

Planning statement

197 Kentish Town Road, Kentish Town, London, NW5 2JU

Arion Developments Limited

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Maddox Associates to accompany a full planning application for a two storey roof extension to the existing building to deliver five residential units on the upper floors with a change of use to provide a commercial unit in A2 use at ground floor level at 197 Kentish Town Road, Kentish Town, London NW5 2JU (hereafter referred to as “the site”). The applicant is Arion Developments Limited (“the applicant”).
- 1.2 The site lies within the boundary of London Borough of Camden. The development of the site has been discussed with the Council prior to the submission of this application through two formal pre-application requests, for which the written responses were issued on 22 January 2019 and 18 October 2019.

The proposal

- 1.3 This application is for full planning permission and the proposed development is:
- “Erection of two storey roof extension and change of use of the upper levels to deliver residential units across the upper levels; provision of an A2 unit at ground floor level; external alterations to the building to include the refurbishment of the main façade of the building and installation of a new shopfront, installation of new windows, doors and balconies; and provision of refuse and cycle storage” (“the proposed development”).*

Site background

- 1.4 The site is located within the defined Town Centre of Kentish Town (Primary Frontage) and Kentish Town Neighbourhood Plan area. The site is not listed and is not located within a conservation area. The Citizen’s Advice Centre to the south west of the site is locally listed.

Pre-submission consultation

- 1.5 The application has been informed by formal pre-application advice from the London Borough of Camden. The first pre-application written response was received on 22 January 2019 following a pre-application meeting held on 1 October 2018. Subsequently, the scheme was revised and a second pre-application meeting took place on 3 September 2019. The second written response was received on 18 October 2019.
- 1.6 The pre-application responses are supportive of the principle of development on the site and the proposed mix of uses. The feedback received has been taken on board in relation to the massing of the proposed extensions. Further to this, the design comments have been considered and incorporated into the revised proposal where possible. The pre-application feedback is addressed in further detail in Section 6 of this report.

Key benefits

- 1.7 The key benefits of the proposed development are as follows:
- Provision of an upgraded and refurbished commercial unit for professional services (Use Class A2) within a defined Town Centre;

- Refurbishment and extension of an under-utilised building which is located in a highly sustainable location to provide five new residential units;
- Provision of eight secure cycle parking spaces; and
- Upgrading the appearance of the existing building through a high-quality design and materials, enhancing the wider streetscene.

The application

1.8 The assessment of the application has been informed by a suite of documents and plans, including written pre-application advice from the London Borough of Camden and detailed technical assessments of the site and proposed development. This statement should therefore be read in conjunction with these planning application documents and plans, which will provide further information on the points summarised. This application is accompanied by the following documents:

- Application form, certificates and notices;
- CIL form;
- Architectural plans and drawings;
- Air quality report;
- Design and access statement
- Daylight and sunlight report;
- Draft construction management plan;
- Noise report; and
- Planning statement.

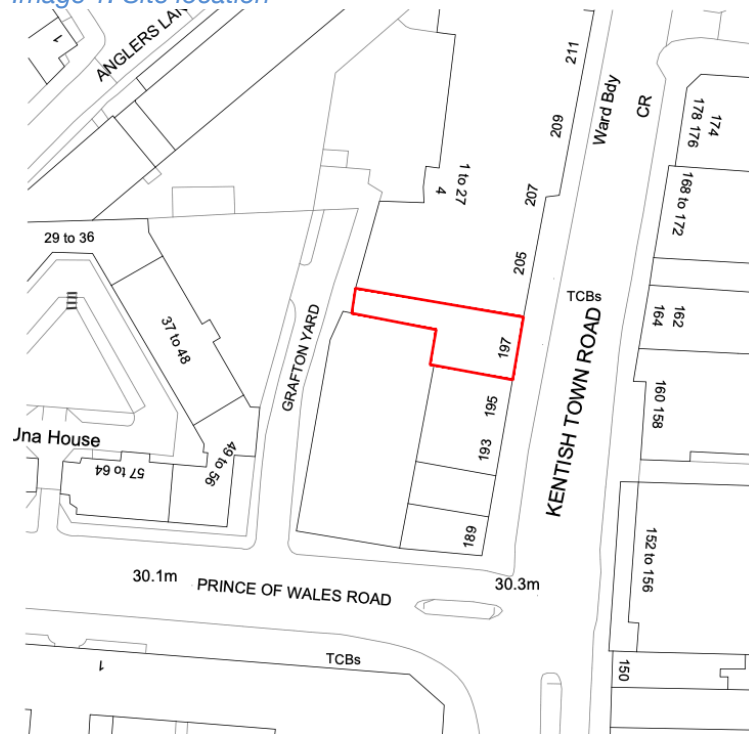
1.9 This application is accompanied by the following plans and elevations:

- Site location plan;
- Block plan;
- Existing and proposed elevations;
- Existing and proposed floor plans; and
- Existing and proposed sections.

2.0 Site and area description

- 2.1 The site address is 197 Kentish Town Road, Kentish Town, London, NW5 2JU. The site area as show in the accompanying site location plan extends to 170sqm. The site is situated on the western side of Kentish Town Road, with the rear frontage facing onto Grafton Yard. The site is located north of the intersection of Prince of Wales Road and Kentish Town Road.

Image 1: Site location



- 2.2 The site consists of a two-storey commercial premises, that appears as three storeys given its comparable height to its immediate neighbour to the south. However, it consists of a partial double height ground floor and includes an unusually high parapet that extends to fourth floor level in the streetscape. The parapet hides a void area behind, which makes the building suitable for comprehensive reconfiguration including an upwards extension. The building is currently vacant having previously been occupied by the NHS job shop (Use Class A2), that vacated in 2018.
- 2.3 As shown by the image below, the building presents an architecturally unattractive frontage to Kentish Town Road at ground floor level and offers little in the way of an active frontage or interest into the streetscape. The site also has access to the rear via Grafton Yard.
- 2.4 The site lies within the defined primary frontage of Kentish Town Centre. It is well located in accessibility terms with Kentish Town underground station located approximately 450m north of the site, Kentish Town West overground station located approximately 300m west of the site in addition to numerous local bus services. This results in the site having a PTAL rating of 6b (excellent). There is a single yellow line directly in front of the site on Kentish Town Road.

- 2.5 The immediate context is characteristic of a London high street with a mix of building ages and typologies. Neighbouring building heights are four storeys to the south and five storeys to the north. Generally, the properties in Kentish Town Road are characterised by a mix of retail, commercial and residential uses. Buildings are typically configured with retail/commercial uses at ground level and residential above.
- 2.6 The site is not located within a conservation area however there is a listed building in close proximity to the site at 213-215 Kentish Town Road. There is no soft landscaping or trees located on the site.

Image 2: Image of the front of the site



3.0 Relevant planning decisions and pre-application consultation

- 3.1 The site itself has no relevant planning history attached to it. Those off-site planning decisions that are considered to be of relevance to the proposed development are set out in the table below.

Table 1: Relevant off-site planning decisions

Address	Reference	Description	Decision	Date
193-195 Kentish Town Road, London, NW5 2JU	2010/0234/P	Erection of a mansard 4 th floor roof extension to create a one-bedroom flat (Class C3).	Granted permission	20 May 2010
317-319 Kentish Town Road, London, NW5 2 TJ	2016/0843/P	Erection of mansard roof on frontage building (facing Kentish Town Road) and a 2 storey extension over part of the single storey rear building (facing York Mews) with associated external and internal alterations to provide 3 additional self-contained residential units (C3) (1x1 and 2x2 bed) with a rear terrace, a change of use from betting shop (Sui Generis) at rear ground floor to office use/financial and professional services (B1/A2) and retention of retail use (A1) on the ground floor (front).	Granted permission subject to 106	18 May 2017
162 Kentish Town Road, London, NW5 2AG	2017/5119/P	Erection of three storey rear extension with roof terraces at first and third floor levels and mansard roof extension with 2 x front dormer windows, 1 x rear dormer door and 1 x rear rooflight, to facilitate conversion of 1 x 2 bed maisonette at 1 st and 2 nd floor levels into 1 x 1 bed flat at 1 st floor level and 1 x 2 bed maisonette at 2 nd and 3 rd floor levels (C3 use).	Granted permission	2 October 2017

- 3.2 Permission was granted in 2010 (reference: 2010/0234/P) for the erection of a mansard fourth floor roof extension to create a one-bedroom flat at 193-195 Kentish Town Road. This extension has not been implemented. However, the permission demonstrates that the development of a mansard roof adjacent to the application site was considered acceptable by the Council.
- 3.3 Planning permission (reference: 2016/0843/P) for the erection of mansard roof on frontage building (facing Kentish Town Road) and a two-storey extension over part of the single storey rear building (facing York Mews) was granted in May 2017. The proposal provides an

extension to an existing building with commercial and retail at ground floor with residential on the upper floors. Of particular relevance, the development proposes a side entrance for the residential units rather than an entrance from Kentish Town Road, demonstrating that that a residential entrance that is not located on the high street was considered to be acceptable by the Council.

- 3.4 Planning permission reference: 2017/5119/P is considered relevant to the proposed development as the proposals comprise residential on the upper floors with the addition of a mansard roof. This application was considered appropriate and is also located along Kentish Town Road.

4.0 Proposed development

- 4.1 The proposed development seeks a comprehensive reconfiguration and conversion of the premises, along with a roof extension, to create a mixed-use building. This will comprise of Class A2 use (professional services) at ground floor level. The upper floors will be converted and extended to create five residential units (Use Class C3). The proposed unit mix comprises one one-bed unit and four two-bed units, as set out in the table below.

Table 2: Schedule of accommodation

Floor	Existing	Proposed		
	Commercial floorspace (sqm GIA)	Commercial (sqm GIA)	Residential Units	
			One bed	Two beds
Ground	346	102.6	-	-
First		-	-	1 (69.1sqm)
Second		-	1* (51.1sqm)	1 (70.8sqm)
Third		-	-	1 (70.8sqm)
Fourth		-	-	1 (62.2sqm)
Total	346	102.6	1	4

*1bed unit over first and second floors

Layout and scale and massing

- 4.2 The proposal comprises a two-storey roof extension that will integrate into the existing building in the form of a mansard roof. The ground floor is proposed to comprise of a commercial unit in A2 use (professional services), and the upper floors are proposed to accommodate residential units.
- 4.3 At ground floor level, the residential units are accessed from a main entrance located on Kentish Town Road. A well-lit secondary entrance is proposed to the rear of the site on Grafton Yard. The commercial unit is proposed to be accessed via a separate entrance on Kentish Town Road.
- 4.4 The proposal is for a two-storey roof extension to an existing three storey building, bringing the total height of the building to five storeys. The roof extension is proposed to be located where the void behind the existing parapet of the building is, creating interest at the third and fourth storeys that are visible from the street.

Tenure

- 4.5 The proposed residential units are private units.

External appearance

- 4.6 The roof extension is proposed to be in line with the neighbouring parapet line and finished in a mansard style with zinc cladding. New powder coated aluminium double-glazed windows are proposed throughout with proportions and heights that are in keeping with the surrounding buildings along the western side of Kentish Town Road. At ground floor the shopfront is proposed to increase its floor to ceiling height in order to reflect the shopfronts

that are present on Kentish Town Road. The building's façade is proposed to be clad in brick slips to be consistent with surrounding buildings.

Amenity space

- 4.7 Four of the residential units are proposed to be provided with private amenity space in the form of balconies. In addition, one of the units is proposed to have a Juliet balcony located to the rear.

Access and parking

- 4.8 Separate entrances are proposed for the residential and commercial uses, with the commercial unit accessible at the front of the site via Kentish Town Road and the residential units accessible from the front of the site on Kentish Town Road through a separate entrance. A secondary rear entrance for the residential units is proposed on Grafton Yard, which is proposed to be monitored by CCTV with the inclusion of automatic motion sensor wall lights. Eight cycle parking spaces are located adjacent to the rear residential entrance. No vehicular parking or access is proposed.

Refuse and servicing

- 4.9 A communal refuse store is proposed to be located at the rear of the site, with its entrance on Grafton Yard.

5.0 Development plan policy and planning guidance

- 5.1 To the extent that development plan policies are material to an application for planning permission the decisions for applications must be taken in accordance with the development plan, unless there are material considerations that indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004).

Development plan

- 5.2 The development plan comprises of the following documents:
- The London Plan (2016) (consolidated with alterations since 2011);
 - The London Borough of Camden Local Plan (2017);
 - The London Borough of Camden Site Allocations (2013); and
 - The Kentish Town Neighbourhood Plan (2016).
- 5.3 The relevant supplementary planning guidance documents have also been taken into account. The site is located within a Primary Frontage in the Kentish Town Road defined town centre.

Emerging development plan

- 5.4 The draft New London Plan has been taken into account in developing the proposal, although the document holds limited weight in the determination of planning applications at this stage.

National planning policy framework

- 5.5 The updated National Planning Policy Framework ('the Framework') was published on 19 February 2019 and sets out the Government's planning policies for England and how these are expected to be applied.
- 5.6 Decisions should apply a presumption in favour of sustainable development and that means approving development proposals that accord with an up to date development plan without delay (paragraph 11, the Framework).
- 5.7 Small and medium sized sites can make an important contribution to meeting the housing requirement of an area as they are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should... support the development of windfall sites through their policies and decisions – giving great weight to the benefits using suitable sites within existing settlements for homes (paragraph 68).
- 5.8 Planning policies and decision should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should... define a network hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grown and diversify in a way that can respond to rapid changes in the retail and leisure industries, allow suitable mix of uses (including housing) and reflects their distinctive characters (paragraph 85).

Planning practice guidance

- 5.9 A range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential... Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services (paragraph 001).

6.0 Key issues and considerations

6.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material consideration indicates otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are considered to be:

- Principle of the proposed development;
- Quality of proposed residential accommodation and housing mix;
- Design;
- Amenity of neighbouring residents;
- Transport impacts;
- Sustainability; and
- Air quality.

Principle of the proposed development

- 6.2 The existing building comprises of commercial floorspace that is in A2 use (professional services). It is proposed to retain A2 floorspace at ground floor level and extend and change the use of the remainder of the floorspace from A2 to residential to deliver five residential units.
- 6.3 The proposal for the retention of A2 use (professional services) at ground floor level is considered to be in accordance with policies TC2 and TC4, which seek to ensure the viability and vitality of town centres is preserved. Professional services cover a range of services including estate agents and banks, that can be visited by members of the public. A2 uses are therefore considered to foster active frontages that contribute to the vitality and viability of town centres, in accordance with policies TC2 and TC4.
- 6.4 Housing is identified as the priority land use in Camden. Policy H1 seeks to maximise the supply of new homes. Point (d) of the policy states the Council will: “where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.” Given the sustainable location of the site, the proposal for residential units on the upper floors of the site is considered to be fully in accordance with policy H1.

Quality of proposed residential accommodation and housing mix

Housing mix

- 6.5 The proposal is for five residential units over first to fourth floor levels. The mix of units includes one one-bed unit and four two-bed units. Given the size of the scheme and the constraints imposed by the existing building, it is considered that the proposed unit mix is broadly in accordance with policy H7, which requires a mix of unit sizes to be provided. The Council’s pre-application written response also confirms that the proposed unit mix is acceptable.

Quality of accommodation, access and provision of amenity space

- 6.6 The proposed units are considered to provide high quality residential accommodation. Each of the proposed units is discussed in turn below.
- 6.7 Unit 1 is a two-bed unit located at first floor level. The unit is dual aspect, with outlook provided at the front onto Kentish Town Road and to the rear of the site. Also located to the rear is the private amenity space in the form of a balcony. The unit comprises one double and one single bedroom (69.1sqm). Whilst Unit 1 does not meet the Nationally Described Space Standards of 70sqm, the unit falls marginally short of the minimum standards (by 0.9m). Given that Unit 1 provides external amenity space in the form of a balcony and the proposal is for the conversion of an existing building rather than new build development, it is considered that the proposed area of the unit is acceptable in regards to the Nationally Described Spaces Standards. Furthermore, following the receipt of pre-application advice from the Council, A2 use has now been removed from the first floor level and the first floor is now entirely in residential use, in accordance with the Council's advice. The quality of Unit 1 should therefore be considered acceptable as it maximises the supply of new homes in a sustainable location, and it has been amended in accordance with the Council's pre-application advice that stated: "the first floor programme should be rationalised to provide either commercial or residential use only across the floor."
- 6.8 Unit 2 is a two-bed unit located at second floor level. The unit is dual aspect, with outlook provided to the front and rear of the site. The unit includes two double bedrooms and meets the minimum Nationally Described Space Standards (70sqm). The unit is provided with private amenity space in the form of a balcony located to the rear of the site.
- 6.9 Unit 3 is a two-bed unit with outlook provided to the front and rear of the site. The unit is 70sqm and includes one double and one single bedroom and exceeds the Nationally Described Space Standards for a three-person, two-bed unit.
- 6.10 Unit 4 is a two-bed unit located at fourth floor level. The unit is dual aspect, with outlook provided to the front and rear of the site. The unit is 61sqm includes one double and one single bedroom and meets the Nationally Described Space Standards for a three-person, two-bed unit. The unit is provided with a Juliet balcony at the rear of the site that provides a form of private amenity space. It is recognised that the amenity space provided is limited; however, as noted above, there are two public open spaces located within close proximity of the site.
- 6.11 Unit 5 is a one-bed unit located across first and second floor levels. It is east-facing and is provided with a generous private balcony facing towards the rear of the site that is accessed via the kitchen/living/dining room. Additional daylight is provided to the kitchen/living/dining room through a skylight. Whilst it is acknowledged that the outlook of the unit is impacted by neighbouring buildings, the photo shown below (Image 3) that is taken through the existing rear window demonstrates that the view to the rear is pleasant and includes views of the sky. The outlook from Unit 5 is considered to be significantly better than outlook provided to more constrained units, such as basement units. Overall, it is considered that the unit is of a good quality and should be considered acceptable.

Image 3: Image taken from existing rear window



- 6.12 The residential units are proposed to be accessed from the front of the site from Kentish Town Road. A secondary residential entrance is proposed on Grafton Yard located to the rear of the site that provides access to the residential bin and bike store. A range of improvements are proposed to the rear entrance to ensure that it is safe and secure for future residents, including lighting, CCTV cameras and a glazed door that will allow residents to see out on to Grafton Yard before they exit the site. The glazed door will ensure that the area between the front door and Grafton Yard is visible and not closed off. Further detail on these improvements is set out in the Design and Access Statement. A neighbouring building that comprises of a number of residential units also has an entrance located on Grafton Yard, demonstrating that the road is currently actively use by a number of residents. The images below show the residential entrance of the neighbouring building, which is also located on Grafton Yard.

Image 4: Rear entrance of neighbouring residential property (source: Google Streetview)



Image 5: Rear entrance of neighbouring residential units



- 6.13 Further to the above, there are a number of residential units located along Kentish Town Road that are not provided with main entrances on Kentish Town Road. For example, application reference: 2016/0843/P was approved in May 2017 and proposes the erection of a mansard roof on frontage building (facing Kentish Town Road) and a two storey extension over part of the single storey rear building (facing York Mews) with associated external and internal alterations to provide three additional self-contained residential units (C3) (1x1 and 2x2 bed) with a rear terrace, a change of use from betting shop (Sui Generis) at rear ground floor to office use/financial and professional services (B1/A2) and retention of retail use (A1) on the ground floor (front). The proposed entrance to the residential units is located on York Mews rather than Kentish Town Road at the front of the site, which is a narrow alleyway that

is likely to be poorly lit at night. In comparison to York Mews, Grafton Yard is much more open and is lit with street lighting. Given the rear entrance to the site is proposed as a secondary entrance and the main residential entrance is proposed to be located on Kentish Town Road as per the Council's pre-application advice, the access arrangements should be considered to be safe and secure for future residents.

Internal daylight

- 6.14 A daylight report has been submitted with the application that assesses the daylight levels within the proposed residential units. The report states that the proposed units are all found to benefit from a high level of compliance when assessed against the relevant BRE guidance. The report states that all units achieve Average Daylight Factor (ADF) values at or above the values set out in the BRE guidelines. All of the assessed rooms also meet achieve the Room Depth Criteria values better than those specified in the BRE guidelines. All of the assessed rooms are also reported to accord with the BRE guidelines in relation to the daylight distribution assessment.
- 6.15 The report states that the proposed kitchen/living/dining rooms have been assessed in relation to access to sunlight. The BRE guidelines recommend that at least one main window faces within 90 degrees of due south and the centre of at least one window to a main living room can receive 25 percent of annual probable sunlight, including five percent of annual probable sunlight hours in the winter months (21st September to 21st March). The report states that all rooms have windows that receive sufficient annual and winter sunlight hours, with the exception of Unit 5. However, it is recognised by the BRE guidance that it is unlikely that all units are likely to pass in a dense urban environment. The report therefore considers that the results are not only acceptable, but also demonstrate a high level of compliance for a central London scheme.

Noise

- 6.16 A noise assessment has been submitted with the application that assesses any potential noise impacts that could harm the amenity of future residents.
- 6.17 The report states that a noise survey was undertaken on site between 24 and 25 October 2019 to assess the existing background noise levels.
- 6.18 The report states that an acoustic model has been set up and a scheme for sound insulation of the building envelope has been developed to ensure that sound levels inside the new residential units will not exceed the relevant British Standard guidance limits during the daytime or night-time. The report therefore concludes that if the recommended acoustic specification for the façade is incorporated within the design, then the internal sound levels within the proposed residential units will not be detrimental to the amenity of future occupiers.
- 6.19 Further to the above, there are a number of residential units located along Kentish Town Road, demonstrating that it is not an unsuitable location for residential development due to noise impacts or disturbance.
- 6.20 On that basis, it is considered that the proposed residential units comprise of high-quality residential accommodation, particularly when the constraints of the existing building are taken into account. The proposal assists the Council by providing a small contribution towards meeting its housing targets, offers a mix of unit sizes, and makes the best use of a previously

developed site. The proposed residential accommodation should therefore be considered acceptable.

Design

- 6.21 The design of the proposed development responds to the site's context and has been worked up following pre-application discussions with Camden's design and planning officers.
- 6.22 The submitted design and access statement includes a thorough assessment of the existing context of the site, and the style of fenestration and materials that characterise this part of Kentish Town Road. The front façade is proposed to be finished in brick to match the appearance of the neighbouring building to the south of the site. The windows are proposed to align with the windows on the buildings to the north and south of the site. New powder-coated aluminium double-glazed windows are proposed to be installed on the front and rear elevations to upgrade the appearance of the building.
- 6.23 The proposal also includes the installation of a new shopfront, that will significantly improve the appearance of the building at ground floor level.
- 6.24 The building is proposed to be finished with a mansard roof that is in keeping with the appearance of the mansard roof located on the neighbouring building to the north of the site. The mansard roof is proposed to be finished in high quality raised seam zinc cladding.
- 6.25 Overall, it is considered that the proposed development will significantly improve the appearance of the site, which currently detracts from the appearance and character of the streetscene. The proposal should therefore be considered acceptable in terms of its design and appearance.

Impacts to the amenity of neighbouring residents

- 6.26 Due to the siting of the proposed residential units, it is not considered that they will result in any harm to neighbouring residents through overlooking. This is confirmed within the Council's pre-application response, which states that: "given the location, orientation and the position of the proposed windows, there would be no overlooking issues." The scale of the proposed development is also considered to be acceptable in regards to the scale of neighbouring buildings. It is therefore not considered that the proposal will result in any overbearing impacts to neighbours, or any loss of privacy.

Impacts to daylight and sunlight

- 6.27 A daylight and sunlight report has been submitted with the application that assesses the impacts of the development on the daylight and sunlight amenity of neighbouring properties.
- 6.28 The report states that the majority of neighbouring windows and all neighbouring amenity spaces comfortably fulfil the BRE guidance in relation to daylight and sunlight impacts. The results are concluded to demonstrate a high level of compliance when the site's context is taken into account, which is a dense urban location in central London. Those windows that experience transgressions in regards to the BRE guidance are discussed below.
- 6.29 Two windows within 1-27 Grafton Yard are identified to experience marginal transgressions in regards to the Vertical Sky Component (VSC) assessment. The windows are located at

second floor level (W4) and third floor level (W4). The report states that due to the configuration of the site, a number of windows at 1-27 Grafton Yard have low base light levels as they face onto an internal courtyard. This means that the existing windows are particularly sensitive to modest increases in massing on the application site. The report states that W4 at second floor level is one of three facets of a bay window, and the other two facets of the bay pass the VSC test. Furthermore, W4 at third floor level serves a dual-aspect room. The report states that the daylight distribution to the kitchen/living/dining room experiences a minimal change as a result of the proposed development. As such, these two transgressions are considered to be acceptable in regards to the BRE guidance.

- 6.30 The report states that in regards to the daylight distribution assessment, there are two marginal room transgressions within 1-27 Grafton Yard. The rooms are R2 and R3 at second floor level. However, the report states that these rooms are identified to have relatively low base levels of daylight distribution (being 3.09% and 3.05%) and are therefore sensitive to modest additions of massing on the application site. The reports states that both rooms retain at or above 0.7 their former value. On this basis, the transgressions are considered to be acceptable given the context of the site.
- 6.31 In regards to the Annual Probable Sunlight Hours (APSH) assessment, the report identifies that three windows within 1-27 Grafton Yard experience annual transgressions (W4 and W5 at second floor level, and W5 at third floor level). Two windows within the building are also identified to experience winter transgressions (windows W4 and W5 at second floor level). As discussed above, the windows at second floor level (W4 and W5) form part of a bay window, and the transgressions are marginal. The two windows that experience transgressions during the winter are identified as having low base levels of sunlight, and only experience a three per cent reduction in winter sunlight. As such, the report concludes that the impacts to neighbouring sunlight is relatively minor, particularly for a dense, urban environment. The impacts to sunlight are identified as marginal and relating to rooms/windows that generally have sensitive base levels as a result of the existing site restrictions.
- 6.32 It is therefore concluded that the impacts of the development on the daylight and sunlight amenity of neighbouring residents is acceptable in regards to the BRE guidance, particularly given the site is located within a dense urban environment.

Transport impacts

- 6.33 The site is located within a highly sustainable, town centre location, with a range of facilities located nearby. Kentish Town underground and railway station is located within a four-minute walk of the site. Kentish Town West overground station is also located within a four-minute walk of the site. There are also a number of bus stops located in close proximity of the site on Kentish Town Road and Prince of Wales Road.
- 6.34 The development is proposed to be car-free, with no vehicular parking provided. To the rear of the site, eight cycle parking spaces are proposed within a secure store for the use of the residential units. A refuse store is also proposed to be located at the rear of the site that is accessible from Grafton Yard.
- 6.35 A draft construction management plan has been submitted with the application that sets out the broad principles proposed for the construction methodology. As per Camden's requirements, the draft CMP has been consulted on with neighbouring properties. The results

of the consultation are set out in the submitted report. The draft document has been prepared using the Council's proforma and will be updated prior to construction.

- 6.36 It is therefore not considered that there are any issues with the development in regards to highways safety. The proposal is therefore considered to be acceptable in relation to policies T1 and T2.

Sustainability and energy

- 6.37 An energy and sustainability statement has been submitted with the application. The report states that the London Plan energy hierarchy principals have been applied to the residential units located within the new extension. The 'Be Lean, Be Clean, Be Green' approach has been applied in order to determine how CO₂ emissions can be reduced within the proposed development.
- 6.38 In relation to the residential units proposed within the extension, the report states that the following measures will be applied:
- "Be Lean": Improvements to the building fabric and energy efficient services to minimise energy demand, including efficient building services such as high efficiency gas fired boilers, mechanical ventilation with heat recovery and low energy LED lighting;
 - "Be Clean": The site is not suitable for a local CHP system or connection to a district network. Therefore, no carbon savings are possible using this measure; and
 - "Be Green": no renewable technologies are proposed for this development as the CO₂ emissions can be reduced using more technically, functionally and economically feasible energy savings solutions that are applicable to the facade and the services.
- 6.39 The report states that the units located within the extension are demonstrated to achieve a five per cent cumulative saving in carbon emissions.
- 6.40 In relation to the refurbished spaces, the report states that the performance of the façade (including the windows) is proposed to be improved, which will enhance the sustainability of the retained part of the building, which will accommodate both flats and commercial floorspace. The report states that these improvements are in accordance with the requirements set out in the building regulations Approved Document Part L (1B and 2B).
- 6.41 It is therefore concluded that the proposed development is acceptable in regards to the London Plan, and Camden's policies CC1 and CC2.

Air quality

- 6.42 An air quality assessment has been submitted with the application. The report states that the site is located within an Air Quality Management Area (AQMA).
- 6.43 The report identifies that background pollutant concentrations are expected to decrease between 2017 and 2022. As such, the report concludes that it is considered likely that pollutant concentrations will decrease from the existing concentrations at the site to the occupancy date of the development, indicating that air quality will have improved once the development is occupied.

- 6.44 The report states that the unmitigated risk to local sensitive receptors from emissions of dust and pollution from construction is deemed to be low. The risk will be mitigated further to a negligible level through the measures set out in the Air Quality and Dust Management Plan (AQDMP), which forms part of the document. On that basis, it is not considered that the proposed development will cause any harmful impacts to air quality.

7.0 Conclusions

- 7.1 This Planning Statement has been prepared by Maddox Associates to accompany a full planning application for a two storey roof extension to the existing building to deliver five residential units on the upper floors and a commercial unit in A2 use at the ground floor level at 197 Kentish Town Road, Kentish Town, London NW5 2JU.
- 7.2 The site lies within the boundary of London Borough of Camden. The development of the site has been discussed with the Council prior to the submission of this application through two formal pre-application requests, for which the written responses were issued on 22 January 2019 and the 18 October 2019. This advice has been considered in developing the final plans for the scheme.
- 7.3 This application is for full planning permission and the proposed development is:
- “Erection of two storey roof extension and change of use of the upper levels to deliver residential units across the upper levels; provision of a commercial unit in A2 use at ground floor level; external alterations to the building to include the refurbishment of the main façade of the building and installation of a new shopfront, installation of new windows, doors and balconies; and provision of refuse and cycle storage”.*
- 7.4 The key benefits of the proposed development are as follows:
- Provision of an upgraded and refurbished commercial unit for professional services (Use Class A2) within defined Town Centre;
 - Refurbishment and extension to an under-utilised building which is located in a highly sustainable location, to provide five new residential units;
 - Provision of eight secure cycle parking spaces; and
 - Upgrading the appearance of the existing building through a high-quality design and materials, enhancing the wider streetscene.
- 7.5 The proposed development is considered to accord with the relevant planning policies and guidance. It is therefore requested that this application is approved, without delay.