

# **Planning Statement**

7-8 Jeffrey's Place, London, NW1 9PP

Iceni Projects Limited on behalf of City & Provincial Properties Ltd

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# 1. INTRODUCTION

1.1 This Planning Statement is submitted to the London Borough of Camden on behalf of City and Provincial Properties Ltd (the Applicant) in support of a full planning application for a single storey roof extension to create a 3x bedroom flat.

Specifically, planning permission is sought for:

"Erection of a single storey roof extension to create a 3x bedroom flat."

- 1.2 City & Provincial Properties Ltd are an established group of property experts who hold the freehold title for the application site. They recognise the development potential of the as an opportunity to contribute to the local demand for residential development in the London Borough of Camden ('the Council'). Their objective is to deliver a high-quality development that is based on a commitment to design quality.
- 1.3 This application has been submitted following the refused application for a single storey roof extension comprising a two bedroom flat (LPA ref: 2015/4920/P) decided on 24 November 2015 and subsequent Planning Appeal which was dismissed by an Independent Planning Inspector (Appeal ref: APP/X5210/W/16/3147212). These decisions confirmed the acceptability of the principle of a roof extension to the property, with the reasons for refusal based on design grounds only.
- 1.4 As such, the Applicant and the design team have reviewed these decisions in detail to develop a set of revised proposals that respond to each concern in full. The revised proposals have been based on a design-led approach that have aimed to respond to the predominant context, character and key views surrounding the site to devise a roof extension that reads as a discreet and appropriate addition to the existing building.

### The submission

- 1.5 This Planning Statement provides a description of the proposed development and an assessment against relevant national, regional and local planning policy. It should be read in conjunction with the following technical reports and supporting documents:
  - Planning Application Form and Certificate of Ownership;
  - CIL Determination Form;
  - Heritage Statement, prepared by Iceni Projects;
  - Existing and Proposed Drawings, prepared by Emrys Architects;

- Design and Access Statement, prepared by Emrys Architects; and
- Daylight and Sunlight Assessment prepared by GVA Schatunowski Brooks.

# 2. THE SITE AND SURROUNDING AREA

- 2.1 The subject site at 7-8 Jeffrey's Place, NW1 9PP. It is located on within the Camden Town with Primrose Hill Ward within the administrative boundary of the London Borough of Camden.
- 2.2 The site contains a three-storey residential building, which is rectangular in shape and occupies the full extent of the site. The existing building was converted from a B1 (a) office use to C3 residential accommodation under prior approval in 2015 (LPA Ref: 2015/0232/P). The existing building retains its historic industrial look and feel, comprising brick walls, metal doors and metal framed windows. A Site Location Plan is provided at **Figure 1.0**.



Figure 1.0 Site Location Plan, Source: Emrys Architects

- 2.3 The site is located within the Jeffrey's Street Conservation Area. The Conservation Area is characterised by early 19<sup>th</sup> Century Georgian developments, primarily residential in nature. The site does not contain any listed buildings. The nearest listed building is the Grade II listed terrace at 8-10 lvor Street.
- 2.4 The sites is bounded by residential developments to the north, south, east and west. The neighbouring developments vary in height, bulkage and architectural style. Development within the Conservation Area does not follow a strict uniformity in its design with buildings comprising brick

and/or rendered walls, timber and/or metal framed windows and a mix of pitched, flat or mansard roof designs.

2.5 The site has an excellent public transport accessibility level (PTAL) rating of 6b, with numerous bus routes operating within the vicinity of the site, along with London Underground and National Rail services operating from Camden Road Station to the south of the site.

### **Relevant Planning history**

- 2.6 A search of the Council's planning history records confirms the existing lawful use of the site as residential use (Class C3), established through the recent conversion works carried out in accordance with prior approval reference 2015/0232/P.
- 2.7 The most relevant planning application for the site is the refused application (LPA ref: 2015/4920/P) and the dismissed appeal decision from the Planning Inspectorate (PINS ref. 3147212).
- 2.8 The reasons for refusal noted by the Council included the following:
  - The design of the roof extension was considered to be out of character to the host building and the Conservation Area and a harmful addition in the setting of the Grade II listed building at 8-10 lvor Street;
  - A daylight and sunlight report had not been submitted to demonstrate that the roof extension would not detrimentally harm the amenity of neighbouring residents; and
  - The additional residential unit in absence of a s106 legal agreement securing car free housing would likely contribute to parking stress and congestion in the surrounding area.
- 2.9 The Inspector considered these reasons for refusal by the Council and dismissed the appeal on design reasons only. These reasons were:
  - The scale, bulk, proportions, fenestration and contemporary design of the roof extension would introduce a harmful contrast at odds with the traditional architectural composition of the existing building; and
  - The roof extension would be visible and unduly prominent from Jeffrey's Place and Ivor Street given the further increase in height and would be viewed as a dominant feature in the townscape, failing to preserve the character and appearance of the Conservation Area and being harmful to the setting of the Grade II listed building at 8-10 Ivor Street.

- 2.10 The Planning Inspector concluded that the proposal would be acceptable in terms of its relationship with surrounding properties in terms of overlooking, daylight and sunlight and noise, as well as highways and transportation.
- 2.11 The Inspector's decision forms a key material consideration for the preparation of a revised application. The appeal decision confirmed that the principle of the roof extension to the property was acceptable, with a number of specific comments forming key considerations for the preparation of revised proposals.
- 2.12 A detailed analysis of the previous reasons for refusal, and how this application addresses each concern in full, is provided at Appendix A1.
- 2.13 Additionally, it is also noted that the neighbouring site 9 Jeffrey's Place, NW1 9PP was granted planning permission (LPA Ref: 2016/66425/P) for a roof extension. This scheme is currently under constructed and demonstrates the acceptability of roof extensions within the conservation area.

# 3. THE PROPOSED DEVELOPMENT

### 3.1 Planning permission is sought for:

"Erection of a single storey roof extension to create a 3x bedroom flat."

- 3.2 The proposed development is for a single storey roof extension providing 1 x additional residential unit. The approach to this proposal has been design-led to consider key views, surrounding roof forms and the form and architecture of the host building.
- 3.3 This approach has resulted in the design of a modest contemporary pitched roof extension which compliments the architectural features of the existing building. Due to its subservient bulk and scale the development appears as a discreet addition when viewed from Jeffrey's Place and Ivor Street. The design of the proposed development is considered to a high-quality and complimentary to the character and appearance of the conservation area and surrounding properties.
- 3.4 The resultant 3 x bedroom unit would provide a high standard of living with three generously sized bedrooms, two bathrooms, a well-structured internal layout, a spacious living/kitchen/dining area and a private roof terrace for the enjoyment of future residents. Openings are proposed to serve all habitable spaces to ensure that future residents have access to an appropriate level of natural light and ventilation.
- 3.5 The proposed unit is 115 sqm in size and would also provide a 15.9 sqm roof terrace, providing adequate private amenity space for future residents.
- 3.6 Further detail on the design of the development has been provided in the Design and Access Statement prepared by Emrys Architects, with Photomontages of the proposed development are provided at Figure 2.0.



Figure 2.0 Sketch of proposed street view (Jeffrey's Place), Source: Emrys Architects

#### Access and transport

- 3.7 Residents will be able to access the building via the existing front entrance on Jeffrey's Place. An internal staircase located at the northern side of the building will provide direct access to the unit at the roof level.
- 3.8 Two additional cycle parking spaces have been provided for at ground floor level within the existing cycle storage area.
- 3.9 The proposals are a car free development in accordance with Council's policies which aim to encourage sustainable transport means, particularly for sites with high public transport accessibility.

#### **Refuse and recycling**

3.10 Dedicated bins separated between waste and recycling will be provided internally in the kitchen of the proposed unit. Each bin will be able to accommodate 30L of waste. Residents will be able to

transfer their household waste to the communal bin store at ground floor level which is able to accommodate the additional waste for the single residential unit.

# 4. PLANNING POLICY FRAMEWORK

- 4.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.2 The statutory development plan for the subject proposals includes the consolidated London Plan (2016) and the adopted Camden Local Plan (2017).
- 4.3 The London Borough of Camden has a number of supplementary planning documents entitled Camden Planning Guidance (CPG). In March 2018 Council adopted a number of new and updated CPG documents. These documents provide further information to support local policies and form a material consideration in planning decisions.
- 4.4 The draft London Plan (2017) was published in November 2017 and is currently undergoing consultation. Appropriate weight to these emerging policies has been given.

### Policy review

4.5 Rather than list all relevant policies here, this report instead deals with them in a section/topic basis in the 'Planning Considerations' section below.

# 5. PLANNING CONSIDERATIONS

- 5.1 This section of the Statement provides an assessment of the proposals against relevant planning policy together with other material considerations. Each planning consideration is assessed in turn and are listed as follows:
  - Principle of the residential use;
  - Design and heritage;
  - Impact on residential amenity;
  - Heritage;
  - Transport and parking; and
  - Waste.

### Principle of residential use

- 5.2 Paragraph 49 of the National Planning Policy Framework (NPPF) states that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 5.3 London Plan (2016) Policy 3.3 recognises the pressing need to provide more homes in London. Table 3.1 contained sets an annual monitoring target for the provision of 889 new homes in Camden over a ten-year period. Notably, the Draft London Plan (2017) significantly increases the Borough's annual housing target to 1,086.
- 5.4 At the local level Council's commitment to provide additional housing in the Borough to meet local needs is recognised in Policy H1 of the Local Plan (2017).
- 5.5 Additionally, Policy H6 seeks to provide a mix of housing types to create an inclusive and sustainable community. Providing suitable housing for families with children is recognised as a policy outcome, with 3 x bedroom units considered to be a high priority for market housing. The proposed flat is to be 'family sized' given its generous size, spacious layout and as it would comprise 3 x bedrooms.
- 5.6 As such, the national, regional and local planning policy context, the site's location within an established residential neighbourhood and the existing lawful use of the site as a residential use (Class C3), support the principle of providing residential accommodation at the subject site.

#### Design and heritage

- 5.7 The design rationale behind the proposed roof extension have been carefully thought out to ensure that the development contributes positively to the character and appearance of the conservation area and does not cause substantial harm to the Grade II listed buildings at 8-10 lvor Street. The design of the proposals have also sought to respond to reason for refusal made by the Inspector in his decision on the previous application.
- 5.8 Paragraph 131 of the NPPF (2012) states that in in determining planning applications, local planning authorities should take account of:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.9 Paragraph 134 of the NPPF states that 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.
- 5.10 At the regional planning level, London Plan (2016) Policy 7.8 states that heritage assets and their settings should conserve their significance through sensitive design in terms of form, scale, materials and architectural detail.
- 5.11 Local Plan (2017) Policy D1 requires development to be of a high quality and sustainable design by respecting the local context and character and preserving and enhancing the historic environment. Design principles are clarified in Camden's Design CPG.
- 5.12 The design of the proposed development has significantly evolved from the initial proposal which was dismissed at appeal. The revised roof extension has been developed as part of a design-led approach, resulting in a pitched roof which has regard to the existing building and surrounding area with the lowest part of the roof corresponding with the existing parapets to ensure the bulk, mass and scale the development appears as a subservient addition to the existing building.
- 5.13 The roof material is grey aluminium which inspires a contemporary look and feel. Whilst the roof material and colouring differs from the traditional brickwork on the existing building, it offers a

sustainable and contemporary design solution that would complement the architectural features of the existing building. It is noted that the design of the development would be consistent with established contemporary roofs in the immediate surrounding area.

- 5.14 The design and visual appearance of the development has been carefully considered in the context of the Grade II listed building at 8-10 Ivor Street. The development at 7-8 Jeffrey's Place is visible from the vista experienced when emerging from the railway arches in a northerly direction on Prowse Place. This is the key approach to the listed building. Whilst the proposal will make a change to this view, the overall setting will remain the same. What is clearly key, in relation to this view, is the retention of the prominence and primacy of 8-10 Ivor Street. The subtle roof extension at 7-8 Jeffrey's Place does not harm this relationship as it retains the legibility of 7-8 Jeffrey's Place as a former factory site and does not generate an increase to the bulk or visibility of the existing building in such a way as to lead to a harmful, competitive relationship with 7-8 Ivor Street. This change is not considered to fundamentally generate a change to the significance of the listed building.
- 5.15 The revised design has successfully introduced a discreet addition that would preserve the character and appearance of the conservation area and would not be harmful to the listed building. The Heritage Statement prepared by Iceni Projects provides further detail on the acceptability of the development in heritage grounds.

#### Amenity

5.16 Local Plan (2017) Policy A1 seeks to protect the quality of life of existing and future occupiers and neighbours by ensuring new development does not result in adverse overlooking and privacy impacts, does not overshadow neighbouring development and does not detrimentally impact neighbouring amenity in any other respect (e.g. noise pollution, outlook etc.). This policy is supported by supplementary guidance CPG Amenity.

#### Daylight/sunlight

- 5.17 The pitched roof design of the development comprising a low roof height at the perimeter (approximately 1.5m) would ensure that there would be no worse impact on the outlook of neighbouring occupiers than the current situation. For these reasons also, the development would not reduce the amount of daylight and sunlight received by neighbours.
- 5.18 A comparative assessment of the daylight and sunlight received by neighbouring properties at present and with the proposed development was undertaken. The assessment demonstrated that potentially affected windows and rooms of properties in the immediate vicinity satisfy all of the BRE daylight and sunlight tests by virtue of retaining their absolute guideline value or retain 0.8 of their former value.

5.19 Further detail of the daylight and sunlight assessment undertaken for the proposed development is provided in the Daylight and Sunlight Report prepared by GVA Schautonowski Brooks.

#### Overlooking

- 5.20 The development would not result in a loss of privacy to neighbouring occupiers. As stated by Council's officer and the Planning Inspector in their review of the initial proposal, the development was not considered to result in an unacceptable loss of privacy to neighbouring occupiers. As part of the design-led approach, the visual prominence of the roof extension has been revised resulting in an improved design that would not adversely impact on the privacy of neighbouring occupiers.
- 5.21 The roof terrace has been scaled, positioned and designed to ensure no loss of privacy to neighbours.

Noise and disturbance

5.22 It is not considered that the amount of noise and disturbance created by a single residential unit would harm the living conditions of neighbouring occupiers as concluded by Council's officer and the Planning Inspector.

Quality of accommodation

- 5.23 The requirement for providing high quality housing accommodation within the Borough is set out in Policy H6 of the Local Plan (2017). The accommodation proposed can be considered to be of high quality for the following reasons.
  - The proposed residential unit is 115m<sup>2</sup> in size which exceeds the minimum size requirement of 86m<sup>2</sup> for a 3x bedroom unit specified in the Technical housing standards nationally described space standards (2015), Mayor's Housing SPG (2016) and the Local Plan (2017);
  - Room sizes and floor to ceiling heights comply with national requirements set out in the aforementioned standard;
  - All habitable rooms are served with openings which provide natural daylight/sunlight and natural ventilation to these spaces; and
  - Future residents would be provided with a spacious living/kitchen/dining area and a private outdoor roof terrace.

#### Summary

5.24 The development is therefore considered to comply with the objectives of Policy A1 and CPG Amenity in regard to protecting amenity of existing and future occupiers.

### Transport and parking

- 5.25 The site is located in an area with an excellent public transport accessibility level (PTAL) rating of 6b, with a various bus routes, railway and London underground connections available within close proximity of the site. A car free development is proposed to promote sustainable transport use.
- 5.26 Cycle parking provision would be made internally for residents, encouraging them to cycle to work, in addition to using public transport.
- 5.27 Therefore, the proposals are considered to comply with the Council's transport objectives at Policy T1 and T2 of the Local Plan (2017) as it would be car free and would encourage walking, cycling and public transport.

#### Waste

- 5.28 Minimal amounts of additional waste would be generated from the proposed residential unit. Dedicated bins separated between waste and recycling will be provided internally in the kitchen. Each bin will be able to accommodate 30L of waste. Residents will be able to transfer their household waste to the communal waste bins located at ground floor level which is able to accommodate the additional waste of one household. Existing waste collection arrangements will continue.
- 5.29 This level of waste generation is not considered to have an adverse impact on neighbouring amenity or the local waste capacity network. The proposed development would therefore comply with Policy CC5 of the Local Plan (2017).

# 6. CONCLUSIONS

- 6.1 This Planning Statement has been prepared on behalf of City & Provincial in support of a planning application for a single storey roof extension to provide a 3 x bedroom flat.
- 6.2 The proposed development would deliver a number of planning benefits which include:
  - providing a high quality residential unit that contributes to the borough's housing stock;
  - providing a family sized unit that exceeds the minimum space standards set by policy; and
  - providing a car free development to promote sustainable transport use.
- 6.3 The proposals are considered provide a sustainable development in accordance with the NPPF and through its revised design respond to the sole reason for refusal from the Planning Inspector. The scheme would preserve the character and appearance of the conservation area, would not cause detrimental harm to the listed building and would fully comply with the adopted development planning policy.

# A1. RESPONSE TO COMMENTS RAISED ABOUT PREVIOUS SCHEME

Comments by LB Camden/Planning	Response
Inspector	
Design and	l heritage
Camden officer: The extension fails to relate to the integrity of the host building. The existing building has a distinct fenestration pattern, design and symmetrical form. Inspector: The existing building has a balanced façade with symmetry of window positions and detailing. The scale, bulk, proportions, fenestration and contemporary design of the extension would introduce a harmful contrast at odds with the traditional architectural composition of the existing building.	This proposal has taken a design-led focus to provide a scheme that compliments the existing building and surrounding area. The shape of the extension takes the form of a dual-pitched roof. The development occupies most of the roof space however it has been designed to ensure the lowest point is at the perimeter with a height to eaves of only 1.5m. In terms of bulk, mass and scale the development appears as a subservient addition to the existing building. The design of the development has significantly evolved from what was initially proposed under the refused application. The development provides a significant benefit
Camden officer: The extension does not respect the proportions of the existing building. Proportions are respected by the window openings with ground floor windows measuring 2.2m in height, first floor windows 1.9m in height and second floor windows 1.5m in height. Proposed extension would protrude 2.3m above the parapet of the parent building, appearing over-dominant in terms of its bulk and out of proportion with the existing building.	to the public by positively contributing to the local housing stock. The design of the development considers the detail and fenestration of the existing building and provides a complimentary, contemporary addition that purposefully does not replicate the proportions of the existing building at the subject site. The development has a more successful relationship with the existing building than the initial proposal under the refused application. The development provides a significant benefit to the public by positively contributing to the
Camden officer: Aluminium material would be an inappropriate contrast with the existing building.	to the public by positively contributing to the local housing stock. The roof extension is to comprise dark grey perforated metal panels as cladding with a

	measured amount glazing to ensure no adverse
	impact to neighbouring amenity.
	Whilst the roof material and colouring differs from the traditional brickwork on the existing building, it offers a sustainable and contemporary design solution that would complement the architectural features of the existing building.
	The principle of contemporary roof designs (similar to the one proposed here) has been established in the Conservation Area and as such the proposed development would be in keeping established development in the local area.
Camden officer: 7-8 Jeffrey's Place has been identified in the Jeffrey's Street Conservation Area Statement as being out of scale with its surroundings in its existing form. Any extension would have to respect the form/scale of the development.	The proposed roof extension has been specifically designed to respect the proportions of the existing building.
Camden officer: Principle of an extension is	The development has been designed to respect
acceptable but it should respect the existing roof form and the existing original details should be precisely matched.	the detail and fenestration of the existing building whilst simultaneously providing a complimentary, contemporary addition.
	From a review of other planning applications in the vicinity of the site, it is noted that planning permission has been granted for a number of roof extensions of varying shapes, sizes and designs as well as development with contemporary roof styles in the Jeffery's Street Conservation Area. Some examples include:
	9 Jeffrey's Place London NW1 9PP (LPA Ref: 2016/66425/P);
	Former garages rear of 174 Camden Street and 29 Prowse Place London NW1 9PN (LPA Ref: 2016/2137/P); and

	7 Ivor Street London NW1 9PL (LPA Ref: 013/5131/P).
Camden officer: The extension would result in harm to the setting of the Grade II listed building on Ivor Street and the skyline of the conservation area by virtue of the additional height, bulk and mass added to the existing building. Inspector: The development would be viewed as an overly dominant feature in the townscape and would fail to preserve the character and appearance of the Jeffrey's Street Conservation Area. Although the extension would be setback, it would remain visible and unduly prominent along Jeffrey's Place and Ivor Street, particularly in the context of the Grade II listed building at 8- 10 Ivor Street, given it would further increase the height of the existing building. The glazing would also add to its visual prominence.	In its present form, the flat roof of the existing building at the subject site is partly visible when viewed from the south of Ivor Street, when facing the aforementioned Grade II listed building. The development has been designed to ensure that the lowest part of the pitched roof (the eaves) is located at a similar height to the existing parapet. The roof gradually increases in height with the highest part of the pitched roof at the centre. The design and visual appearance of the development has been carefully considered in the context of the Grade II listed building at 8- 10 lvor Street. The development at 7-8 Jeffrey's Place is visible from the vista experienced when emerging from the railway arches in a northerly direction on Prowse Place. Whilst the proposal will make a change to this view, the overall setting will remain the same. The proposed change is not considered to fundamentally generate a change to the significance of the listed building.
Residential amenity Camden officer: The terrace would be set in from the roof perimeter and the existing parapet wold shield overlooking to 8 and 10 Prowse Road.	The proposed terrace has been carefully sized, positioned and located to ensure that it does not result in a mutual loss of privacy between neighbouring occupiers and future occupies of the residential unit.
Camden officer: Downward views from the proposed windows would not result in privacy concerns to neighbouring properties (e.g. dwellings opposite the site on Jeffrey's Place or the dwellings on Ivor Street). Inspector: The setback and oblique angle of downward views towards the affected areas	The new dual-pitched roof design is an improvement on the previous box-shaped design.

would prevent unacceptable loss of privacy to occupiers of surrounding properties.	
Camden officer: Direct sunlight received by the dwellings opposite the host building (e.g. no.'s 16, 17 and 18) on Jeffrey's Place would be reduced as a result of the proposed extension. No daylight/sunlight report has been submitted to demonstrate otherwise. Sunlight and daylight to buildings to the west, south and east would be unaffected by the proposed roof extension. Inspector: Information submitted includes a BRE daylight and sunlight report which identifies a minor impact upon light provision to neighbouring properties. As such the development would not have an unacceptable overshadowing effect on the daylight of neighbours. Whilst there would be some effect on the light provision to 16 to 20 Jeffrey's Place and 6 to 8 Ivor Street in particular, the degree would not be significant enough to warrant a refusal in this instance.	The pitched roof design of the development coupled with the low height proposed at the roofs perimeter (approximately 1.5m) would ensure that the development would not reduce the amount of daylight and sunlight received by neighbours. A daylight and sunlight assessment of the potential impacts of the proposed development demonstrated that potentially affected windows and rooms of properties in the immediate vicinity satisfy all of the BRE daylight and sunlight tests by virtue of retaining their absolute guideline value or retain 0.8 of their former value.
Inspector: The development (with setbacks and oblique angles of roof design) would not result in overbearing impacts on the occupiers of neighbouring properties. The height, scale and massing of the existing building is already somewhat imposing on the outlook of neighbouring properties.	The revised design of the development is an improvement on the initial roof design proposed under the refused application. As such the development would not result in overbearing impacts to neighbouring occupiers.
Camden officer: Noise omitted from a two bedroom flat is unlikely to result in a discernible increase in cumulate noise levels. Inspector: The occupation of flats has the potential to increase general levels of activity typical of that of a household, but the additional noise and disturbance would not be harmful to the living conditions of neighbouring occupiers.	Whilst the revised proposal includes an additional bedroom, it is unlikely that the single residential unit would result in a discernible increase in cumulative noise level or disturbance to neighbouring occupiers.

Energy and sustainability	
Camden officer: The design and access statement confirms levels of energy efficiency would meet sustainably targets. Considering the location of the proposed extension, a dwelling at roof level is not considered possible to meet the majority of the 16 point criteria in the lifetime homes. Sedum green roof around the perimeter would maintain greater water retention and improve the green environment. Inspector: There would be environmental benefits related to energy efficiency and provision of a sedum roof.	The proposals has been designed to incorporate a number of sustainable design solutions that meet sustainability targets. The proposals will use low tech materials in combination with a wildflower green roof and high performance glazing and external envelope. Energy efficiency is at the thrust of the design with the inclusion of appropriate heating, cooling and power systems to minimise CO2 emissions. Additionally, bathroom design features will comprise dual flush toilets, a low flow shower heads and spray taps to conserve water.
Transport and parking	
Camden officer: Given the high PTAL rating (6a second highest) and the area being identified as suffering parking stress, if the application were recommended for approval the developer would be required to enter into a s106 legal agreement to ensure the development is car free. Inspector: The site is within a Controlled Parking Zone and Council have indicated that the site is within an area of on-street parking stress. A s106 legal agreement would be necessary to ensure the development is car free and does not conflict with the local development plan.	A car free development is sought to ensure no worsening of the current situation.
Camden officer: The design and access statement confirms 1 cycle parking space but the plans do not illustrate where the space will be located.	The new proposal is for a 3x bedroom flat. The existing cycle storage space at the ground floor level will accommodate two additional cycle parking spaces (drawing reference: 1422-0200-AP-301).
Public benefit of development	

Inspector: The development offers potential	The development provides a large home
benefits in terms of increasing housing supply	meeting the aims of policy H7 of the Local Plan
and housing choice in a sustainable location with	(2017) which seeks to create a mixed, inclusive
excellent public transport links. There would be	and sustainable community.
temporary economic benefits with regard to the	
associated construction works.	