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**Contact:** David Fowler  
**Direct Line:** 020 7974 2123  
**Email:** david.fowler@camden.gov.uk

**Development Management  
Supporting Communities**  
London Borough of Camden  
5 Pancras Square  
London N1C 4AG

Tel 020 7974 4444  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Mia Scaggiante  
Savills

*Sent by email*

Dear Mia,

### **The site**

- 1.1 This site is located on the north-eastern side of Haverstock Hill, to the north-west of the junction with Adelaide Road, Crogsland Road, Chalk Farm Road and Regent's Park Road. There are currently 3 Georgian or early Victorian buildings (18, 18a and 20-22) on the site, which accommodate 11 flats, a Class A1 ground floor unit and a Class A5 hot food takeaway unit. There is a forecourt area with parking on site and a gated vehicular access to a hard-standing area used for parking to the rear. The site covers an area of 0.074 hectares.
- 1.2 The site is bounded to the south-east by the Salvation Army building (Citadel), by Haverstock Hill to the south with 3-13 Adelaide Road and Chalk Farm Station beyond and by Haverstock School to the north-west and north.
- 1.3 Numbers 18 and 18a are located within the Town Centre of Camden Town. There are no listed buildings on site and no conservation areas cover the site. In the vicinity, the Roundhouse is grade II\* listed and Chalk Farm Station is grade II listed. The Regent's Canal Conservation Area is located to the south-east and the Eton Conservation Area is located to the west. The Parliament Hill – Palace of Westminster viewing corridor lies to the east. There are neighbourhood centres located to the west (on Adelaide Road) and south-west (on the corner of Adelaide Road and Regent's Park Road).

### **Proposals**

- 2.1 Two schemes have been submitted:
  - Scheme A; 31 flats proposed over 7 storeys, G+4 at front, including 2 x Class A uses at G floor
  - Scheme B; 30 flats over 7 storeys, G+4 at front, including 2 x Class A uses at G floor
- 2.2 One of the main differences between the 2 schemes is that Scheme B has an angled footprint, whereas Scheme A's footprint is parallel to the road.

### **Land use**

## Housing

3.1 Camden Local Plan policies H1, H2, H4, H6, H7 and Camden Planning Guidance 2 (Housing) are relevant with regard to the provision of housing, including affordable housing. Residential use is the Council's priority land use and is welcomed in principle. You stated at our meeting that the existing units are not HMO's and therefore there would be no objection to the loss of the existing units.

3.2 Under the proposals there would be 30-31 flats provided on site. An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings, and the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. No details of tenure have been provided at this stage. Should you provide less than this amount of affordable housing, then a viability report would be required to justify this shortfall.

4.1 Policy H7 requires homes of different sizes to meet the priorities set out in the Dwelling Size Priorities Table (see below). The proposed unit mix should broadly accord with this table, although the Council will be flexible when assessing development.

**Table 1: Dwelling Size Priorities**

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

4.2 The proposed unit mixes are as follows:

- Scheme A; 31 flats – 4 x studio, 4 x 1B, 18 x 2B, 3 x 3B, 2 x 4B.
- Scheme B; 30 flats – 4 x studio, 8 x 1B, 12 x 2B, 4 x 3B, 2 x 4B.

4.3 It is not possible to state whether the unit mix is acceptable at this stage, without details of tenure.

4.4 The proposed residential accommodation should meet the National Space Standards which are outlined below. Floorspace figures of all the flats should be provided as part of any future application, which demonstrates that they all meet the National Space Standards. Any discrepancies should be strongly justified.

Number of bedrooms	Number of bed spaces	Minimum GIA (m <sup>2</sup> )			Built-in storage (m <sup>2</sup> )
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Notes to Table 3 3

- \* Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m<sup>2</sup> to 37m<sup>2</sup>, as shown bracketed.
- The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls<sup>1</sup> that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m<sup>2</sup>).
- The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

Class A uses

3.3 Policy TC4 seeks to maintain the vitality and viability of Town Centres. Part of the site lies within a Core Frontage (north) of the Town Centre. In the Core Shopping Frontages North (north of the junction of Jamestown Road, Hawley Crescent and Camden High Street) the Council will not grant planning permission for development which results in the number of ground floor premises in retail falling below 50% within Core Shopping Frontages. Where the number of retail premises in these frontages is already less than the minimum requirement of 50%, no further loss of retail will be permitted. The retention of the Class A uses is a policy requirement, given their location within the Town Centre, and their re-provision is welcomed.

Amenity of the proposed flats

4.5 All residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, in both new build and change of use:

- is self-contained and has its own secure private entrance;
- has good ceiling heights and room sizes;
- is dual aspect except in exceptional circumstances;
- has good natural light and ventilation;
- has good insulation from noise and vibration;
- has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities);
- 3+ bed units should separate kitchen and living areas;
- incorporates adequate storage space;
- incorporates outdoor amenity space including balconies or terraces; and
- is accessible and adaptable for a range of occupiers.

- 4.6 The London Plan Housing SPG (March 2016) requires all flats to have private amenity space as follows:
- Standard 26
- A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.
- Standard 27
- The minimum depth and width for all balconies and other private external spaces should be 1500mm.
- 4.7 A daylight/sunlight report should be submitted with any future applications demonstrating that the proposed flats would receive sufficient daylight. A noise report should be submitted as part of any future application and should include the impact on proposed residential accommodation as well as existing residential accommodation (see 'Amenity of neighbouring properties' below).
- 4.8 All housing should meet Part M building regulations. We require 10% of units to be wheelchair homes or easily adaptable.
- 4.9 With regards to the windows facing over the Salvation Army building, as discussed, these would be 'bad neighbours' and the proposed units could not rely on these windows to provide light or outlook, as this would prejudice the future development of this neighbouring site. Daylight/sunlight calculations should exclude these windows.
- 4.10 We note that you have sought to minimise the number of single-aspect units in the scheme and that none of these units are north-facing. We consider that the depth of the building and the over-development has resulted in an impact on the outlook and aspect from the proposed flats. A reduced scheme would provide more opportunity for aspect over open space on the site and shallower floorplates, to the benefit of the amenity of prospective occupiers. Specific concerns exist regarding the single-aspect 1B flats which are located in the rear middle of the site (Levels 1-4), facing towards the Salvation Army building. It is questioned whether these would provide sufficient light and outlook, particularly if a development comes forward on the Salvation Army site in the future.
- 4.11 All of the units except the 1B flats mentioned above would have external amenity space, which is welcomed. However, officers consider that developing the site fully to the rear is overdevelopment that is not characteristic of the area and that more open space should be provided on site.

## **Conservation and design**

- 5.1 Policies D1, D2 and CPG1 (Design) of the Camden Local Plan are relevant to conservation and design.
- 5.2 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") are relevant with regards to impacts on heritage assets. Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that area. The effect of this section is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas. The loss of the locally-listed and non-designated heritage assets would also need to be weighed up in terms of harm and public benefit. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 12). You should address this issue in any future applications.

5.3 The current scheme is indicative of bulk and massing and our comments respond to this. Once we have more details of the architectural language, we will comment on this.

5.4 Justification is required as to the townscape appropriateness for a scheme of the proposed scale. The approved scheme at 5-17 Haverstock Hill is not considered sufficient. This scheme was allowed on the basis of the mansion block typology of which it forms a part. The subject site is not part of that zone in our view. Officers consider that the proposals are excessively large in terms of height, bulk, massing and depth for this site and the proposals should respond to the context of this part of Haverstock Hill/Chalk Farm Road in terms of scale and depth. The roundhouse provides the full stop or marker at the entrance or exit of Camden Town. The site needs to form part of the streetscape to join with the terrace on the other side of the Salvation Army building.

### **Amenity of neighbouring properties**

6.1 Policy A1 and CPG6 (Amenity) of the Camden Local Plan are relevant with regards to the amenity impact on neighbouring properties.

6.2 A daylight/sunlight assessment should be submitted as part of any future application to demonstrate that there would be no material impact on neighbouring properties.

6.3 Given there are no residential properties immediately adjacent to the site, officers are not concerned with regards overlooking to neighbouring flats. With regards to overlooking the school, we are aware that this can be a sensitive issue, though have no objections in principle. You are advised to discuss this with the school.

6.4 Full details of all plant and ventilation are required and a noise report should be submitted as part of any future application.

4.12 You will be required to include mitigation and offsetting measures to deal with any negative air quality impacts associated with your development proposals. At the same time your development should be designed to minimise exposure of occupants to existing poor air quality. An Air Quality Assessment would be required as part of any future application.

### **Transport**

#### **Car parking**

7.1 The proposed residential units would be secured as car free under a Section 106 Agreement. We welcome the removal of parking areas.

#### **Servicing and construction**

7.2 Full details of servicing would required in any future applications in the form of a Servicing Management Plan. A draft Construction management Plan should also be submitted, and should follow the Council's [pro-forma](#). We encourage you to remove the forecourt and follow the predominant building line of this part of Haverstock Hill/Chalk Farm Road. Given the scale of development, including just 2 commercial units, we consider that the site could be serviced from the road, although this is a point that would need to be agreed with TfL, given the bus lane. A contribution towards CMP monitoring would be secured. A Servicing Management Plan would be required as part of any future application. This should include details such as hours of servicing, which should be out of rush hour times.

#### **Cycle parking**

7.3 Cycle parking should be provided in line with the standards laid out in the [London Plan 2016](#) for both the residential and non-residential elements.

### **Trees and landscape**

8.1 A full Arboricultural Report would be required, given the proximity of the adjacent trees on the school site. As we have not seen the full extent of the site, we are not aware of any trees to the rear; however, should there be trees here they should also be included.

### **Sustainability**

8.2 A Sustainability Plan and Energy Plan should be submitted as part of any future application, detailing how the proposals accord with policies CC1, CC2, and CC3.

### **Conclusion**

8.3 The provision of residential use on this site is welcomed. Affordable housing should be provided. The proposed retention of the Class A uses is also welcomed. You should ensure that the Class A1 uses in the frontage remains above 50%.

8.4 We have concerns regarding the aspect and outlook of the proposed flats, and these issues appear symptomatic of the overdevelopment of the site in terms of depth and ground coverage.

8.5 We consider the proposals are overdevelopment, with excessive bulk, scale, massing and depth. No justification has been provided for this scale of development.

8.6 We encourage the removal of the forecourt and suggest off-site servicing.

8.7 Whilst the key land use principles are acceptable, Officers consider that significant more work is required. We look forward to discussing the pertinent issues with you and helping you achieve the maximum quantum of development at a high quality on this site.

### **Community Infrastructure Levy**

At the present time development would be subject to the Mayor of London's Crossrail CIL given that more than 100sqm increase in floorspace is proposed. The rate depends on the type of floorspace with (for example) £50 per sqm levied for residential use in Camden. Please be aware that the Mayor is reviewing his CIL schedule and has indicated that a new schedule may be in place in 2019.

The proposal by its size and land use type will be liable for the London Borough of Camden's Community Infrastructure Levy (CIL) introduced on the 1st April 2015 to help pay for local infrastructure. You will need to refer to the prevailing charge at the time that any planning permission is granted. At present the Council levies a charge of £250 per sqm for residential development.

### **Section 106 Obligations**

CPG8 (Planning obligations) is relevant with regards to planning obligations.

The section 106 obligations below are likely to be included in an agreement. Please note that this list is not exhaustive.

### Potential section 106 terms

- Car free
- Sustainability/energy
- Construction Management Plan + monitoring fee
- Highways contribution
- Pedestrian, Cycling and Environmental contribution
- Public Open Space
- Affordable housing
- Employment and training

You are encouraged to undertake public consultation, including with local groups, before the submission of any planning applications. The details of any should be provided within a Statement of Community Involvement.

You are strongly advised to make early contact with local organisations/groups and ward councillors.

As part of your submission you should set out what public consultation you have carried out, what comments have been received and how your proposal has been amended in response to such comments.

### Information to be submitted with any planning application (not exhaustive)

- Planning Statement
- Design and Access Statement(s)
- Affordable Housing Statement
- Viability Report if not providing policy compliant affordable housing (Private and Confidential) (potentially)
- Daylight/Sunlight Assessment
- Transport Statement
- Townscape, Heritage and Visual Impact Assessment
- Air Quality Report
- Statement of Community Involvement
- Energy Statement
- Sustainability Statement
- Details of refuse and recycling storage
- Noise (and Vibration) Report and details of necessary attenuation measures
- Draft Construction Management Plan
- Statement of Community Involvement
- Flood Risk Assessment
- Ecological Appraisal.

Please note that failure to provide all of the above information with any planning application is likely to lead to delays in the application being validated. Please note, this list is not exhaustive, and other documents may be required to validate the application if they are considered necessary at a later date.

#### Disclaimer:

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries about the above letter or the attached document please contact **David Fowler** on **020 7974 2123**.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

David Fowler  
Principal Planning Officer