

Our ref: Q40228
Your ref: PP-08461211
Email: Leo.Cunningham-Baily@quod.com
Date: 28 January 2020



FAO: David Peres De Costa
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London, WC1H 9JE

For the attention of David Peres De Costa

By email

Dear David

Land at Kiln Place Estate – Full planning application for refuse and cycle stores

Town and Country Planning Act 1990 (as amended)

We are instructed by our client, the London Borough of Camden (the 'Applicant') to submit a full planning application for the installation of refuse and cycle stores at the Kiln Place Estate. The proposed refuse and cycle stores form part of the wider redevelopment of the Kiln Place Estate and the proposed development can be described as the "*Installation of refuse and cycle store enclosures, associated areas of hardstanding, and related works*" (the 'Proposed Works').

1 Relationship with Minor Material Amendment (ref: 2019/4473/P)

The proposals are intended to complement the Minor Material Amendment ('MMA') application (ref: 2019/4473/P) which seeks design changes to the approved estate improvement works approved under planning permission (ref: 2014/6697/P, as amended by 2016/2651/P and 2017/4471/P) (the 'Extant Permission').

Importantly, the related works proposed by this full planning application fall beyond the red line boundary of the Extant Permission, and therefore cannot be covered by the MMA application. Accordingly, this separate application for full planning permission is necessary.

It is politely requested that the London Borough of Camden determine both the Minor Material Amendment ('MMA') application (ref: 2019/4473/P) and this application in tandem.

2 Proposals

This application seeks full planning permission for the installation of new refuse and cycle stores and associated hardstandings. The general arrangement of the proposals and how they differ from the approved approach under the Extant Permission is shown on the 116_P_03P Kiln Place Refuse Strategy (Rev J). The proposed works and their objectives are further detailed below.

Refuse Storage



Refuse Store 1 – Adjacent to 117-164 Kiln Place

Properties at 117-164 Kiln Place and the new Units 1.1-1.4, approved under the Extant Permission, will be serviced by the following refuse stores:

- 1 no. linear refuse store south of Lamble Street; and
- 1 no. existing refuse storage room beneath 117-164 Kiln Place.

The new linear store will accommodate 4 x 1280L General Waste, and 1 x 500L Food Waste bins. with the existing refuse storage room will accommodate 3 x 1280L Recycling bins. This approach prevents the residential properties at 117-164 Kiln Place being affected by potential odour issues resulting from the storage of general and food waste beneath these dwellings.

This results in a slight overprovision of 620L surplus General Waste 220L of Recycling.

Refuse Store 2 – East of 97-104 Kiln Place

The previous refuse strategy for the Kiln Place Estate, approved under the Extant Permission, included the provision of a refuse store adjacent to the new Unit 3. This was required to service the properties at 65-96 Kiln Place, equating to circa 23 dwellings. However, the subsequent discovery of shallow UKPN services prevented the installation of a refuse store in this location.

Accordingly, a linear refuse store is proposed to the east of 97-104 Kiln Place to accommodate 4 x 1280L General Waste and 2 x 1280L Recycling bins. An additional external bulk waste store will also be provided in this location.

Refuse Store 3 – Adjacent to Unit 4 Kiln Place

The previous refuse strategy for the new properties at the Kiln Place Estate, approved under the Extant Permission, included a linear refuse store in this location. The revised refuse strategy would require a slightly reconfigured refuse store in this location, comprising:

- 1 no. linear refuse store adjacent parking bays close to Unit 4 Kiln Place.

This linear store will contain 3 x 1280L General Waste and 2 x 1280L Recycling bins. This refuse store will provide waste storage for the properties at 1-64 Kiln Place and Unit 4.

Refuse Store 4 – Close to junction between Kiln Place and Grafton Road

Two linear refuse stores and associated hardstanding are required Close to junction between Kiln Place and Grafton Road, comprising:

- 1 no. linear refuse store to north of Kiln Place; and

- 1 no. linear refuse store to south of Kiln Place.

These linear stores will contain 3 x 1280L General Waste and 1 x 1280L Recycling bins and 1 x 500L food waste. It will serve the properties at 97-116 Kiln Place, equating to circa 20 dwellings, in addition to new Units 5.1 to 5.3. The store will also have spare capacity for three additional Eurobins, allowing further properties within the estate be serviced by this communal refuse store if considered feasible when the waste strategy is reviewed in the future.

It should be noted that the hardstandings for these stores have already been constructed and therefore retrospective planning permission is sought for these. The linear refuse store south of Kiln Place towards Grafton Road will be limited to two refuse bins. This is to ensure an appropriate distance from existing properties is maintained, as requested by Linda Hall-Brunton (Principal Environmental Services Officer) at London Borough of Camden.

Cycle storage

It is proposed to install the following cycle stores in an area of existing hardstanding, located immediately to the south east of the playground, adjacent to Kiln Place:

- Bikehanger – with capacity for 6 cycles; and
- Mini Bikehanger – with capacity for 4 cycles;

The location of these proposed cycle stores is shown on drawing reference: 116C_L_002-FP Kiln Place Ground Floor Plan (Rev A). The specification sheets for each of these Bikehanger products has been submitted in support of this application. Planning assessment

3 Planning assessment

Refuse stores

The proposals subject to this full planning application differ from the approach to refuse storage previously approved by the Extant Permission in the following principal ways:

- The properties at 97-116 Kiln Place and new Units 5.1-5.3 will now be serviced by refuse stores at Refuse Store 4.
- The refuse store servicing properties at 65-96 Kiln Place and new Units 3.1 and 3.2 has been relocated to land east of 97-104 Kiln Place. This is to avoid UKPN services identified at the previously proposed location (adjacent to new Unit 3).
- Incorporation of new Units 1.1 - 1.4 and new Unit 4 into communal waste system, requiring additional refuse storage provision at Refuse Store 1.

These changes have been subject to extensive pre-application consultation with Linda Hall-Brunton (Principal Environmental Services Officer) at London Borough of Camden, who is satisfied with the proposed refuse strategy and associated works.

Policy CC5 (Waste) in the Camden Local Plan (2017) confirms that the borough will *"make sure that developments include facilities for the storage and collection of waste and recycling"*. The purpose of the proposed works subject to this application is to achieve this objective.

Wherever feasible, the proposals have been informed by section 8 (Storage and collection of recycling and waste) of Camden Planning Guidance – Design (2019) (the 'Guidance'). The proposed design would provide refuse storage areas which are safely located and accessible for all users.

The proposals protect residential amenities by ensuring general waste and food waste is not stored beneath dwellings. In addition, the proposed strategy allows some space for additional bins, thus providing flexibility to accommodate future increases in recycling targets.

In accordance with paragraph 8.33 of the Guidance, none of the proposed refuse stores would be located within 6m of any buildings. The proposed stores would MetroSTOR products which are both secure and protected from the elements. The concrete hardstanding on which these stores would be installed would provide an impervious and easy to clean platform, again consistent with paragraph 8.33 of the Guidance.

Despite having to respond to the constraints presented by the existing estate, the proposals address the Guidance. However, it is not possible to comply with the target travel distances for occupants contained in the Guidance. Where the relevant travel distances cannot be met, we have instead proposed individual refuse collections.

Extensive engagement has been undertaken with Linda Hall-Brunton (Principal Environmental Services Officer) at London Borough of Camden to ensure the proposals are acceptable. This is considered to be a strong material consideration when weighing the planning balance for these proposals.

New Units 1.5, 1.6, 2.1, 2.2 and 5 all remain with their own individual bin stores, as previously approved. The intention is to continue to evolve and improve the refuse strategy for the estate in collaboration with the Environmental Services and Estate Services at London Borough of Camden in the coming months.

A new condition is therefore proposed to be added to the Extant Permission as part of the MMA application (ref: 2019/4473/P). This would require a review of the refuse strategy, and the approval of an updated strategy within 6 months of the date the first of the new residential units to be delivered under the MMA proposals are occupied.

Cycle storage

Residential Unit 2.2, 3.1, 4 and Unit 5.3 approved by the Extant Permission are within 50m of cycle stores proposed by this application, with Unit 5.1 within 60m.

As part of the Extant Permission, a new Bike Hanger with capacity for 4 cycles is proposed close to the junction with Kiln Place and Lambie Street, helping to service Units 2.1 and Unit 6. Additionally, all the units at Site 1

benefit from private cycle stores. This ensures that holistically, covered cycle storage areas are provided for 22 cycles across the Kiln Place Estate, secured through both the MMA application and this full planning application, consistent with condition 9 of the Extant Permission.

Policy T1 (Prioritising walking, cycling and public transport) in the Camden Local Plan (2017) clarifies the Borough's commitment to promoting cycling and ensuring a safe and accessible environment for cyclists. To achieve this, the Council (inter alia) encourage developments to provide for accessible and secure cycle parking facilities, such as those proposed through this application.

The quantum of cycle parking to be provided through the wider Kiln Place Estate regeneration project was set through the approval of the Extant Planning Permission in 2015, responding to the cycle parking requirements in place at that time.

The site constraints and competing objectives relevant to the Kiln Place Estate regeneration make the provision of further cycle parking challenging. However, the Applicant will continue to monitor the situation and review any opportunities for additional cycle parking should these arise in the coming years.

4 Application and supporting information

This application seeks full planning permission for the Proposed Works and is supported by the following information, in line with Camden's Local Area Requirements for Planning Applications (July 2018):

- Application Form, duly completed;
- Schedule of Notice Served to Accompany Application Form;
- Site Location Plan (drawing reference: 116C_P_00X-FP Rev A);
- Proposed Site Plan (drawing reference: 116C_P_01P-FP Rev A);
- Kiln Place Ground Floor Plan (drawing reference: 116C_L_002-FP Rev A);
- Kiln Place Elevation MetroStors 01 (drawing reference: 01 116_E_16-FP Rev A);
- Kiln Place Elevation MetroStors 02 (drawing reference: 116_E_17-FP Rev A);
- Kiln Place Refuse Strategy (drawing reference: 116_P_03P Rev J);
- Kiln Place Existing Ground Floor Plan (drawing reference: 116C_L_002X-FP Rev A);
- Waste Strategy Note (November 2019); and
- This supporting letter.

The application fee of £234.00 has been paid via Planning Portal. The information supporting this application is consistent with our email correspondence on 12 July 2019 regarding the necessary deliverables. Under Article 9(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), a Design and Access Statement is not required to support 'minor' development. On this basis, a Design and Access Statement has not been prepared.

5 Summary

The changes proposed are an improvement to the previously approved refuse strategy and represent a response to engagement with Linda Hall-Brunton (Principal Environmental Services Officer) at London Borough of Camden. The proposals will allow a higher proportion of dwellings on the Kiln Place Estate to be serviced via communal waste storage and collection.

The cycle stores proposed will also ensure that the new residential units approved by the Extant Permission are served by secure and covered cycle storage. The proposed approach to cycle parking has been agreed through pre-application discussions with Stephen Burke at London Borough of Camden.

Fundamentally, the Proposed Works will improve the wider Kiln Place Estate, serving to meet the needs of existing and future residents.

We trust the enclosed is sufficient for you to validate the application and we look forward to receiving confirmation of this in due course. If for any reason this is not the case, please contact us immediately.

Yours sincerely



Leo Cunningham-Baily
Associate

- enc. Please refer to section 4 of this letter for enclosure list
- cc. Debra Constance - Construction Project Manager (London Borough of Camden)