



21 October 2018

Mr Jonathan McClue 4908  
Planning Solutions Team  
London Borough of Camden  
Contact Camden Reception  
5 Pancras Square

London N1C 4AG

Dear Sir,

Re: Planning Application **2018/4871/P**

I would draw your attention to the eighteen reasons given by the London Borough of Camden for refusing the original application (2012/6548/P) for a 7 storey building on this site. As there have been no material changes to these reasons, I would expect that a planning application to add a seventh floor (2018/4871/P) would again be refused.

For reference, the eighteen reasons as displayed on LB Camden's website are listed below.



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cc Inkerman Area Residents Association

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**Refusal Reasons Page for Planning Application - 2012/6548/P**  
**Site Address**65 - 69 Holmes Road London NW5 3AN

**Reasons 1**

The proposed development would result in an unacceptable loss of existing and no suitable replacement of flexible employment floorspace which is suitable to meet the needs of existing or alternative business users. The site has potential for continued occupation by uses within the business use classes including B1(c) light industrial and B8 storage and distribution and could include provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace. This would have a detrimental impact on the local economy and the mixed use character of the area contrary to policies CS1 (Distribution of growth), CS6 (Providing quality homes), CS8 (Promoting a successful and inclusive Camden economy), DP1 (Mixed use development), DP2 (Making full use of Camden's capacity for housing) and DP13 (Employment sites and premises) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 2**

The proposed development would result in an over-concentration of student accommodation, harmful to the established mixed and inclusive community, and would result in a loss of amenities to existing residents contrary to policies CS5 (managing the impact of growth & development), CS6 (Managing the impact of growth and development), CS10 (supporting community facilities and services), DP9 (Student housing, bedsits and other housing with shared facilities), DP26 (Managing the impact of development on occupiers and neighbours) and DP31 (provision of, and improvements to open space) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 3**

The proposed development would fail to provide adequate external amenity space to meet the needs of the occupiers of the student accommodation proposed. The application is therefore contrary to policies CS14 (high quality places & heritage), DP24 (high quality design) and DP26 (managing the impact of development) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 4**

The proposed development by virtue of its height, bulk, massing and design would have an adverse impact on the character and appearance of the surrounding streetscenes and local area. The application is therefore contrary to policies CS5 (managing the impact of growth and development), CS14 (high quality places and conserving heritage) and DP24 (high quality design) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 5**

The proposed development would fail to provide an appropriate level of accommodation capable of being easily adapted to meet wheelchair housing standards. The application is contrary to policies DP6 (lifetime homes and wheelchair housing) and DP29 (improving access) of the London Borough of Camden Development Policies 2010.

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**Reasons 6**

In the absence of sufficient supporting information regarding the sunlight and daylight impact of the proposed development the applicant has failed to demonstrate that the development would not cause a harmful loss of sunlight or daylight to the residents of surrounding residential properties and is therefore considered to be contrary to policies CS5 (impact of growth and development) and DP26 (impact of development on occupiers and neighbours) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 7**

The proposed development, in the absence of a construction management plan (in the event that the Council were to find the construction arrangements acceptable in other respects), would be likely to give rise to conflicts with other road users, and be detrimental to the amenities of the area generally, contrary to policies CS5 (Managing the impact of growth and development), CS19 (Delivering and monitoring the Core Strategy), DP21 (Development connecting to the highway network), DP26 (Managing the impact of development on occupiers and neighbours) and DP28 (Noise and vibration) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 8**

The proposed development, in the absence of a legal agreement to secure highway contributions to undertake external works outside the application site, would fail to secure adequate provision for the safety of pedestrians, cyclists and vehicles, contrary to policies CS11 (Promoting sustainable and efficient travel), CS19 (Delivering and monitoring the Core Strategy), DP17 (Walking, cycling and public transport) and DP21 (Development connecting to the highway network) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 9**

The proposal, in the absence of a legal agreement securing contributions towards Camden's Pedestrian, Environmental and Safety improvement initiative would fail to undertake external works outside the application site, and would fail to secure adequate provision for the safety of pedestrians, cyclists and vehicles, contrary to policies CS11 (Promoting sustainable and efficient travel), CS19 (Delivering and monitoring the Core Strategy) and DP21 (Development connecting to the highway network) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 10**

The proposed development, in the absence of a legal agreement for car-free housing, would be likely to contribute unacceptably to parking stress and congestion in the surrounding area, contrary to policies CS11 (Promoting sustainable and efficient travel), CS19 (Delivering and monitoring the Core Strategy), DP18 (Parking standards and limiting the availability of car parking) and DP19 (Managing the impact of parking) of the London Borough of Camden Core Strategy and Development Policies 2010.

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**Reasons 11**

The proposed development, in the absence of a Workplace and Student Travel Plan, would be likely to give rise to significantly increased car-borne trips and would result in a unsustainable form of development, contrary to policies CS11 (Promoting sustainable and efficient travel), CS19 (Delivering and monitoring the Core Strategy), DP16 (The transport implications of development) and DP17 (Walking, cycling and public transport) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 12**

The proposed development, in the absence of a legal agreement securing a student management plan, would fail to protect the amenities of the surrounding area contrary to policies CS5 (Managing the impact of growth and development), CS19 (Delivering and monitoring the Core Strategy), DP9 (Student housing, bedsits and other housing with shared facilities), DP26 (Managing the impact of development on occupiers and neighbours), of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 13**

The proposed development, in the absence of a legal agreement for defining that the occupation of the student units would be restricted to students in full or part time higher education and no part of the property to be sold as a separate self-contained unit contrary to policies DP9 (Student housing, bedsits and other housing with shared facilities) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 14**

The proposed development, in the absence of a legal agreement for securing contributions for public open space, would be likely to contribute to pressure and demand on the existing open space in this area contrary to policies CS15 (Protecting and improving our parks and open spaces and encouraging biodiversity) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 15**

The proposed development, in the absence of legal agreement providing for a local labour and procurement agreement, work placement opportunities and construction apprentices would fail to contribute towards the economic renewal of the area contrary to policies CS8 (Promoting a successful and inclusive Camden economy) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Core Strategy and Development Policies 2010.

**Reasons 16**

The proposed development, in the absence of a legal agreement requiring a design stage BREEAM Assessment prior to works commencing on site and a post construction review, would fail to be sustainable in its use of resources, contrary to policies CS13 (Tackling Climate Change through promoting higher environmental standards), CS19 (Delivering and monitoring the Core Strategy), DP22 (Promoting sustainable design and construction), DP23 (Water) and DP32 (Air quality and Camdens Clear Zone) of the London Borough of Camden Core Strategy and Development Policies 2010.

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**Reasons 17**

The proposed development, in the absence of a legal agreement securing the energy efficiency measures proposed, would fail to be sufficiently sustainable in its use of resources, contrary to policies CS13 (Tackling climate change through promoting higher environmental standards), CS16 (Improving Camden's health and well-being) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 (Promoting sustainable design and construction), DP23 (Water) and DP32 (Air quality and Camden's Clear Zone) of the London Borough of Camden Local Development Framework Development Policies.

**Reasons 18**

The proposed development, in the absence of a legal agreement for securing contributions for public open space, would be likely to contribute to pressure and demand on the existing open space in this area contrary to policies CS15 (protecting and improving our parks and open spaces and encouraging biodiversity) and CS19 (delivering and monitoring the core strategy) of the London Borough of Camden Local Development Framework Core Strategy.