

May 2016

# Planning Statement

28 Redington Road, London, NW3



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# 1. Introduction

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1.1 This statement has been produced on behalf of the Linton Group to accompany an application submission for the following development at 28 Redington Road:

*Demolition of the existing property, and redevelopment of the site to provide a four storey (plus basement storey and accommodation within the roof) detached property comprising 8 self contained apartments (1 x 1 bed, 5 x 2 bed, 1 x 3 bed and 1 x 4 bed). The proposals also include hard and soft landscaping and the provision of off street car parking.*

1.2 This statement provides the background information on the site, and a detailed consideration of the proposals in relation to planning policy and other material considerations.

1.3 The proposed replacement building has been designed following pre-application discussions and an extensive study into the characteristics and appearance of the Redington/Frognaal Conservation area. It is proposed to replace the existing outworn building with an exceptionally high quality residential development which takes its reference from the arts and crafts style which is prevalent in the locality.

1.4 Whilst the initial pre-application response advised that the council would be “unlikely to accept” the demolition of the existing building “irrespective of a suitable replacement building” (based on its designation as positive contributor to the Conservation Area) we remain of the view that through sensitive design, there is an opportunity to provide a new, high quality building on this site which would bring visual enhancements to the street scene Conservation Area. It is our view that the proposed scheme does exactly that.

1.5 This statement has been set out under the following headings:

- **Section 2** outlines the site and its context within the surrounding area
- **Section 3** provides an overview of the planning history
- **Section 4** examines the main planning considerations
- **Section 5** draws our conclusions in respect of the proposals

## 2. Site and Surroundings

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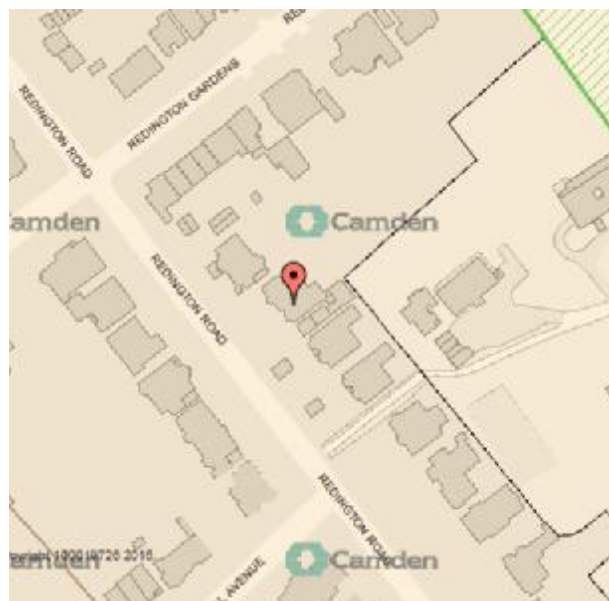
- 2.1 The site comprises a large house in a large plot of land. The building is set back from the road frontage and is at an elevated position compared to the street level, as is the case with other properties in this side of Redington Road. The front boundary is heavily vegetated making it difficult to see the whole house from the street.



*Above: Aerial view of the site*

- 2.2 The property comprises four levels of accommodation at lower ground (partially sunken), upper ground, first floor and a further second floor within the roof form. To its side is a two storey coach house element which comprises a garage and workshop on the lower floor with habitable accommodation above.
- 2.3 The property has evidently been extended over time to the side and at the rear, and possibly within the roof form, and clearly is much altered from its original composition (including the painting of the pebble-dash exterior to the front).
- 2.4 The site benefits from a vehicular access from Redington Road with front forecourt parking that could accommodate 7 cars. The house also benefits from a very large rear garden.
- 2.5 The surrounding area is predominantly residential in character with a mixture of single dwellings and flatted apartment blocks, some of which are conversions of former single dwellings. The surrounding built form, both in the immediate context and further afield, does exhibit some similar architectural characteristics but could be said to be fairly varied in scale and form. It is certainly not a uniform townscape and there are examples of contemporary buildings interspersed within the more traditional built form.

- 2.6 The building itself is not statutorily listed and has not been included on Camden's Local List of historic buildings and features that are valued by the local community. This Local List was only recently adopted in January 2015.
- 2.7 The site does fall within the Redington Froggnal Conservation Area, which was designated in 1985. The Council has prepared a Conservation Area Appraisal (CAA) for the area. The CAA describes the character of the Area as being a well-preserved example of a prosperous late 19<sup>th</sup> Century and Edwardian residential suburb. The houses are predominantly large detached houses and semi-detached houses and display a variety of formal and free architectural styles typical of the late 19<sup>th</sup> and early 20<sup>th</sup> Centuries. On the whole these are built of red brick with clay tiled roofs, occasional areas of tile overhanging and render and may of them have white painted small paned windows. Mature trees and dense vegetation form the dominant features of the street scene in many of the roads. In addition, the rear gardens, many of which are sizeable, make a contribution of their own to the area's verdant quality. Of great significance to the character of the area are it contours and slopes providing numerous views and vistas and giving emphasis to many of the buildings.
- 2.8 In the CAA, Redington Road is placed in a smaller sub-area comprising Redington Road, Redington Gardens, Templewood Avenue, Templewood Gardens and West Heath Road. The CAA describes this sub-area as one containing some of the larger and more generously spaced houses in the Conservation Area in a mature landscape. Whilst this gives the sub area a general theme, the period over which the sub area was developed has resulted in a mix of architectural styles, although parts of Redington Road and Templewood Avenue are of consistent character and appearance. There are a number of mid and late 20<sup>th</sup> Century houses and flats occupying parts of the former grounds of adjoining properties.



***Above: Extract from Proposals Map***

- 2.9 There are a number of listed buildings along Redington Road and other buildings identified in the CAA as of being of particular interest; these are nos. 2-4 (listed), 16 (listed), 35-37, 39, 54-56 and 66. Nos. 18 to 28 are identified as being buildings and groups of buildings that make a positive contribution to the conservation area. The CAA identifies the stretches between nos. 41-49 and nos. 71-77 as being those which exhibit the most consistency in terms of architectural style. Nos. 16-28 are identified as being those that are set back behind

dense vegetation. The roadside garages and forecourts at nos. 24, 26 and 30 are identified as being negative detractors to the Conservation Area.

- 2.10 The only other designation across the site is that it lies within an Archaeological Priority Area. The property is not identified as being in an area at risk of flooding.

Use of the building

- 2.11 The lawful use of the building is considered to be residential (C3) although not in the conventional sense. Over many years it has been lived in as a single unit by priests from the Missionary Society of St Columban and has, on occasion, accommodated visiting members of the society. Council tax records show that the property is registered as a single dwelling.

- 2.12 Under the Use Classes Order as amended, C3 (c) allows for groups of people (up to six) living together as a single household. This change was made to allow for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for. The planning portal specifically refers to a small religious community as falling into this section.

The Development Plan

- 2.13 The current Development Plan for Camden comprises the Further Alterations to the London Plan (2015), Camden Core Strategy (2010) and the Development Policies (2010), which is accompanied by Camden Planning Guidance. In addition, the National Planning Policy Framework is a material consideration in the determination of all planning applications.

- 2.14 Camden is in the process of reviewing its policies with a view to adopting a new Local Plan sometime in 2016. Until then, the policies within the Core Strategy and Development Management Policies will continue to apply although, where relevant, emerging policies are touched upon in this document.

### 3. Planning History and Proposals

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- 3.1. The on line planning history for the site is nearly all for works to trees with one permission for a rooflight in 1993. Historically, there was an application in 1969 by 'The Columbian Fathers' for a change of use to a mission hostel. This was refused due to the loss of family accommodation.
- 3.2. Council Tax records show the property is registered as a single dwelling and it is considered that the property's lawful use is residential (Class C3).

#### Pre-application discussions

- 3.3. The proposal to demolish the existing dwelling and replace it with a new building comprising flats was the subject of pre-application discussions with the Council in December 2015. The proposal comprised the provision of 9 flats, including 6 basement car parking spaces (6 x 3 bedroom and 3 x 2 bedroom).
- 3.4. The building comprised a four storey building (plus basement storey and accommodation in the roof) with hard and soft landscaping as well as the provision of car parking spaces. The proposal included the provision of a lower ground floor that extended significantly into the garden area.

*Below: Proposed front elevation (pre-application)*



*Below: Proposed rear elevation (pre-application)*



*Below: Proposed section (pre-application)*



3.5. In summary, the council outlined the following concerns in their pre-app response:

Demolition – that the demolition of the existing building is unacceptable as it makes a positive contribution to the conservation area, irrespective of the replacement.



Design:

- Bulk and scale of the proposed building excessive at three floors plus roof level accommodation. The characteristic pattern is 2 floors plus roof level accommodation. Excavation at front allows more of the building to be visible.
- Scale of windows oversized and fenestration does not respect traditional hierarchy.
- Detail on the front elevation such as the ground floor entrance is out of keeping with the character of the area.
- Rear elevation is over-scaled and design inappropriate. Large areas of glazing no in keeping with traditional character of conservation area.

Unit mix: that the council would encourage a greater proportion of 2 bed flats as well as a range of other flat sizes.

Quality of accommodation: Concern regarding light and outlook to three flats on the lower floors.

Basement: The basement excavation should be restricted to providing an enlarged area at what is currently referred to as lower ground floor level and the basement excavation should be confined to the proposed footprint of the upper floors.

Cycle Parking: If cycle parking providing at lower ground floor level then step free access is needed.

- 3.6. The current proposals seek to address the council's concerns that were raised in the pre-application response and the scheme has been substantially amended as a result. The detailed design of the elevations has undergone significant change to take on board the council's comments regarding the appearance of the front and rear of the building. The design now takes on a much more traditional look with very direct references to the arts and crafts style something which is prevalent on many of the buildings in the locality.

*Below: Proposed front elevation*

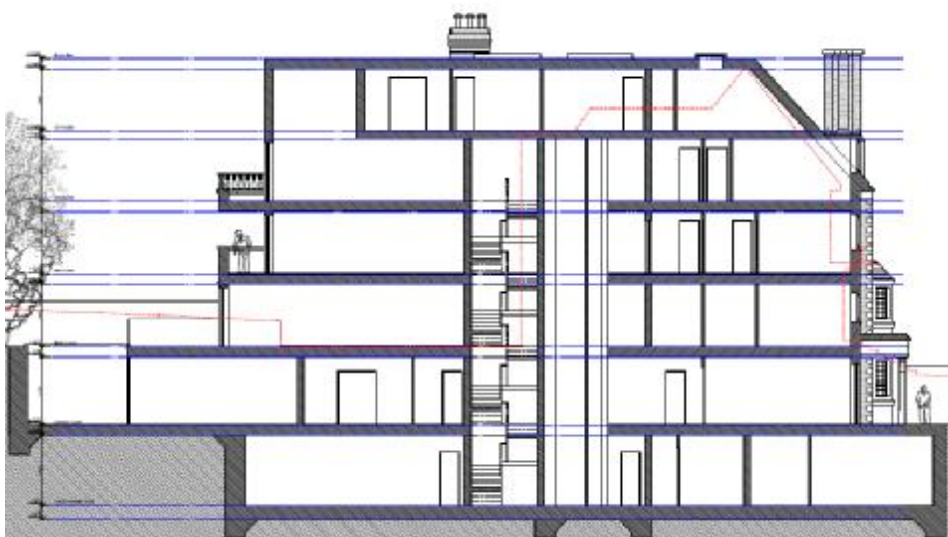


*Below: Proposed rear elevation*



- 3.7. In terms of the bulk and scale of the building, although the development would result in the provision of three full floors above ground and accommodation in the roof, we have sought to reduce the apparent scale of the building form the street through the provision of a bank of landscaping which serves to partially hide the ground floor window on western side of the front elevation. This replicates the existing building where the window at this level is partially obscured. In order to further reduce the perceived scale of the building and simplify the appearance of the front elevation, the proposal incorporates only one gable end projecting from the front roofslope as opposed to two in the pre-application scheme.
- 3.8. The level of excavation has been scaled back substantially. The lower ground floor is confined to the footprint of the proposed building as advised in the pre-application response and the ground floor projects out only a modest distance beyond the main rear wall of the building. The extensive projection of the lower ground floor and associated lightwells into the rear garden has been removed.

*Below: Proposed section*



- 3.9. As a result of these changes, there has also been a significant re-working of the internal arrangement of the units to ensure that they all have sufficient light and outlook and a reduction in unit numbers from 9 to 8. The unit mix has also changed to provide a broader range of unit sizes; rather than 3 x 2 bed units and 6 x 3 bed units, the scheme now proposes 1 x 1 bed, 5 x 2 bed, 1 x 3 bed and 1 x 4 bed.
- 3.10. With regard to cycle parking, whilst this remains in the basement, it is accessed by a passenger lift that is of sufficient size to carry bikes ensuring suitable, step free access.
- 3.11. We are of the view that the revised scheme fully addresses the council's concerns raised in the pre-application response letter and serves to provide a building that would enhance the character and appearance of the conservation area, whilst bringing with it a number of other substantial benefits such as the provision of much needed additional housing and a much more sustainable building than currently exists. In these respects, the proposals are considered to optimise the use of the site.
- 3.12. Detailed consideration of the proposals against relevant planning policy is set out in the following section of this statement.

## 4. Planning Considerations

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### National Planning Policy Framework

- 4.1. The National Planning Policy Framework (March 2012) sets out the Government's planning policies for England and has replaced the majority of the existing Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs) with immediate effect. The NPPF is a material consideration in planning decisions
- 4.2. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14). It states, at paragraph 17, that planning should proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs.
- 4.3. The NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed use communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
- 4.4. The paper Fixing the Foundations: Creating a More Prosperous Nation (July 2015) was released by the HM Treasury to address the Government's long term plan for raising productivity within the United Kingdom. Raising productivity is centred around two key pillars, including encouraging long-term investment and promoting a dynamic economy.
- 4.5. This paper addresses planning processes which impact on productivity, as well as the current state of housing across the United Kingdom. The paper states that housing is a National priority, and specifies a housing target for London of 42,000 homes per year.
- 4.6. Furthermore, the paper discusses how excessively strict planning systems impact on efficiency, resulting in a slow, uncertain and expensive processes for developers. This strict planning system directly influences productivity within the United Kingdom and is a National priority for improvement. This paper is considered highly applicable to the proposed development.

### Local Policy

- 4.7. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that any planning application must be determined in accordance with the development plan for the area, unless any material considerations indicate otherwise.
- 4.8. The Camden Core Strategy was adopted in November 2010 and the Development Policies document was also adopted in November 2010. Both of these documents are used to determine planning applications within the borough.
- 4.9. However, the Council are currently in the process of reviewing their policies and have produced a Local Plan Submission Draft 2016 which was consulted upon between February and April of this year. An Examination in Public is likely this summer with adoption anticipated in early 2017. On this basis, this statement also considers the policies contained within this document although given that it is not yet adopted, they are afforded limited weight.

- 4.10. Also of relevance is the Redington / Froggnal Conservation Area Statement which was adopted in 2004.

Principle of Demolition

- 4.11. Policy DP25 of the Development Plan Policies deals with the matter of demolition in a conservation area and states that in order to maintain the character of Camden's conservation areas, the council will:
- 4.12. (c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character of appearance of the conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention. (my emphasis)
- 4.13. Paragraph 25.7 of the Development Policies document states that when considering applications for demolition, the Council will take account of group value, context and setting of buildings, as well as their quality as individual structures and any contribution to the setting of listed buildings. Applications must clearly show which buildings or parts of buildings are to be demolished.
- 4.14. As the Development Policies Document was produced prior to the adoption of the NPPF, Policy DP25 is out of step with the NPPF in relation to this matter.
- 4.15. With regard to the potential harm to heritage asset arising from a development, the NPPF advises that substantial harm to the significance of designated heritage assets should be exceptional or wholly exceptional whilst 'less than substantial harm' can be justified and weighed against the public benefits of the proposal. Under the NPPF, there is no in principle objection to the demolition of a non-designated heritage asset that makes a positive contribution to a conservation area, and there is no test of "exceptional circumstances" in this context.
- 4.16. In contrast with the adopted plan, the draft Local Plan captures these sections of the NPPF relating to heritage stating that the council will not accept the loss of, or substantial harm to, a designated heritage asset unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or other criteria apply. In addition, the council will not permit development that results in less than substantial harm *"unless the public benefits of the proposal convincingly outweigh that harm"*.
- 4.17. In the Council's pre-application response to the previous scheme, it is advised that:
- "The Council's Design and Conservation Officer is satisfied that the building is a positive contributor and therefore should not be demolished and in this regard council officers are unlikely to accept its removal irrespective of a suitable replacement"*.
- 4.18. However, this stance is at odds with the council's own policy which specifically resists the demolition of buildings which make a positive contribution where harm is caused (my emphasis) to the conservation area. These words suggest that in order to make a judgment regarding the acceptability of demolition, the merits of the proposed building and its impact on the conservation area needs to be weighed in the balance in order to establish whether, indeed, the development would result in harm.

- 4.19. In addition, the NPPF requires that the council consider the particular significance of any heritage asset when considering a development proposal that affects it. Whilst the building is identified as a positive contributor in the Conservation Area Appraisal, no detailed assessment has been undertaken of its significance by the council in any of its suite of planning documents. Furthermore, there is no detailed consideration of the significance of the building within the pre-application response. In addition, the Framework plainly requires consideration of the benefits of the proposed building, yet the Council's response effectively says that this is irrelevant.
- 4.20. As set out in the Heritage Statement by KM Heritage accompanying this application, the existing building at 28 Redington Road is of no particular architectural quality that has an unsatisfactory relationship with its surroundings. It is advised in the Heritage Statement that *"the contribution of 28 Redington Road to the character and appearance of the Redington/Frogna Conservation Area is limited and essentially neutral"*. The contribution that 28 Redington Road makes to the conservation area has to do with its residential typology, its massing and its siting – not with its inherent architectural quality. Even without the alterations that have occurred it was of no notable design in an area typified by much higher quality buildings.
- 4.21. The new building on site will be designed to reflect the character of the conservation area demonstrating a clear understanding of the townscape and urban design character of the site and its context, and the significance of the Redington / Frogna Conservation Area. The plans have been amended since the pre-application scheme to ensure that the development more greatly reflects the arts and crafts character that typifies the area. The building successfully brings together those references to the arts and crafts style and the locality into a cohesive architectural form suitable to the site and its surroundings.
- 4.22. KM Heritage is of the view that the development has been successfully designed to ensure that the elements of the conservation area that give it its character are preserved and enhanced by the addition of a high quality building, that has been carefully conceived to make a positive contribution in its own right. To this end, the Heritage Statement concludes that;
- "The quality of the architecture proposed is commensurate and in some cases arguably better than that which makes up the surrounding conservation area – an area whose character and appearance large, individually designed residential buildings, that have a broad style in common, but are otherwise each unique"*.
- 4.23. It is the view of KM Heritage that the proposed building, rather than just preserving the character and appearance of the conservation area, actually serves to enhance it by replacing the existing building, which lacks quality and finesse and makes a neutral contribution, with one that makes a positive contribution as a result of its design detailing, quality and contextual materiality. The development is in accordance with policy.

#### Design and Scale of Development

- 4.24. Core Strategy Policy CS14 states that the Council will require development of the highest standard of design that respects local context and character; and preservation and enhancement of Camden's rich and diverse heritage assets and their settings, including conservation areas.

- 4.25. This is supported by Development Policies policy DP24 which requires all developments to be of the highest standard of design and will expect developments to consider the character, setting, context and the form and scale of neighbouring buildings; the character and proportions of the existing building and the quality of materials to be used.
- 4.26. The replacement building has been designed to an exceptionally high quality, and utilises appropriate and sensitive materials. As set out in the accompanying Design and Access Statement by Jo Cowen Architects, the proposals have been informed by a detailed analysis of the surrounding context, with regard to matters such as height, plot width, building lines and materials and detailed design.
- 4.27. In terms of scale, massing and height the proposal is considered to be in keeping with the character of neighbouring properties on Redington Road. The proportions of the existing buildings within the vicinity have been studied and incorporated within the proposal.
- 4.28. The proposed building maintains important aspects of the immediate townscape including the overall height of the development on the site, its separation from its neighbours and some of the more detailed architectural elements.
- 4.29. The ridge line of this section of Redington Road increases incrementally as the street progresses, and the existing rhythm is maintained by the proposals. The step up from no. 30 to 28 is replicated, as it the slight set down between the subject property at no. 26.



Fig. 3.3.2 Ridge Height Elevation of neighbouring houses as proposed



Fig. 3.3.4 Width between buildings of neighbouring houses as proposed

*Above: Building height and siting studies, taken from the pre application document*

- 4.30. As the image below demonstrates, the proposals will maintain the relationship of the site with the immediately adjoining properties, utilising a similar palette of materials whilst also respecting the prevailing height, massing and gaps along the street.

*Below: Existing and proposed street elevations*



- 4.31. As set out within the accompanying Design and Access Statement, a thorough analysis of the site's relationship with the neighbouring properties has been undertaken and the proposals seek to respond to the elements which contribute to the character and appearance of the conservation area. Detailing such as the ridge line, the subservient nature of the side project and fenestration patterns all take their lead from the most positive aspects of the adjoining building. Such elements are brought together in the new design to create a development which improves the contribution of the site to the Conservation Area.

*Below: Front elevation of proposed building*





Below: Rear elevation of proposed building



Below: Proposed landscaping scheme to front



Below: Proposed Landscaping Scheme to Rear:



- 4.32. The proposal includes a high quality landscaping scheme to complement the new building and the character and appearance of the surrounding area. To the rear this comprises a traditional woodland garden with gravel paths, natural stone and woodland style planting which pays reference to the Arts and Crafts style of architecture and local vernacular. At the front it is proposed to enhance the existing planting with new mixed evergreen and deciduous species as well as new feature ornamental trees for seasonal interest. Again, natural and traditional materials in the Arts and Crafts style are proposed in order to provide an attractive frontage that is in keeping with the character and of the rear and blend with the surrounds.
- 4.33. The sympathetic design of the proposed building ensures that it brings enhancements to the street scene and therefore benefits to the conservation area. On this basis, the development does not cause visual harm. We are therefore of the view that the proposals accord with the heritage and design policies contained in the NPPF, the council's Development Policies Document and the emerging Local Plan.

### Trees

- 4.34. The site is heavily greened and therefore an Arboricultural Report accompanies this application assessing the impact of the development on the existing trees. The report confirms that the development would not result in the loss of important trees and incorporates adequate tree protection measures. The report recommends tree works to 26 trees including the felling of 6 trees. The trees to be felled are either dead, dying or decaying and therefore their removal accords with good arboricultural practice. In order to protect those trees that are worthy of retention, the basement line is to be excavated manually in the vicinity of those trees.
- 4.35. There is a significant amount of greenery at the front of the site which provides attractive greenery in this urban area. It is set out in the landscaping statement that the planting at the front will be reviewed and enhanced with new mixed evergreen and deciduous species together with new feature ornamental trees for seasonal interest. At the rear, it is intended to provide a traditional woodland garden. No existing trees are to be felled as part of the landscaping scheme, only a small number on health grounds.
- 4.36. The proposals comprise good arboricultural management by felling those trees that are dead, dying and decaying and doing much needed works to various other trees. The existing green environment will be enhanced through the provision of additional sensitive planting that will bring enhancements to the appearance of the site and the conservation area.

### Land Use

- 4.37. Policy DP2 of the Camden Development Policies documents states that the Council will seek to minimise the loss of housing in the Borough by a) protecting residential uses from development that would involve a net loss of residential floorspace.
- 4.38. The existing property comprises a single self contained residential dwelling, as confirmed by current Council tax records. The proposals involve the redevelopment of the site to provide 8 new self contained dwellings, and therefore there will be no net loss of units.
- 4.39. Policy 3.4 the London Plan seeks to optimise the housing potential of sites in recognition that demand for housing has consistently outstripped supply over the years.
- 4.40. Core Strategy policy CS6 states that Council will aim to make full use of Camden's capacity for housing by maximising the supply of additional housing to meet or exceed Camden's target of 5,950 homes.
- 4.41. The proposals will deliver 7 additional residential units within the Borough and will contribute towards the Council's housing delivery targets; a significant benefit of the proposal. In terms of density, the proposal would achieve 41 habitable units per hectare. Which accords with the London Plan target of London Plan target of between 35 and 95 habitable units per hectare for an urban location.

### Basement

- 4.42. The proposals incorporate a basement storey and therefore Policy DP 27 is relevant. In determining proposals for basements the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability.
- 4.43. A Basement Impact Assessment accompanies this application and demonstrates that the basement is secondary to the main building and would not cause harm to ground water flow and structural stability.
- 4.44. The policy regarding basements is subject to change within the emerging Local Plan and amongst other criteria limits the size of basements as follows. These should:
- Not comprise more than one storey
  - Be built under an existing basement
  - Not exceed 50% of each garden within the property
  - Be less than 1.5 times the footprint of the host building in area
  - Extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation
  - Be set back from the neighbouring properties boundaries where it extends beyond the footprint of the host building
  - Avoid the loss of garden space or trees of townscape or amenity value
- 4.45. The basement has been considerably reduced in comparison to the pre-application scheme in direct response to officers and now does not extend beyond the footprint of the proposed building above ground. This ensures that it does not harm the appearance or setting of the property above ground or the established character of the surrounding area.
- 4.46. Whilst lightwells are proposed at the front and rear, these are appropriate to the style and size of the proposed building and do not detract from its appearance. The restriction of the basement to the footprint of the building also means that a substantial garden area is left ensuring that satisfactory landscaping. The proposal accord with all the requirements of the emerging policy in terms of its size and therefore it accord with both Policy DP27 of the current DPD and Policy A5 of the emerging Local Plan.

### Residential Amenity

#### Privacy and Overlooking

- 4.47. Amenity, in terms of a house's relationship with neighbouring properties and its internal space standards, is key aspect of housing quality. The Council will protect the amenity of Camden's residents by making sure that the impact of developments on their occupiers and neighbours is fully considered, in accordance with development policy DP26 and Core Strategy policy CS5

4.48. Development Policy DP26 outlines that The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors that Camden will consider as part of any new development include:

- a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels;
- d) noise and vibration levels;
- e) odour, fumes and dust;
- f) microclimate;
- g) the inclusion of appropriate attenuation measures.

4.49. The Council will also require developments to provide:

- h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- i) facilities for the storage, recycling and disposal of waste;
- j) facilities for bicycle storage; and
- k) outdoor space for private or communal amenity space, wherever practical

4.50. The proposals respect the building line along the frontage to Redington Road. Although occupying a larger footprint than the existing building (shown below), the outlook, privacy and levels of light received by the adjoining properties has been assessed in order to ensure that the proposals do not harm existing levels of amenity.

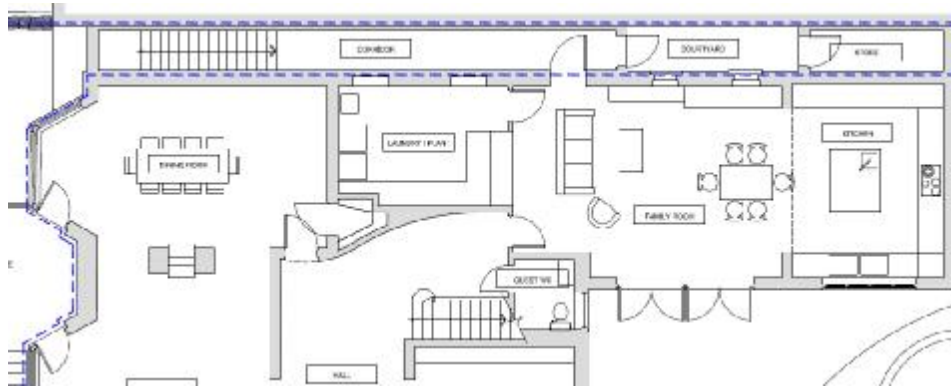
*Below: Footprint of proposed building (existing outlined in red)*



4.51. The main properties to be affected by the proposals would be those either side of the application site, nos. 26 and 30 Redington Road. The proposals are respectful of these properties having been carefully designed to ensure that it does not have a harmful impact on them.

4.52. With regard to outlook, no. 26 Redington Road has no habitable room windows in the rear elevation of the projecting part of the building which runs along the shared boundary with the application site. Whilst there are three habitable room windows located its elevation facing the development site, two of which are at ground floor level, these two windows serve a family room which has bifold doors on the opposing elevation that provide the main outlook to the room.

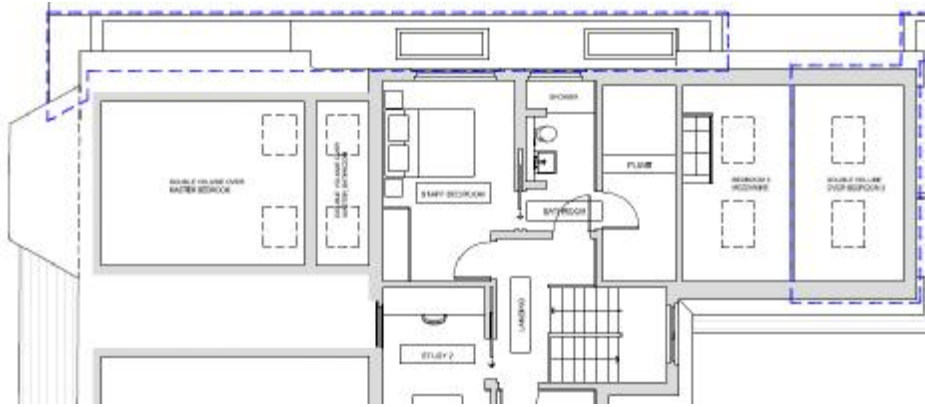
*Below: Ground floor plan of 26 Redington Road*



*Below: First floor plan of 26 Redington Road*



*Below: Second floor plan of 26 Redington Road*



- 4.53. The window at second floor level serves a staff bedroom. Whilst the proposal would impinge have an impact on the outlook to this room, there would be no impact on the outlook from the remainder of the rooms in this large house given their orientation towards the front and rear rather than towards the application site. Overall, therefore, we are of the view that the development does not cause unacceptable harm to the outlook of no. 26.
- 4.54. A daylight and sunlight report accompanies this application assessing the proposal against the BRE guidelines in terms of its impact on nos. 26 and 28 Redington Road (appendix 5). For no. 26 Redington Road it concludes that there is a moderate adverse impact on three windows at first floor level facing the site. These three windows will experience of loss of VSC of 23% (exceeding the 20% guideline), however, the proposed VSC values will remain greater than 20%. It is therefore concluded that these windows will still receive adequate levels of light. In addition, all these windows serve bathrooms and they are therefore non-habitable rooms.
- 4.55. With regard to privacy, whilst there are some windows in the side elevation of the proposed development facing no. 26 Redington Road, these windows are in the same position as windows on the existing building and therefore there would be no increase in overlooking as a result of the development.

*Below: Image of relationship of proposed building to neighbours (rear)*



*Below: Image of relationship of proposed building to neighbours (front)*

Bulk reduced on boundary with 30 Redington Road



- 4.56. No 30 Redington Road property has a number of habitable room windows in the side elevation facing the development site. However, they should experience an improvement to outlook as the proposed development sits further off the side boundary above ground floor level as shown in the image above.
- 4.57. At ground floor level, the development sits on the boundary, following the line of the existing building. This is reflected in the daylight and sunlight report which shows that the development would either have a beneficial or negligible impact on the windows of no 30 Redington Road in respect of the BRE and as such is acceptable in this respect.
- 4.58. In respect of privacy, as with no. 26 Redington Road, most of the windows in the side elevation of the development which face no. 30 are in the same position as windows on the existing building. The dormer window proposed at roof level is at such height that views from it would be over no. 30 Redington Road ensuring no direct overlooking occurs. Whilst an additional window would also be inserted in the west elevation at second floor level facing no. 30 Redington Road this would not directly face any habitable room windows in no. 30.
- 4.59. Overall, therefore, due to careful design, the development does not result in any harm to neighbouring residential amenity in accordance with Core Strategy Policy CS5 and Development Policy DP26.

Residential Standards

- 4.60. The nationally describe space standards as set out in the Housing Technical Standards are as follows:

Table 1 - Minimum gross internal floor areas and storage (m<sup>2</sup>)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37.1)			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	96	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	



- 4.61. With regards to amenity space, the GLA's Housing Supplementary Planning Guidance 2016 states that a minimum of 5sq m of outdoor private amenity space should be provided per 1-2 bedroom dwelling and an extra 1sq m for each additional occupant. The minimum depth and width of for all balconies and other private external spaces should be 1.5m.
- 4.62. All of the proposed dwellings will meet and exceed these standards. Internally, the units range from 144 - 271 square metres, and will provide exceptionally high quality private homes. All of the units are provided with generous areas of external amenity space in the form of private rear gardens, courtyard gardens, lightwells and roof terraces. The main rear garden area will be shared, and is extremely generous in size.
- 4.63. An internal daylight and sunlight report accompanying this application demonstrates that all the units would achieve acceptable levels of daylight and sunlight provision. The development has also been designed to ensure good levels of outlook, particularly for those units at lower ground and ground floor level.
- 4.64. Unit 1 occupies part of the lower ground and ground floor. The lower ground floor is lit by a bay window within a lightwell. In order to ensure a good quality of outlook, the main habitable rooms are located at ground floor level with only a study/library and media room at lower ground floor level.
- 4.65. Unit 3 also spans part of the ground and first floor. Due to the change in levels at the site the ground floor of this unit (housing a kitchen/diner) would face onto and have access to a well proportioned lightwell/terrace area at ground floor level at the rear. The size of the terrace area is such that sufficient outlook would be provided. The remainder of the unit at first floor level sits above ground.
- 4.66. The whole of unit 2 is at ground floor level. As with unit 3, the change in levels means that the rear of this property is served by a lightwell that is large enough to serve as a terrace. This scheme has been designed to ensure that this unit has satisfactory levels of outlook despite the site constraints. As a result, the main living areas are located to the front (living and dining area and main bedroom). The secondary living areas are located to the rear including the second bedroom and kitchen/diner. A small study is also proposed in the middle of the unit. The development includes a lightwell on the boundary with no. 26 Redington Road which provides additional outlook to the kitchen/diner and provides light to the study. As such, the unit is considered to have satisfactory levels of outlook.

#### Dwelling Mix

- 4.67. Camden's Development Policies document sets out the borough's priorities in relation to residential dwelling mix. In relation to market housing, 2 bedroom dwellings have a 'very high' priority in the borough, with the aim being 40% of all new residential development being 2 bed units.
- 4.68. Within the emerging Local Plan, it is set out in Policy H7 that 2 bedroom properties remain a high priority and 3 bedroom properties are included on the high priority list. Four bedroom properties and 1-bedroom and studio properties are low priority
- 4.69. Five of the units out of eight would have 2 bedrooms (high priority) which represents a figure of 63%. In the emerging Local Plan, given that 3 bedrooms are also shown to be a high priority, this figure would increase to 75% (one 3 bedroom unit proposed).

- 4.70. The provision of additional residential units, a majority of which are of sizes that are a high priority in the borough, is a significant benefit of the scheme.

Dwelling Size Priorities Table					
	1-bedroom (or studio)	2-bedrooms	3-bedrooms	4-bedrooms or more	Aim
Social rented	lower	medium	high	very high	50% large
Intermediate affordable	medium	high	high	high	10% large
Market	lower	very high	medium	medium	40% 2-bed

Above: Development Policies document residential development mix table

#### Affordable Housing

- 4.71. Camden’s Development Policy DP3 sets out that the Council will expect all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing.
- 4.72. The existing site contains one single dwelling, with the proposed scheme seeking to increase the level of housing on the site by 7 net additional dwellings and the uplift in residential floorspace is less than 1,000 sq m. On this basis, no contribution towards affordable housing is required.

#### Car Parking

- 4.73. Development policy DP16 states that:

*“The Council will seek to ensure that development is properly integrated with the transport network. We will resist development that fails to assess and address any need for the following:*

- *Movements to, from and within the site;*
- *Links to existing transport networks; and*
- *Additional transport capacity off-site (such as improved infrastructure and services) where existing or committed capacity cannot meet additional need generated by the development;*

- 4.74. The site currently accommodates 7 off street car parking spaces, as demonstrated by the accompanying Design and Access Statement. The proposals seek to relocate the parking to the basement level, which will be accessed via a car lift.
- 4.75. At present, the site accommodates 7 off street car parking spaces within the front driveway area. The existing dwelling on the site is also entitled to on street car parking permits.

- 4.76. The basement will provide 7 secured car parking spaces, one of which will be accessible by disabled users. No net increase in car parking is proposed, and therefore a car free or car capped scenario is not applicable.

#### Energy and Sustainability

- 4.77. Policy DP22 of the Development Policies Document relates to sustainable design and construction and advises and requires applicants to demonstrate how sustainable design principles have been incorporated into the design and proposed implementation.
- 4.78. Core Strategy policy CS13 seeks to tackle climate change through promoting higher environmental standards and covers matters such as promoting the efficient use of land and buildings, minimising carbon emissions from developments including adherence to the energy hierarchy and minimising the potential for surface water flooding.
- 4.79. An Energy and Sustainability Statement accompanies this application. This statement demonstrates that the development follows the Mayor's energy hierarchy, 'Be Lean, Be Clean, Be Green'. In terms of its 'be lean' credentials, it is proposed, amongst other things, to utilise highly efficient heating and hot water systems and use low energy lighting. With regard to Be Clean, it is intended to connect to district heat networks or communal heating systems. The development also incorporates an air source heat pump in order to provide renewable energy to ensure that the development is 'Green'. With these measures in place, the development the strategy would provide an average of 53.6% CO2 reduction savings against the TER set by Building Regulation Part L1A.
- 4.80. The development therefore accords with both the policies on sustainability and energy contained in the London Plan and Camden's Core Strategy and Development Policies Document. The provision of a sustainable building is considered to be a significant benefit of the proposed scheme. The age of the existing building means that none of the modern sustainability measures contained in the proposed development are present in the existing building.

#### SUDs

- 4.81. The development has been designed to ensure that it complies with the Council's policies regarding SUDs. It is detailed in the SUDs pro forma accompanying the application that the site is not at risk of surface or ground water flooding. The discharge volume from the proposed development would remain the same as existing. However, attenuation is required for to store surface water for more extreme events and the effects of climate change. It has been calculated, using micro-drainage that between 2.3m<sup>3</sup> and 17m<sup>3</sup> of storage is required. Due to the small volume of storage required it is proposed that the required attenuation is provided within the drainage network.

## 5. Conclusion

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- 5.1. The proposals seek to replace the existing building with an exceptionally high quality residential development, which will provide living accommodation which benefits from high levels of amenity. Whilst the existing building is noted as making a positive contribution to the character and appearance of the conservation area, a detailed assessment of its significance in the accompanying heritage statement concludes that the contribution of the building actually neutral and that the proposed building would make a more positive contribution.
- 5.2. The proposed building has substantial architectural integrity. Considerable analysis of the surrounding area has been undertaken in order to ensure the provision of a high quality building that is in keeping with the character and appearance of the locality. On this basis, the design references the Arts and Crafts style which is prevalent in many of the nearby buildings and brings many elements of this style together in a single cohesive form. The development would include a high quality landscaping scheme including the retention of all healthy trees on site and the provision of new trees and planting.
- 5.3. Internally, the property will provide 8 exceptionally high quality residential units. The provision of 7 additional residential units on the site is considered a significant benefit of the scheme as it assists the council in meeting its housing targets. In addition, a majority of the units would be two bedroom, which are seen as a high priority in the Borough.
- 5.4. The scheme also brings with it sustainability benefits as the development would provide an average of 53.6% CO2 reduction savings against the TER set by Building Regulation Part L1A.
- 5.5. The building has been carefully designed to ensure that it would not have a harmful impact on neighbouring residential amenity in terms of loss of light, outlook and privacy.
- 5.6. Overall, the development sees the replacement of an existing rather unremarkable building with a building of high quality design that makes a more positive contribution to the character and appearance of the conservation area which optimises the use of the site.