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# Planning Statement

(includes Affordable Housing Statement and Planning Obligations Statement)

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18-22 Haverstock Hill, London

Prepared by Savills (UK) Limited

PPR Haverstock Hill LLP

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*Front cover image courtesy of Piercy&Company*

## 1. Introduction

- 1.1. This Planning Statement has been prepared by Savills (UK) Limited (“Savills Planning”) and is submitted in support of a Full Planning Application. It is made on behalf of PPR Haverstock Hill LLP (“the Applicant”) for the redevelopment of the site at 18-22 Haverstock Hill, London, NW3 2BL in the London Borough of Camden (“LBC / the Council”).

### Description of Development

- 1.2. Full planning permission is sought for the following:

*“Demolition of existing buildings and ancillary structures (11 flats, A1 unit, A5 unit) and construction of a new building comprising ground plus basement and five upper floors for use as 29 no. dwellings (Class C3) and flexible Class A1/A2/A3/A4 together with cycle parking, landscaping, refuse and associated works.”*

### Overview of Development Proposals

- 1.3. The development proposals seek to redevelop the existing site at 18-22 Haverstock Hill by demolishing all existing buildings on site, in order to erect a 5 storey building with a ground floor plus basement level.
- 1.4. The new buildings will contain new homes in the form of 29 apartments, as well as approximately 273sqm of commercial floorspace at ground floor level. Cycle and refuse storage will be provided for both the residential and retail elements, together with landscaping and other associated works across the site.

### Pre-Application Consultation

- 1.5. The Applicant has engaged with LBC via extensive pre-application discussions and the feedback has informed the final design. The Applicant has also consulted with its neighbours and key stakeholders. The details are contained throughout this supporting Planning Statement and Record of Engagement.

### Supporting Information

- 1.6. This Planning Statement sets out the application proposals and relates them to national, regional (London) and local planning policies. This Statement should be read in conjunction with the drawings, Design and Access Statement, as well as the supporting documents. The full submission list comprises the following:

- **Design and Access Statement (DAS)**, prepared by Piercy&Company;
- **Drawings (location plan, existing and proposed – see separate issue sheet)**, prepared by Piercy&Company;
- **Planning Statement** (this document), prepared by Savills Planning, including:
  - **Affordable Housing Statement**; and
  - **Planning Obligations Statement**;
- **Air Quality Impact Assessment**, prepared by ITP Energised;
- **Arboricultural Statement**, prepared by Greengage;
- **Basement Impact Assessment**, prepared by Engineeria;
- **Daylight & Sunlight Assessment**, prepared by EB7;
- **Draft Outline Construction Management Plan**, prepared by Stace;
- **Energy Assessment**, prepared by Silcock Dawson & Partners;
- **Noise Assessment**, prepared by ITP Energised;
- **Preliminary Ecological Appraisal**, prepared by Greengage;
- **Pre-application Consultation Statement**, prepared by GL Hearn;
- **Sustainability Statement**, prepared by Silcock Dawson & Partners;
- **Transport Statement**, prepared by Transport Planning Associates; and
- **Viability Report**, prepared by Savills.

1.7. In addition to the above, a completed Application Form, Ownership Certificate, Community Infrastructure Levy (CIL) Additional Questions Form, and covering letter (prepared by Savills) have also been supplied. The application fee has also been provided under separate cover.

## Structure of this Planning Statement

1.8. The structure of this Planning Statement is set out as follows:

- **Section 2 (Context of the Proposals)** provides background to the proposal, including a description of the site and surrounding area and planning history of the site;
- **Section 3 (The Proposed Development)** sets out details of the development proposal;
- **Section 4 (Pre-application Consultation Statement)** sets out the details of the consultation programme;
- **Section 5 (Planning Policy Framework)** sets out the relevant planning policy framework that the proposal is considered to be considered against;
- **Section 6 (Planning Assessment)** sets out the discussion of the material planning considerations arising from the application proposals; and
- **Section 7 (Conclusions)** presents our conclusions.

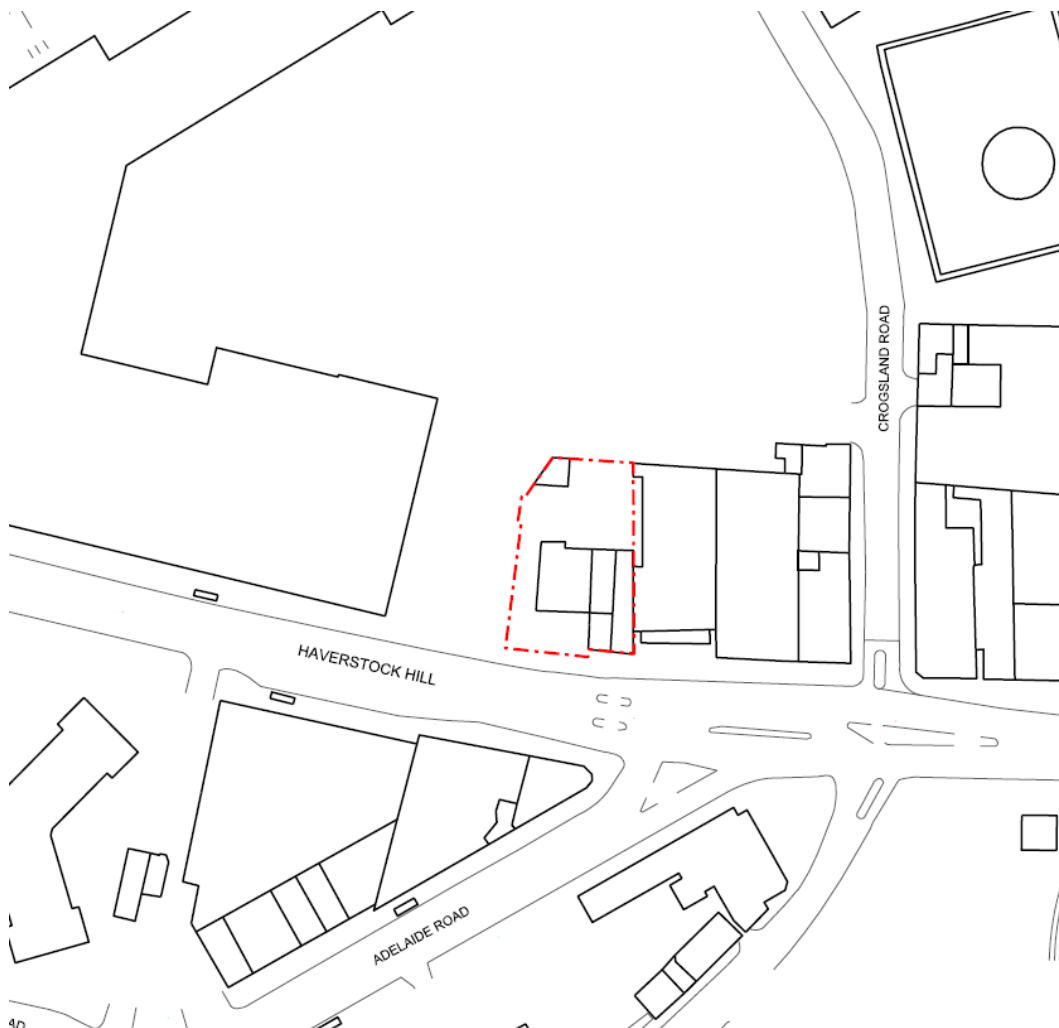
## 2. Context of the Proposal

2.1. This section provides details of the background to the application proposals and provides the context within which the application is being made.

### The Site and Surrounding Context

2.2. The site extends to approximately 0.074 hectares and is on the north-western side of Haverstock Hill, near to the junction Adelaide Road, as shown in **Figure 2.1** below. Further to the south is the junction of Regent's Park and Crogsland Road. A portion of the site is located within the Camden Town Major Town Centre.

**Figure 2.1: Site Location Plan**



- 2.3. The building is a heavily altered terraced building comprising Nos.18, 18a, 20 and 22 Haverstock Hill. The main terraced building is set back from the site's front boundary and comprises 11 existing residential flats.
- 2.4. The northern part of the terrace (at Nos. 20-22) comprises a lower ground, upper ground and two upper floors. The southern part of the terrace (at Nos.18-18a) comprises ground and two upper floors, with the building stepping down towards the southern boundary.
- 2.5. There is an existing forecourt which has been part-filled by a front ground floor extension with roof terrace above (Nos.18-18a). This extension includes an A1 unit (a hairdressers trading as 'Oscar Pink') and an A5 unit (a hot food takeaway trading as 'Chalk Farm Grill'). The remaining part of the forecourt is used for ad hoc parking, and provides access to the rear of the terraced building.
- 2.6. To the north and rear of the site is Haverstock School, an 11-18 year old comprehensive school. The adjacent neighbouring building to the south is a Salvation Army building. Opposite the site to the west is a Grade II Listed Chalk Farm underground railway station building.

### **Access**

- 2.7. The site has 'excellent' accessibility to public transport, with a PTAL rating of 6a. The site is located approximately 60m north east of Chalk Farm Station, served by the Edgware branch of the Northern Line on the London Underground. This station provides direct links to north, central and south London.
- 2.8. The site is located near several bus stops which are served by the following bus routes:
- 31 (White City to Camden Town Station);
  - 168 (Old Kent Road, *Tesco* to Hampstead Heath); and
  - 393 (Chalk Farm, *Morrisons* to Clapton).
- 2.9. The following night bus services run from bus stops near the site:
- N5 (Edgware to Trafalgar Square);
  - N28 (Wandsworth to Camden Town Station); and
  - N31 (Clapham Junction to Camden Town).

## **Flood Risk**

- 2.10. The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 1.

## **Local Heritage**

- 2.11. The site is not located within a conservation area, and there are no statutorily or locally listed heritage assets within the curtilage of the site. Within the vicinity of the site there are a number of statutory and locally listed buildings:

- Chalk Farm Underground Station, Grade II listed, approximately 45m opposite the site;
- The Roundhouse, Grade II\* listed, approximately 145m to the south east of the site;
- 131-149 Prince of Wales Road, Grade II listed, approximately 160m to the north of the site; and
- 2 Haverstock Hill and 45-47 Crogsland Road, locally listed, approximately 70m to the south east of the site.

- 2.12. The site is not located with an Archaeological Priority Area.

## **Planning History**

- 2.13. A planning history search reveals a number of planning applications at the site (listed in full in Appendix 1). They primarily relate to retail-related development at the site, with several applications also lodged for residential-related development.

## 3. The Proposed Development

- 3.1. This section sets out a summary of the key elements of the proposals. A comprehensive description of the design is set out in the accompanying drawing and Design and Access Statement prepared by Piercy&Company.
- 3.2. The current buildings onsite are to be demolished, and a residential-led mixed-use development is proposed in their place. This new building will house 29 residential units and 273sqm of retail floor space at ground level. The proposals also include associated landscaping, amenity space and cycle storage provision.

### Site Layout

- 3.3. The layout and positioning of the proposed buildings has been informed by a detailed assessment of the site's opportunities and constraints.
- 3.4. The proposals seek to deliver a high quality scheme, and the proposed layout has been carefully designed to make efficient use of the site, whilst improving its appearance and integrating the development with the surrounding area and nearby developments. The layout provides an outward facing scheme with active frontages and attractive landscaping which will enhance the visual appearance of the site from both Haverstock Hill and neighbouring properties.
- 3.5. The development accommodates the commercial unit at ground floor along with access to the three duplex units, as well as residential communal space for access to the upper floors. Access to the basement for the cycle and refuse stores is also provided at ground floor.
- 3.6. The levels from first floor to fifth floor house the remaining residential units. The massing of the building is reduced at the fourth floor level which allows for a generous communal terrace to which all residents will have access. Plant servicing the building is located in the basement.

### Residential Accommodation

- 3.7. On an area of approximately 0.074ha, the scheme proposes a variety of unit types (apartments and duplexes) and sizes (studios, 1, 2 and 3 bed units), comprising 29 units, with a total of 75 habitable rooms. **Table 3.1** below summarises the proposed unit mix.
- 3.8. The residential element of the scheme provides 5 x 3-bed units, which represents 17% family accommodation.



- 3.9. Of the 29 units, it is proposed for 3 units to be wheelchair adaptable, which would meet the requirements of Part M4(3). This would equate to 10% of the total number of units proposed.

**Table 3.1: Proposed Unit Mix**

Unit Type	Persons	No. Units Total	Total Type %
Studio	1 person	4	14%
1 bedroom	2 person	9	31%
2 bedrooms	3 person	4	38%
	4 person	7	
3 bedrooms	5 person	1	17%
	6 person	4	
<b>Total:</b>		<b>29</b>	<b>100</b>

### Non Residential Floorspace

- 3.10. While the majority of the development's floorspace is for residential use, a portion of the ground floor has been allocated for flexible commercial uses (Use Classes A1/A2/A3/A4) (273sqm).

### Design

- 3.11. The massing, height, materials and detailed architectural treatment have been designed in response to the particular site characteristics and urban context, including the nearby heritage assets, together with the need to deliver the necessary functional requirements for the flexible A1/A2/A3/A4 and residential uses.
- 3.12. The height and massing of the building has been developed through extensive pre-application engagement, including one DRP. The DAS submitted with the planning application sets out the full details and design rationale of the development proposals.

### Residential Quality

- 3.13. The dwellings have been designed to be of a high quality and to meet the standards set out in the Mayor London's Housing Supplementary Planning Guidance (March 2016) and the National Technical Standards.
- 3.14. There will be one main core, which will serve all of the apartment units.

- 3.15. Private external amenity space will also be provided for the majority of the residential units in the form of private terraces and balconies. Communal terrace space will also be provided for all future residents, measuring 96.9sqm.
- 3.16. As per the GLA's Play and Informal Recreation SPG, based on the type and number of units provided within the development, the scheme will have a child yield of 3 children. As the London Plan only requires formal play space to be included with developments with a child yield of 10 or more children, there is no requirement for the inclusion of formal play space within the scheme.
- 3.17. Notwithstanding this, the large communal space on the fourth floor has been designed so as to allow multi-generational usage of the space, with informal play facilities being provided in the form of an artificial turf area and small stone boulders. The part of this terrace earmarked for playable space measures 38.7sqm.
- 3.18. The playable space provided on the development is intended to be used by children under 5 years old. For older children, the closest play area or public park is approximately 450m to the north east at Talacre Gardens.

### **Access, Parking and Servicing**

- 3.19. Pedestrian access to the site will be provided from the pavement on Haverstock Hill itself, with separate entrances for both the residential and commercial elements.
- 3.20. Given the excellent public transport connectivity of the site, it is not proposed to incorporate any off-street car parking spaces within the development. This extends to disabled parking spaces, but should the need arise for a disabled occupant to have access to car parking facilities, opportunities have been identified within the local highway network to allow for disabled parking. Please see the submitted Transport Statement for further detail in the regard.
- 3.21. A total of 52 long-stay cycle spaces are proposed in a secure store in the basement of the development. A further 8 short stay cycle spaces will be provided in the form of 4 Sheffield stands within the entrance courtyard.
- 3.22. Servicing and refuse collection will be undertaken from Haverstock Hill to the northwest of the site. A management company will be employed to transfer refuse bins from the basement store, through the lift and entrance lobby of the building, to the kerbside at collection days. It is proposed to establish an on-street loading bay on Haverstock Hill, which would allow

Camden Council to control the loading arrangements here.

- 3.23. Further information on access, servicing and other related matters is provided in the submitted Transport Statement, prepared by Transport Planning Associates.

## **Energy, Sustainability and Biodiversity**

- 3.24. The proposed development will maximise reductions in carbon dioxide emissions through the implementation of Be Lean, Be Clean and Be Green energy efficiency measures. The development has been designed to achieve a 28.2% regulated carbon reduction on 2013 Building Regulations. This will be achieved through the following measures:

- Improved fabric insulation including triple glazing;
- Improved air tightness;
- High efficiency balanced whole house heat recovery units;
- Low energy lighting throughout;
- Installation of a community heating system; and
- Installation of photovoltaic panels.

- 3.25. In addition, a cash in lieu payment will be agreed to offset the remaining regulated carbon emissions from the scheme resulting in a zero-carbon development overall.

- 3.26. In addition to the carbon reduction detailed above for the residential units, the commercial unit has the potential to achieve a BREEAM rating of “Excellent” (depending on its final fit-out), which is in line with LBC planning policy.

- 3.27. Further details are provided within the Energy Assessment and Sustainability Statement prepared by Silcock Dawson and Partners.

## 4. Pre-application Consultation Statement

- 4.1. In accordance with the Localism Act 2011, a programme of public consultation has been undertaken prior to the submission of this application. The consultation focussed on engaging with community stakeholders, including local residents, businesses and politicians in order to seek their views.
- 4.2. Neighbours and local stakeholders were engaged in the design process of the development proposals throughout the pre-application process prior to the submission of the planning application. As well as meetings that were held with local councillors, public consultation was undertaken through a public drop-in event and stakeholder meetings with the nearby school.
- 4.3. On the whole, feedback received during the consultation process has been positive. The majority of respondents are of the view that the proposals have been well designed and well thought-out.
- 4.4. The Pre-application Consultation Statement that has been prepared by GL Hearn sets out the full details and accompanies this planning application.

## 5. Planning Policy Framework

- 5.1. The redevelopment proposals have taken account of relevant national, regional and local planning policy. This section of the Planning Statement sets out a summary of the relevant planning policy documents and the following section demonstrates compliance with these policies.
- 5.2. In accordance with section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 5.3. The development plan comprises:
- The London Plan (2015 consolidated with alterations since 2011) and minor alterations to the London Plan (2016);
  - Camden Local Plan (July 2017); and
  - Camden Site Allocations Document (2013).
- 5.4. The development plan is supported by other material considerations including the National Planning Policy Framework (NPPF) and associated guidance contained within the Planning Practice Guidance (PPG) relevant Supplementary Planning Documents/Guidance (SPDs/SPGs) produced by LBC, which are referenced to in this Planning Statement.

### **National Planning Policy Framework**

- 5.5. At the national level, the Government published its National Planning Policy Framework (NPPF) on 27 March 2012. The NPPF provides an overarching framework for the production of local policy documents and at the heart of the NPPF is a presumption in favour of sustainable development.
- 5.6. In accordance with the NPPF, this should be seen as a 'golden thread' running through both plan-making and decision-taking, and sets out twelve core land-use planning principles (Paragraph 17) which should underpin plan-making and decision-taking, and which planning should achieve. In accordance with Paragraph 14 of the NPPF, for decision-taking, this means:
- *“approving development proposals that accord with the development plan without delay; and*

- *where the development plan is absent, silent or where relevant policies are out-of-date, granting planning permission unless:
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole;*
  - or*
  - *specific policies in the NPPF indicate development should be restricted.*”*

5.7. In addition, Paragraph 10 sets out that plans and decisions should take into account local circumstances, so that they respond to the different opportunities for achieving sustainable development in different areas.

5.8. The Government expects the planning system to deliver the homes, business, infrastructure and thriving local places that the country needs, while protecting and enhancing the natural and historic environment.

5.9. The Government published its National Planning Policy Guidance (NPPG) notes in March 2014. The NPPG notes support the NPPF and provide high level legislation with regard to specific planning issues and processes. The NPPG notes are referenced where applicable throughout this document.

5.10. Also of relevance, albeit not policy, DCLG published the Housing White Paper: Fixing our Broken Housing Market in February 2017. This White Paper sets out the Government’s plan to reform the housing market and boost the supply of new homes.

5.11. In March 2018, the Government published a draft revision to the NPPF, which primarily consolidates a number of proposals outlined in various policy consultation documents issued previously, such as the Housing White Paper.

## **The London Plan**

5.12. The London Plan (2016) is the overall strategic plan for Greater London, and sets out the Mayor of London’s overall strategic plan for London. The London Plan (2016) comprises the London Plan 2011 consolidated with Revised Early Minor Alterations to the London Plan (October 2013); Further Alterations to the London Plan (March 2015); and Minor Alterations to the London Plan (MALP) (March 2016). The most recent alterations, the MALP, were prepared to provide updates to the London Plan to reflect national housing standards and car parking policies.

- 5.13. Relevant London Plan policies are referenced in our assessment where appropriate.
- 5.14. The London Plan is supported by a number of Supplementary Planning Guidance (SPG) and Best Practice Guidance (BPG) documents which will be referred to in this Planning Statement as appropriate. This includes the following:
- **Housing SPG (2016)** sets out guidance to supplement the housing policies in the London Plan. It was updated in March 2016 to reflect the FALP and MALP and supersedes the 2012 Housing SPG, the Mayor's Housing Standards Policy Transition Statement and the 2010 Interim London Housing Design Guide.
  - **Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment SPG (2014)** provides advice on implementing inclusive design principles and on creating an accessible environment, with a particular emphasis on the access needs of disabled and older people.
  - **Sustainable Design and Construction SPD (2014)** sets out guidance on the implementation of London Plan policies relating to sustainable design and construction, as well as how to deal with a range of other matters relating to environmental sustainability.
  - **Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)** provides guidance in support of London Plan Policy 3.6, Children and Young People's Play and Informal Recreation Facilities, and sets out the key mechanisms for making sure that play spaces are secured and protected, and in particular to ensure new developments provide enough playspace to meet the needs of child occupiers.
  - **Affordable Housing and Viability SPG (2017)** sets out guidance in an effort to increase the amount of affordable housing delivered through the planning system, to embed the requirement for affordable housing into land values, and to increase the transparency and consistency of the viability process. For schemes which comply with the requirement to deliver a certain percentage of affordable units, the SPG outlines how they can be more rapidly delivered through the planning process. Schemes which do not comply with the requirement will be subject to processes and procedures detailed in the SPG.
- 5.15. The Mayor of London recently consulted on the first draft of the new London Plan, between 4 December 2017 and 2 March 2018.
- 5.16. Shortly after becoming elected in mid-2016, the current Mayor of London, Sadiq Khan, produced the 'A City for All Londoners' document, which outlined the city's top opportunities and challenges as a first step towards the creation of the new London Plan as referred to

above.

## Local Planning Policy

- 5.17. It is necessary to consider LBC's Local Plan which was adopted in July 2017. It sets out the Borough's long-term strategic vision and detailed planning policies up to 2031, in line with the principles of sustainable development.
- 5.18. LBC have a number of SPDs which are complementary to their development plan documents (titled Camden Planning Guidance (CPG)). A number of these were consulted upon and subsequently updated or replaced in March 2018. LBC will then be undertaking a further review of the remaining CPG documents later in 2018.
- 5.19. Of relevance are the following Camden Planning Guidance documents:
- Camden Planning Guidance: Housing (interim);
  - Camden Planning Guidance: Basements (March 2018);
  - Camden Planning Guidance: Biodiversity (March 2018);
  - Camden Planning Guidance 1: Design (July 2015 updated March 2018);
  - Camden Planning Guidance 2: Housing (May 2016 updated March 2018);
  - Camden Planning Guidance 3: Sustainability (July 2015 updated March 2018);
  - Camden Planning Guidance 5: Town centres, retail and employment (September 2013);
  - Camden Planning Guidance 6: Amenity (September 2011 updated March 2018);
  - Camden Planning Guidance 7: Transport (2011); and
  - Camden Planning Guidance 8: Planning obligations (July 2015 updated March 2018).
- 5.20. Relevant Local Plan policies are referenced in our assessment where appropriate.



## 6. Planning Assessment

- 6.1. This section assesses the proposals against the national, regional and local planning policy framework and sets out the main planning issues.

### **Principle of Development**

- 6.2. A presumption in favour of sustainable development is identified as the basis for every plan and every decision in the NPPF. The London Plan Policy 1.1 sets out that growth will be supported across all parts of London to ensure it addresses the need for development, regeneration and social and economic convergence. The general thrust of national, regional and local policies is to secure sustainable patterns of development and re-use previously developed ('brownfield') urban land.
- 6.3. Paragraph 17 of the NPPF sets out that the planning system should proactively drive and support sustainable development to deliver the new homes that the country needs. Paragraph 47 of the NPPF identifies measures to "*boost significantly the supply of housing*" and requires Local Plans to meet their objectively assessed need for housing, and paragraph 49 of the NPPF, housing applications should be considered in the context of the presumption in favour of sustainable development.
- 6.4. New homes is a key priority for the Mayor and Table 3.1 of the London Plan sets a minimum ten year target of 42,389 new homes to be delivered across London in the period from 2015 to 2025 and for Camden an overall annual housing target of 889 net additional homes with a minimum provision of 8,892 homes in the same ten year period. The Mayor emphasises his drive to deliver new homes in the draft London Plan at Table 4.1, which sets a considerably higher minimum ten year target of 64,935 new homes for the capital between 2019/20 to 2028/29, and for Camden an annual housing target of 1,086 net additional homes with a minimum provision of 10,860 homes in the same ten year period.
- 6.5. Policy G1 (Delivery and location of growth) outlines the Council's desire to create the suitable conditions needed for growth in the Borough, which will deliver the homes, jobs and infrastructure needed by those who live and work in the Borough. Growth in Camden will contribute towards achieving the strategic objectives set out in the Local Plan, which includes the provision of 16,800 additional homes, 695,000sqm of office floorspace and circa 30,000sqm of retail floorspace.
- 6.6. Policy H1 states that the Council will aim to secure a sufficient number of homes to meet the

needs of existing and future households, by maximising the supply of housing.

- 6.7. Policy E1 seeks to secure a successful and inclusive economy in Camden, stating that the Council will be creating the conditions for economic growth and harnessing the benefits for local residents and businesses.
- 6.8. The application proposals provide an opportunity to deliver a sustainable high quality and sensitive scheme, whilst optimising the development potential of this brownfield site and improving its visual appearance to the benefit of the surrounding area. In accordance with the aims of sustainable regeneration, the proposed development has been designed to optimise the use of the site through the delivery of new high quality residential accommodation in keeping with the existing development pattern and local character. The proposals to deliver 29 residential units (including family accommodation) at the site would fully comply with national, London and local planning policy and guidance.

### **Town Centre Uses**

- 6.9. Policy TC1 states that the Council will focus new retail and related uses in LBC's existing town centres and designated growth areas. The Camden Town Town Centre will also receive a significant additional provision of retail distribution.
- 6.10. Policy TC2 states that, through a number of measures, the Council will promote successful and vibrant centres throughout Camden to serve the needs of residents, workers and visitors.
- 6.11. Policy TC3 states that the Council will seek to protect shops in the borough which are located outside centres, and will only grant planning permission for such a loss where there is nearby alternative provision, evidence that the current use is not viable and that, within Central London, the replacement proposals would positively contribute to local character, function, viability and amenity.
- 6.12. Policy TC4 requires that the development of town centre uses does not cause harm to character, function, vitality and viability of a centre, the local area or the amenity of neighbours. LBC will consider any planning application for town centre uses against this criteria, and will use planning obligations and conditions to address impacts related to noise, refuse, fumes, etc..
- 6.13. The proposals incorporate a commercial unit at ground floor (273sqm), providing an active frontage along Haverstock Hill. The planning application seeks permission for flexible retail uses (A1/A2/A3/A4), excluding hot food takeaways (A5).

- 6.14. Schedule 2, Part 3, Class V of the Town and Country Planning (General Permitted Development) (England) Order 2015 ("the Order") allows the local planning authority to grant permission for: *"Development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application, to another use which that permission would have specifically authorised when it was granted."*
- 6.15. This is subject to conditions that the application was not made before 5 December 1988, that permission is not carried out more than 10 years after the grant of permission, that development does not consist of a change of use to a betting office/pay day loan shop, or that it would result in any breach of condition, limitation or specification.
- 6.16. Effectively, the Order enables a local planning authority to grant permission for more than one planning use for the same land parcel, subject to conditions. This application therefore proposes flexible space for use as A1 (Shops), A2 (Professional Services), A3 (Restaurants and Cafes) or A4 (Drinking Establishments) at ground/basement levels.
- 6.17. Subject to permission being granted, this means that any of the stated uses may be implemented and thereafter, provided it is not more than 10 years after the date of permission, a change of use may take place to any of the other stated uses i.e. A1, A2, A3 or A4.
- 6.18. These reason for proposing these different uses is to enable a greater degree of flexibility for the tenant to meet their future requirements, with the potential for the unit to be occupied as one or multiple retail units. This would thereby ensure the ongoing vitality and viability of the building within this part of Camden.
- 6.19. It is estimated that the commercial unit at ground floor will employ approximately 13 people, based on 268sqm (NIA) of retail floorspace. This is on the basis of there being 1 employee per 20sqm, as set out in the Employment Density Matrix supplied in the Homes & Communities Agency's Employment Density Guide (3<sup>rd</sup> Edition) for A1, A2 and A3 uses. A4 uses are not specified within this density guide.
- 6.20. A significant planning benefit of the development proposals is the removal and replacement of the existing A5 unit on site. As Officers will be aware, the application site is in close proximity to Haverstock School (100m to the north west). As outlined in the Planning for Health and Wellbeing CPG, the Council are concerned about the negative health correlation between the proximity of hot food takeaway outlets to educational institutions. By removing the A5 use as part of the planning application, this will improve the existing situation and help reduce any negative health effects as a result of the site's proximity to Haverstock School.

- 6.21. Appendix 4 of the Local Plan states the minimum requirement that the primary shopping frontages north of the junction of Jamestown Road, Hawley Crescent and Camden High Street (within the Camden Town Town Centre) the Council will not grant planning permission for development which results in the number of ground floor premises in retail falling below 50% within these frontages. This policy is relevant given that the final A Class usage of the development may or may not be an A1 use, and therefore could remove the existing A1 use from the site and wider frontage.
- 6.22. Having conducted an audit of this shopping frontage, it is considered that no matter the final usage of the retail unit, the frontage would retain at least 50% A1 Class units. Using LBC's guidance (which states that frontages should be counted as a whole unit), there are approximately 102 frontages. Of these, as existing, approximately 52% of them are Class A1. With the development proposals in mind (and taking into account whether the retail unit could be split into two individual frontages), there is no combination of uses (either A1 or non-A1) which would bring this figure below 50%. Therefore, it is considered that the development proposals would be in line with the requirements set out in Appendix 4.
- 6.23. The proposals are considered to be compliant with Policy E1, as the scheme will contribute to Camden's successful and inclusive economy. The development is also in line with Policies TC1, TC2, TC3 and TC4, as it meets the aspirations of Camden to focus retail development in town centres by retaining and expanding the commercial floorspace on site. The design of this retail unit will also ensure that the amenity of nearby uses is protected, and will not be negatively affected as a result of the proposals.

### **Residential Mix**

- 6.24. The proposed scheme has been designed to provide a range of unit types which will assist in creating a mixed and balanced community and complement the existing housing provision in the locality.
- 6.25. NPPF Paragraph 9 states that sustainable development involves seeking positive improvements in the quality of the built environment including widening the choice of high quality homes. The NPPF recognises that to create sustainable, inclusive and diverse communities, a mix of housing based on demographic trends, market trends and the needs of different groups should be provided.
- 6.26. London Plan Policy 3.8 states that "*Londoners should have a genuine choice of homes that they can afford and which meets their requirements for different sizes and types of dwellings*

*in the highest quality environments”.*

- 6.27. Policy H6 states that the Council will aim to create sustainable, mixed and inclusive communities by seeking high-quality and accessible homes. LBC will also require the provision of a variety of housing which is suitable for the borough’s existing and future households, having regard to the size, income and type of housing needs.

**Table 5.1: Proposed Unit Mix**

Unit Type	Persons	No. Units Total	Total Type %
Studio	1 person	4	14%
1 bedroom	2 person	9	31%
2 bedrooms	3 person	4	38%
	4 person	7	
3 bedrooms	5 person	1	17%
	6 person	4	
<b>Total:</b>		<b>29</b>	<b>100</b>

- 6.28. The proposed mix has been developed following careful consideration of the local characteristics of the site, market trends and demands, demographics and the desire to optimise the development potential of the site. In addition, the approach to the proposed residential unit mix has been agreed with officers during pre-application discussions.
- 6.29. It is considered that the proposals are in accordance with the principles of national, regional and local planning policy guidance, through the provision of an appropriate residential mix in a highly accessible central urban location.

### **Affordable Housing**

- 6.30. At the national level, the NPPF requires local planning authorities to ensure that policy documents meet fully objectively assessed housing needs. The NPPG recognises that any planning obligations, including affordable housing, must be fully justified and evidenced and should not prevent development going forward. Para 031 of the NPPG refers to the order of the Court of Appeal dated 13 May 2016, which gives legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014.
- 6.31. Policy 3.13 of the London Plan sets a standard affordable housing provision threshold of sites

with capacity to provide 10 or more units.

- 6.32. In negotiating the provision of affordable housing on individual sites, Policy 3.12 of the London Plan (2016) states that *“negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for reappraising the viability of schemes prior to implementation (contingent obligations), and other scheme requirements”*.
- 6.33. At the local level, Local Plan Policy H4 states that for all developments which provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more, the Council will seek affordable housing provisions based on a sliding scale target. The latter starts from 2% where there is capacity for one additional home and increases by 2% for each home up to a capacity for fewer than 25 additional homes. Where developments have a capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu (PiL) of affordable housing. For development of 10 or more additional homes, this provision of affordable housing will be sought on-site. Where affordable housing cannot be practically provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area, or exceptionally a payment-in-lieu.
- 6.34. As it relates to the current site, there are 11 existing self-contained residential flats. The existing residential GIA equates to 691.2 sqm.
- 6.35. On the basis that the redevelopment proposal totals of 29 self-contained residential flats, this would result in a net uplift of 18 self-contained flats. The total proposed residential GIA would be 2,597.65 sqm GIA (i.e. 2,469.3sqm plus 50% (128.35 sqm GIA) of the shared areas).
- 6.36. Taking into account the above, the net residential GIA uplift would be 1,906.45 sqm. In line with the Interim Housing CPG, this figure would be rounded down to 1,900sqm equating to 19 additional homes. In applying 2% to the 19 homes, the affordable housing percentage target would be 38%. The on-site affordable housing target would therefore equate to 724.45sqm GIA. Paragraph IH2.51 of the Interim Housing CPG states the Council will focus on seeking affordable homes of an appropriate size and layout rather than absolute mathematical correspondence with the affordable housing floorspace target.
- 6.37. On the basis of the above, it is acknowledged that in policy terms the preference is for on-site affordable provision. The Design Team has considered the potential for the site to provide on-site affordable housing but due to the constrained nature of the site this has proven to be

difficult for the reasons as set out below:

- The provision of on-site affordable units would result in the proposal having a reduced retail frontage and floor area which would detrimentally impact the range and number of future, potential retail tenants/occupiers, negatively impacting the Camden Town Centre;
- Due to the constrained nature of the site, it is likely that any additional bins/bikes storage area would need to be accommodated at the ground floor level resulting in an unattractive 'back of house' appearance within the Camden Town Centre along its primary retail frontage;
- Due to the small site, it would be problematic for the scheme to accommodate an additional, separate core and/or lifts, as this would detrimentally impact the proposed building's appearance of the ground floor frontage (as outlined in the points above) the building's layout, circulation spaces, its efficiency, involve a loss of residential floor area and comprise the quality of residential accommodation;
- The accessible units would need to be re-located in the upper levels and require an additional lift – again impacting on the building as outlined in the aforementioned point;
- Any affordable units would be required to share the core/amenity/service areas which is normally problematic for Registered Providers (RP) for service charge reasons; and
- RPs are often reluctant to take on a small number of affordable housing units as they usually require a 'critical mass' of affordable housing units.

6.38. The Applicant also does not own any other buildings/sites in the vicinity of the application site, or within LBC. It would therefore not be possible to provide off-site affordable housing provision.

6.39. Notwithstanding the above, the Viability Assessment Report, prepared by Savills Development and submitted confidentially in support of this application, sets out that it is not financially viable to provide any affordable housing. There are considerable planning benefits to be delivered on site, each of which have a negative effect on the viability of the scheme. The provision of affordable housing would only serve to worsen the deficit and place doubt on the scheme being deliverable, of which there are considerable planning benefits – including



but not limited to the provision of new, high quality residential homes which would contribute to the Borough's housing targets, additional high quality retail floor area/units and associated new jobs and increased retail frontage which would contribute to the vitality and viability of the Camden Town Centre.

- 6.40. In line with the NPPF, and the Mayor's strategic planning guidance for London, site-specific financial viabilities are a material consideration in determining how much and what type of affordable housing should be required in residential and mixed-use developments. As such, the viability appraisals can and should be used to analyse and justify planning obligations to ensure that Section 106 requirements do not make a scheme unviable.
- 6.41. Whilst the Viability Assessment has demonstrated that there is a deficit incurred in viability, the Applicant is prepared to take a commercial decision and provide a PiL whereby the applicant will forgo an amount of profit in order to deliver the proposed scheme which would provide considerable planning benefits. The Applicant is happy to discuss this further.
- 6.42. It is acknowledged that London Plan Policy 3.12c seeks to provide on-site affordable housing, and only in exceptional circumstances where it can be demonstrated robustly that this is not appropriate in terms of the policies it may be provided off-site, and that a payment in lieu contribution should only be accepted where this would have demonstrable benefits in furthering affordable housing and other policy objectives. In line with the Mayor's Viability SPG, such resources can be pooled and 'ring fenced' to enable greater, more appropriate, new affordable housing to be provided. Having regards to the constrained nature of the site, the provision of on-site affordable housing would not be appropriate as outlined above. In the context of the proposal, the site constraints and viability assessment, on balance it is considered that the provision of a PiL would offer greater benefits to the Borough and therefore considered as exceptional circumstances and would therefore comply with Policy H4, the London Plan, the Mayor's Viability SPG and the NPPF.

### **Residential Density**

- 6.43. At the national level, the NPPF does not set out any prescriptive guidance with regards to residential density and instead states that local planning authorities should set out their own approach to housing density to reflect local circumstances.
- 6.44. London Plan Policy 3.4 states that having regard to local context, the London Plan's design principles and public transport capacity, development should seek to optimise housing output for different types of location within the relevant density ranges. The London Plan seeks to



optimise housing potential through such densities. However, it is noted in paragraph 3.28 of the London Plan that these densities should not be applied mechanically.

- 6.45. Density guidance for new residential developments are set out in the London Plan, and relate to the accessibility of sites. On the basis of the site being 'central' in character and having a PTAL of 6a, Table 3.2 of the London Plan sets out indicative density guidance of between 650 and 1,100 habitable rooms per hectare.
- 6.46. The Mayor's Housing SPG further advises that the density matrix should be used as a guide rather than as an absolute rule. Density decisions on new schemes should take account of the different housing needs of the households who will live in the completed scheme.
- 6.47. Policy H1 states that Camden will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.
- 6.48. The application site is approximately 0.074ha and the proposals comprise 29 dwellings and 75 habitable rooms. This would result in a density of 392 u/ha or 1,014 hr/ha, which is in line with London Plan recommendations.

### **Residential Quality and Layout**

- 6.49. With regards to residential quality and layout, Paragraph 57 of the NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 6.50. London Plan Policy 3.5 states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The policy further states that they should incorporate minimum space standards, which conform to those set out in the London Plan. Policy 3.8 of the London Plan requires all new housing to be built to Lifetime Homes standards, and states that 10% of new housing should be adapted or adaptable for wheelchair use.
- 6.51. The London Plan goes on to state that boroughs should include residential space standards in line with the London Plan's Table 3.3, and notes that boroughs should seek to ensure that new development reflects these standards. These standards were subject to minor modifications as a result of the introduction of the new National Technical Standard, which

have been incorporated within the MALP.

- 6.52. The Mayor's Housing SPG (2016) sets out that housing should be designed so that people can use it safely and easily and it should meet inclusive design principles. Housing should be designed to accommodate and easily adapt to a diverse range of needs.
- 6.53. The full details and accommodation schedule is set out in the Design and Access Statement and also summarised in Appendix 2. The proposals either meet, or where possible exceed, the relevant planning policy guidance and fully complies with the planning policies. As such, the scheme would deliver a high quality residential accommodation.
- 6.54. All of the proposed units have sought to comply with the Lifetime Homes standards. 10% of the residential units (equating to 3 units) will be wheelchair accessible and the details of these are outlined under the Access headline in this Planning Statement. The proposals are therefore in accordance with relevant planning policy guidance and will deliver high quality residential accommodation which addresses the needs of the local community and wider borough.

### **Amenity Space**

- 6.55. Standards 26 and 27 of the Mayor's Housing SPG seeks to ensure that all proposed amenity space is a minimum of 5sqm and that an extra 1sqm should be provided for each additional occupant, and that the minimum depth for such private external spaces should be 1500mm.
- 6.56. The proposed amenity provision has been developed to ensure that the majority of dwellings have access to private outdoor amenity space, either in the form of balconies, terraces, ranging from 5.5sqm to 96sqm in area. Due to the site constraints, it has not been possible to provide some of the studio and 2 bedroom units with their own private external space. In line with paragraph 2.3.32 of the Mayor's Housing SPG, these units have instead been provided with additional internal living space area that is equivalent to the area of the private open space requirement; this is indicated on the proposed drawings. Future residential occupiers will also have access to the large external communal terrace on the fourth floor. Appendix 2 sets out the details of the private external amenity space which confirm the guidance has been complied with.
- 6.57. Policy 3.6 of the London Plan requires that housing developments should make provision for play and informal recreation based on the expected child yield. The Mayor's Play and Informal Recreation SPG recommends that new housing developments that will provide a child yield

of 10 children or more should make provision for play and informal recreation. Using the Mayor's Play and Informal Recreation SPG play space calculator, on the basis of the proposed unit mix, the proportion of children is likely to be 3 children in total (2 children aged under 5, and 1 aged between 5 and 11).

- 6.58. Given that the development will generate fewer than 10 children, the London Plan does not require the proposals to include formal play space. However, the large communal space on the fourth floor has been designed so as to allow multi-generational usage of the space, with informal play facilities being provided in the form of an artificial turf area and small stone boulders.
- 6.59. Overall, the proposed amenity provisions comply with the policy guidance requirements of the Mayor's Housing SPG, the relevant London Plan requirements and Policy 3.6, thereby resulting in a high-quality environment for residents.

### **Townscape and Design**

- 6.60. The NPPF attaches great importance to the design of the built environment. Paragraph 56 sets out that good design is a key aspect of sustainable development, and is indivisible from good planning. Furthermore, Paragraph 58 requires proposals to function well and add to the overall quality of the area, establish a strong sense of place, and respond to local character and history without stifling appropriate innovation.
- 6.61. At the regional level, London Plan Policy 7.1 states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 6.62. London Plan Policy 7.2 further states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. The principles of inclusive design which seek to ensure that developments achieve the following are supported by this Policy and have been addressed throughout the evolution of the development proposals for the site:
- developments that can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances;
  - developments that are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;

- developments that are flexible and responsive, taking account of what different people say they need and want, so people can use them in different ways; and
  - developments that are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.
- 6.63. London Plan Policy 7.4 goes on to state that developments should have regard to the form, function and structure of an area, including the scale, mass and orientation of surrounding buildings. The Policy further states that buildings should provide contemporary architectural responses that:
- have regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass;
  - contribute to a positive relationship between the urban structure and local natural landscape features;
  - are human in scale;
  - allow existing buildings and structures that make a positive contribution to the character of a place to influence the existing character of the area; and
  - are informed by the surrounding historic environment.
- 6.64. London Plan Policy 7.6 further states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to its context.
- 6.65. Policy D1 (Design) seeks to ensure that development is of the highest quality design, and states that the Council will resist development of poor design that does not take advantage of opportunities to improve the quality and character of an area and the way that it functions.
- 6.66. National, regional and local planning policy promotes the delivery of high quality and inclusive design in the creation of new developments. Paragraph 56 sets out that the Government attaches great importance to the design of the built environment and that good design is a 'key aspect' of sustainable development and is indivisible from good planning.
- 6.67. A detailed description of the main design principles underpinning the proposed development is set out in the supporting DAS. The applicants' consultant team have taken a design-led approach to the scheme and undertaken a detailed analysis of the site specific constraints, including the consideration of nearby trees, the existing school to the rear of the site, and the heritage assets which are situated near the site.

- 6.68. The DAS notes the local character zones. This includes the mix of uses and retail frontage along Chalk Farm Road – in which the site is located, mansions blocks to the north west of the site, and Georgian townhouses further to the north and south-west (page 16 of DAS). In the emerging development context there is an opportunity to build up to the street edge and increase the height of some of the existing plots along Chalk Farm Road in order to respond to the policy requirement to provide new housing and contribute to the vitality and viability of the Camden Town Centre.
- 6.69. The site analysis reveals how the site belongs to the end of an urban typology ‘system’ located on the northern side of Chalk Farm Road, rather than the larger scaled mansions block typology to the north, on the south side of Haverstock. The architecture on the north side of Chalk Farm Road shows that the ends of urban blocks are ‘celebrated’ with corner buildings. In this context, the redevelopment of the site presents an opportunity to provide a building informed by its local context. The site’s location at the corner of an urban block lends itself to this corner block identity, as analysed in detail (pages 30-32 of DAS). The building’s form, height and massing has been developed in consultation with LBC offices (page 24 of DAS) and the design, materials and internal layout refined from feedback from the Design Review Panel (page 26-27 of DAS) and engagement with key stakeholders and the community. The key townscape views of the building are set out on pages 54-56 of the DAS.
- 6.70. In terms of the general layout, the ground floor proposes to continue the Camden Town Centre along Haverstock Hill by providing retail uses, thus promoting activity and encouraging natural surveillance. As requested by officers, an appropriate signage strategy is set out in the DAS (page 50) to ensure that that future tenants retain the design integrity of the front façade. The ground floor along Haverstock Hill also provide access to the residential entrance which would be used by future residents to access the flats at all levels.

### **Secure by Design**

- 6.71. Consultation of the development proposals has been undertaken with the Metropolitan Police to discuss the security provisions required on the scheme in order to reduce the possibility for crime at the site. The police’s recommendations are set out in full in the DAS, and primarily include the following:
- Refinement in building form to reduce possibility of being approached by a surprise attacker;
  - Implementation of security-rated doors across the site;

- Audio/video controlled entry system for communication between visitors and residents; and
- Highly secure cycle-storage area with a fob-controlled door and 3-point locking system for all bicycles.

6.72. The applicant will be undertaking the relevant works accordingly. Therefore, it is considered that the proposals are in accordance with Policy C5, which states the LBC will require developments to demonstrate that they have incorporated design principles which contribute to community safety and security.

### **Heritage**

6.73. The NPPF requires proposals to 'conserve heritage assets in a manner appropriate to their significance.' Paragraph 128 of the NPPF requires the assessment of the impact of any heritage assets affected by development proposals.

6.74. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. 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, including its optimum viable use.

6.75. The London Plan at Policy 7.8 seeks to ensure heritage assets are safeguarded. The policy encourages development that (i) identifies, values, conserves, restores, re-uses and incorporates heritage assets, where appropriate, and (ii) conserves heritage assets and their setting.

6.76. Policy D2 (Heritage) states that Camden will seek to preserve, and where appropriate, enhance the Borough's rich and diverse heritage assets and their settings, including conservation areas. In order to maintain the character and appearance of these conservation areas, Camden will take account of conservation area statements, appraisals and management strategies when assessing planning applications within such areas.

6.77. Whilst the site is not statutory or locally listed, nor is it within a conservation area, there are a number of heritage assets within the surrounding area which have the potential to be affected by the proposals. This includes the Grade II listed Chalk Farm Underground Station located opposite the site (to the west), as well as the locally listed 2 Haverstock Hill (Enterprise Inn)

and 45-47 Crogsland Road (to the south) and the Roundhouse just further south along Chalk Farm Road. Other conservation areas including the Eton Conservation Area lies further away to the south-west, and the Regents Canal Conservation Area to the south east.

- 6.78. It is considered that the existing buildings on the site do not contribute to the significance of the Station nor the surrounding heritage assets through any setting relationship. Instead, the site forms part of the wider urban setting comprising a mixed townscape which has a number of modern and medium-sized developments, as illustrated in the DAS. The proposed height, scale, materials and details of the proposals have been carefully designed to ensure that it does not dominate the surrounding heritage assets. Indeed, the Grade II listed station can still be appreciated and it continues to be the main focal point for the immediate area. Any visible views of the new building in the context of the heritage assets continue to form part of the existing townscape.
- 6.79. As such, the proposals would preserve and not harm the significance of the nearby Grade II and locally listed buildings. In view of the above, the proposals would therefore fully comply with the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, the London Plan and Policies CS12 and DM 12.1.

### Overlooking

- 6.80. The site borders a number of different properties. Haverstock School is located to the north west, while the Salvation Army building is situated to the south east. As the design of the development has evolved, Officers have made suggestions in relation to the scheme's potential for overlooking.
- 6.81. As such, a number of amendments to the building's design have been made in order to ensure overlooking would not be a negative effect as a result of the development. These amendments are set out in full in the DAS but are summarised as follows:
- Set-back of windowed facades;
  - Reduction in quantum of glazing in particularly sensitive areas; and
  - Removal of balconies of several units adjacent to the Salvation Army (and increase in their internal overall space).

### Design Summary

- 6.82. The proposals comprise a high quality design solution which responds effectively to the site's location, its shape and capacity, and the character and proximity of the existing buildings and

surrounding area. The proposed development will generate a significant number of design benefits and it is considered that the development represents an appropriate and positive response to its location.

- 6.83. The proposed development has been developed in response to comments from LBC officers and is designed to be attractive, durable, adaptable and accessible in order to achieve good sustainable and inclusive design.
- 6.84. The proposed scale, bulk and mass and elevational design and appearance have been carefully designed and accords with the planning policy and guidance summarised above. It responds to the context and character of the site and will provide a high quality environment, significantly improving the appearance of the site.
- 6.85. The scheme would fully comply with London Plan Policy 7.2, 7.3, 7.4, and 7.6 which seeks inclusivity and accessibility in development, designing out crime, respects the local context and providing the highest quality urban design. It would also fully comply with LBC adopted design policies, which set out design standards and seek that new development take the opportunity to improve the character and quality of an area and its function, and provide legible, safe, inclusive and sustainable environments.

### **Daylight and Sunlight**

- 6.86. Guidelines relating to daylight and sunlight are contained within the Building Research Establishment (BRE) Handbook – Site Layout Planning for Daylight and Sunlight (2011). This guidance includes a discussion on how to protect the daylighting and sunlighting of existing buildings when new developments are proposed.
- 6.87. Policy 7.6 of the London Plan requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. The policy makes reference to this being particularly important for residential buildings.
- 6.88. Local Policy A1 states that the Council will seek to protect the quality of life of occupiers and neighbours within the borough. Permission for development will not be granted if it would cause unacceptable harm to local amenity. As part of this, LBC will consider whether proposals would impact upon sunlight and daylight, and whether overshadowing would result from the development.
- 6.89. A full assessment of the daylight, sunlight, and overshadowing impacts of the proposed



development has been undertaken by EB7 and is submitted as part of this planning application. Based on the assessment described below, it is considered that the planning application would comply with Local Policy A1 and London Plan Policy 7.6.

### **Daylight and Sunlight Impact to Neighbouring Properties**

- 6.90. The majority of the neighbouring properties within reasonable proximity of the site are non-residential uses with a school to the north west and the Salvation Army Hall to the south east. As the BRE guidelines are intended primarily for assessing daylight and sunlight to residential dwellings, these properties have not been considered within the daylight and sunlight assessment.
- 6.91. The only residential use nearby is the scheme under construction at 4-8 Haverstock Hill to the south east of the site, which received planning permission in December 2016. The drawings available on LBC's (application ref: 20150487P) illustrate there are no windows within the flank walls of this development. There will therefore be no effect to this proposal and it is not relevant for detailed assessment in this regard.
- 6.92. As such, the proposed scheme is in full compliance with BRE guidance in terms of daylight and sunlight amenity.

### **Daylight and Sunlight Assessment of the Proposals**

- 6.93. An assessment has been undertaken to measure the level of daylight within the proposed apartments at 18-22 Haverstock Hill, Chalk Farm. The quality of the daylight within the scheme has been assessed using the ADF test following the methodology of the BRE guidance and British Standards Document BS8206 pt 2.
- 6.94. The assessment has considered the habitable rooms to the lowest floors as the most constrained spaces within the development. All but one room to these floors will meet or exceed the suggested targets. There is one minor deviation affecting a secondary bedroom falling just 0.2% short of the target. This transgression is considered an appropriate 'trade-off' for valued amenity space and is wholly acceptable under the London Housing Design Guide Standards and BRE recommendations.
- 6.95. Overall, the development demonstrates a good level of compliance and will provide a high level of amenity for future occupants. The internal daylight levels are considered in line with the overall intentions of the BRE Guidelines, British Standards and relevant planning policy.

## Transport and Highways

- 6.96. In accordance with the NPPF, all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should be made on the basis of whether:
- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
  - safe and suitable access to the site can be achieved for all people; and
  - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 6.97. National, regional and local policy promotes the utilisation of sustainable transport modes, such as public transport, walking and cycling. The NPPF and Policy 6.1 of the London Plan both seek to promote public transport usage and minimise the use of private vehicles, thus promoting developments in areas with high public transport accessibility.
- 6.98. At the regional level, London Plan Policy 6.3 requires the impacts of new developments on the transport network to be fully assessed and states that developments should not adversely impact the safety of the transport network.
- 6.99. Policy T1 states that Camden will promote sustainable travel across the Borough by prioritising walking, cycling and the use of public transport. The Council will seek that development proposals include a number of provisions to ensure this sustainable objective is met.
- 6.100. In an effort to further encourage sustainable travel in Camden, Policy T2 states that the Council will require all new developments within the Borough to be car-free and will limit the availability of parking. To comply with Policy T2, the development will be car-free, and the dropped kerb vehicular access and existing parking to the front and rear of the site will be removed.

## Car Parking

- 6.101. The NPPF states that in setting local parking standards for residential development, local planning authorities should take account of the following:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles.

6.102. London Plan Policy 6.13 promotes an appropriate balance between the promotion of new development and the prevention of excessive car parking provision that can undermine cycling, walking and public transport use. Maximum car parking standards are set out in Table 6.2 of the London Plan.

6.103. In line with Policy T2, and in light of the excellent public transport accessibility level of the site, the proposals have been designed to be car-free. This extends to disabled parking spaces, but should the need arise for a disabled occupant to have access to car parking facilities, opportunities have been identified within the local highway network to allow for disabled parking.

6.104. This car-free provision has been developed in response to the site's location, existing conditions and the policy requirements. As such, the proposed parking provision accords with London Plan Policy 6.13 and Local Plan Policy T2 and is therefore considered appropriate.

### **Cycle Parking**

6.105. London Plan Policy 6.13 requires developments to meet minimum standards for cycle parking, as set out within Table 6.3 of the London Plan. In summary, based on the development proposals, it would be necessary to provide at least 47 long stay spaces (45 associated with the residential element and two associated with the retail element) and 7 short stay (1 associated with the residential element and 8 associated with the retail element) cycle parking spaces.

6.106. Cycle parking will be provided in exceedance of the adopted standards, with a total of 60 cycle spaces (52 long-stay, 8 short-stay) proposed. The long-stay cycle parking will be provided in a secure store at basement level, with the short-stay spaces in the form of four Sheffield stands within the front setback of the development.

### **Access**

6.107. Policy C6 states that the Council will promote fair access and remove barriers which prevent everyone from accessing facilities and opportunities. Development proposals should

incorporate inclusive design measures to improve access for all, ensuring that spaces, routes and facilities between buildings are fully accessible.

- 6.108. The three duplex units at basement/ground floor levels will be fully wheelchair accessible i.e. Unit numbers 0.01, 0.02 and 0.03. Where necessary, the duplex apartments have the capacity for hoist lifts to be installed, to allow for disabled transition between floors within these units. The DAS sets out in detail how the wheelchair adaptable units will be configured.
- 6.109. The design of the proposals has incorporated the need to provide suitable access and ensure the development is well connected with the local area, in accordance with the requirements of Section 4 of LBC's Interim Housing CPG, which requires that ten percent of units are M4(3) compliant.

### **Servicing and Refuse Strategy**

- 6.110. Policy CC5 (Waste) states Camden's intention to make itself a low waste borough. For development proposals, it will achieve this by ensuring that schemes incorporate facilities for the storage and collection of waste and recycling.
- 6.111. The proposed servicing and waste strategy has been developed carefully. Servicing and refuse collection will be undertaken from Haverstock Hill to the northwest of the site. A management company will be employed to transfer refuse bins from the basement store, through the lift and entrance lobby of the building, to the kerbside at collection days. It is proposed to establish an on-street loading bay on Haverstock Hill (via a Section 278 agreement), which would allow Camden Council to control the loading arrangements here.
- 6.112. In line with this policy, details of the refuse and recycling collection and strategy have been provided in the Design and Access Statement and the Transport Statement. It is considered that the development proposals fully comply with Policy CC5.

### **Sustainability and Energy**

- 6.113. The NPPF encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change.
- 6.114. The London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy set out at Policy 5.2:
- Be Lean: use less energy;

- Be Clean: supply energy efficiently; and
  - Be Green: use renewable energy.
- 6.115. London Plan Policy 5.2 further requires major development proposals to provide a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction are to be met within the framework of the energy hierarchy. The Mayor now requires 'zero carbon' for new residential development. For non-residential development, the policy requires that the most up to date building regulations are met. Major development proposals are required to include a detailed energy assessment to demonstrate how this target will be met within the framework of the energy hierarchy.
- 6.116. London Plan Policy 5.3 further states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. London Plan Policy 5.5 prioritises the development of decentralised heating and cooling networks. Where feasible, developers should prioritise connection to existing or planned decentralised energy networks.
- 6.117. Policy 5.6 requires major development proposals to select energy systems in accordance with the following hierarchy:
- connection to existing heating or cooling networks;
  - site wide CHP network;
  - communal heating and cooling.
- 6.118. Local Policy CC1 states that all development proposals must minimise the effects of climate change, and encourages all developments to meet the highest feasible environmental standards which are financially viable at both the construction and occupation phases of development.
- 6.119. Local Policy CC2 (Adapting to climate change) requires all proposals to be resilient to climate change, and adopt a range of climate change adaptation measures, including sustainable design and construction measures.
- 6.120. A detailed Energy Assessment has been prepared by Silcock Dawson and Partners in support of the application. In the report, it is recommended that photovoltaic panels are installed on the development to generate renewable energy. Furthermore, while it is not economically viable for a CHP to be installed to serve the development, a community heating system will

be installed with condensing boilers operating at low return water temperatures to maximize system and combustion efficiencies. The plant room will be located at basement level and will be designed to allow connection into a wider heat network should one become available in the future.

- 6.121. While the development proposals will not meet the 35% CO<sub>2</sub> reductions target (achieving 28.2%), the applicant will be making a payment to LBC in order to cover the shortfall. Based on the calculations, to achieve zero carbon on the residential part of the development, and a 35% CO<sub>2</sub> reduction on the commercial unit, the corresponding offset payment would be £73,224 based on a payment of £90 per tonne over a 30 year period.
- 6.122. The proposed development provides a high quality development that serves the local community and aids the commitments to meeting on-going sustainability targets. Design principles have addressed the need to tackle climate change and energy, community cohesion, placemaking, transport, ecology, resources and sustainable construction. It is considered therefore that the development proposals are in full accordance with the relevant policies listed above.

### Ecology and Biodiversity

- 6.123. At the national level, the NPPF seeks to minimise the impacts of development on biodiversity and sets out guidance for local planning authorities to follow in developing policy.
- 6.124. Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by (inter alia):
- protecting and enhancing valued landscapes, geological conservation interests and soils;
  - recognising the wider benefits of ecosystem services; and
  - minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 6.125. Policy 7.19 of The London Plan seeks a proactive approach to *"the protection, enhancement, creation, promotion and management of biodiversity."*
- 6.126. Local Policy A3 states that the Council will seek the protection and enhancement of sites of nature conservation and biodiversity. Camden will also protect and seek to secure the

provision of additional trees and vegetation across the Borough.

- 6.127. Local Policy CC2 states that all proposals should be resilient to climate change, and adopt a range of climate change adaptation measures, including sustainable design and construction measures.
- 6.128. A Preliminary Ecological Appraisal has been prepared by Greengage and is submitted in support of the planning application. This was undertaken in order to establish the ecological value of the site and its potential to support notable or legally protected species.
- 6.129. The report found that the site has moderate potential to support roosting bats. As such, the report recommends a number of key mitigation, compensation and enhancement measures which would provide for net gains in biodiversity at the application site. These measures include the provision of habitat bat boxes, nesting boxes for birds and incorporation of living/biodiverse roof space, which would be appropriate should there be a future presence of nesting birds at the site.
- 6.130. With these mitigation measures in place, it is considered that the development proposals would fully comply with regional and local planning policies concerning ecology and biodiversity.

### **Trees**

- 6.131. An Arboricultural Impact Assessment has been prepared by Greengage in support of this planning application.
- 6.132. The assessment noted that while there are six trees in the vicinity of the site which have the potential to be affected by the proposed development, there are no trees located within the boundary of the site itself.
- 6.133. The assessment sets out how the mature cherry tree (T1) is growing very close to the site boundary retaining wall and is pushing against the wall which has resulted in temporary remedial wall repairs. Whilst the design team has sought to retain this cherry tree, it has become clear that the existing retaining wall would need to be replaced, irrespective of the nature of the proposals.
- 6.134. Given the desire to retain the tree, a meeting was held with the Council's tree officer and was subsequently agreed that the tree should be removed. In order to mitigate the loss of this tree (and the other very low quality trees) and improve the quality of the adjacent tree stock, it is

proposed to plant additional, high quality replacement trees, as set out in the proposed landscaping plan.

- 6.135. Accordingly, no detrimental residual impacts on arboriculture or the amenity value of the local area are predicted through redevelopment of the site. Re-landscaping of the adjacent land will deliver a positive contribution to the landscape. It is considered therefore, that the development proposals are in accordance with Local Policy A3.

### **Basement**

- 6.136. Local Policy A5 relates to basement development within the borough. The policy states that the Council will only allow basement development where it can be demonstrated that there would be no harm to neighbouring properties or heritage assets, structural, ground or water conditions of the local area, or the character and amenity of the area.
- 6.137. A Basement Impact Assessment has been prepared by Engineeria and is submitted in support of the planning application.
- 6.138. The report confirms that the Basement Impact Assessment was carried out following the information and guidance published by the London Borough of Camden and information from a Site Investigation. It is concluded that the proposed development is unlikely to result in any specific land or slope stability issues or groundwater issues.

### **Noise**

- 6.139. The publication of the NPPF in March 2012 replaced the guidance set out in the PPSs (Planning Policy Statements) and PPGs. In the absence of more specific guidance, the recommendations set out in PPG24 still apply.
- 6.140. NPPF Paragraph 123 sets out that policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, by mitigating and reducing noise to a minimum, including through the use of conditions. The NPPF does recognise however that development will often create some degree of noise.
- 6.141. At the regional level, Policy 7.15 of the London Plan requires development proposals to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.
- 6.142. Local Plan Policy A4 states that the Council will ensure that noise and vibration is managed



and controlled. Planning permission will not be granted for development proposals which would be likely to generate unacceptable levels of noise and pollution, and would resist development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

- 6.143. A Noise Assessment has been prepared by ITP Energised and is submitted in support of the planning application. The assessment comprised a baseline noise survey within a first-floor flat of the existing building, to determine existing noise levels in the vicinity of the proposed development, both with open and closed window attenuation.
- 6.144. The measured internal noise levels have been evaluated against LBC's noise criteria for residential development, with noise levels within the existing building found to be at a point between having an adverse and significantly adverse effect on health and quality of life. Mitigation measures, such as the installation of appropriate cladding and acoustic glazing, have been specified to enable ambient noise levels within the bedrooms of the proposed development to meet acceptable levels by the Council.
- 6.145. With these mitigation measures in place, the development proposals would be in compliance with London Plan Policy 7.15 and Local Plan Policy A4.

### **Air Quality**

- 6.146. London Plan Policy 7.14 requires that development proposals should minimise increased exposure to poor air quality and promote sustainable construction to reduce emissions. This is also set out in the NPPF which requires planning policies to ensure that pollution is minimised.
- 6.147. Local Policy CC4 concerns air quality issues in Camden, stating that the Council will ensure that any impact of development on air quality is mitigated, and reduce the exposure to poor air quality of those living and working in the borough. LBC will assess the impact of development proposals on air quality when determining planning applications, and will require Air Quality Assessments to be submitted with applications where development is likely to expose residents to high levels of air pollution.
- 6.148. An Air Quality Impact Assessment, prepared by ITP Energised has been submitted in support of the planning application. The assessment was undertaken in order to demonstrate compliance with the air quality objectives set out in the National Air Quality Strategy. Modelling

was used to predict concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> in relation to emissions from existing road traffic, together with existing background concentrations at proposed future receptor locations within the application site.

- 6.149. It is considered that the average concentrations of these pollutants comply with the relevant air quality objectives, and the proposals will not introduce new sensitive receptors into an area of poor air quality.
- 6.150. The proposed development is considered to be air quality neutral, and there a number of mitigation measures embedded into the design which will reduce air pollution and minimise the potential exposure of future occupants to poor air quality. The site is therefore considered to be appropriate for future residential and commercial development in relation to air quality, and so the proposals would fully comply with London Plan Policy 7.14 and Local Plan Policy CC4.

### Planning Obligations

- 6.151. The Community Infrastructure Levy (CIL) Regulations at Regulation 122 provide limitations on the use of planning obligations. Planning obligations may only be sought where they meet all of the following tests:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development.
- 6.152. These tests are further reinforced at Paragraph 204 of the NPPF. The NPPG recognises that any planning obligations must be fully justified and evidenced and should not prevent development going forward.
- 6.153. Local Policy DM1 states that the Council will utilise planning obligations to contribute towards the delivery of infrastructure in the borough.

### Draft Heads of Terms

- 6.154. In addition to the planning benefits of the proposed scheme, it is anticipated that an appropriate package of Section 106 contributions will be negotiated and agreed with the Council in accordance with the statutory tests contained in Regulation 122 of The Community Infrastructure Levy Regulations (2010) and the overall viability of the proposals. Regard has also been had to LBC's CPG 8: Planning Obligations document.

6.155. It is anticipated that the Section 106 may include the following Heads of Terms:

- Car Free Development for all uses;
- Delivery and Service Management Plan;
- Demolition and Construction Management Plan;
- Employment and Local Procurement;
- Highways Contribution (to cover any repair works and improvements to the local highway as required);
- Planting of replacement trees and associated landscaping on adjacent land; and
- S278 to secure the servicing bay.

### **Community Infrastructure Levy (CIL)**

6.156. The Mayoral Community Infrastructure Levy (CIL) payments came into force 1 April 2012 to fund the development of Crossrail. LBC is designated as a 'Collecting Authority' for the Mayoral CIL. This requires a charge of £50 per square metre to be levied.

6.157. The Council's CIL Charging Schedule came into effect on 1 April 2015. CIL will be calculated on the basis set out in Part 5 of the Community Infrastructure Levy Regulations 2010 (as amended). The application site is located within CIL Charging Zone B and the following rates are relevant: retail uses (including bar / restaurant / entertainment and other town centre uses) at £25/sqm; residential of 10 or more dwellings (or above 1,000sqm) and private care residential homes with a degree of self-containment at £250/sqm.

6.158. The Council's Regulation 123 list sets out that the monies received from CIL will be used to fund the following types of infrastructure:

- Infrastructure within or enabling access to Strategic Sites;
- Community infrastructure (as defined by Local Policy DM1 and the aforementioned Planning Obligations CPG);
- Public open space;
- Public sports and leisure; and
- Local transport infrastructure.

6.159. The CIL Additional Questions form has been completed and is submitted as part of this planning application. Subject to planning permission being granted, the requisite forms will be completed and submitted to the Council in accordance with the Community Infrastructure Levy Regulations 2010 (as amended).

## 7. Conclusions

7.1. This Planning Statement has been prepared in support of a full planning application, submitted to the London Borough of Camden on behalf of PPR Haverstock Hill LLP for the site at 18-22 Haverstock Hill.

7.2. This application seeks permission for:

*“Demolition of existing buildings and ancillary structures (11 flats, A1 unit, A5 unit) and construction of a new building comprising ground plus basement and five upper floors for use as 29 no. dwellings (Class C3) and flexible Class A1/A2/A3/A4 together with cycle parking, landscaping, refuse and associated works.”*

7.3. The proposals have been developed following positive pre-application discussions and extensive engagement with key stakeholders and neighbouring residents, which have informed the overall design of the scheme.

7.4. The benefits of the proposed scheme are summarised as follows:

- The development of new high-quality housing units, which will contribute towards the housing targets for both LBC and London;
- A new building with the highest standards of design and materials palette, reflecting the local townscape and preserving the setting of the neighbouring heritage assets;
- An increase in the amount of retail floorspace provided at ground floor, contributing to the vitality and viability of the town centre;
- An increase in the number of employment opportunities on site;
- The provision of communal areas and play space for residents;
- Protection of amenities of surrounding and future residential occupiers;
- Net biodiversity and ecological gains through inclusion of green roof and bird/bat boxes;
- Sustainable transport promoted through secure cycle parking provisions and proximity to public transport services;
- Carbon savings of 28.5% and appropriate carbon off-setting solutions;
- Predicted BREEAM rating of “Excellent” in compliance with policy; and
- Adequate refuse/recycling and servicing provisions in line with LBC’s requirements.

7.5. This Planning Statement has also summarised the conclusions of supporting reports relating to a number of technical aspects of the development proposals.

# Planning Statement

18-22 Haverstock Hill, London

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- 7.6. The proposals accord with national, regional and local planning policy and would provide many positive benefits to the local area and Camden. Accordingly, we respectfully request that planning permission is granted.

## Appendix 1 – Planning History

Ref. No.	Site Address	Development Description	Decision	Decision Date
8137	18 Haverstock Hill, Camden.	The installation of a new shopfront at 18 Haverstock Hill, Camden.	Granted	03-02-1970
8278	18A, Haverstock Hill, N.W.3.	Installation of new shopfront at 18A, Haverstock Hill, N.W.3.	Granted	18-02-1970
H10/3/3/25785	18 Haverstock Hill NW3	Installation of a new shop front.	Granted	16-02-1978
AD815	18 Haverstock Hill, N.W.3.	The installation of an internally illuminated fascia sign 10' (3.05metres) long by 4' (1.22 metres) high.	Advertisement Consent	15-03-1978
PE9900814	20-22 HAVERSTOCK HILL LONDON NW3 2BL	Change of use and conversion of the ground floor of no.20 from builders office to a one bedroom flat and the basement of no.22 from ancillary storage to a one bedroom flat together with the use of the basement of no.20 as a builders office and the erection of a new metal entrance staircase and alterations to the front and rear elevations. Drawing numbers: 5259.01, 5249.03, 5249.02B & 5249.03	Granted	08-02-2000
PEX0000203	20-22 HAVERSTOCK HILL LONDON NW3 2BL	Approval of details of design of metal entrance stair, pursuant to additional condition 02 of the planning permission dated 08/02/00 (Reg No. PE9900814R1) As shown on one un-numbered A4 plan (front/side elevation).	Granted	11-04-2000
PEX0000610	20 HAVERSTOCK HILL LONDON NW3 2BL	Change of use of basement from offices (Class B1) to a self-contained flat. As shown on drawing nos. 4/3360/01A, 02A.	Granted	12-09-2000
PEX0000732	20 HAVERSTOCK HILL LONDON NW3 2BL	The erection of a temporary building for office use in the rear yard. As shown on drawing numbers: 22/1 and 22/1	Granted	12-12-2000
PEX0200886	18 Haverstock Hill LONDON NW3 2BL	Installation of new shopfront and ventilation duct to restaurant premises (class A3). As shown on drawing numbers: Ordnance Survey Map; 3160/1, 3160/2 Rev.B and Photograph (existing) on A4 sheet	Granted	17-12-2002

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AEX0200887	18 Haverstock Hill LONDON NW3 2BL	Display of internally illuminated sign at fascia level and a projecting box sign on front elevation of A3 restaurant premises. As shown on drawing numbers: Ordnance Survey map, 3160/1, 3160/2 and Photograph (existing) on A4 sheet.	Advertisement Consent	17-12-2002
2004/2405/P	18 & 18A Haverstock Hill London NW3 2BL	The change of use from restaurant (class A3) to residential (class C3) at part first floor level together with a rear extension at first floor level and the erection of an additional storey to create 2 x 1 bedroom flats.	Granted	06-08-2004

## Appendix 2 – Accommodation Schedule

Floor Level	Number of Units	Unit Type	Unit No.	No. Persons	Proposed Unit Size (GIA sqm)	London Plan Table 3.3 Minimum Standards (GIA sqm)	Proposed Private Outdoor Amenity Area (GIA sqm)			Mayor's Housing SPG Outdoor Space (GIA sqm)
							Balconies (GIA sqm)	Terrace / Garden area (GIA sqm)	Provided as additional internal living space? (Yes or N/A)	
Basement/ Ground	3	3bed (Duplex) Wheelchair Adaptable	0.01	6	137.8	102	-	20.7	N/A	9
		3bed (Duplex) Wheelchair Adaptable	0.02	6	123.8	102	-	29.3	N/A	9
		3bed (Duplex) Wheelchair Adaptable	0.03	5	124.3	102	-	25	N/A	8
First	7	1 bed	1.01	2	57.6	50	5.5	-	N/A	5
		2 bed	1.02	4	79.6	70	-	-	Yes	7
		2 bed	1.03	4	76.6	70	7.25	-	N/A	7
		Studio	1.04	1	45.5	39	-	-	Yes	5
		1 bed	1.05	2	52.4	50	6.3	-	N/A	5
		2 bed	1.06	3	72.6	61	-	-	Yes	6
		1 bed	1.07	2	56.1	50	5.6	-	N/A	5
Second	7	1 bed	2.01	2	57.6	50	5.5	-	N/A	5
		2 bed	2.02	4	79.6	70	-	-	Yes	7
		2 bed	2.03	4	76.6	70	7.25	-	N/A	7



# Planning Statement

18-22 Haverstock Hill, London



Floor Level	Number of Units	Unit Type	Unit No.	No. Persons	Proposed Unit Size (GIA sqm)	London Plan Table 3.3 Minimum Standards (GIA sqm)	Proposed Private Outdoor Amenity Area (GIA sqm)			Mayor's Housing SPG Outdoor Space (GIA sqm)
							Balconies (GIA sqm)	Terrace / Garden area (GIA sqm)	Provided as additional internal living space? (Yes or N/A)	
		Studio	2.04	1	45.5	39	-	-	Yes	5
		1 bed	2.05	2	52.4	50	6.3	-	N/A	5
		2 bed	2.06	3	72.6	61	-	-	Yes	6
		1 bed	2.07	2	56.1	50	5.6	-	N/A	5
Third	7	1 bed	3.01	2	57.6	50	5.5	-	N/A	5
		2 bed	3.02	4	79.6	70	-	-	Yes	7
		2 bed	3.03	4	76.6	70	7.25	-	N/A	7
		Studio	3.04	1	45.5	39	-	-	Yes	5
		1 bed	3.05	2	52.4	50	6.3	-	N/A	5
		2 bed	3.06	3	72.6	61	-	-	Yes	6
		1 bed	3.07	2	56.1	50	5.6	-	N/A	5
Fourth/ Fifth	5	2 bed	4.02	3	67.8	61	-	-	Yes	7
		2 bed	4.03	4	73.9	70	7.3	-	N/A	7
		Studio	4.04	1	45.5	39	-	-	Yes	5
		3 bed (Duplex)	4.05	6	160.2	102	-	96	N/A	9
		3 bed (Duplex)	4.06	6	141.9	102	-	71	N/A	9
<b>TOTAL</b>	<b>29</b>									