage assets, including conservation areas, and requires that new development should “conserve, restore, re-use and incorporate heritage assets” and be “sympathetic to their form, scale, materials and architectural detail”.

Camden Local Plan

3.11 *Policy H1 – Maximising Housing Supply*

This housing supply policy seeks to secure at least 16,800 additional homes between 2016 and 2031 and confirms that self-contained housing is “the priority land use of the Local Plan”.

3.12 *Policy H4 – Maximising the Supply of Affordable Housing*

This states that the Council will expect a contribution to affordable housing from all developments providing one or more additional homes. Subparagraph (d) of the policy sets a sliding scale for contributions, starting at 2% for one home and increasing by 2% for each additional unit thereafter. Subparagraph (g) of the policy

states that where the development is for 10 units or less, the Council will accept a payment in lieu rather than on-site provision.

3.13 *Policy H6 – Housing Choice and Mix*

This policy seeks a variety of housing accommodation, with all homes expected to meet the national space standards. A range of dwelling sizes will be required in accordance with policy H7 (Large and Small Homes).

3.14 *Policy H7 – Large and Small Homes*

Policy H7 seeks to secure a range of homes of different sizes and requires housing development to include a mix of large and small units, although a flexible approach will be taken having regard to the size, characteristics and constraints of the site.

3.15 *Policy A1 – Managing the Impact of Development*

This policy seeks to protect the quality of life of occupiers and neighbours taking into account factors such as privacy, outlook, sunlight, daylight, overshadowing, transport and noise.

3.16 *Policy A3 – Biodiversity*

This states that the Council will protect and enhance nature conservation and biodiversity, including the provision of landscaping within new developments.

3.17 *Policy D1 – Design*

This policy states that the Council will seek to secure high quality design and requires new development to:

- respect local context and character;
- preserve or enhance heritage assets;
- be sustainable in its design and construction;
- include details and materials that complement local character;
- incorporate high quality landscaping; and
- incorporate outdoor amenity space.

3.18 *Policy D2 – Heritage*

This heritage policy reflects the guidance in the NPPF and, amongst other things, states that development that results in “less than substantial harm” will not be permitted unless the public benefits of the proposal convincingly outweigh the harm.

The policy also seeks to preserve trees and garden spaces that contribute to the character and appearance of conservation areas.

3.19 *Policy CC1 – Climate Change Mitigation*

This states that new development should minimise the effects of climate change, meet the highest feasible environmental standards and reduce carbon dioxide emissions. Measures promoted by this policy include:

- minimising the need to travel by car;
- encouraging energy efficiency improvements; and
- using renewable energy.

3.20 *Policy T1 – Prioritising Walking, Cycling and Public Transport*

This states that the Council will promote sustainable transport modes, including walking, cycling and public transport, and will require developments to provide cycle parking facilities.

3.21 *Policy T2 – Parking and Car-free Development*

This states that the Council will limit the availability of parking and “require all new development in the borough to be car-free”. The policy requires that new developments are subject to section 106 planning obligations preventing residents from applying for on-street parking permits and also supports the redevelopment of existing parking areas for alternative uses.

4 THE NATIONAL PLANNING POLICY FRAMEWORK

4.1 I set out below those parts of the guidance in the NPPF that I consider material to this application.

Section 7 – Requiring Good Design

Paragraph 58

- 4.2 “..... Planning policies and decisions should aim to ensure that developments:
- will 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."

Paragraph 59

- 4.3 "Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally."

Paragraph 60

- 4.4 "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness."

Section 12 – Conserving and Enhancing the Historic Environment

- 4.5 Section 12 of the NPPF provides guidance on the conservation of the historic environment. This guidance sets out the matters that should be taken into account when considering planning applications (see paragraph 131) and stresses that the need to conserve the heritage asset must be balanced against any substantial public benefits of the proposal.

4.6 Paragraphs 126 and 131 state that when developing their strategy towards conservation and heritage and when deciding planning applications, local planning authorities should take into account, amongst other aims:

“the desirability of new development making a positive contribution to local character and distinctiveness.”

4.7 Paragraph 134 of the NPPF states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

5 PLANNING MERITS

5.1 The main planning issues are considered to be as follows:

- the principle of the development;
- design and townscape;
- heritage considerations;
- the quality of the accommodation;
- car parking and transport; and
- affordable housing.

The principle of the development

5.2 The NPPF, the London Plan and the Camden Local Plan stress the importance of making efficient use of previously-developed land for housing and increasing housing supply. The extension of the property to provide five additional flats would make a valuable contribution towards the supply of housing in Camden, resulting in a net increase of five in the number of dwelling units on the site.

5.3 It is, in my view, inappropriate to apply the broad density guidelines set out in the London Plan to a small site such as this, which is in mixed commercial and residential use.

5.4 The proposal is therefore consistent with the following housing policies:

- London Plan policy 3.3;
- London Plan policy 3.4; and
- Camden Local Plan policy H1.

Design and townscape

5.5 A full description of the location of the property, its townscape context and the significance of the heritage asset (i.e. the Camden Square Conservation Area) is given in the Design, Access and Heritage Statement prepared by Inhouse Design Associates. Therefore, in terms of information supplied, the application documents comply with the requirements of paragraph 128 of the NPPF.

5.6 The proposed roof extension would be set back by about 0.5 metre from the front parapet of the existing building and would be covered in mid-grey zinc cladding. The roof addition would appear subordinate to the host building, would be unobtrusive in short and long distance views and would, in its use of materials, reflect the prevailing roof material (Welsh slate) in much of the Conservation Area.

5.7 With regard to the proposed rear extension (adjoining 282a Camden Road), this would also appear as a subordinate element being a full storey lower than the main building, and its use of contemporary form, design and materials would create an innovative addition which is architecturally distinct from, and does not attempt to mimic, the host property.

5.8 In addition to the roof extension and rear addition, the proposed development includes the following works to the existing building and its curtilage.

- Improvements to the access to the retail unit via new steps at the corner.
- Provision of two new windows to the first- and second-floor corner elevation to replace the existing blank window features.
- Construction of an attractive boundary wall at the corner and along the Camden Road frontage.
- Removal of existing unsightly car parking arrangements and hardstanding on the Camden Road frontage.
- Provision of comprehensive landscaping of the Camden Road frontage in place of the existing parking spaces.

The proposed extensions, together with the associated enhancements to the design of the buildings and the landscaping of the site would serve to create a strong and distinctive landmark development on this prominent corner site.

- 5.9 The removal of the existing on-site car parking and the provision in its place of a landscaped amenity area would add visual interest, colour and biodiversity to the environment. This would be consistent with the advice in the Council's Camden Square Conservation Area Appraisal and Management Strategy 2011. Section 5.8 of that document states:

“The private front gardens add colour and biodiversity to the residential street scene. The loss of any of these gardens through parking, ancillary structures, hard-standing or neglect severely erodes the character of the streets. This has happened particularly on Camden Road.”

Section 7.9 of the document emphasises the Council's preference for gardens rather than car parking on frontages in Camden Road:

“Parking in front gardens, particularly in Camden Road, will be resisted by the Council because of the harmful impact it has on the character and appearance of the conservation area. Reinstatement of front gardens and typical local boundaries (for example hedges or walls) is an important way of enhancing the streetscape and incrementally improving the quality of the area. This will be encouraged where lost to parking in the past.”

- 5.10 There is no reason, in principle, why contemporary design, if carefully considered, cannot be acceptable within conservation areas and this is expressly acknowledged at section 7.4 of the Conservation Area Appraisal and Management Strategy:

“There is scope for new buildings in the area. High quality design and high quality execution will be required of all new development at all scales, and opportunities for enhancement and further revealing the significance of the conservation area should be taken. Successful modern design can be of the 21st century and enhance the conservation area, by carefully assessing and responding to the form and qualities of surrounding buildings and spaces.”

The use of contemporary and non-traditional forms of design in appropriate circumstances is supported at national level by the NPPF, which states, at paragraph 60, that local planning authorities “should not stifle innovation, originality or initiative”.

- 5.11 The project architects have made reference, at section 2.3 of their Design, Access and Heritage Statement, to contemporary developments that have been permitted in this Conservation Area. This illustrates that the Council accepts that a contemporary

approach to new development, if designed and constructed to the highest standard, is compatible with the preservation and, indeed, enhancement of conservation areas.

- 5.12 It should be stressed that the advice within the Council's Camden Square Conservation Area Appraisal and Management Strategy is a material policy consideration in this case because policy D2 of the Camden Local Plan specifically states that conservation area appraisals and management plans will be taken into account when determining planning applications.
- 5.13 For the above reasons, it is considered that the design of the development is well-conceived and appropriate to the context of the site, and is compliant with the following:
- policies 7.4 and 7.6 of the London Plan;
 - policies D1 and D2 of the Camden Local Plan; and
 - section 7 of the NPPF.

Heritage considerations

- 5.14 The Design, Access and Heritage Statement prepared by Inhouse Design Associates sets out, in line with the requirements of section 12 of the NPPF, the history and significance of the heritage asset (the Conservation Area) in which the site is located and the effect of the proposed development on the significance of the heritage asset.
- 5.15 The project architects are of the opinion, which I share, that the site in its current state detracts from the character and appearance of the Conservation Area. The various features that detract from the appearance of the building and its curtilage are explained at paragraph 5.3 of the Design, Access and Heritage Statement. The analysis within the Camden Square Conservation Area Appraisal and Management Strategy mirrors this view. That document identifies, at section 5.9, buildings and spaces that make a neutral contribution to the character and appearance of the Conservation Area (as distinct from buildings and spaces that either make a positive or a negative contribution) and these include 282a Camden Road and 181-183 York Way.
- 5.16 The proposal is to extend and alter a non-listed building in a conservation area which the Council considers makes a neutral contribution to the area. Having regard to the design quality of the proposed extensions, together with the enhancements to the existing building and its curtilage (including elevational improvements, new boundary treatment, removal of car parking and landscaping of the site), I consider that the development scheme as a whole would be beneficial and should result in the site

being recategorised as a building and space that makes a positive contribution to the Conservation Area. Paragraph 137 of the NPPF states that “local planning authorities should look for opportunities for new development within conservation areas to enhance or better reveal their significance”.

5.17 As I have noted at paragraph 5.10 above, there is no reason in principle to resist, in conservation areas, buildings or extensions that are of contemporary design. Indeed, the Council has permitted (see paragraph 5.11 above) contemporary architecture in this Conservation Area.

5.18 For the reasons explained above, the proposed development would benefit the heritage asset (the Conservation Area) and should therefore be granted planning permission.

5.19 Since the proposal would cause no harm (whether substantial or less than substantial harm) to the significance of the heritage asset, it is unnecessary to consider whether the proposal would produce any public benefits that might outweigh any harm caused (see paragraph 4.7 above) but, were it necessary to do so, I would argue that the following public benefits would occur:

- provision of five additional dwellings;
- removal of visually intrusive car parking;
- enhanced appearance of the existing buildings and its curtilage;
- increased local biodiversity through new landscaping; and
- promotion of sustainable transport objectives.

I consider that these benefits would demonstrably outweigh any less than substantial harm that might, in the view of the Council, result from the proposed development.

5.20 For the reasons explained above, the proposed development would be appropriate in heritage terms and would accord with the following policies and requirements:

- section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990;
- London Plan policy 7.8
- Camden Local Plan policy D2; and
- NPPF section 12.

Quality of the accommodation

- 5.21 The London Plan policy 3.5 places a significant new focus on internal space standards for dwellings. The purpose of the policy is to ensure that all new homes are fit for purpose and offer the potential to be occupied over time by households of all tenure. The London Plan table 3.3 and Housing SPG baseline standard 4.1.1 set out the minimum gross internal area for new homes.
- 5.22 The floorspace of the proposed flats would meet the space standards (37 m² for a one-bedroom, one-person flat and 50 m² for a one-bedroom, two-person flat) set out in the Mayor of London's Housing SPG and in the DCLG's Technical Housing Standards.
- 5.23 The existing flats at the site have no external amenity space. The proposed development would include a landscaped front garden which, although of limited use as private amenity space, would provide a high quality setting and outlook for the existing and proposed flats.
- 5.24 For the above reasons the proposal would provide a good standard of residential accommodation and would accord with the following:
- policy 3.5 of the London Plan;
 - the standards set out in the Housing SPG;
 - policy D1 of the Camden Local Plan; and
 - DCLG Technical Housing Standards.

Car parking and transport

- 5.25 The existing property includes provision for off-street car parking in accordance with the layout approved under planning permission granted in 1995 (94/01695). The development now proposed would not only provide no further car parking (as there is no space to do so) but also remove the existing parking facilities and replace them with a landscaped front garden. In view of the accessible central location of the site (see paragraph 1.4 above), a car-free development is considered to be both acceptable and desirable, having regard to the sustainable transport policies in the development plan, namely:
- London Plan policy 6.13; and
 - Camden Local Plan policies T1 and T2.

5.26 In addition, the removal of car parking from the front garden would, as indicated at paragraph 5.9 above, be consistent with the heritage enhancement advice in the Camden Square Conservation Area Appraisal and Management Strategy.

5.27 It should be noted that a planning application (reference 2016/3675/P) was submitted in 2016 for a variation of planning conditions 3 and 4 of planning permission 94/01695 so as to allow for the removal of the car parking spaces on the site. The Planning Officer's report on that application included the following:

“In accordance with policy DP19 in order to promote more sustainable modes of travel, the Council generally welcomes proposals to reduce the amount of off-street parking in the borough, provided that the removal of spaces would not displace parking to controlled parking zones (CPZs), particularly in identified areas of parking stress. The Council would therefore support the removal of the condition requiring the car parking spaces to be retained provided the original development is secured as a car free development via a section 106 agreement to prevent displacement of car parking of future residents onto CPZs. The site is located in a CPZ which does not experience very high levels of congestion (74% capacity). However policy DP19 does not exclusively apply to CPZs that experience high parking stress pressure; there is just particular concern with highly stressed zones.”

5.28 The applicant would be prepared to enter into a section 106 planning obligation with respect to arrangements for a car-free development.

Affordable housing

5.29 Policy H4 of the Camden Local Plan requires an affordable housing contribution from all developments providing one or more dwellings. This conflicts with Government policy (see paragraph 031 of Planning Practice Guidance: Planning Obligations) stating that affordable housing obligations should not be sought from housing schemes of 10 units or less.

5.30 If the Council is able to provide a convincing explanation as to why, despite Government guidance at paragraph 031 of the Planning Practice Guidance, this policy is essential, the applicant would be prepared to enter into a section 106 planning obligations with respect to a payment in lieu affordable housing contribution on the basis of the sliding scale indicated in policy H4 (which is 10% in this case).

6 CONCLUSION

6.1 For the reasons set out in this Statement, the proposed extension of the building to provide five additional flats would:

- be appropriate in principle and make a valuable contribution to the supply of housing;
- be suitable in its design and its effect on the street scene;
- enhance the character and appearance of the Conservation Area;
- provide a very good standard of accommodation;
- give rise to no car parking objections; and
- comply with the relevant policies in the development plan and the NPPF.

6.2 The Council is therefore invited to grant planning permission subject to appropriate planning conditions and planning obligations.

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September 2017