



Our ref: 3710/LAM

46 Inverness Street, London NW1 7HB

Planning Statement

On behalf of

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Small Planning Consultancy of the Year 2019

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1. Introduction

1.1 This Planning Statement is written in support of the demolition of the existing vacant building at 46 Inverness Street, London, NW1 7HB and the replacement with a two-storey plus basement dwelling.

1.2 In addition to this Planning Statement, the application (Planning Portal reference PP-08197954) is comprised of the following documents with the responsible consultant in brackets:

- Completed statutory application form (NTR Planning);
- Completed Community Infrastructure Levy form (NTR Planning);
- Heritage Impact Statement (Purcell);
- Assessment of Proposals (KM Heritage);
- Basement Impact Assessment (Stand Consulting Engineers);
- Daylight and Sunlight Report (Waldrams);
- Draft Construction Traffic Management Plan (Traffic Management London);
- Design and Access Statement (Purcell); and
- Drawings (Purcell):
 - Existing: 236534-001; 002; 100 A; 110; 111; 112; and
 - Proposed: 236534-201 A; 202 A; 203 A; 204 A; 210 A; 211; 220 A; 221 A; 222 A; 223 A.

1.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. In effect, this has established a presumption in favour of granting permission for developments which are in accordance with the extant Development Plan.

1.4 This principle has been developed and clarified by subsequent case law, which has confirmed that a particular proposal does not need to accord with each and every

policy in a Development Plan; the key issue is that it accords with the overall thrust of development plan policies taken as a whole.

1.5 Sub Section 5 of Section 38 states that:

“if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be)”.

1.6 The National Planning Policy Framework (NPPF) 2019 does not change the fundamental premise of Section 38(6) of the Planning and Compulsory Purchase Act 2004. Paragraph 2 of the NPPF clearly states that:

“Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.”

1.7 This Planning Statement seeks to provide a background and overview of the application proposals and an assessment of compliance with relevant planning policy in order to satisfy the requirements of Section 38(6) of the Planning & Compulsory Purchase Act 2004.

1.9 Section 2 describes the application site and surroundings. Section 3 lists the relevant planning history and pre-application engagement. Section 4 details the proposals and Section 5 confirms the applicable policy context. Section 6 provides the analysis of the proposals and Section 7 concludes the foregoing.

2. Site Location and Surroundings

- 2.1 46 Inverness Street is a single storey brick white rendered building the north side at the western end abutting 46 Inverness Street to the east and 24 Gloucester Crescent to the west. Both of these adjoining properties are Grade II listed but number 46 is not listed. The building is within the Primrose Hill and on the boundary of the Camden Town Conservation Areas.
- 2.2 The adjoining buildings are three and four storeys with Gloucester Crescent characterised by the four storeys and significantly tall trees within the front areas to the pavements providing a vertical townscape. These buildings are generally rendered white on the ground floor and brick on the uppers with white detailing on the facades *e.g.* window frames and parapet lines.
- 2.3 On this western stretch of Inverness Street there is a variation in the design with less uniformity than the adjacent Crescent. Generally, the lowest number of storeys is three rising to five in both the traditional and modern corner buildings with Arlington Road.
- 2.4 The mix of traditional and modern buildings also provides a variation in the established brick palette with the later additions being paler in more of a buff colour.
- 2.5 The more eastern stretch of Inverness Street beyond Arlington Road is pedestrianized and commercial in nature in terms of both the building uses and the daily clothes and souvenir market stalls. The southeastern side is dominated by the significantly tall and bulky Mecca Bingo building and the commercial property that wraps round onto Camden High Street. The northwestern side is comprised of a three-storey terrace accommodating active commercial frontages at ground floor.
- 2.6 The surrounding context is critical to understand with respect to 46 Inverness Street. The building is dilapidated on the inside – comprised of one main space with adjacent storage and toilets having last been used as a restaurant - and shows significant decline
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on the exterior. Arguably these elements could be remedied but rather the fundamental point is that the current building does not positively benefit the character or appearance of either Conservation Area. Indeed, it can be said to detract from both. It is within a main building gap due to the junction of the two roads and is rightly subservient to the surroundings, in particular the adjacent listed buildings. However, overall it has a detrimental effect on the quality of the streetscene and Conservation Areas.

- 2.7 The property is very well served by public transport with an accessibility level of 6a with only 6b being higher.

3. Relevant Planning History and Pre-Application Discussions

3.1 The planning history has been gained from the Council's online records and is as follows:

- Erection of a new three bedroom, two storey plus basement level dwelling following demolition of the existing building – application withdrawn (Council reference: 2015/0493);
- The excavation of a basement to provide additional restaurant facilities and external alterations to the front elevation and the roof – refused (Council reference: 9400189);
- Erection of a high-level extract duct up the flank wall up 24 Gloucester Crescent – refused (Council reference: 9300118); and
- Extension to provide toilets and alterations to the frontage – conditional approval (Council reference: CTP/J11/2/9/10244).

3.2 Following the most recent refusal, which was for a development of a similar nature to the one currently proposed, a pre-application submission was made to the Council for a revised scheme (Council reference: 2016/1657/PRE). The response to this has been assessed by Purcell and design alterations made, which form this further revised scheme.

3.3 As summary of the Officer's comments contained within that pre-application response are as follows:

- No objection is made in principle of a replacement structure in this location;
- The proposed infill of the gap to the extent proposed would detrimentally impact the character and appearance of this part of the Conservation Area and also the setting of the listed buildings in the immediate vicinity;
- The proposed height, scale, bulk and massing would impose, dominate and detract from both the Gloucester Crescent and Inverness Street listed buildings;

- The proposed infill house would not be subordinate or recessive and would be clearly visible in the significant view westward from Inverness Street to Gloucester Crescent;
- The proposed dwelling would be higher than the listed porch entrance structure at No 24 physically obscuring part of the flank wall of No. 24 Gloucester Crescent when approaching along Inverness Street;
- The concern regarding the impact of the first-floor extension on the listed buildings and conservation area were highlighted as a reason for refusal in the 1993 appeal decision;
- The proposed solid to void ratio and proportions do not follow the historic proportions, as can be seen by comparing the front doors, fan lights, window widths and solid masonry elements;
- The datums taken from the historic architecture of Inverness Street attempt to create a relationship but the result is the proposed development is seen as all the more overwhelming;
- The principle of developing the site is not objected to but the proposed new dwelling would result in harm to the character and appearance of the Conservation Area diminishing its value and heritage;
- The proposed excavation of a basement level would be acceptable provided it complied with current criteria and legislation.

3.4 The following text provides a summary of how these comments have been addressed in these current proposals:

- The proposed height of the dwelling has been reduced by 1100mm to address general concerns regarding the overall height, scale and bulk of the proposals;
- Furthermore, the reduction in height directly responds to concerns regarding the listed porch entrance structure to 24 Gloucester Crescent, ensuring the level of the new dwelling is not overbearing or dominant;

- A larger gap and step have been introduced at the junction between the listed porch structure to No.24 Gloucester Crescent and the proposed dwelling, further separating the existing and new structures;
- The main elevation of the proposed dwelling has been set back further from the main elevation of 44 Inverness Street to improve the hierarchy of the new and listed facades;
- The fenestration has been simplified and reduced in size to ensure the appearance is subordinate to that of 44 Inverness Street and the wider streetscape. The arrangement has also been altered to provide a more traditional appearance;
- The materiality of the proposed dwelling has been altered to reduce the contrast between the new dwelling and the surrounding listed buildings. This serves to reduce the dominance of the dwelling in the context of the streetscape and surrounding listed buildings;
- The datums of the proposed dwelling have been altered to improve the relationship to the wider streetscape of Inverness Street and have been carefully considered to ensure the overall appearance is subordinate to that of the historic terrace.

4. Development Proposals

4.1 The proposals have evolved in response to the existing and established context in addition to the advice from consultants and the pre-application discussions.

4.2 The description of development as per the statutory application form is:

'The demolition of the existing derelict building last used as a restaurant (Use Class A3) and the replacement with a two-storey plus basement residential property.'

4.3 The proposed building will occupy the same footprint as the existing and will include a stepping back from the existing building line and porch of 24 Gloucester Crescent and from the original footprint line adjacent to 44 Inverness Street. This will allow for a mark of subservience to the adjacent larger buildings and also provide natural daylight to the proposed basement via lightwells.

4.4 The building will provide the following accommodation over the three levels linked by a spiral staircase located centrally at the rear of the building incorporating a double-glazed rooflight:

- Basement:
 - Guest bedroom – naturally lit by a lightwell;
 - Shower room and associated facilities;
 - Media room – naturally lit by a lightwell;
 - Utility room;
 - Plant room.
- Ground floor:
 - Kitchen, dining and living area as an open plan arrangement – naturally lit by three double-glazed windows in the front façade.
- First floor:
 - Master bedroom – naturally lit by double-glazed window on the front façade;
 - Shower room with associated facilities;
 - Dressing room - naturally lit by double-glazed window on the front façade.

- 4.5 The proposals incorporate an air source heat pump to provide the heating and hot water. This technology can reduce carbon dioxide emissions by 85% now and 95% in approximately 5 years' time. This same technology can cut equivalent gas boiler heating costs by over 50%. The proposed plant room in the basement will accommodate the major elements of the heat pump system and will incorporate the requisite noise and vibration attenuation. The associated inlet and outlet will be located at roof level – just below the parapet – and will recycle fresh air only as opposed to the emission of gas pollution as per a conventional boiler.
- 4.6 The proposed Inverness Street façade is to be brick that will incorporate deep reveals and dark powder coated aluminium framed windows. As stated within the Design and Access Statement, the proposals are to respond to the local terrace vernacular using a modern interpretation – the intention and result is to respect the extant but without a pastiche effect on a building that is much smaller than those in the street and surroundings.
- 4.7 In order to further achieve the subservience with particular regard to number 24, the roof has been purposely sloped towards that garden. Whilst this does result in some restricted head heights the Applicant considers this design to be appropriate to the surroundings and minimises any perception of loss of sunlight as a result of these proposals. The usability of the first floor rooms is not compromised by the incorporation of this roof slope. A Daylight and Sunlight Report is enclosed and confirms the acceptability of the scheme.
- 4.8 There is no private external amenity space due to the constrained footprint of the site. This was considered acceptable at the pre-application stage due to the proximity and size of Regent's Park.

- 4.9 Similarly, no off-street parking is proposed or possible. As previously stated, the location benefits from a PTAL rating of 6a and as such a highly sustainable location with a number of public transport options readily available.
- 4.10 There is no opportunity for the external storage of waste – the Council has previously confirmed through the acknowledgment of the site’s size that in this instance, internal storage is acceptable with refuse/recycling being placed outside on collection days.

5. Planning Policy

5.1 This section assesses the proposals in the context of the applicable planning policy as the material consideration in terms of the determination of this application. The Camden Local Plan was adopted July 2017 and is the key policy document for this application.

5.2 The following paragraphs will provide the text of the applicable policies and an assessment of the proposals against these.

5.3 Policy H1 – Maximising Housing Supply states:

“The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.

We will seek to exceed the target for additional homes, particularly self-contained homes by:

- a. regarding self-contained housing as the priority land-use of the Local Plan;**
- b. working to return vacant homes to use and ensure that new homes are occupied;**
- c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing; and**
- d. where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.**

We will monitor the delivery of additional housing against the housing target, and will seek to maintain supply at the rate necessary to exceed the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or capital value of different house types and tenures, and the needs of different groups.”

The proposals will assist in the delivery of housing in the Borough by the provision of a self-contained unit on a site that is vacant and has been for some time. There is no conflict between the proposals and this policy.

5.4 Policy H7 – Large and Small Homes states:

“The Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

We will seek to ensure that all housing development, including conversion of existing homes and non-residential properties:

- a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and**
- b. includes a mix of large and small homes.**

We will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:

- c. the different dwelling size priorities for social-affordable rented, intermediate and market homes;**
- d. any evidence of local needs that differ from borough wide priorities;**
- e. the character of the development, the site and the area, including the impact of the mix on child density;**
- f. site size, and any constraints on developing the site for a mix of homes of different sizes;**
- g. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and**
- h. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.”**

The Applicants have for many years lived at the adjacent 44 Inverness Street – their decision to develop number 46 as a smaller residential property will provide a home to better meet their near future needs and releases the existing larger dwelling onto the market/Borough’s housing mix.

5.5 Policy A4 – Noise and vibration states:

“The Council will seek to ensure that noise and vibration is controlled and managed.

Development should have regard to Camden’s Noise and Vibration Thresholds (Appendix 3). We will not grant planning permission for:

- a. development likely to generate unacceptable noise and vibration impacts; or**
- b. development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.**

We will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. We will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.”

It is considered that the proposals will not generate unacceptable noise and vibration impacts due to the residential nature of the works. The proposed plant will incorporate sound insulation – this can be properly secured by way of a suitably worked planning condition given the proposed residential *i.e.* non-commercial use.

5.6 Policy A5 – Basements states:

“The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a. neighbouring properties;**
- b. the structural, ground, or water conditions of the area;**
- c. the character and amenity of the area;**
- d. the architectural character of the building; and**
- e. the significance of heritage assets.**

In determining proposals for basements and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- f. not comprise of more than one storey;**
- g. not be built under an existing basement;**
- h. not exceed 50% of each garden within the property;**
- i. be less than 1.5 times the footprint of the host building in area;**
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;**
- k. not extend into or underneath the garden further than 50% of the depth of the garden;**
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and**
- m. avoid the loss of garden space or trees of townscape or amenity value.**

Exceptions to f. to k. above may be made on large comprehensively planned sites.

The Council will require applicants to demonstrate that proposals for basements:

- n. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 ‘very slight’;**
- o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;**
- p. avoid cumulative impacts;**
- q. do not harm the amenity of neighbours;**
- r. provide satisfactory landscaping, including adequate soil depth;**
- s. do not harm the appearance or setting of the property or the established character of the surrounding area;**
- t. protect important archaeological remains; and**
- u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.**

The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

We will generally require a Construction Management Plan for basement developments.

Given the complex nature of basement development, the Council encourages developers to offer security for expenses for basement development to adjoining neighbours.”

This application submission includes a Basement Impact Assessment and a draft Construction Traffic Management Plan (CTMP) using the Council’s own template for the latter. The proposals accord with the requirements of this policy, which is demonstrated within these documents. The Applicants have liaised with their neighbours as part of the draft CTMP.

5.7 Due to the number of applicable and specific criteria, Policy D1 – Design has been annotated within the policy text by comments in *italics*. The Policy and assessment state:

“The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character; *The Design and Access Statement (DAS) is the correct document that explains the design evolution of the proposals. The scale and form of the proposals have been arrived at having undertaken a thorough assessment of the existing context and character and these proposals respect that and go further by the demolition of the out-of-character existing building.***
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage; *As part of the overall and initial assessment of the extant context and character, the demolition can be said to enhance the historic environment. The proposed building in terms of its scale, detail of verticality and elevational treatment preserve and enhance the setting of the adjacent listed buildings and the two Conservation Areas. The Heritage Impact Assessment (HIA) is the proper document to assess the proposals within the historic environment and concludes that the new building will be a welcome contemporary addition to the impressive variety of Inverness Street.***
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; *The Applicants are committed to sustainable design and construction. The proposals will at the minimum meet all requisite credentials and are to incorporate a ground source air pump to lower CO₂ emissions from that of a conventional gas boiler.***
- d. is of sustainable and durable construction and adaptable to different activities and land uses; *The proposals will not conflict with this criterion.***
- e. comprises details and materials that are of high quality and complement the local character; *As confirmed in the DAS and HIA, these proposals will preserve AND enhance the local character.***
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; *As demonstrated in the DAS, the proposed building will integrate well into the surroundings. Due to the streetside location there are not the opportunities to alter movement etc., but in that regard, there is no conflict with this policy.***

- g. is inclusive and accessible for all; *Whilst this is a new build, the site is heavily constrained by the established surroundings. The accessibility is considered acceptable within this context.*
- h. promotes health; *The heating system will emit fresh air rather than gas emissions. The proximity of Regent's Park will allow for the enjoyment of outdoor activities as simple as walking and running to promote health and general well-being.*
- i. is secure and designed to minimise crime and antisocial behaviour; *The proposals have been designed so as not to incorporate 'hiding' or darkened areas. The property will be designed to be properly secured to the benefit of the occupiers. The proposals on the constrained footprint does not lend itself to crime etc.*
- j. responds to natural features and preserves gardens and other open space; *Once again due to the constrained nature of the site, there is currently no garden etc. The significant asset of Regent's Park will not be affected by these proposals. Consequently, there is no conflict with this criterion.*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping; *There is no opportunity to incorporate landscaping due to the constrained nature of the site – therefore, this criterion has little, if any, applicability.*
- l. incorporates outdoor amenity space; *Once again, the constrained form of the site, does not allow for a built use and external space. This has been accepted at the pre-application stage in this instance given the proximity of Regent's Park.*
- m. preserves strategic and local views; *The proposals accord.*
- n. for housing, provides a high standard of accommodation; and *The proposals accord.*
- o. carefully integrates building services equipment. *A specific plant area has been designed as part of the building.*

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. *Great care and professional consideration has been taken and verified by a separate heritage consultant so as to ensure that the proposals do improve the character and quality of the area.*

Tall buildings – *this section is not applicable to these proposals.*

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;
- s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
- t. the contribution a building makes to pedestrian permeability and improved public accessibility.

In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

Public art – *this section is not applicable to these proposals.*

The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.

Excellence in design

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.” *Whilst only a single dwelling, the Applicants have worked closely with the Architects in order to achieve what is considered to be an excellent design that takes account of the surrounding heritage assets and has the required functionality and internal form of a residential unit. The constrained gap site that lies at the boundary of two differing conservation area characters has presented a unique challenge with great and achievable opportunity as per the proposals.*

5.8 Policy D2 – Heritage states:

“The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, 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 all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. To preserve or enhance the borough’s listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.”

Given the inclusion and proximity to the conservation areas and the adjacency of the listed buildings, the matter of heritage has been central to the formulation of these proposals. Accordingly, the HIA is the proper submission document to refer to in the assessment of these proposals against this policy. The HIA is clear in its conclusions in that through the *‘considered assessment of the surrounding buildings and careful composition of the new façade, the new building both absorbs and reflects the rhythms and lines of the adjacent buildings whilst protecting what has become important to the site from the neglect of number 46. The new building will be a welcome contemporary addition to the impressive variety of Inverness Street.’* The Applicant has also sought the assessment of these proposals from a second heritage consultant (KM Heritage) who concludes that *‘the proposed scheme is exemplary in its design and response to its site and should be granted planning permission.’* Therefore, it has been demonstrated and confirmed that the proposals are acceptable and consequently accord with this policy.

5.9 Policy T1 – Prioritising walking, cycling and public transport states:

“The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

Walking

In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments:

- a. improve the pedestrian environment by supporting high quality public realm improvement works;
- b. make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
- c. are easy and safe to walk through (‘permeable’);
- d. are adequately lit;
- e. provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and
- f. contribute towards bridges and water crossings where appropriate.

Cycling

In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

- g. provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;
- h. provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;
- i. makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;
- j. is easy and safe to cycle through (‘permeable’); and
- k. contribute towards bridges and water crossings suitable for cycle use where appropriate.

Public Transport

In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.

Where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.”

There is no conflict with this policy and the aims of the Council in respect of the proposals.

5.10 Policy T2 – Parking and car-free development

“The Council will limit the availability of parking and require all new developments in the borough to be car-free.

We will:

- a. not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;**
- b. limit on-site parking to:**
 - i. spaces designated for disabled people where necessary, and/or**
 - ii. essential operational or servicing needs;**
- c. support the redevelopment of existing car parks for alternative uses; and**
- d. resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.”**

The Applicants understand that this new dwelling will need to be car-free and are happy to enter into any such legal agreement as required on the granting of planning permission.

6. Planning Analysis

- 6.1 The preceding section consider the proposals in light of the applicable planning policy. It is important in the determination of the application to undertake a planning analysis and focus on the key considerations in the assessment of this application. This section identifies and considers these.

Is the change of use from restaurant (A3) to residential (C3) acceptable?

- 6.2 The site is located in a residential area with no other designations apart from the conservation area. It is approximately 65 metres from Camden Town, which offers a great range of restaurants and alternative facilities for local residents within a five to ten-minute walk. The building has been vacant for some time and in a poor condition – in addition, it is isolated in its commercial nature *i.e.* not part of a parade with a greater draw. The Council has previously accepted (reference 2016/1657/PRE) that on the balance of probability, the site is poorly suited to a continued commercial use and the close proximity of alternative facilities is likely to make the site unviable for a commercial use. Therefore, it is considered that the loss of what is already a vacant site is acceptable. The need for housing of a variety of sizes is an accepted matter within London. The construction of this unit will allow for the ‘freeing up’ of the larger adjacent property of number 46 to the benefit of the housing market in terms of size. Therefore, the change of use is considered acceptable.

Do the proposals have an unacceptable detrimental impact on the setting of the Grade II listed buildings and the character and appearance of the Primrose Hill conservation area?

- 6.3 The Applicants are fully committed to achieving a built form in this location. The design has evolved on the advice of the project team and pre-application comments from the Planning Department. The Applicants have demonstrated a further commitment to ensuring that the proposals do not detrimentally affect these heritage assets by the appointment of KM Heritage who has verified the acceptability of the scheme both in terms of the demolition of the extant and the design, form and materials of the proposed. KM Heritage has concluded that the proposals preserve and enhance the

character and appearance of the conservation area as well as the setting of the nearby listed buildings and the Camden Town conservation area. Therefore, the proposals do not have an unacceptable detrimental impact on the heritage assets and indeed go further to preserving and enhancing these.

Is the principle of a basement acceptable?

6.4 The Basement Impact Assessment confirms that the proposals are acceptable with specific analysis of:

- Land/slope stability;
- Hydrology and groundwater flooding;
- Hydrogeology, surface water flooding and sewer flooding.

6.5 The proposals have been assessed against and comply with Policy A5 – Basements. Therefore, these are acceptable.

Is the proposed standard of accommodation acceptable?

6.6 The proposed room sizes accord with the applicable space standards. In addition, a Daylight and Sunlight assessment has been undertaken, which confirms the acceptability of the proposals for the future occupiers but also for the existing adjacent properties. Consequently, the proposals are acceptable.

7. Summary and Conclusions

Summary

- 7.1 This Planning Statement has been prepared by NTR Planning and is written in support of an application for the demolition of the existing A3 but vacant building and the replacement with a new dwelling.

Planning Balance

- 7.2 There are no other material considerations associated with the development. As such, the planning balance clearly lies in favour of the development proposals.

Conclusion

- 7.3 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, the proposals are acceptable in consideration of the development plan and the presumption is clearly in favour of planning permission being granted.

NTR Planning Ltd

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