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Planning Statement – Section 73 Application

Highgate Newtown Community Centre, 25 Bertram
Street, London N19 5DQ

Iceni Projects Limited on behalf of
London Borough of Camden
Development Division
November 2018

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ON BEHALF OF LONDON
BOROUGH OF CAMDEN
DEVELOPMENT DIVISION

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Application
HIGHGATE NEWTOWN COMMUNITY CENTRE, 25
BERTRAM STREET, LONDON N19 5DQ

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A1. LETTERS OF SUPPORT

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a Section 73 application being submitted by the London Borough of Camden Development Division ('the Applicant') to the London Borough of Camden ('the Council') for the redevelopment of the Highgate Newtown Community Centre, 25 Bertram Street, London, N19 5DQ ('the site').
- 1.2 This Section 73 Application seeks to modify extant planning application 2016/6088/P to deliver the following revised description of development:

“Redevelopment of the existing Highgate Newtown Community Centre and Fresh Youth Academy and the change of use of the People’s Mission Gospel Hall to provide replacement community facilities (Use Class D1) and 41 residential units (Use Class C3) together with associated public open space, landscaping, cycle storage, plant and other associated infrastructure.”

- 1.3 This Planning Statement has been prepared by Icen Projects Ltd and provides the planning case in support of the amendments to the proposed development. It assesses the development in the context of the extant permission and relevant adopted and emerging planning policy and guidance at national, regional and local levels.

Background

- 1.4 The site, which is currently occupied by Highgate Newtown Community Centre (HNCC) and Fresh Youth Academy (FYA), was identified through Camden Council's Community Investment Programme (CIP) as being in significant need for investment. The current HNCC buildings are all in a poor state of repair. Without significant investment in new buildings, the Community Centre would find it difficult to attract funding for services to make it more self-sustaining.
- 1.5 Following an extensive community engagement and pre-application consultation process that commenced in 2014, planning permission was granted for the redevelopment of the site in June 2017 (LPA ref. 2016/6088/P). The proposals comprised the comprehensive redevelopment of the site to provide new a community centre and associated facilities for both the HNCC and FYA (Class D1), the provision of 31 residential units (Class C3) for market sale (including conversion works to the People's Mission Gospel Hall), along with comprehensive hard and soft landscaping works, public realm improvements and associated infrastructure.

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- 1.6 This scheme has progressed on the premise that it would be self-funding, with the market housing being used to pay for the re-provision of the community facilities. The consented scheme was designed to 'break even', with any additional profit being generated through increased sales revenue to be recycled back into the Council's affordable housing fund.
- 1.7 During the detailed design development process that followed the 2017 granting of planning permission, it became apparent that the costs associated with the redevelopment were significantly higher than previously anticipated. This is largely the result of wider increases in construction costs felt across the industry, coupled with a flattening sales market. The complex structural design of the scheme, the costs associated with the significant basement excavation and the decrease in anticipated sales values of the larger units, were also key factors affecting the delivery of the consented scheme.
- 1.8 In light of the above considerations, the project team undertook a full review of the consented scheme to identify opportunities to deliver a more viable scheme that could be confidently taken forward through the planning process. Since late 2017, the project's design team have been refining the proposals, in consultation with key stakeholders, to ensure the scheme is deliverable, the community benefits are maintained, and the impacts to surrounding neighbours minimised.
- 1.9 The proposed amendments to the scheme have been developed and progressed through a series of pre-application consultation meetings with officers of the London Borough of Camden, and through a series of meetings and discussions with key stakeholders, including the Highgate Newtown Community Centre (HNCC), the Fresh Youth Academy (FYA), local ward councillors, resident groups from Bertram Street, Winscombe Street and Croftdown Road as well as the wider community.
- 1.10 The main design changes that have been incorporated into the revised scheme include the removal of the basement level from the development (with the exception of a small plant room), the revision of the unit mix to better respond to local need, and the simplification of the structural design, including separating community and residential uses into separate buildings. These changes also result in a number of additional planning benefits including improvements to the overall quality and flexibility of the community facilities, the scheme's ability to provide 7 x affordable rented units and a significantly reduced construction programme.
- 1.11 The continued overarching objective of the proposals is to secure the future of affordable community services for local people and provide state-of-the-art facilities, which would better meet current and future needs, enabling growth and financial stability for the organisations for years to come. In order to successfully achieve this objective, the new community facilities, and significant public realm enhancements would be cross-funded through the delivery of new on-site residential accommodation.

1.12 The Applicant is seeking to secure these changes to the scheme through this Section 73 Application.

The Submission

1.13 This Planning Statement should be read in conjunction with the other drawings, plans and documents submitted in support of this application. These documents comprise:

- Application Form and Certificate of Ownership;
- Community Infrastructure Levy Form;
- Area and Land Use Schedule;
- Schedule of Proposed Planning Conditions;
- Site Location Plan, Existing, Consented and Proposed Plans, Sections and Elevations, prepared by RCKa Architects;
- Proposed Stopping Up Plans, prepared by the London Borough of Camden;
- Addendum Design and Access Statement, prepared by RCKa Architects;
- Statement of Community Involvement, prepared by RCKa Architects;
- Heritage Statement, prepared by Icen Projects;
- Daylight and Sunlight Study (Neighbouring Properties), prepared by Right of Light Consulting;
- Daylight and Sunlight Study (within Development), prepared by Right of Light Consulting;
- Energy Strategy, prepared by McBains;
- Drainage Strategy, prepared by McBains;
- Sustainability Statement, prepared by Icen Projects;
- Arboricultural Impact Assessment and Tree Protection Plan, prepared by Greenman Environmental Management;
- Preliminary Ecological Appraisal, prepared by Syntegra;
- Acoustics Report, prepared by Ion Acoustics;
- Air Quality Assessment, prepared by Isopleth;

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- Transport Technical Note (including Swept Path Analysis), prepared by Systra;
 - Ground Investigation and Basement Impact Assessment, prepared by GEA; and
 - Viability Assessment Report, prepared by Savills.

2. THE SITE AND SURROUNDING AREA

- 2.1 The site is approximately 0.27 ha in size and is located within the administrative boundary of the London Borough of Camden.
- 2.2 The site contains the existing HNCC buildings, FYA, the People's Gospel Mission Hall, a vacant caretaker's cottage and two residential flats. These buildings are one to three storeys in height and are situated around a centralised courtyard that is used for informal parking and a community garden.
- 2.3 The character of the surrounding area is predominantly residential, defined by a mixture of late 19th century dwellings alongside 20th century development. Specifically, the site is bound to the north by Bertram Street and Winscombe Street which contain late Victorian terraced housing, to the east by the Grade II listed Winscombe Street terrace, and to the south and west by the Brookfield Estate flats fronting Croftdown Road. A Site Location Plan is provided at Figure 2.1.

Figure 2.1 Site Location Plan



Source: RCKa Architects, 2018

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- 2.4 Pedestrian and vehicular access to the site is via Bertram Street to the north. There is a pedestrian right of way which links Croftdown Road to Bertram Street and Chester Road, running along the western boundary of the site.
- 2.5 The site has a public transport accessibility level (PTAL) rating of 3, indicating a moderate level of public transport accessibility. The closest public transport connections are via bus stops on Chester Road to the north and Dartmouth Park to the east, with Archway Underground Station located approximately 800m to the north east.

Relevant Planning History

- 2.6 The most relevant planning application with respect to this Section 73 Application is extant planning permission reference 2016/6018/P.
- 2.7 This application established a number of key principles associated with the site's redevelopment. These include the overall design approach, the quality of the replacement community facilities, landscaping and public realm benefits, transport, sustainability and energy requirements. All of these development principles have remained unchanged with the proposed amendments sought by this application.

3. THE PROPOSED AMENDMENTS

3.1 The Section 73 application seeks to modify the scheme that was granted planning permission on 30 June 2017 for the comprehensive redevelopment of the site to provide replacement community facilities (Use Class D1), 31 new residential units (Use Class C3) and improvements to the public realm.

3.2 These changes would result in improved community facilities, an improved public realm and open space, new homes, including family-sized homes and affordable Camden Living units, and a shorter overall construction programme. Specifically, the scheme would result in the following key changes:

- A higher quality and more usable community centre that better meets the needs of HNCC and FYA, including providing the sports hall at ground floor level;
- The delivery of 41 residential units, an increase of 10 units, with 7 of these units being affordable rented units;
- A revised unit mix that better responds to local needs;
- The removal of most of the basement level from the development, reducing overall construction programme;
- Minor increases to the height of the scheme in some areas on site, with a decrease in height in other areas; and
- A revised public open space and courtyard area.

3.3 The revised description of development is as follows:

“Redevelopment of the existing Highgate Newtown Community Centre and Fresh Youth Academy and the change of use of the People’s Mission Gospel Hall to provide replacement community facilities (Use Class D1) and 41 residential units (Use Class C3) together with associated public open space, landscaping, cycle storage, plant and other associated infrastructure.”

3.4 Further information regarding the amended development proposals is provided below.

Land use

- 3.5 The proposed development would result in the delivery of new community facilities and residential floorspace. Minor changes to the overall floorspace quantum of the development have occurred as set out in Table 3.1.

Table 3.1 Consented versus Proposed Floorspace Schedule

Use	Consented sq. m (GIA)	Proposed sq. m (GIA)	Net Change sq. m (GIA)
<i>Residential (Class C3)</i>	3,258	3,610	+352
<i>Community Centre (Class D1)</i>	2,161	1,754	-407
<i>Total</i>	5,419	5,364	-55

- 3.6 The reduction in the overall area of the community floorspace is a result of the omission of the extensive basement storage and viewing areas that were provided in the consented scheme. This change has served to simplify the construction of the proposed scheme by removing the need to excavate the entirety of the site. Removing the basement (saved for plant space in the south eastern corner of the site) has enabled the public courtyard to be directly accessible from and on the same level as the hall, which facilitates viewing space into the hall. This viewing external viewing space is not including in the floorspace figures in Table 3.1.
- 3.7 Importantly, the revised proposals would deliver more efficient and better functioning facilities than the consented scheme. These improvements have been achieved in consultation with HNCC and FYA to ensure the facilities meet their current and future needs.
- 3.8 The proposed community facilities sought by the amended scheme would still result in an increase of 53 sqm GIA when compared to the existing facilities.

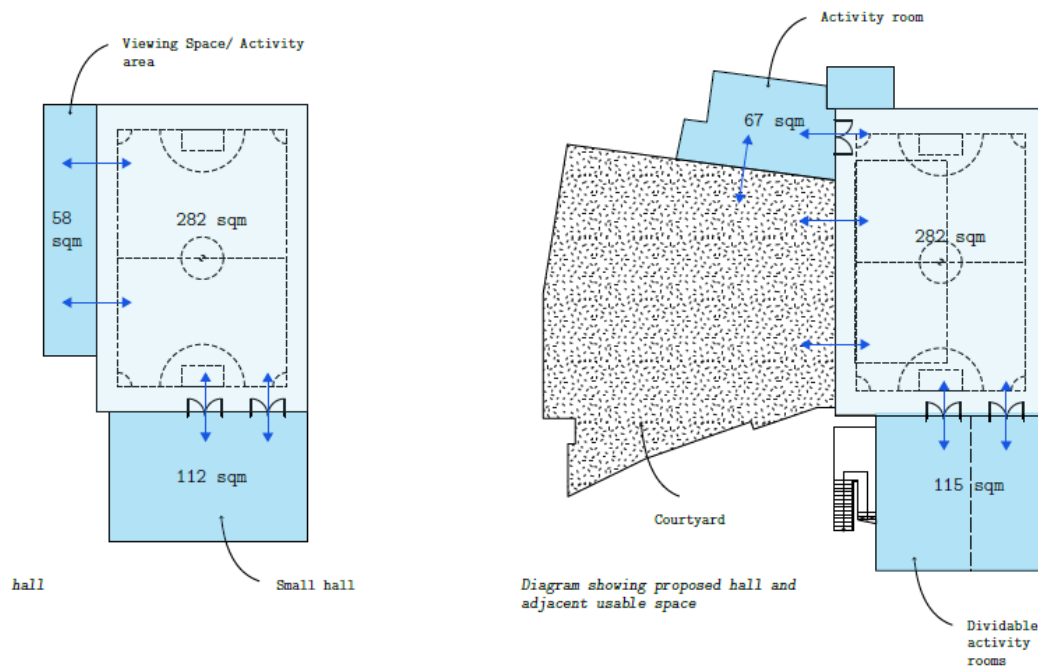
Re-provision of Community Facilities

- 3.9 The overarching objective of the proposals is to secure the future of affordable community services for local people and provide state-of-the-art facilities, which would better meet current and future needs, enabling growth and financial stability for the organisations for years to come. The key change made to the proposed community facilities is the relocation of all of the basement level facilities to ground floor level. This positive change creates a number of significant improvements when compared to the consented scheme. All of the main activities in the hall would now be visible from

the central courtyard, with the increased areas of active frontage at ground floor creating a lively, safe and attractive public realm. This would also provide opportunities for activities to spill out into the courtyard space, which was not achievable with the consented scheme.

- 3.10 This improved usability of the hall would allow a range of additional events to be held, including larger events that could utilise both the hall and the courtyard. This change is demonstrated in the diagram at Figure 3.2.

Figure 3.2 Improvements to the community hall



- 3.11 Aside from the improved usability of the hall, the community floorspace has been designed to meet the specific needs and requirements of HNCC and FYA. A flexible floor layout is provided to ensure that the range of activities on offer by each organisation can be facilitated. This flexible layout would future proof the facility, allowing each organisation to evolve and grow into the future.
- 3.12 The impact of bringing the hall up to ground floor level on neighbouring properties, specifically to the east of the site, has been addressed through the introduction of a pitch to the eastern side of the sports hall. This would reduce the overall visual impact and bulk of the sports hall compared with the consented scheme. Further detail on this design treatment is provided within the Addendum Design and Access Statement.
- 3.13 Additionally, the roof of the sports hall would no longer have a roof terrace, which would result in an improved relationship with adjoining properties to the east, improving their residential amenity.

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- 3.14 Further detail on the design changes to the community facilities and the design process and engagement that occurred during pre-application consultation can be found in the Addendum Design and Access Statement and Statement of Community Involvement, prepared by RCKa Architects.

Housing and Affordable Housing

- 3.15 The proposed development would provide 41 residential units, a net increase in 10 units compared to the consented scheme. The additional 10 units have been provided primarily as a result of revising the unit mix of the scheme, with the provision of a greater proportion of smaller units. This unit mix better responds to the local market demand and removes the larger four-bedroom units from the consented scheme, which were detrimental to the viability of the previously approved development.
- 3.16 Of the increase in 10 units, 7 of these would be affordable. The delivery of affordable housing is a significant planning benefit of the amended scheme. These 7 affordable units would be provided within Block D of the development and would be provided by Camden Living, a Camden Council owned provider of affordable housing. Further detail on the proposed unit mix and affordable housing provision is provided later in this report.
- 3.17 The design of the residential buildings has been refined, with a clear separation between residential and community uses being an important design principle that has been introduced. The residential development would primarily be provided on the western side of the site in Block A, which has allowed for a more rational design to be developed.
- 3.18 The standard of residential accommodation in the proposed development continues to be high, and has been improved by removing the basement level, ensuring no residential floorspace would be provided below ground.
- 3.19 The overall height of Block A has increased slightly compared to the consented scheme, primarily through the introduction of roof extension to the northern half of the building. This roof extension is set back, ensuring its impact on surrounding properties is minimised.
- 3.20 The design of the residential buildings has also been developed to improve the relationship with surrounding properties, ensuring that any overlooking between the proposed development and adjoining properties is minimised. Specifically, the relationship to 23 Bertram Street and 118 Croftdown Road has been improved through the relocation and removal of windows compared to the consented scheme.
- 3.21 Further detail on the design of the residential block, including its design principles and its relationship with surrounding properties, is including within the Addendum Design and Access Statement prepared by RCKa Architects.

Public Realm

- 3.22 The public realm would be enhanced on site through a comprehensive soft and hard landscaping scheme.
- 3.23 The central communal courtyard has been designed to allow and encourage members of the public, community centre users, and local residents to use and interact within the space. External activities in relation to the community centre's services would be encouraged by the relocation of the hall to ground level, helping to create a unique, active and safe space at the heart of the local community. New paved areas would be complemented by increased planting including new trees, hedges and other soft landscaping as well as, seating, lighting and cycle parking.
- 3.24 A key benefit of the consented scheme was the creation of a new pedestrian route through the heart of the site, increasing permeability between Bertram Street and Croftdown Road. This public realm improvement is maintained within the proposed development.
- 3.25 Further details on the public realm and the soft and hard landscaping are included within the Addendum Design and Access Statement prepared by RCKa Architects.

Amendments to the Public Right of Way

- 3.26 The current public right of way which runs along the western side of the site, linking Croftdown Road and the rear of Bertram Street (ultimately providing access to Chester Road), is proposed to be stopped up as public highway. A new pedestrian and cycle route would be provided through the centre of the site and across the public courtyard, with a path provided along the northern boundary of the site, linking the right of way to the north.. The access from Croftdown Road would be widened to create a more open and attractive entrance into the site from the south. These proposed changes are set out in the proposed Stopping Up Plans, submitted with this application.
- 3.27 Relocating the public right of way would have a number of benefits for surrounding properties on Croftdown Road. A key benefit would be the improved safety and security for these properties by re-routing pedestrians through the public courtyard in the middle of the site.

Parking, Access and Servicing

- 3.28 The development would continue to be car free, with a total of 58 secure cycle spaces provided for residents, along with a further 18 cycle spaces provided throughout the public realm for the use of residential visitors and users of the community centre.
- 3.29 The parking, access and servicing strategy for the proposed development remains broadly the same as the consented scheme. Vehicular access would remain from the Bertram Street entrance of the

site, with bollards used to control access for drop offs to the community centre, waste collection and delivery vehicles only. No vehicular access would be provided from Croftdown Road.

- 3.30 The disabled parking bay that was previously provided on site for users of the community centre is being relocated to Croftdown Road, providing a simplified and more direct level access to the wheelchair accessible entrance to the Community Centre, which has now been relocated towards Croftdown Road.
- 3.31 Further details of the transport, parking and servicing strategy are provided within the Transport Technical Note, prepared by Systra.

Changes to Conditions

- 3.32 The proposed development would facilitate the change to a number of the conditions attached to the extant permission.
- 3.33 A schedule of proposed planning conditions has been enclosed with this application. This includes changes to conditions to address the specific elements of the scheme that have been altered as well as amendments to the trigger points of specific conditions.

4. PLANNING CONSIDERATIONS

4.1 This section of the Planning Statement defines the Development Plan and assesses the proposed development against the relevant adopted and emerging planning policy and guidance at national, regional and local level.

Planning Policy Framework

4.2 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

4.3 The relevant Development Plan for the site consists of:

- The London Plan (2016).
- The Camden Local Plan (2017)

4.4 Camden Council also has a number of supplementary planning documents (SPDs) known as Camden Planning Guidance (CPG). These are also relevant material considerations for the application.

4.5 The Revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.

4.6 The Mayor of London is in the process of preparing the New London Plan, which was published for consultation from December 2017 to March 2018 and will be subject to Examination in Public (EiP) in Autumn 2018.

4.7 Additionally, the draft Dartmouth Park Neighbourhood Plan (2018), which has recently undergone consultation, is a material consideration for this application. This plan is still yet to undergo EiP, however relevant draft policies have been considered in the assessment of this application.

Planning Considerations

4.8 The relevant planning considerations associated with this application include:

- The principle of mixed use redevelopment;

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- The replacement community centre;
 - Design, scale and massing;
 - Quality of residential accommodation;
 - Unit mix and affordable housing;
 - Accessibility;
 - Relationship with neighbouring properties;
 - Daylight and sunlight;
 - Heritage;
 - Energy and sustainability;
 - Transport, parking and access;
 - Arboriculture and ecology;
 - Basement development;
 - Air quality;
 - Noise; and
 - Flood risk and drainage.

4.9 Each consideration is assessed in turn below.

Principle of mixed use redevelopment

4.10 The overarching objective for the proposed development is to re-provide a fit-for-purpose, modern and flexible community centre to replace the existing facilities that are no longer suitable for long term sustainable use and are falling into a state of disrepair. Achieving this outcome occurs through the provision of new residential accommodation on site, the income from which would be used to self-fund the delivery of the new community floorspace.

4.11 The mixed-use development approach for the site was established through the extant planning permission and the same approach is proposed as part of the amended proposals for the site.

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- 4.12 In policy terms, the delivery of the new community facilities is endorsed by Policy C2 of the Local Plan, which encourages the retention and provision of community facilities to meet local needs. Additionally, the delivery of residential housing aligns with Policy H1 of the Local Plan which states that housing is the boroughs key land use priority. The scheme would also maximise the delivery of self-contained housing as part of the mixed-use approach to the site's redevelopment, in line with Policy H2.

The replacement community centre

- 4.13 Policy C2 of the Local Plan seeks to ensure that a diverse range of community facilities are provided throughout the borough to enhance quality of life, social cohesion and instilling a sense of community identity. Community facilities are also noted as often being used to support the most vulnerable and least well-off in society. Ensuring that these community facilities remain viable is a key objective of Policy C2.
- 4.14 Existing community facilities are protected by Policy C2, with Part G of the policy requiring a replacement facility of a similar nature to be re-provided on site that meets the needs of the local population or its current or intended users. The replacement community floorspace would accord with this policy requirement, with the new community facilities designed to meet the current and long-term needs of the HNCC and FYA, allowing both organisations to continue to serve the local community.
- 4.15 Importantly, the amendments sought by the proposed development would represent a significant number of improvements when compared to the consented scheme. Notably, the community centre would now be provided at ground floor level, allowing increased usability and flexibility of the community space, allowing activities to use both the hall and the communal courtyard. The facilities would also remain flexible, allowing both HNCC and FYA opportunities to utilise the space for a range of activities, including renting the spaces out to local community groups. HNCC have provided a letter of support for the proposals, which is provided at Appendix A1.
- 4.16 Draft Policy CM1 of the Dartmouth Park Neighbourhood Plan requires that equivalent replacement facilities are provided as part of the development of the site. The amendments sought through this scheme would ensure replacement facilities are provided and the overall quality of the community centre's facilities are improved, meeting the current and future needs of its occupiers and the community.
- 4.17 Overall, the replacement community facilities are considered to wholly accord with the principles of Policy C2 of the Local Plan and draft Policy CM1 of the Dartmouth Park Neighbourhood Plan, ensuring the facilities would secure the future of HNCC and FYA on site in the long term to the benefit of the local community.

Design, scale and massing

- 4.18 The revised design, scale and massing of the amended buildings have been informed by the design principles established by the consented planning application.
- 4.19 These buildings would be sited around a new central courtyard area, forming the active heart of the development, with a new residential block (Block A) provided along the western side of the site and the new community centre and associated facilities provided on the eastern side of the site (Block B). The conversion of the People's Mission Gospel Hall would remain the same as consented (Block C) and a smaller residential building, containing the 7 x affordable units, would be provided to the north of the site (Block D).
- 4.20 The residential Block A would no longer be split, however the design team have ensured that the building would still read as two separate buildings through the use of setback winter gardens within the middle of the block. A roof extension to the northern part of Block A is also provided. Whilst this extension increases the height of the proposals when compared to the consented scheme it is setback from the parapet, ensuring it is not visible from key views into the site.
- 4.21 The design of the amended development has been developed in conjunction with design and conservation officers of the Council as well as with the Council's independent design review panel. The key design principles that were refined during this process were to ensure the development referenced the distinct local character of the area, the development continued to use high quality materials and finishes and ensured that key views through the site from the public realm were enhanced.
- 4.22 By following the key massing and design principles established from the consented scheme, and further refined during the pre-application process, the design team have ensured that the amended development does not result in any further impact on the amenity of surrounding properties and would appropriately reference the surrounding local character.
- 4.23 The design of the amended proposals are considered to achieve a high quality of design, in accordance with Policy D1 of the Local Plan and draft Policy DC3 of the Dartmouth Park Neighbourhood Plan.
- 4.24 Full details of the amended design are set out with the accompanying Design and Access Statement prepared by RCKa.

Quality of residential accommodation

- 4.25 The proposed residential units have been designed to deliver a high-quality residential environment for future residents. Particular regard has been given to floor to ceiling heights, orientation, providing

dual aspect units and ensuring each unit would have access to adequate private and communal amenity space.

- 4.26 The amended proposals remove the basement level to Block A, ensuring that there is no residential floorspace below ground floor level.
- 4.27 All unit sizes within the amended development would comply or exceed the relevant space standards as set out by Policy 3.5 of the London Plan, the Nationally Described Minimum Space Standards. The layouts of the residential units also ensure that the internal standards contained within the Mayors Housing SPG (2016) and CPG 2 – Housing, have been met.
- 4.28 The design of this private amenity space has had regard to potential overlooking and privacy impacts both within the development and with adjoining properties. Additionally, each balcony and terrace have a minimum depth of no less than 1.5m and are easily accessible from the main living area of each dwelling, ensuring that they provide a high level of usability for future residents. These key design measures are in accordance with the guidance provided within CPG 1 Design and CPG 2 Housing.
- 4.29 Additionally, all residential units would receive good internal daylight levels, which is set out in the accompanying Daylight and Sunlight Report from Right of Light Surveyors and discussed further below.

Unit mix and affordable housing

- 4.30 The proposed amendments to the scheme would result in the delivery of a total of 41 residential units. Whilst the number of units has increased from the consented, the proposed revisions to the scheme now include the delivery of affordable housing.
- 4.31 The unit mix and tenure split of the proposals is as follows:
- 6 x 1-bed units and 1 x studio unit for the affordable rented housing
 - 13 x 1-bed units (38%), 14 x 2-bed units (41%) and 7 x 3-bed units (21%) for the market sale housing
- 4.32 The extant scheme proposed a unit mix that comprised 8 x 1-bed units (26%), 13 x 2-bed units (42%), 8 x 3-bed units (26%) and 2 x 4-bed units (6%). The scheme did not provide any affordable housing.
- 4.33 Policy 3.8 and 3.9 of the London Plan aims for all new development in London to contribute to mixed and balanced communities through the delivery of housing that provides a range of unit sizes and tenures. At a local level, Policy H7 of the Camden Local Plan outlines the dwelling size priorities for

the London Borough of Camden. This is also reiterated by draft Policy H1 of the Dartmouth Park Neighbourhood Plan. Schemes should broadly accord with these priorities.

4.34 Policy H7 of the Local Plan notes the following 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

4.35 Policy H7 notes that the Council should be flexible in their assessment of the mix of proposals and should consider a number of material considerations including affordable housing requirements, the character of the development, viability and the need for flexibility to maximise the delivery of additional affordable housing.

4.36 It is acknowledged that the unit mix of the amended development does not fully accord with the dwelling size priorities. However, in exercising a flexible approach as policy allows, the delivery of the affordable housing - which has its own unique unit size requirement - would be maximised, resulting in a significant planning and public benefit. When considering the market sale units separately from the affordable housing units, the mix broadly aligns with Policy H7 of the Local Plan, as well as the unit mix that was established through the consented scheme.

4.37 Further detail on the proposed tenure and operator of the affordable housing, Camden Living, as well as the viability analysis that has underpinned this provision, is below.

Affordable Housing – Camden Living Units

4.38 Camden Living is a Camden Council owned provider of affordable rented housing. The company was set up by the Council in order to keep ownership of more of the properties that the Council build through the Community Investment Programme.

4.39 Camden Living specifically targets individuals on middle incomes between £30,000 and £40,000 who are unlikely to qualify for social housing but find it difficult to afford private rents. Many of these people have been identified by Camden Council as key workers including teachers and nurses.

4.40 Camden Living has successfully let a number of properties to key workers throughout the Borough in its short existence. This includes 4 x homes in the Chester Balmore development to the north of the application site on Chester Road, as well as 39 x units in the Maiden Lane development in Kings Cross and 9 x units at the Bourne Estate.

4.41 This affordable housing programme is a new tenure that is being promoted by the Council. The key benefits and features of the affordable rented product include:

- Apartments are offered for rent at Camden Living Rent level, which is significantly below market rent but above social rent.
- Apartments are offered to people living and working in Camden, with a specific aim to help key workers in the borough. Smaller apartments, including studios and 1-bedroom units, are key to help meet this strategic need.
- Apartments are offered with three-year tenancies, providing greater security than the private rented sector.
- Income from Camden Living Units is recycled back into the Council to help pay for services that have faced funding cuts from the government.

4.42 The delivery of 7 x affordable rented units as part of the modifications to the consented scheme are a significant planning benefit of the proposals. These units include 6 x 1-bed units and 1 x studio unit that would be offered to key workers.

4.43 These units would be provided within Block D and would not be mixed with any market sale housing within Block A. This would assist with the ongoing maintenance and management of the properties by Camden Council.

4.44 Camden Living have provided a letter of support at Appendix A1 which confirms their commitment to the delivery of affordable housing.

Affordable Housing – Viability

4.45 The financial viability of the scheme is the key driver behind the proposed development. The consented scheme was a 'break even' scheme, with the market housing cross subsidising the delivery of the new community facilities. The viability analysis that accompanied that consented scheme demonstrated that the scheme would generate a deficit and would not ordinarily be deliverable. The reason why the consented scheme was considered deliverable was due to the special circumstance of the site owner and application, with the Council not seeking a minimum 25% profit from the development, as normal developers would.

4.46 As noted earlier in this report, as a result of increased building costs and a softening of the housing market, the consented scheme was considered to be undeliverable in late 2017. The design team was then tasked to develop a revised set of proposals that would ensure the scheme could be viably delivered. The key changes made by the design team were to remove the significant amount of basement floorspace from the scheme, simplify the structural design of the development and provide

a unit mix that better responded to local market conditions. Collectively, these improvements to the scheme have enabled the scheme to not only be deliverable but to also include an element of affordable housing, whilst still cross funding the delivery of the new community facilities. A detailed Viability Report, prepared by Savills, provides further detail on the viability of the scheme.

- 4.47 The Viability Report notes that the Residual Land Value generates a deficit against the Site Value Benchmark and is therefore not considered commercially viable in development viability terms. However, the report notes that when taking into account the unique and special circumstances involved (i.e. a Council owned and delivered scheme that does not seek a minimum 25% profit but instead for sufficient funds to enable the redevelopment of the community facilities), that the scheme is able to become deliverable on the basis of providing 7 x affordable units.
- 4.48 Overall, the proposed provision of affordable housing is considered acceptable in the context of Policy 3.12 of the London Plan, Policy H4 of the Local Plan and draft Policy H2 of the Dartmouth Park Neighbourhood Plan, which seek to maximise the delivery of affordable housing.

Unit Mix – Market Housing

- 4.49 The amended development would deliver a total of 41 residential units, which comprises 7 x affordable units and 34 x units for market sale.
- 4.50 As mentioned above, the 7 x affordable units would be smaller 1-bed and studio units in order to meet the specific needs and profile of individuals that Camden Living is aiming to assist. Therefore, it is important to consider the unit mix of the market housing separately to the unit mix of the affordable housing, given the specific needs of Camden Living.
- 4.51 When considered separately, the unit mix of the market housing proposed is 13 x 1-bed units (38%), 14 x 2-bed units (41%) and 7 x 3-bed units (21%). This results in a unit mix that generally accords with the dwelling size priorities listed by Policy H7 of the Local Plan, with the market housing including 62% of the units as 2 and 3 bedroom units, two housing sizes identified as being high priority.
- 4.52 This unit mix is also consistent with the 31 market units from the consented scheme, as indicated in the Table 4.1

Table 4.1 Unit Mix of Consented Scheme versus Proposed Scheme

Unit Size	Consented Scheme	Proposed Scheme	Change
1 bed	8 (26%)	13 (38%)	+5
2 bed	13 (42%)	14 (41%)	+1
3 bed	8 (26%)	7 (21%)	-1

4 bed	2 (6%)	0	-2
TOTAL	31	34	+3

- 4.53 The change to the mix of the market units has been to provide a scheme that better responds to local needs and demands. The primary change has been the removal of the 2 x 4-bed units, as these larger units are considered inappropriate by local agents due to the scheme being car free. Instead, these units have been re-provided as 1 and 2-bedroom units. 7 x 3-bed units would continue to be provided to ensure an appropriate level of family-sized housing is located on site.
- 4.54 When considering the unit mix of the market housing separate from the specific needs and requirements of Camden Living's affordable units in Block D, the proposed unit mix generally accords with the dwelling size priorities of Policy H7 and is consistent with the unit mix of the consented scheme.

Accessibility

- 4.55 Both the London Plan (2016) and the Camden Local Plan (2017) seek to ensure the highest levels of accessibility are provided to new residential units. Under these adopted plans, Policy 3.8 of the London Plan and Policy H6 of the Local Plan require 90% of new units should be designed to meet Part M4 (2) of the Building Regulations, with the remaining 10% of the units needing to be designed to meet Part M4 (3) of the Building Regulations. This is also reiterated in the Council's supporting Interim Housing CPG, dated March 2018, and the Mayors Housing SPG (2016).
- 4.56 Part M4 (2) of the Building Regulations requires step-free access to units that are accessed above or below ground floor level. Part M4 (3) of the Building Regulations requires units to be fully wheelchair accessible.
- 4.57 The proposed development would meet these policy requirements with respect to Block A, which delivers the majority of residential units.
- 4.58 Block D is a four-storey building with no lift access proposed to the three upper floors. This approach is necessary in order to maximise the amount and delivery of affordable housing on site, which would not be achievable due to the physical and financial constraints of the scheme.
- 4.59 The adopted London Plan states at paragraph 3.48A the following:

Boroughs should seek to ensure that dwellings accessed above or below the entrance storey in buildings of four storeys or less have step-free access. However, for these types of buildings this requirement may be subject to development-specific viability assessments and

consideration should be given to the implication of ongoing maintenance costs on the affordability of service charges for residents. Where such assessments demonstrate that the inclusion of a lift would make the scheme unviable or mean that service charges are not affordable for intended residents, the units above or below the ground floor that cannot provide step free access would only need to satisfy the requirements of M4(1) of the Building Regulations.

4.60 Part M4 (1) of the Building Regulations does not require level access to units accessed above or below the ground floor level. This is further expanded in paragraph 2.3.11 of the Mayors Housing SPG which states:

If proposals do not include step free access they should clearly demonstrate that achieving step free access would make the development unviable or would mean that service charges are not affordable for the intended residents. If the LPA accepts this then the base Building Regulation M4(1) could be applied. Both the London Plan and the supporting Housing SPG notes that local planning authorities can apply the accessible housing policies flexibly in certain instances, particularly for buildings of four storeys or less when the delivery of a lift would have implications for the viability of a development and for ongoing service charge costs for residents.

4.61 There are a number of reasons why providing a lift to Block D is not appropriate in this particular instance, and why the Council should take a flexible approach to the application of Policy 3.8 of the London Plan and Policy H6 of the Local Plan. These include:

- The proposed development would not be able to viably deliver any affordable housing
- The requirement for the lift would result in the loss of usable floorspace within Block D
- The lift would have implications for the appearance and impact of the Block D, increasing its height and its overshadowing to the rear of homes on Bertram Street, due to the provision of a lift overrun.

4.62 These reasons were discussed and agreed during pre-application consultation with officers, and would ensure that the delivery of affordable housing on site is maximised.

4.63 For the reasons set out above, it is considered that in this particular instance, the Council should flexibly apply the provisions of Policy 3.8 of the London Plan and Policy H6 of the Local Plan in relation to the accessibility of Block D.

Relationship with neighbouring properties

- 4.64 The proposed development has been designed to ensure that the amendments to the scheme would cause no further impacts to the amenity of surrounding residential properties. The scheme has also sought to improve the potential for overlooking when compared to the consented scheme, particularly in relation to 23 Bertram Street and 118 Croftdown Road.
- 4.65 The siting and massing of the proposed development is consistent with the consented scheme, with separation distances no shorter. The number of windows and balconies on Block A that face residential properties have been refined to ensure that an improved relationship would occur. These improvements are considered to respond to Condition 10 from the consented scheme, which required further details to be provided on how overlooking would be managed by the proposed development. Illustrative diagrams demonstrating these revisions, are provided within the Addendum Design and Access Statement.
- 4.66 The proposed community hall has been brought up to ground floor level, but its impact on properties on the eastern boundary of the site has been minimised through the introduction of a pitch to the roof of the hall. This would improve the overall visual relationship to properties to the east of the site, including the listed Winscombe Street terrace, when compared to the consented scheme.
- 4.67 The re-routing of the ancient right of way through the middle of the site would create an improved boundary condition on the western boundary of the site. This boundary would now see rear garden to rear garden, whereas the consented scheme provided a pathway along this boundary which required lighting and would pose safety and security concerns for residents.
- 4.68 Overall, the proposed development is considered to result in an acceptable relationship with neighbouring properties in accordance with Policy A1 and D1 of the Local Plan and CPG 1 – Design.

Daylight and sunlight

- 4.69 The scale, massing and design of the proposals has been further developed with consideration of daylight and sunlight levels and overshadowing of neighbouring properties, as well as within the proposed residential units. Consideration of these design constraints is a requirement of Policy A1 of the Local Plan.
- 4.70 Right of Light Consulting has carried out a full daylight, sunlight and overshadowing analysis in relation to surrounding properties. The analysis has been carried out in accordance with the BRE Guidelines and considered surrounding properties at 18, 20-24 Bertram Street, 110 to 112, 114 to 116, 120 and 122 Croftdown Road and 14, 16, 18, 20 and 24 to 32 Winscombe Street.

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- 4.71 The report noted that, due to the existing buildings on site being of a lower scale compared to the proposed development, the intensification on development would have an impact on daylight and sunlight levels to a certain degree.
- 4.72 The report concluded that the majority of windows tested would meet or surpass the BRE numerical recommendations. It also noted that some windows fall short of the recommended targets, but that these results were not considered unusual given the site's urban location and are considered to be acceptable in the context of the BRE guidelines and the principles established by the consented scheme.
- 4.73 When compared to the consented scheme, the amended development would result in no significantly greater impacts in terms of daylight and sunlight levels.
- 4.74 Daylight and sunlight levels to the proposed residential units are also deemed by Right of Light to meet the relevant BRE Guidelines, ensuring an appropriate level of residential amenity for future occupiers.
- 4.75 Overall, it is considered that the sunlight impacts of the proposals are acceptable when balanced against the objectives of Policy A1 of the Local Plan and in the context of the consented scheme.

Heritage

- 4.76 The site is located within Sub-Area 5 of the Dartmouth Park Conservation Area. The site does not contain any listed buildings, however the adjoining Winscombe Street terraces to the east of the site are Grade II listed.
- 4.77 Considering the proposed development's impact on the character and appearance of the Conservation Area is a statutory test under Section 72 (1) of the Planning (Listed Building and Conservation Areas) Act 1990. Additionally, Policy 7.8 of the London Plan, Policy D2 of the Local Plan and draft Policy DC2 of the Dartmouth Park Neighbourhood Plan aim to ensure the significance of heritage assets and conservation areas are considered in planning decisions.
- 4.78 A Heritage Statement is submitted as part of the application, concluding that the revisions to the scheme would enhance the character and appearance of the conservation area and would not result in a harmful relationship with the listed building at Winscombe Street. Additionally, it noted that the works to the non-designated heritage asset, the People's Gospel Mission Hall, would be beneficial to the building. As such the proposed development is not considered to give rise to harm under the statutory test of the Planning (Listed Building and Conservation Areas) Act 1990 and would be in accordance with Policy 7.8 of the London Plan, Policy D2 of the Local Plan and draft Policy DC2 of the Dartmouth Park Neighbourhood Plan.

Energy and sustainability

- 4.79 The proposed development has aimed to ensure it achieves a high standard and energy efficient and sustainable design in line with Policies CC1, CC2 and CC3 of the Local Plan.
- 4.80 The proposed development would introduce a number of energy efficient measures including the use of a combined heat and power unit (CHP) as a site wide heating solution as well as the use of PV solar panels throughout the development. Further details are set out in the Energy Strategy prepared by McBains.
- 4.81 The Energy Strategy and Sustainability Statement confirm that the proposals are targeting BREEAM Excellent and would achieve a 37% reduction in CO₂ emissions compared to Part L 2013, with the remainder of domestic emissions being financially off-set to zero carbon.
- 4.82 These energy and sustainability outcomes are considered to be consistent with adopted planning policy.

Transport, parking and access

- 4.83 The amended development would have the same transport, parking and access arrangements as the consented scheme, with the exception of a change to disabled parking.
- 4.84 The development would continue to be car-free, with residents of the proposed development unable to obtain parking permits. Parking surveys that have been carried out have confirmed that there is adequate spare capacity in the surrounding street network, confirming that the proposed development would not result in any material impact to the local transport system.
- 4.85 Vehicular access would be retained at the northern access point to Bertram Street, however, this would be limited to emergency vehicles, disabled users being dropped off and servicing vehicles.
- 4.86 Waste collection and deliveries would occur via the internal courtyard. Access would be limited to this area which would be restricted via bollards.
- 4.87 The disabled car parking bay provided for users of the community facility that was provided within the courtyard in the consented scheme has been relocated to Croftdown Road. This space would ensure that disabled users visiting the community centre have a direct level access to the community centre located within 50m of the entrance, which has been relocated towards Croftdown Road. The loss of one car parking space on Croftdown Road has been deemed acceptable due to the existing capacity within the surrounding street network, as confirmed by car parking studies.

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- 4.88 Further details of the transport and servicing strategy and provided within the Transport Technical Note, prepared by Systra.

Arboriculture and ecology

- 4.89 The amended development would result in the removal of 4 x trees that are located along the southern and eastern boundary of the site. These trees would require removal due to the proposed construction of the new development. This is compared to the consented scheme which would have resulted in the removal of 2 x trees. Although the siting of the buildings is unaltered with the amended proposals, more detailed investigations and design work has been undertaken which confirmed that 2 x additional trees would likely require removal to facilitate the development.
- 4.90 A detailed scheme of soft landscaping and planting has been proposed which would ensure the loss of these trees would be offset through the provision of new tree planting throughout the site.
- 4.91 An Arboricultural Assessment and Tree Protection Plan, which contains further details on the proposed trees that would be removed and how to ensure existing trees are protected.
- 4.92 An updated Preliminary Ecological Appraisal (PEA) has been prepared by Syntegra that updated the survey results provided with the original planning application. The results from this assessment confirmed that the site has a low ecological value due to its highly developed nature and lack of vegetation. Notwithstanding this, a number of potential habitats were found on site for roosting and the report has recommended appropriate mitigation measures to be followed to ensure the proposed development would not impact on existing ecology.
- 4.93 Additionally, the PEA identified a number of ecology improvements that could be implemented within the development, including the use of bird and bat boxes and suggestions for the green roof species. All of these measures would be included within the proposed development.

Basement development

- 4.94 The development has been amended to remove the majority of the basement level from the scheme, with the exception of a plant room at the south eastern portion of the site. Removing this basement level would result in a streamlined construction programme that would reduce the overall levels of disturbance to surrounding properties during the construction phase of the development.
- 4.95 This reduction in basement area is a significant improvement delivered by the amended development. As the consented scheme confirmed the acceptability of a significantly large basement area on site, it is considered that the minimised basement area in the south eastern area of the site is acceptable.

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- 4.96 An amended Basement Impact Assessment and Ground Investigation Report has been prepared by GEA which demonstrates that the proposed development would be acceptable and would not result in any impacts to ground conditions, subject to appropriate mitigation during construction. The proposed basement level on site is considered acceptable in line with CPG 4 – Basements.

Air quality

- 4.97 The London Borough of Camden is designated as an Air Quality Management Area and an updated Air Quality Assessment has been prepared by Isopleth in accordance with Policy 7.14 of the London Plan, which requires all new developments to be air quality neutral.
- 4.98 The assessment concluded the following:
- The scheme would continue to be car free and would generate similar car journeys to and from the site which would ensure that the air quality impacts of the proposed development are negligible and below air quality benchmarks.
 - The proposed CHP unit would meet the energy needs of the development, with the emissions from the development significantly lower than benchmarks for heat and energy.
- 4.99 The report concluded that the overall emissions of the scheme are an improvement when compared to the extant scheme and is considered to be compliant with adopted planning policy and guidance, including the Mayor's Sustainable Design and Construction SPG.

Noise

- 4.100 An amended Acoustic Assessment has been prepared for the development to consider the noise impacts to surrounding residential properties and to the new proposed properties within the development. The report also considers how the scheme would comply with the current acoustic conditions attached to the planning permission.
- 4.101 The assessment utilised existing background noise data from the site and found that the noise generated from the proposals would be within the noise parameters set by the LB Camden and concluded that the scheme would not have a detrimental impact on the amenity of adjoining properties. It also noted that the removal of the roof terrace from the community centre would have a net improvement on overall noise levels from development.
- 4.102 Overall, the amended development is considered to be acceptable from an acoustic perspective, in line with what was established with the consented scheme, in line with Policy A1 and A4 of the Local Plan.

Flood risk and drainage

- 4.103 The site is identified as being located in Flood Zone 1 and is not at risk of fluvial flooding.
- 4.104 An updated Drainage Strategy has been prepared by McBains which outlines the SuDS measures incorporated into the design of the amended proposals, demonstrating that a robust and sustainable drainage scheme would be provided to appropriately manage surface water flows on site and ensure no risk to adjoining properties. This strategy also includes a completed SuDS ProForma, in line with the Council's policies.

5. CONCLUSIONS

- 5.1 The Planning Statement has been prepared in support of a Section 73 application that seeks to amend planning application 2016/6018/P for the comprehensive redevelopment of the HNCC, located at 25 Bertram Street, London, N19 5DQ.
- 5.2 The proposed amendments would deliver a number of planning benefits above and beyond those that were associated with the approved development. These include:
- The delivery of a new fit-for-purpose community centre that would secure the long-term future of HNCC and FYA on site. The community centre facilities would be brought up to ground floor level ensuring the main hall would become more flexible and offer a greater range of activities to occur with the public courtyard.
 - The delivery of 41 residential units, including the provision of 7 x affordable housing units to be delivered by Camden Living. This unit mix responds to local market needs and demand and maximises the delivery of affordable housing on site.
 - High quality design that references the site's unique local context and maximises the use of high quality materials, finishes and details.
 - The removal of the majority of the basement level on site, ensuring a more streamlined construction programme that would reduce the overall amount of disturbance to surrounding properties when compared to the consented scheme.
 - The provision of an accessible public open space and improved public realm that would increase pedestrian permeability through the site. This is to be complimented by a detailed scheme of soft and hard landscaping, including the provision of new tree planting.
- 5.3 The amendments sought by the proposed development have been assessed and considered to comply with the relevant adopted and emerging planning policy and guidance.
- 5.4 Overall, the proposed development presents an opportunity to secure the long-term future of important community facilities on site, the delivery of much needed housing, including affordable housing, as well as a range of other planning and wider public benefits.

A1. LETTERS OF SUPPORT

Robert Aitken
Highgate Newtown Community Centre
25 Bertram Street
London N19 5DQ



Providing the services
you care about

31 October 2018

Dear Luke,

Redevelopment of Bertram Street site

This is to confirm that the HNCC Board are of the view that the current proposal is the best that can be achieved in the current climate in order to secure a first class brand new facility for our community to replace the existing one which sadly is not sustainable in the long term.

Yours sincerely

Robert Aitken

Chair HNCC

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Senior Development Manager
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N1C 4AG

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London N19 5DQ
020 7272 7201

Chair: Gill Aitken
Vice-Chair: Linda Lefevre
Patron: His Honour Jeremy Connor

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Company number: 01859172