
Planning and Heritage Statement

Unit 2-4, 112-124 Camden High Street, London,
NW1 0RR

Penwell Design Concepts Ltd

Planning and Heritage Statement

Units 2 – 4, 112 – 124 Camden High Street, London, NW1 0RR



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1. Introduction

1.1 This Planning and Heritage Statement has been prepared in support of a full planning application submitted to the London Borough of Camden (LBC) on behalf of Penwell Design Concepts Ltd (the Applicant) for the redevelopment of Units 2-4, 112-124 Camden High Street (the site).

1.2 The planning application seeks planning permission for:

‘The change of use of the first and second floor from ancillary retail (Use A1) to office (Use B1a) and the erection of a single storey roof extension to provide additional office space (Use B1a)’

1.3 The above proposals are referred to in this Statement as ‘the development’.

1.4 This Statement assesses the planning considerations associated with the development in the context of national, regional and local planning policy and guidance.

Accompanying Reports

1.5 This Statement summarises the application proposals and provides an assessment of the proposed development in the context of relevant national and local policy guidance and other material considerations, and summarises the heritage impacts.

1.6 It should be read in conjunction with the accompanying plans and drawings submitted as part of the application, as well as the following specialist reports:

- Signed and dated planning application forms including Certificate A, prepared by Savills;
- CIL forms, prepared by Savills;
- Site Location Plan, prepared by Gollifer Langston Architects;
- Existing and proposed plans, elevations and sections, prepared by Gollifer Langston Architects;
- Design and Access Statement, prepared by Gollifer Langston Architects;
- Planning and Heritage Statement, prepared by Savills;
- Retail Agent Planning Support Letter, prepared by Savills;
- Noise Impact Assessment, prepared by KP Acoustics; and
- Energy Statement, prepared by SGA

1.7 This Statement is structured as follows:

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- **Section 2** describes the site and its surroundings and the planning history of the site;
- **Section 3**; details the proposed development;
- **Section 4** highlights the main national, regional, and local planning policy and guidance relevant to the determination of the application;
- **Section 5** assess the development against relevant policy guidance
- Our conclusions are provided in **Section 6** (Conclusion).

2. Site Context and Planning History

- 2.1 This section provides a brief description of the site and the immediate surrounding area, together with a summary of the relevant planning history and pre-application discussions.

The Site

- 2.2 The application site consists of two retail units within a three-storey terraced building. The current occupiers are the Post Office and Vision Express at ground floor level with ancillary retail above. The terrace was originally constructed in the 1990's as part of a group of six retail units.
- 2.3 The premises are in retail use (Use Class A1) and the upper floors are rarely used and have not been fitted out for the Vision Express Site. The Post Office occupies the double frontage at Unit 3/4 providing retail, banking and Post Office counter services, and Vision Express takes up one unit. The upper floors are in ancillary retail use and currently underutilised. To the rear the premises share a ground floor service area.
- 2.4 The site is located within a Core Shopping Frontage, and in Camden Town Centre. The surrounding character reflects that of Main Town Centre Uses including ground floor retail shops, restaurants, and offices and residential uses at upper levels which all contribute to Camden's Vitality and Viability.
- 2.5 The premises directly to the rear are commercial in character, becoming more residential moving away from the High Street. Building heights along this part of Camden High Street vary between 1 and 5 storeys with a diversity in architectural styles and fenestration. To the rear the buildings along Bayham Street the properties are typically 3 and 4 storeys.
- 2.6 The site is not statutory or locally listed, however, the site is located within the Camden Town Conservation Area. The site is well connected by public transport and in close proximity to both Camden Town Underground Station and Mornington Crescent Underground Station, as such, the site has a PTAL of 6b. The site is of low flood risk being in Flood Zone 1.

Figure 1: Site Location Plan



Planning History

- 2.7 The planning history search illustrates the following planning applications at the site:
- 2.8 In 2015 a Certificate of Existing Lawful Use (LPA Ref. 15/2752/P) was approved on 8 July 2015 for the existing use of the ground floor as Retail Class A1.
- 2.9 On 24th August 2016 the Council approved a Certificate of Existing Lawful Use (LPA Ref. 2016/3472/P) which confirmed the existing lawful use of the first and second floors of Units 3 and 4 as unrestricted retail.
- 2.10 In addition, there has also been a series of pre-application requests made in relation to the application site.
- 2.11 In August 2017, a request was made for advice in relation to the proposed change of use of the upper floors from ancillary retail to residential floorspace. A new access at street level was proposed (LPA Ref. 2017/3460/PRE).
- 2.12 The advice from the Council confirmed that the loss of ancillary retail above would be acceptable subject to clear demonstration that the loss would not impact on the long term viability / future of the ground floor retail units.

- 2.13 A further pre-application advice request was made on 24 December 2018 (2018/5624/PRE) for change of use of first and second floor from ancillary retail (Use A1) to office (Use B1a) and erection of two storey roof extension to provide additional office space.
- 2.14 The Council considered that the principle of the loss of the ancillary retail space is considered acceptable in principle providing that it can be demonstrated within the planning application that the loss of such would not impact upon the long term viability of the ground floor retail units.
- 2.15 The Council confirmed that the introduction of office floorspace is supported due to the existing retail space on upper floors being ancillary and underutilised.
- 2.16 The Council considered that the two-storey roof top extension was excessive and dominant in relation to the host building. Notwithstanding this, the Council identified minimal impact from the street scene and that the extension would not be visible from many public views. The Council advised that the extension should be reduced in height to a single storey in order for it to be subordinate to the host building.

3. The Proposed Development

3.1 The planning application seeks detailed planning permission for:

'The change of use of the first and second floor from ancillary retail (Use A1) to office (Use B1a) and the erection of a single storey roof extension to provide additional office space (Use B1a)'

3.2 A full description of the development and design evolution is contained in the Design and Access Statement, prepared by Gollifer Langston Architects. The key details of the proposal are summarised in this section.

3.3 The application proposes the change of use of the first and second floor from ancillary retail (Use A1) to office (Use B1a) and the erection of a single storey roof extension providing an additional 199m² (GIA) of office space (Use B1). The development will include the reconfiguration of the existing internal floorspace to accommodate the new office floorspace, and with minor adjustments to the facades including a new office entrance on the principal façade at ground floor level.

3.4 The two ground floor retail units will be retained (Use Class A1), however, there will be a small reduction of 20.4 sqm (GIA) retail space from the ground floor units to accommodate the new entrance and corridor for the new office. The front elevation will be adjusted to accommodate the new office entrance. The new entrance would lead to a new circulation core situated more centrally to enable an improved internal layout.

3.5 The first floor windows to the rear of the property are proposed to be enlarged generating better lighting into the newly formed office. The proposed extension will use reddish brick with buff coloured pre-cast elements within a lightweight steel framed. The proposed extension is to the rear of the building and is not visible from Camden High Street.

4. Planning Policy Context

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals are determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Development Plan

- 4.2. The development Plan for the London Borough of Camden currently comprises the :
- The London Plan (Consolidated with alterations since 2011) (2016);
 - London Borough of Camden Local Plan (2017);
 - London Borough of Camden Planning Guidance (2018);
 - Camden Town Conservation Area Appraisal and Management Strategy (2007).
- 4.3. The National Planning Practice Guidance (2014, as amended), Supplementary Guidance notes (SPGs) and Supplementary Planning Documents (SPDs) are all relevant material considerations and will be referred to where necessary and appropriate.
- 4.4. The NPPF (2018) directs a presumption in favour of sustainable development which underpins the Framework. The National Planning Practice Guidance (NPPG) provides clarity and guidance on the interpretation of Policy.

National Planning Policy

- 4.5. At the national level, the Government published its Revised National Planning Policy Framework (NPPF) on 24 July 2018. The NPPF provides an overarching framework for the production of local policy documents and at the heart of this document is a presumption in favour of sustainable development.
- 4.6. The NPPF adopts a “presumption in favour of sustainable development” for the purposes of achieving sustainable development. Sustainable development is defined through three, interdependent objectives:
- 4.7. **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- 4.8. **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with assessable services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- 4.9. **An environmental objective** - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to

a low carbon economy.

- 4.10. Paragraph 80 of the revised National Planning Policy Framework (NPPF) states that significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
- 4.11. Paragraph 85 emphasises that planning decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaption. Indeed, town centres should meet the anticipated needs for use classes and respective market demands.
- 4.12. Paragraph 85 also states that planning policy should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed to meet anticipated needs for retail, leisure, office and other main town centre uses over this period. In addition, Paragraph 86 states that main town centre uses such as Class B1a office floorspace should be in town centres.
- 4.13. Paragraph 92 states that decisions should ensure an integrated approach when considering the location of economic uses.
- 4.14. Paragraph 120 states that applications for alternative uses on land should be supported, where the proposed use would contribute to addressing an unmet need for development in the area.
- 4.15. Paragraph 121 advises that local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs
- 4.16. Proposals affecting heritage assets are contained at Paragraph 189 through to Paragraph 202.

London Plan (Consolidated with alterations since 2011) (2016)

- 4.17. The London Plan provides the overall strategic plan for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. It forms part of the development plan and guides decisions on planning application by the London Borough's.
- 4.18. With reference to the site, London Plan Policy 2.15 identifies the site within Camden Town Centre as a Major Centre where the plan encourages high provisions of retail alongside leisure and other service related floorspace. The London Plan also recognises that office floorspace could be promoted as part of mixed-use developments.
- 4.19. The site is also identified within the London Plan as part of a Business Improvement District. The Mayor strongly endorses the concept of Business Improvement Districts in the London Plan at Policy 2.7 and Policy 2.15. Part F of Policy 2.7 states that the Mayor will prioritise improvements to the business environment through enhancing the vibrancy of town centres through higher density, retail, commercial and mixed use development.
- 4.20. Policy 7.8 relates to the historic environment, and it states that developments that affect heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and

architectural detail. Paragraph 7.31 of the London Plan states heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.

Local Planning Policy

- 4.21. Policy E1 (Economic Development) from the Camden Local Plan states that new office development should be situated towards growth areas such as town centres. Growth should also support businesses of all sizes, especially small to medium enterprises.
- 4.22. Policy TC2 (Camden's Centres and Other Shopping Areas) Part F, protects the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre. Policy TC4 (Town Centre Uses) precludes development that will cause harm to the character, function, vitality and viability of a centre. a key consideration within the Policy is the impact of development on shopping provision. The supporting text also considers use B1(a) to be appropriate for town centre use.
- 4.23. A key strategic aim identified in Policy G1 (Delivery and Location of Growth) is to create conditions for the delivery of 695,000sqm office floorspace across the plan period. Development will be directed to key locations such as Camden Town Centre as it is highly accessible.
- 4.24. Policy D2 (Heritage) requires developments that are within Conservation Areas to preserve or where possible, enhance the character or appearance of the area.

5. Material Planning Considerations

- 5.1 This section of the Statement sets out the main planning issues arising from the application proposals with reference to the planning policy framework set out in the previous chapter.

Principle of Development

- 5.2 The National Planning Policy Framework (NPPF, 2018) includes a presumption in favour of sustainable development, through the effective use of land driven by a plan-led system, to ensure the delivery of sustainable economic, social and environmental benefits. The NPPF promotes the efficient use of land with high density, mixed-use development, in accessible locations. It encourages the use of previously developed, vacant and underutilised sites to maximise development potential.
- 5.3 The application site has a PTAL value of 6b and is highly accessible by public transport. The site is also located within a Business Improvement District and within Camden Town, which is identified as a Major Centre within the London Plan where the provision of business and retail uses at higher densities is encouraged by the Mayor.
- 5.4 Both Class A1 retail and B1a uses are defined as 'Main Town Centre Uses' within the NPPF, and are appropriate uses within town centres to ensure the continued vitality and viability of centres. The introduction of Class B1a at this location complies with Local Plan Policy TC2 as it is identified as an appropriate use for a town centre. Therefore, the introduction of new office accommodation would comply with planning policy at all levels.
- 5.5 The proposals will deliver a range of social, economic and environmental benefits as follows:
- **Social:** The development of the site for office space will maximise the employment potential of the site, and maximise opportunities for people to work locally within the Borough in a central urban location. The application will not change the use of the existing retail units at ground floor level and therefore it would not affect retail expenditure from the local population.
 - **Economic:** The proposed development will contribute to helping build a strong, responsive and competitive economy by providing new, purpose-built modern commercial floorspace to support growth, innovation and improved productivity. The new office floorspace will complement the town's existing retail offer and will enhance Camden's vitality and viability through appropriate re-use of under-utilised floorspace. In addition, the development will provide additional jobs in the supply chain. New workers will spend within the local economy which will assist in sustaining the local services and infrastructure in the wider area. The new office floorspace will provide circa 85 FTE jobs on average based on the HCA's Employment Density Guide of 1 employee per 9.6 sqm.

- **Environmental:** The proposals are considered to accord with the Development Plan, for the reason that they are found to respect the local character by using consistent and high quality material pallet. The proposals have been developed with sustainable design and construction in mind and opportunities have been taken to reduce the carbon emissions from the development. The application is submitted with an Energy Statement demonstrating that measures will be taken to reduce carbon. In addition, the scheme makes effective use of underutilised space.

5.6 It is considered that the proposed development meets the three key requirements which define sustainable development in line with paragraph 8 of the NPPF. It is therefore considered that the application proposals comply with the principle of sustainable development. The scheme will assist in improving the visual appearance of the site and accords with the principles of the NPPF, the London Plan and LBC's Local Plan.

Land Use

- 5.7 The application site is within the Core Frontage (South) of Camden Town Centre. The area is subject to an Article 4 Direction which precludes the change of use from office to residential use permitted under class J, part 3 of the General Permitted Development Order 2015. The Direction has been implemented as there has been a notable reduction in office floorspace within Camden Town Centre. The proposals provide an opportunity to offset the loss of office floorspace in a town centre location.
- 5.8 Policy TC2 (Camden's Centres and Other Shopping Areas) Part F, protects the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre. Policy TC4 (Town Centre Uses) precludes development that will cause harm to the character, function, vitality and viability of a centre. A key consideration within the Policy is the impact of development on shopping provision. The supporting text also considers use B1(a) to be appropriate for town centre use.
- 5.9 A key strategic aim identified in Policy G1 (Delivery and Location of Growth) is to create conditions for the delivery of 695,000sqm office floorspace across the plan period. Criterion F of Policy E1 (Economic Development) directs new office development to growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000 sqm of office floorspace between 2014 – 2031.
- 5.10 The proposed development is in accordance with planning policy delivering 817.4 sqm of office floorspace which will generate a high number of new jobs. The proposals have ensured that there is minimal impact on the retail function of the centre and maintains the existing shops at ground floor level. It is the case that the proposals are in direct compliance to planning policy at all levels.

Loss of Existing Ancillary A1 Space (Retail)

- 5.11 The application only seeks a minor reduction in retail floorspace and maintains the use of the existing ground floor retail units as shops in Class A1 retail use. The application seeks to change the use of the under-used and ancillary retail space at floors to new offices.
- 5.12 The change of use of the upper floors to office accommodation was considered by officers at the pre-application stage. The Council stated that; *"the principle of the loss of ancillary retail space is considered acceptable in principle providing that it can be demonstrated... that the loss of such would not impact upon the long term viability / future of the ground floor units."*
- 5.13 The loss of the ancillary retail would not impact the vitality and viability of the existing ground floor units. These upper floors are used for minor administrative purposes and general storage, with much of the space not used at all. As such, the loss would not affect the existing units ability to trade as the removal of the ancillary retail floorspace does not affect the shops primary function.
- 5.14 The introduction of new office uses at upper floors will require a new entrance from the Camden High Street elevation to facilitate access into the new office accommodation. The creation of the new entrance and access between the retail units would result in a small loss of floorspace to Retail Unit 1.
- 5.15 However, the resulting floorspace of Retail Unit 1 would be 290 sqm which is identified within the Council's pre-application response as a *"viable amount of floorspace for the continuation of the unit and the wider frontage."* Retail Unit 2 would not be affected through the internal reconfiguration. The creation of the entrance would result in 49sqm NIA loss of retail space. The proposal extension and change of use would result in total office space 817 sqm (Total Office Space 1st floor GIA and 2nd floor GIA).
- 5.16 In further support, the application is accompanied by the professional view of a Retail Agent that works closely with the Post Office. The letter is submitted alongside the planning application and it addresses the growing prevalence of online shopping which has reduced the amount of ancillary storage retailers require from their physical stores.
- 5.17 The letter confirms that the online sales functions are performed from warehouse distribution hubs which operate independently from retail stores. Physical stores are increasingly becoming 'showrooms' whereby retailers display products, which may be purchased from the store, or available to order and distributed from the retailer's warehouse. As such, lower stock quantities are taken into store and that which is will be displayed on the sales floor rather than held in ancillary storage space. The retail agent also notes that the vision express store do not currently use their upper floors and that the post office unit has a large amount of back of house ancillary space not used as the shop floor at the ground floor level.

- 5.18 Given the foregoing, the principle of the loss of ancillary retail space is considered acceptable on the basis that the existing ancillary floorspace is under-utilised and does not affect the existing ground floor units function and continued use.
- 5.19 In accordance with making efficient use of land within sustainable locations, the proposal will redevelop the under-utilised floorspace with new office accommodation and as such it will enhance the vitality and viability of Camden Town with new town centre uses, including the provision of new jobs.

Provision of Office Floorspace

- 5.20 The introduction of new office uses at upper floors will require a new entrance from the Camden High Street elevation to facilitate access into the new office accommodation. The proposal extension and change of use would result in total office space 817 sqm (Total Office Space 1st floor GIA and 2nd floor GIA).
- 5.21 Policy H1 requires a mix of uses in development where appropriate in all parts of the Borough, including a contribution towards the supply of housing. In Camden Town Centre, where development provide more than 200 sqm (gross) additional floorspace it is required that 50% of all additional floorspace is to be housing.
- 5.22 In this case, the development will contain 199 sqm of gross additional floorspace. Therefore, the proposed extension does not trigger Camden's mixed use policy requirement under Policy H1, the development is not required to deliver new residential floorspace. The additional office accommodation proposed is to be delivered in an area which has lost significant office space in recent years, therefore will provide jobs in this town centre location.

Design and Heritage

- 5.23 The existing buildings are neither statutory or locally listed, however, the site does sit within the Camden Town Conservation Area, and accordingly development should preserve or enhance the character of the heritage asset. The Camden Town Conservation Appraisal and Management Strategy does not identify the buildings to be of any merit and confirms that the buildings do not contribute positively to the area.
- 5.24 The site is identified in the Conservation Area Appraisal as *"a poor quality, over-scaled, 1980s block containing the Post Office; crudely detailed with pink render, it roughly adheres to a Post-Modern style."* The proposals have been carefully designed to not worsen the appearance, and seeks to implement improvements to the overall appearance of the buildings.
- 5.25 Local planning authorities responsible for heritage related consent regimes are determined by Planning (Listed Buildings and Conservation Areas) Act 1990. The NPPF 2018 sets out national policies for conserving and enhancing the historic environment (NPPF paragraphs 184 - 202). In determining applications, local planning authorities should take account of:

- a. The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b. The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c. The desirability of new development making a positive contribution to local character and distinctiveness (NPPF para 192).

- 5.26 Local Plan 7.8 concerns heritage assets and includes the following requirements; Part C states development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate; Part D states development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 5.27 At local level, Policy D1 (Design) states that development should respect local context and character; and it should preserve or enhance the historic environment and heritage assets. The Council will resist development off poor design that fails to take opportunities available for improving the character and quality of an area.
- 5.28 Policy D2 (Heritage) identifies conservation areas as heritage assets. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas. Developments within conservation areas should either preserve or enhance the appearance or character of an area. Developments that cause total or substantial harm to an unlisted building that makes a positive contribution to the area will be resisted.
- 5.29 Camden's Design CPG1 addresses extensions, and states:
- Be secondary to the building being extended in terms of location, form, scale, proportions and detailing;
 - Respect and preserve the original proportions of the building, including its architectural period and style;
 - Respect and preserve the historic pattern and established townscape of the surrounding area;
 - Not cause loss of amenity to adjacent properties.
- 5.30 The design and scale of the proposed extension has been amended following the pre-application advice received in December 2018 (LPA Ref. 2018/5624/PRE). The previous proposal at the site was for a two storey rear extension which was considered excessive and dominant in relation to the host building. However, it was acknowledged within the Council's pre-application letter that the "*two storey extension would not be seen in many public views.*" Overall, the extension was considered by the Council to be overwhelming and the advice was to reduce the height of the rear extension to one storey in order for it to be subordinate to the application building.

- 5.31 The adjustments to the entrances and shopfronts of the building maintain the uniformity evident along Camden High Street and do not deviate from the existing character of the shopfronts in the parade. This is in line with Policy D1 which seeks to preserve the context and character of the area.
- 5.32 In line with the guidance received, the extension has been reduced to a single storey. The extension would appear subordinate to the host building and would sit below the original ridge of the host building. This is considered acceptable based on the pre-application advice received to date, and on the basis that the proposed extension would not be seen from any public views or the street scene.
- 5.33 It is therefore the case that the proposed development would cause negligible harm to the conservation area, and the benefits associated with the enhanced employment opportunities generated from the development would outweigh any perceived impact.
- 5.34 Following the pre-application advice, the proposal removes works to the first floor terrace and does not include openings at first floor level. The application also includes some minor adjustment to the openings to the rear to generate more light into the new office space. The materials which are proposed in the construction of the extension are deemed to be contemporary while being sympathetic to the host building, aligning with the surroundings.

Amenity

- 5.35 Policy A1 (Managing the Impact of development) supports development where it does not cause harm to amenity. The factors considered include inter alia visual privacy and overlooking; overshadowing and outlook; sunlight, daylight and artificial light levels; and noise and vibration levels.
- 5.36 The proposals do not result in overlooking or impact on neighbouring residential amenity. There will be no direct views between residential buildings. The step back from first floor ensures privacy to the units along Camden High Road. To the rear, the premises overlook the rear court yard and an office building to the rear with separation distances that are not uncommon in a town centre location.
- 5.37 Overall, the scheme has been designed to achieve a height, scale and mass that avoids negative impacts on neighbouring amenity and to ensure its acceptability in planning terms. The scheme has been carefully designed to be of high quality and to avoid adverse effects on existing properties whilst making an efficient use of the site.

Materials

- 5.38 The materials proposed are considered to be sensitive to the surrounding area. The extension will be constructed from brick to conform with the existing material palette. A plant screen will also be provided at roof level to conceal the plant and lift overrun, this will also be brick.

- 5.39 The proposed materials used in the construction of the rear extension is considered contemporary while sympathetic to the host building. The materials used are matching brickwork, aluminium framed glazing, and steel balustrading.

Noise Impact

- 5.40 NPPF Paragraph 180 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. In addition, the NPPF recognises that development will often create some noise.
- 5.41 At the regional level, London Plan Policy 7.15 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.
- 5.42 Local Camden Policy A4 seeks to ensure that noise and vibration are controlled and managed and should not harm the amenity of both local occupiers and neighbouring properties through unacceptable noise and vibration.
- 5.43 The results of the survey undertaken allow a representative background noise level to be set. The Noise Impact Assessment has concluded that the plant would be observed to have no negative impact on the nearest residential receivers and would not exceed background noise levels.

Energy and Sustainability

- 5.44 The development has been designed with sustainability matters in mind in order to reduce the environmental impact of new development. Full details are set out in the Energy Statement prepared by SGA Consulting prepared in support of the application.
- 5.45 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 efficiency;
- Be Green: use renewable energy;
- 5.46 At local level, Policy CC1 (Climate change mitigation) states that developments should minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. In addition, where development involves 500sqm of gross internal floorspace an Energy Statement is required demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2.

- 5.47 The energy Statement prepared by SGA Consulting sets out a range of measures to reduce carbon emissions in line with the hierarchy. Existing roofs and windows will be thermally upgraded to reduce specific energy requirements; services to existing areas will be renewed to current standards to improve internal conditions and to reduce specific energy requirements; reversible air source heat pumps will be used to provide simultaneous heating and cooling with heat recovery.
- 5.48 These passive design and systems efficiency upgrade proposals for the redevelopment will constitute to a reduction of approximately 16.9% in the buildings fuel (including electricity) emissions CO₂e per m² (excluding cooling).

Transport

- 5.49 At the national level, the NPPF sets out the Governments aspiration to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, focusing development in locations which are sustainable and accessible.
- 5.50 London Plan Policy 6.1 encourages development which reduces the need to travel and supports development at locations with high public transport accessibility. The Mayor's overall strategic vision is to encourage development to reduce car borne travel. Maximum car parking standards are set out in Table 6.2 of the Parking Addendum to the London Plan which seeks less than 1 space per 1-2 bedroom unit. London Plan Table 6.3 sets out the Mayor's cycle parking standards. The London Plan also states that development in areas of good public transport accessibility should aim for significantly less than 1 space per unit. Adequate levels of parking for disabled people must also be provided.
- 5.51 In local terms, Policy T1 prioritises walking, cycling and public transport in the borough. Policy T2 aims to limit the availability of parking and requires all new developments in the Borough to be car free.
- 5.52 The refuse and delivery strategy remains unchanged from the current situation. The site has high accessibility to public transport with a PTAL of 6b and as such the development is proposed as car free to encourage the use of the adjacent public transport facilities.
- 5.53 It is anticipated within the development that both staff and visitors will make use of the cycle store. The cycle store will provide 6 cycle spaces, which is in line with Camden Development Policy. The cycle store will be located at the rear entrance from the courtyard.

6. Conclusion

- 6.1 This Planning and Heritage Statement has been prepared in support of a full planning application submitted to the London Borough of Camden on behalf of Penwell Developments Ltd for the development at Units 2-4, 112-114 Camden High Street, London.
- 6.2 The proposals are design-led and have evolved through detailed pre-application discussions with officers to provide a high quality design in response to the respective constraints and opportunities of the site.
- 6.3 The development will make highly effective use of the site through the delivery of new town centre uses at the location. The development will protect the primary retail function of the site and will enhance the employment opportunities through new office accommodation. The development has been carefully designed following pre-application advice and the proposals involve minimal adjustment to the principal façade. The extension has been revised to a single storey and will not be seen from public views from the street scene.
- 6.4 This Planning and Heritage Statement has assessed the material considerations arising from the proposals against the prevailing planning policy framework and has demonstrated that the scheme complies with the relevant national, regional and local planning policy guidance. Therefore, it is respectfully requested that the proposals are recommended for approval.