



Planning & Development Ltd

JMS PLANNING & DEVELOPMENT LIMITED

PLANNING STATEMENT

**IN SUPPORT OF A PLANNING APPLICATION FOR A
RESIDENTIAL DEVELOPMENT**

AT

**GARAGES TO THE SOUTH OF
27A WEST END LANE
WEST HAMPSTEAD
NW6 4QJ**

Client: AG Homes

Project: Garages to the south of 27A West End Lane, West Hampstead

Date: July 2020

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SECTION 1: INTRODUCTION

- 1.1 This Planning, Design and Access Statement has been prepared by JMS Planning & Development Ltd (JMSP+D) on behalf of AG Homes in support of a full planning application for the demolition of existing garages and redevelopment for residential use with associated amenity space, new landscaping, cycle store, bin store and other associated works at garages to the south of 27A West End Lane, West Hampstead, NW6 4QJ (*'the site'*).
- 1.2 It is considered that the application is of considerable benefit to the London Borough of Camden (*'the Council'*), providing additional residential units to help meet LB Camden's housing need; representing sustainable, "*car free*" development and providing high quality new homes on previously developed land making a better, more efficient use of the application site. The proposed new residential units will comply with both national residential design standards and the relevant design and planning policy guidance of the Council. The application site already benefits from an extant residential permission. It is considered the application proposal comprises a high-quality design, taking into consideration the character of the area.
- 1.3 Accordingly, this report continues in Section 2 by providing a summary of the site's location and its context, with a brief summary of the planning history for the site within Section 3. Full details of the proposal are set out in Section 4 including a detailed description of the layout and facilities to be offered on the site. Section 5 sets out the planning policy position at national and local level with full justification for the proposal expanded upon in Section 6, with conclusions drawn in Section 7.

SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The site currently comprises eight single storey garages with entrances to the north and with the rear comprising the street frontage to West End Lane, which currently presents a negative blank feature to the streetscene. The site is surplus to parking requirements, and it is now vacant and sectioned off by construction hoarding. The site has an approximate area of 300 sqm.
- 2.2 The site sits directly south of Sycamore Court at 17A West End lane, close to its junction with Mutrix Road. This southern end of West End Lane slopes downhill towards Kilburn High Road to the south west and uphill towards Abbey Road to the north. This gradient is reflected across the site and in the surrounding built form.
- 2.3 The immediate surrounding context is wholly residential with a mix of blocks of flats, houses and some Victorian terraces with heights typically varying from three to four storeys. Immediately north of the site is Sycamore Court, a three-storey sheltered housing block with three storey terraced townhouses directly to the north east of the site on Mutrix Road.
- 2.4 On the opposite side of West End Lane, to the south, a variety of buildings including a two storey Victorian dwelling adjacent to a four storey post-war building and a three storey block of residential flats forming part of Holmesdale House, which increases to five storeys as the street slopes towards Kilburn High Road.
- 2.5 The site has a high PTAL accessibility rating of 6a which is excellent with Kilburn High Road and Kilburn Park Underground/Overground Stations in close proximity, and bus links from the main arterial route of Kilburn High Road serving Bus Routes 139, 206, 16, 32, 316, 332, 9, 328, 31 and 189.
- 2.6 The site is not located within a conservation area and there are no listed buildings in the immediate vicinity.
- 2.7 The site is within Flood Zone 1 and is therefore not at risk of flooding.

SECTION 3: PLANNING HISTORY

3.1 An online review of the site's planning history has been undertaken using the London Borough of Camden's online database. A full review of the planning history of the site is set out below:

Application Reference	Proposal	Decision	Dated
2018/2217/P	Details of drainage system (condition 11), rainwater recycling (condition 13), drainage strategy (condition 17) and piling method statement (condition 18) required by planning permission granted on 27/01/2017 (reference: 2016/5031/P for the demolition of the existing eight garages and the erection of a two to three storey terrace of 3x3bed townhouses (Class C3) and associated landscaping.)	Granted	13 Jun 2018
2017/4785/P	Details to partially discharge condition 14b (Ground investigation) of planning permission 2016/5031/P (dated 27/01/2017) for demolition of the eight garages and the erection three townhouses.	Granted	25 Aug 2017
2017/1414/P	Details of Condition 14a (Ground investigation) of 2016/5031/P (dated 27/01/2017) for demolition of the eight garages and the erection three townhouses.	Granted	12 Apr 2017
2017/0787/P	Details of Condition 8 (Photovoltaic Panels) of 2016/5031/P (dated 27/01/2017) for demolition of the eight garages and the erection three townhouses.	Granted	10 Feb 2017
2017/0747/P	Details of Condition 10 (Living Roof) of 2016/5031/P (dated 27/01/2017) for demolition of the eight garages and the erection three townhouses.	Granted	07 Feb 2017
2016/5031/P	Demolition of the existing eight garages and the erection of a two to three storey terrace of 3x3bed townhouses (Class C3) and associated landscaping.	Granted Subject to a Section 106 Legal Agreement	15 Sep 2016
2016/1380/P	Demolition of the existing eight garages and the erection of a two to four storey	Withdrawn	18 Mar 2016

Application Reference	Proposal	Decision	Dated
	building to provide six residential units (Class C3) and associated landscaping		
2015/5551/P	Demolition of the existing eight garages and the erection of a two to four storey building providing 6 residential (Class C3) (2x1-bed, 2x2-bed and 2x3-bed) units	Withdrawn	07 Oct 2015

3.2 The above table represents all the planning history that is available online. The above planning history confirms that the principle of a residential development on site has been considered acceptable by the Council with the grant of planning permission LPA Ref: 2016/5031/P on 15 Sept 2016 for the *“Demolition of the existing eight garages and the erection of a two to four storey building providing 6 residential (Class C3) (2x1-bed, 2x2-bed and 2x3-bed) units”*. This permission has been lawfully implemented.

3.3 Prior to this application, two further applications have been submitted and withdrawn on site which were considered to be unacceptable because of the proposed scale, bulk, massing and impact on residential amenity. This application therefore has been carefully designed taking into consideration previous comments in respect to the site’s opportunities and constraints.

SECTION 4: THE PROPOSAL

4.1 The application proposal seeks the demolition of the existing eight garages on site and the re-development of the site to comprise a three storey plus lower ground floor building to comprise eight residential units (Use Class C3) with associated amenity space, cycle store, bin store, new landscaping and other associated works.

4.2 The schedule of the proposed residential development is as follows:

Floor	1b2p	2b3p	3b4p	Total
Lower Ground	2		1	3
Ground	1	1		2
First		2		2
Second			1	1
TOTAL	3	3	2	8

4.3 Overall, the proposal will provide a total of eight residential units on site.

4.4 The proposed housing mix is as follows:

Housing Mix				
	1 bedroom	2 bedroom	3 bedroom	Total
Number of units	3	3	2	8
	37.5%	37.5%	25%	100%

4.5 There will be a single residential entrance lobby to the block at ground floor level allowing access to the lower ground floor and upper levels incorporating a stairwell.

4.6 The site layout is such that private amenity space in the form of terraces/balconies are to be provided mainly on the east elevation overlooking West End Lane and some facing the public footway on the south-western site boundary. Thus, ensuring that all units have some private amenity outdoor space associated with their flats.

- 4.7 The proposed units will meet the required space standards as set out in the Nationally Described Space Standards (October 2015) and are dual aspect wherever possible. It is considered that the proposals will provide good quality living conditions with a good outlook and outdoor amenity space.
- 4.8 The proposal will include appropriate bin store and cycle store. A dedicated refuse and recycle storage area is to be provided at ground floor level adjacent to the main entrance to the site. In addition, a dedicated food waste store will be located in front of the cycle store. Waste collection and servicing is proposed to take place from West End Lane.
- 4.9 Cycle storage has been designed into the scheme from the outset and is provided at ground floor level southeast of the site, easily accessible, covered, and secure in accordance with the Council's Standards for residents.
- 4.10 No car parking spaces are proposed for the new apartments due to the site's excellent accessibility levels and transport links. The Applicant accepts that the development will be 'car free'.
- 4.11 The proposal will ensure that the occupiers of the residential development have high-quality residential accommodation and outside amenity space to meet their needs, plus screened refuse storage and plentiful bicycle storage.
- 4.12 Overall, it is considered that the proposed development would have a positive impact on the character of the area, with no detrimental impact on the functioning or safety of the highway and the general functioning of the area.
- 4.13 Full details of the design of the proposed development and materials are included within the accompanying Design and Access Statement prepared by Atomik Architecture.

SECTION 5: PLANNING POLICY

- 5.1 This section of the Planning Statement sets out relevant national and local planning policy relevant to the proposed development.

National Planning Guidance

National Planning Policy Framework (2019)

- 5.2 The revised National Planning Policy Framework (NPPF) was updated in June 2019 and constitutes guidance for local planning authorities and decision takers. It is a material consideration in the determination of planning applications (paragraph 2).
- 5.3 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6).
- 5.4 Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways:
- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - A social objective – to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing;

- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.5 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).

5.6 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision making, this means:

- Approving development proposals that accord with the development plan without delay, and
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless;
 - The application of policies in the framework that protect areas or assets of particular importance provides clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole (paragraph 11).

5.7 The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making (paragraph 12).

5.8 Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work

proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible (paragraph 38).

- 5.9 Planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing (paragraph 47). Local Authorities may give weight to relevant policies and emerging plans according to the stage at which they are at and the extent of unresolved objections (paragraph 48).
- 5.10 Chapter 7 of the NPPF deals with delivering a sufficient supply of homes. Paragraph 59 confirms that to support the Government's objectives of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups of specific housing requirements are addressed and that land is developed without unnecessary delay.
- 5.11 Small and medium sized sites can make an important contribution to meeting the housing requirements of an area and 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 of using suitable sites within existing settlements for homes (paragraph 68).
- 5.12 Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or brownfield land (paragraph 117).
- 5.13 Paragraph 118 confirms that planning policies and decisions should promote and support the development of underutilised land and buildings, especially if this would help meet an identified need for housing where land supply is constrained, and available sites could be used more efficiently.

- 5.14 This is further confirmed in paragraph 122 whereby planning policies and decisions should support development that makes efficient use of land taking into account the identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting or are promoting regeneration and change; and the importance of securing well-designed, attractive and healthy places.
- 5.15 Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimum use of the potential of each site (paragraph 122).
- 5.16 The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is the effective engagement between applicants, communities, Local Planning Authorities and other interests throughout the process (paragraph 124).
- 5.17 Planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; and create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users (paragraph 127).
- 5.18 Design quality should be considered throughout the evolution and assessment of individual proposals (paragraph 128) and permission should be refused for 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 (paragraph 130).

The Development Plan

- 5.19 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that all applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.20 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004 the statutory development plan comprises The London Plan (Consolidated with Alterations Since 2011)(March 2016) and the Camden Local Plan (adopted 3 July 2017).
- 5.21 Each of the documents relevant to the application site is considered in turn below.

The London Plan (Consolidated with Alterations Since 2011) (March 2016)

- 5.22 Policy 3.3 (Increasing Housing Supply) confirms the Mayor recognises the pressing need for more homes in London and that the Mayor with relevant partners should seek to ensure provision of at least an annual average of 32,210 additional homes across London. The policy confirms that Boroughs should seek to achieve and exceed the relevant minimum Borough annual average housing targets wherever possible.
- 5.23 Policy 3.4 (Optimising Housing Potential) seeks to optimise housing density, having regard to local context, design principles and public transport accessibility.
- 5.24 Policy 3.5 (Quality and Design of Housing Developments) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment.
- 5.25 Policy 3.8 (Housing Choice) confirms Londoners should have a genuine choice of homes that they can afford, and which meet their requirements for different sizes and type of dwellings in the highest quality environments.
- 5.26 Policy 3.13 (Affordable Housing Thresholds) confirms that Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes based on relevant density guidance.

- 5.27 Policy 5.2 (Minimising Carbon Dioxide Emissions) confirms development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- Be Lean: use less energy;
 - Be Clean: supply energy efficiently;
 - Be Green: use renewable energy.
- 5.28 Policy 5.3 (Sustainable Design and Construction) states the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including construction and operation and ensure they are considered at the beginning of the design process.
- 5.29 Policy 5.13 (Sustainable Drainage) confirms development should utilise sustainable drainage systems (SUDS) unless there are practical reasons for not doing so.
- 5.30 Policy 5.18 (Construction, excavation and demolition waste) requires appropriate management plans for the efficient handling of construction, excavation and demolition waste and materials.
- 5.31 Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve high standards of accessible and inclusive design and supports the principles of inclusive design.
- 5.32 Policy 7.3 (Designing out Crime) confirms development should reduce opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.
- 5.33 Policy 7.4 (Local Character) confirms that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation surrounding buildings and should improve an area's visual or physical connection with natural features. Buildings, streets and open spaces should provide a high-quality design response.

5.34 Policy 7.6 (Architecture) confirms that architecture should make a positive contribution. Buildings and structures should:

- (a) be of the highest architectural quality;
- (b) be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
- (c) comprise details and materials that complement, not necessarily replicate, the local architectural character;
- (d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings;
- (e) incorporate best practice in resource management and climate change mitigation and adaptation;
- (f) provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
- (g) be adaptable to different activities and land uses, particularly at ground level;
- (h) meet the principles of inclusive design;
- (i) optimise the potential of sites.

The Camden Local Plan (July 2017)

5.35 Policy H1 (Maximising Housing Supply) confirms the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households, exceeding a target of 16,800 additional homes from 2016/2017-2030/2031. This will be achieved by, inter alia, regarding self-contained housing as a priority land-use of the Local Plan and where sites are under used or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site. It is also noted that the Council is actively working to improve the quality of accommodation in the private rented sector.

5.36 Policy H4 (Maximising the Supply of Affordable Housing) states that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home

and increasing by 2% of for each home added to capacity. Policy goes on to say that where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.

- 5.37 Policy H6 (Housing Choice and Mix) seeks to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households.
- 5.38 Policy H7 (Large and Small Homes) states that 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.
- 5.39 Policy G1 (Delivery and Location of Growth) confirms that the Council will support development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. Policy goes on to say that development is expected to take place in highly accessible locations.
- 5.40 Policy A1 (Managing Impact and Development) confirms that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless it causes unacceptable harm to amenity.
- 5.41 Policy A3 (Biodiversity) confirms that the Council will protect, and seek to secure additional, trees and vegetation. This includes, expecting developments to incorporate additional trees and vegetation wherever possible.
- 5.42 Policy A4 (Noise and Vibration) confirms the Council will seek to ensure that noise and vibration is controlled and managed.
- 5.43 Policy A5 (Basements) states that the Council will only permit basement development where it is demonstrated that the proposal would not cause harm to neighbouring properties; the structural, ground, or water conditions of the area; the character and amenity of the area; the architectural character of the building; and the significance of heritage assets.
- 5.44 Policy goes on to say that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Further guidance

on basement development is laid out within the Camden Planning Guidance 4: Basement and Lightwells (July 2015).

- 5.45 Policy D1 (Design) confirms the Council will seek to secure high quality design and development. In particular, the Council will require development that respects local context and character and preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage). It requires development to be sustainable in design and construction and to comprise details and materials that are of high quality and complement the local character and integrate well with the surrounding streets and open spaces.
- 5.46 Policy T1 (Prioritising walking, cycling and public transport) seeks to prioritise walking, cycling and the use of public transport in the borough.
- 5.47 Policy T2 (Parking and car-free development) requires all new developments to be car free.
- 5.48 Policy CC1 (Climate Change Mitigation) confirms the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 5.49 Policy CC2 (Adapting to Climate Change) requires development to be resilient to climate change by adopting measurements such as protecting green spaces and promoting new green infrastructure; whenever possible reducing surface run-off through the increase of permeable surfaces and the use of SUDS; incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate and measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 5.50 Policy CC3 (Water and Flooding) seeks to ensure developments do not increase flood risk and reduce the risk of flooding where possible achieved through the inclusion of inter alia, water efficiency measures and the use of SuDS.
- 5.51 Policy CC5 (Waste) requires all new development to include facilities for the storage and collection of waste and recycling.

Supplementary Planning Guidance

- 5.52 Supplementary Planning Guidance documents which provide detailed planning guidance relevant to the proposal include the Camden Planning Guidance – Design (March 2019), Housing (May 2016 - updated March 2019), Transport (March 2019) and Basements (March 2018).

Emerging Planning Policy

Intend to Publish Draft New London Plan (December 2019)

- 5.53 The Intend to Publish London Plan 2019 was submitted by the Mayor to the Secretary of State on the 9th December 2019 for final approval. This document is however currently subject to a Holding Direction by the Secretary of State. Once adopted, the London Plan (2019) will form part of the Development Plan.
- 5.54 Policy GG2 (Making the Best Use of Land) encourages making the best use of land by creating high-density, mixed-use places by prioritising development of Opportunity Areas, brownfield land, sites within and on the edge of town centres, and small sites and sites which are well-connected by public transport, walking and cycling, applying a design-led approach.
- 5.55 Policy GG4 (Delivering the Homes Londoner's Need) supports the delivery of new homes, it states that those involved in planning and development must inter alia; support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable; create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing; and identify and allocate a range of sites, including small sites, to deliver housing locally.
- 5.56 Policy D1 (London's Form, Character and Capacity for Growth) provides a policy framework for delivering growth, optimising site capacity through the design-led approach set out in Policy D3.

- 5.57 Policy D2 (Infrastructure Requirements for Sustainable Densities) requires the density of development proposals to consider and be linked to the provision of planned levels of infrastructure rather than existing levels, as well as being proportionate to the site's connectivity and accessibility by different transport means, jobs and services.
- 5.58 Policy D3 (Optimising Site Capacity Through the Design-Led Approach) sets out the requirements to optimise site capacity based on a design-based approach which responds to a site's context and capacity for growth. It goes on to say that development proposals should:

Form and layout

- 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 3) be street-based with clearly defined public and private environments
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience

- 5) achieve safe, secure and inclusive environments
- 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) deliver appropriate outlook, privacy and amenity
- 8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 9) help prevent or mitigate the impacts of noise and poor air quality
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and Character

- 11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- 12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- 13) aim for high sustainability standards (with reference to the policies within London Plan Chapter's 8 and 9) and take into account the principles of the circular economy
- 14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

5.59 Policy D4 (Delivering Good Design) seeks to ensure good design from developing to completion stages. It confirms that proposals will be scrutinised based on the requirements set out in part B of Policy D3. Policy goes on to state that the design quality of development should be retained through to completion by:

- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
- 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
- 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
- 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion

- 5.60 Policy D5 (Inclusive Design) confirms that to deliver an inclusive environment, development proposals are required to achieve the highest standards of accessible and inclusive design ensuring they can be entered and used safely; are convenient and welcoming with no disabling barriers; and are designed to incorporate safe and dignified emergency evacuation for all building users. It goes on to say that in developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 5.61 Policy D6 (Housing Quality and Standards) supports a range of housing typologies to optimise the development of housing on sites across London. It confirms that new homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of occupants over their lifetimes taking into account the needs of children, disabled and older people.
- 5.62 Policy goes to set the minimum space standards (Table 3.1) which should apply to all tenures and all residential accommodation that is self-contained including both private internal spaces and private outdoor spaces. In addition, Policy includes within Table 3.2 quality design aspects to be addressed in housing developments.
- 5.63 Policy D7 (Accessible Housing) requires at least 10% of new dwellings to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users (Building regulations M4(3)), and all other new build dwellings to be 'accessible and adaptable dwellings'(Building regulations M4(2)).
- 5.64 Policy D8 (Public Realm) sets out the requirements for development proposal in regard to public realm to ensure it is safe, accessible, inclusive, attractive and well-connected, easy to understand and maintain; it relates to the local and historic context, and provides natural surveillance; incorporates good quality design, landscaping, planting, street furniture and surfaces. Any on-street parking should not be dominant or continuous so that there is space for green infrastructure as well as cycle parking in the carriageway.
- 5.65 Policy D10 (Basement Development) requires boroughs to establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where it is identified as an issue locally.

- 5.66 Policy D11 (Safety, Security and Resilience to Emergency) confirms that new developments, including building refurbishments, should maximise building resilience and minimise potential physical risks including those arising as a result of fire, flood, terrorism and related hazards, in addition to incorporating design out crime measures.
- 5.67 Policy D12 (Fire Safety) requires all developments to incorporate appropriate fire safety solutions and represent best practice in fire safety planning in both design and management.
- 5.68 Policy D14 (Noise) states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by inter alia, separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening or internal layout. Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles. It goes on to say that proposals should improve and enhance the acoustic environment and promote appropriate soundscapes.
- 5.69 Policy H1 (Increasing Housing Supply) sets out the 10 year target for net housing completions which Local Planning Authority should plan for and include within their Development Plan documents. The 10 year target for the period 2019/2020-2028/2029 has increased since that of the previous plan period to 649,350 (an increase of approximately 98,983) and the proposed annual monitoring target for the period noted above for Camden has increased to 10,380 (compared to 8,892 for the previous plan period). These housing figures are based on the 2017 London SHLAA, which suggests there is capacity across London for approximately 40,000 new homes a year on large sites with an additional potential capacity on smaller sites for 12,000 new homes a year.
- 5.70 Policy H2 (Small Sites) confirms that small sites should play a much greater role in housing delivery and boroughs should proactively support well-designed new homes on small sites to embrace planning decisions and plan making in order to:
- (i) Significantly increase the contribution of small sites to meeting London's housing needs;

- (ii) Diversify the sources, locations, type and mix of housing supply;
- (iii) Support small and medium sized housebuilders;
- (iv) Support those wishing to bring forward custom, self-build and community led housing; and
- (v) achieve the minimum targets for small sites as a component of the overall housing targets.

- 5.71 The policy continues to say that Boroughs should recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments. The policy also suggests that site specific briefs, masterplans and housing design codes should be prepared to promote good design and to proactively encourage increased housing provision, higher residential densities and small scale housing developments, and this should be set out in Design Codes and in supplementary planning guidance where appropriate.
- 5.72 Policy H2 also advises that Boroughs should increase planning certainty on small sites by identifying and allocating appropriate small sites for residential development.
- 5.73 As noted above, the policy makes reference to a Design Code but where there is no such Design Code, the presumption means approving small housing developments unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or safeguarded land which outweighs the benefits of additional housing provision. The policy also sets out a number of criteria where the presumption in favour of small housing developments should not be applied which include statutory listed buildings, developments of more than 25 houses, sites of more than 0.25 hectares in size and a number of other criteria.
- 5.74 The 10 year target for net housing completions on small sites (below 0.25 hectares in size) within Camden is 3,280, which annualised results in 328 dwellings per annum.
- 5.75 Policy H4 (Delivering Affordable Housing) states that the strategic target is for 50% of all new homes delivered across London to be affordable and seeks to apply a threshold approach to the delivery of affordable housing on residential and mixed-use developments.

- 5.76 Policy H5 (Threshold Approach to Applications) seeks to apply a threshold approach to development proposals which are capable of delivering more than 10 units or which have a combined floorspace greater than 1,000 sqm. The threshold level of affordable housing is initially set at a minimum of 35%, which will be reviewed in 2021 and, if appropriate, increased through Supplementary Planning Guidance.
- 5.77 Policy H6 (Affordable Housing Tenure) sets out the split of affordable housing products which should be applied to development whereby a minimum of 30% of low cost rented homes allocated according to need and offered to Londoners on low incomes, a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared Ownership. 40% to be determined by the relevant borough based on identifying need provided they are consistent with the definition of affordable housing based on identified need. Only schemes delivering the threshold of affordable housing with a tenure split that meets the requirements can follow the fast track route for approval.
- 5.78 Policy H10 (Housing Size Mix) states that to determine the appropriate mix of units sizes in relation to the number of bedrooms for a scheme, both applicants and decision-makers should have regard to the range of housing need and demand identified by the 2017 London SHMA; the requirement to deliver mixed and inclusive neighbourhoods; the mix of uses in the scheme, the range of tenures in the scheme; the nature and location of the site, with higher proportions of one and two bedrooms more appropriate in locations close to town centres, stations or with higher public transport access and connectivity; the aim to optimise housing potential on sites; the ability of new development to reduce pressure on conversions, sub-division and amalgamation of existing stock and the role of one and two bed units in freeing up family housing.
- 5.79 Policy G5 (Urban Greening) confirms that major development proposals should contribute to the greening of London by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature based sustainable drainage. Policy goes on to say that boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF is currently only applied to major applications but may eventually be applied to applications below the major development threshold.

- 5.80 Policy SI 1 (Improving Air Quality) sets out the requirements for development plans to improve air quality. In addition, it confirms that development proposals should not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits or delay compliance in areas that are currently in exceedance of legal limits; and create unacceptable risk of high levels of exposure to poor air quality.
- 5.81 For most minor developments, achieving Air Quality Neutral will be enough to demonstrate that they are in accordance with Part B1 of the Policy.
- 5.82 Policy SI 4 (Managing Heat Risk) requires development proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the inclusion of green infrastructure.
- 5.83 Policy SI 5 (Water Infrastructure) seeks to protect and conserve the use the use and supply of water. It confirms that development proposals should:
- minimise the use of mains water in line with the Optional Requirement of the Building regulations (residential developments), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption);
 - achieve at least the BREEAM excellent standard for the 'Wat 01' water category;
 - incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.
- 5.84 In terms of water quality, policy requires proposals to seek to improve the water environment and provide adequate wastewater infrastructure capacity and take action to minimise the potential for misconnections between foul and surface water networks.
- 5.85 Policy SI 12 (Flood Risk Management) states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed, this should include where possible, making space for water and aiming for development to be set back from the banks of watercourses. The use of natural flood management methods is sought due to their

multiple benefits including increasing flood storage and creating recreational areas and habitat.

- 5.86 Policy SI 13 (Sustainable Drainage) confirms that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, with a preference for green over grey features in line with the drainage hierarchy set out in the Policy. In addition, policy requires development to avoid impermeable surfacing, and be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 5.87 Policy T1 (Strategic Approach to Transport) seeks to support and facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. In addition, it states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 5.88 Policy T4 (Assessing and Mitigating Transport Impacts) requires all development proposals to reflect and be integrated with current and planned transport access, capacity and connectivity and where appropriate mitigate any adverse transport impacts of the proposal.
- 5.89 Policy T5 (Cycling) confirms that development plans and proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through inter alia, securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking in accordance with LP minimum standards which require one space per studio or 1p1b dwelling, 1.5 spaces per 2p1b dwelling, and two spaces per all other dwellings (long stay) and 2 spaces for 5 to 40 dwellings and 1 space per 40 dwellings thereafter (short stay). Policy requires a minimum two short stay and two long stay cycle parking spaces for every development, albeit, it does not apply to residential developments of fewer than five dwellings.
- 5.90 Policy T6 (Car Parking) confirms that car-free development should be the starting point for all development proposals that are well-connected by public transport. Policy goes on to say

that where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.

- 5.91 Policy T6.1 (Residential Parking) states disabled residential car parking is required to be provided for new residential developments delivering 10 or more units and requires as a minimum 3% of dwellings should have at least one designated disabled bay from the outset. It goes on to say that as part of a Parking Design and Management Plan, an additional 7% of dwellings could be provided with disabled parking spaces in the future if demand dictates. In addition, it requires at least 20% of spaces to have active charging facilities, with passive provision for all remaining spaces.
- 5.92 Policy T7 (Deliveries, Servicing and Construction) requires development proposals to facilitate safe, clean, and efficient deliveries and servicing and prioritise and maintain inclusive and safe access for people walking or cycling during the construction phase of development.
- 5.93 Policy T9 (Funding Transport Infrastructure Through Planning) confirms that planning obligations (Section 106 agreements), including financial contributions will be sought to mitigate impacts from development.

Summary of Planning Policy

- 5.94 The above section sets out relevant general planning policies pertinent to the application. A key issue arising from the policy review is the identified need for additional housing in the borough to meet an identified need. This is further emphasised in emerging policy where the need for additional housing is increased and the role of small sites in meeting this need is highlighted and supported.
- 5.95 The above planning policies are discussed in more detail in the following section setting out the key planning issues.

SECTION 6: KEY PLANNING ISSUES

- 6.1 Having reviewed the relevant planning policy background and the characteristics of the site and surrounding area and the proposed development, it is considered that the following issues are most relevant to the consideration of the application.

1. Principle of Development
2. Residential design standards;
3. Residential amenity considerations;
4. Housing density, mix and tenure;
5. Daylight and sunlight matters;
6. Transport and Servicing;
7. Basement Impact; and
8. Sustainability

Please note that full details and justification for design and access matters are set out within the accompanying Design and Access Statement prepared by Atomik Architecture.

Principle of Development

- 6.2 The principle of development of the site for residential use has already been established through the granting of planning permission with LPA Ref: 2016/5031/P on 15 Sept 2016 for the *“Demolition of the existing eight garages and the erection of a two to four storey building providing 6 residential (Class C3) (2x1-bed, 2x2-bed and 2x3-bed) units”*. This permission has been implemented and remains extant.
- 6.3 The NPPF (2019) promotes making best use of existing sites where no adverse impact on design, amenity or heritage matters occurs. Paragraph 118 confirms that planning policies and decisions should promote and support the development of underutilised land and buildings, especially if this would help meet an identified need for housing where land supply is constrained, and available sites could be used more efficiently.

- 6.4 This is further confirmed in paragraph 122 which states planning policies and decisions should support development that makes efficient use of land taking into account the identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting or are promoting regeneration and change; and the importance of securing well-designed, attractive and healthy places.
- 6.5 Policy 3.3 (Increasing Housing Supply) of the London Plan confirms that Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets as set within the London Plan, as there is a pressing need for more homes in London. Part D of the policy states the Boroughs should seek to achieve and exceed housing targets through, inter alia, the intensification of brownfield housing sites.
- 6.6 The proposed development will see the redevelopment of eight disused garages which are currently vacant and sectioned off by construction hoarding presenting a large blank wall to the streetscene.
- 6.7 The proposal would comprise 3x1bed , 3x2bed and 2x3bed units, and therefore will result in the provision of 8 residential houses to add to the Borough's stock. The application proposal gives rise to a net increase in the number of residential units on the site and therefore will assist in meeting the housing need.
- 6.8 Furthermore, the application proposes the beneficial redevelopment of an existing brownfield site and provides much needed residential development in a form which seeks to meet relevant residential design standards, thereby providing units which provide a high quality of living.
- 6.9 The need for additional housing in London is also acknowledged within the Intend to Publish London Plan and Policy H2 (Small Sites) recognises the very valuable contribution that small sites can make to the provision of housing in London. This policy states that in order to deliver small site targets set out within the plan, Boroughs should apply a presumption in favour of, inter alia, infill development on vacant and underused sites.

- 6.10 It is considered that the site is currently underused and could be more efficiently used to provide additional units to accommodate increasing population and changing demographics.
- 6.11 The results of the London Plan Annual Monitoring Report 15 (AMR 15), dated October 2019 confirms that in relation to Key Performance Indicator 4, in relation to the London Plan which requires an average completion of a minimum of 42,000 net additional homes per year, and this year recorded a net total of 32,083 net total completions which represents 76 per cent of the 42,388-target introduced in the 2015 London Plan. However, there is a significant variation in delivery between the Boroughs, with Camden only meeting 88% of its target.
- 6.12 Within the Intend to Publish London Plan, Policy H1 (Increasing Housing Supply) sets out the 10 year target for net housing completions which Local Planning Authorities should plan for and include within their Development Plan documents. The 10 year target for the period 2019/2020-2028/2029 has increased since that of the previous plan period to 649,350 (an increase of approximately 98,983) and the proposed Annual Monitoring Target for the period noted above for Camden has increased to 1,038 (compared to 889 for the previous plan period) which represents a 17% increase.
- 6.13 In summary, National Planning Policy guidance contained within the NPPF and relevant policies of the adopted Development Plan presumes in favour of making better use of previously developed land where the development will not give rise to any design, amenity or heritage impact. As will be set out later within this document, the proposal has been thoroughly considered in respect to its design providing net benefits ensuring that there are no such adverse impacts arising from this application. Accordingly, there is a presumption in favour of the proposal.

Residential Design Standards

- 6.14 Local Plan Policies D1 (Design) and CPG Design and Housing sets out the general standards required for the design of residential developments and confirm that any development should be appropriately located and designed taking into consideration the existing context, character and appearance of the area, ensuring it functions well and is attractive, and ensuring good living conditions for existing and future residents by meeting all the relevant design standards, providing an appropriate level of floor area and the required floor to ceiling heights, amenity space, adequate access and refuse storage.

- 6.15 The proposed development will meet all the relevant design standards, providing an appropriate level of floor area, dual aspect accommodation, required floor to ceiling heights and an appropriate level of amenity space.
- 6.16 Appropriate refuse and cycle storage will be provided on site in line with the Council's standards and policies.
- 6.17 Amenity space is provided to each unit as terraces or balconies. This complies with CPG which states that all new dwellings should provide access to some form of private outdoor amenity space.
- 6.18 All residential units are dual aspect and the proposed windows will provide the units with sufficient daylight/sunlight and ventilation to provide future residents with good living standards.
- 6.19 Overall, it is considered that the proposed residential units offer a comfortable, high-quality living environment for proposed occupiers.

Residential Amenity Considerations

- 6.20 Policy A1 (Managing Impact and Development) confirms that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless it causes unacceptable harm to amenity. Further guidance on amenity issues are contained within CPG Amenity.
- 6.21 The proposed residential development would see its western boundary back onto the rear of 2-8 Mutrix Road. CPG Amenity advises that to ensure privacy there should normally be a minimum distance of 18m between windows of habitable rooms of different units that face each other. Notwithstanding, policy goes on to state that where this standard cannot be met, the use of other measures such as consideration of the location and positioning of rooms within the development; the orientation and size of windows; obscure glazing and screening can be used to ensure overlooking is reduced to acceptable levels.

- 6.22 The height and volume of the proposal has been designed so that it steps back at upper levels and set back as much as possible away from neighbouring properties so to ensure that there is no unacceptable loss of privacy. The western façade of the development would be separated by approximately 8 metres from the rear façade of properties on Mutrix Road at its closest point and around 14 metres on third floor level, and windows would face each other on both facades. However, it is proposed that windows incorporate ‘slotted’ window screening so that residents of Mutrix Road be presented with louvered windows with no apparent overlooking.
- 6.23 The same approach is proposed for any windows on the eastern façade to prevent views into Sycamore Court. In addition, frosted glass/obscure glaze and greenery are proposed on terraces to protect the amenity of residents where necessary.
- 6.24 Notably, a similar approach was proposed in planning application with LPA ref: 2016/5031/P granted by decision notice dated 15 Sept 2016 and was considered an acceptable mean to protect neighbouring amenity.
- 6.25 Overall, it is considered that the mitigation measures proposed are effective as means to mitigate any overlooking and privacy issues, and as such, it is considered that there will be no impact on neighbouring residential occupiers in terms of outlook, and privacy.
- 6.26 Conversely, the new occupiers, due to the proposal meeting residential design standards, will have a high-quality living environment in a prime position to access the transport network and services of Camden.

Housing Density, Mix and Tenure

- 6.27 The NPPF (2019) promotes making best use of existing sites where no adverse impact on design, amenity or heritage matters occurs. It states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimum use of the potential of each site (paragraph 122).
- 6.28 Local Plan Policy G1 (Delivery and Location of Growth) confirms that the Council expect development to take place in highly accessible locations.

- 6.29 As previously stated, the proposed site is well-located for public transport access, amenities and services, therefore development at higher density on site is supported by national and local policy.
- 6.30 In terms of mix, Local Plan Policy H6 and Policy H7 seek a variety of housing suitable for Camden's existing and future households. Policy goes on to say that the Council will consider opportunities presented by each site.
- 6.31 It is proposed that the development will accommodate a range of dwelling types as shown on the illustrative plans and as set out in Section 4 of this Statement. The proposed mix is considered appropriate for this urban location.

Daylight and Sunlight Matters

- 6.32 Paragraph 123(c) of the NPPF confirms that authorities should take a flexible approach to daylight and sunlight to ensure the efficient use of land. In this regard, it states that *"local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."*
- 6.33 The proposal has been set back from the rear boundary as much possible as well as presenting a stepped back design on the upper floor level in order to mitigate any daylight-sunlight impacts to neighbouring properties on Mutrix Road. The principle of the development of the application site is already established.
- 6.34 An internal sunlight and daylight assessment has been carried out on site by Right of Light Consulting which confirms that the proposal satisfies all of the requirements set out in BRE guide 'Site Layout Planning for Daylight and Sunlight'.
- 6.35 As such, it is considered that the proposal provides good quality living accommodation for future occupiers and will not have any adverse impact on the amenity of neighbouring properties.

Transport and Servicing

- 6.36 The site has a high PTAL accessibility rating of 6a which is excellent with Kilburn High Road and Kilburn Park Underground/Overground Stations in close proximity, and bus links from the main arterial route of Kilburn High Road serving Bus Routes 139, 206, 16, 32, 316, 332, 9, 328, 31 and 189.
- 6.37 Adopted London Plan Policies T3, T6, and T8 seek to ensure that proposals for development have a limited impact on the performance and safety of the highway network and sufficient car parking and cycle storage are provided to support and encourage sustainable transport.
- 6.38 Local Plan Policy T1 (Prioritising walking, cycling and public transport) seeks to prioritise walking, cycling and the use of public transport in the borough.
- 6.39 Emerging London Plan Policy T6 (Car-Parking) states that car-free should be the starting point for all development proposals in place that are well-connected by public transport. This sentiment is replicated in Local Plan Policy T2 (Parking and car-free development) which requires all new developments to be car free.
- 6.40 As previously stated, the site has a Public Transport Accessibility Level (PTAL) score of 6a, which is considered 'excellent', where an increased housing density is encouraged. The scheme is proposed to be car-free due to its location and its good accessibility levels to services, shops and public transport links. It is considered that the type of apartments that will be created will be occupied by people who would make use of the abundant local public transport network and would not require a motor vehicle.
- 6.41 In this regard, the applicant is willing to sign a legal agreement (Section 106 Agreement) prohibiting occupiers of the additional unit from having Council on-street car parking permits, in line with local policy T2 (a) which requires all new developments to be permit free.
- 6.42 Adopted London Plan (2016) Policy 6.9 (Cycling) states that for planning decisions, development should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards and the guidance set out in the London Cycle Design Standards. Local Plan Policy T1 confirms that cycle parking facilities should meet

minimum standards outlined in the London Plan Table 6.3 and designed to requirements as set out within the CPG Transport.

- 6.43 Intend to publish London Plan Policy T5 (Cycling) requires 1.5 space per 1b2p unit and 2 spaces per 2b+ unit. In addition, 2 short-stay visitor space are required for residential proposals of 5-40 residential dwellings.
- 6.44 Cycle storage has been designed into the scheme from the outset and is provided at ground floor level southeast of the site, easily accessible, covered and secure in accordance with the Council's Standards for residents.
- 6.45 Regarding waste management, Local Plan Policy CEC5 (Waste) requires all new development to include facilities for the storage and collection of waste and recycling.
- 6.46 A dedicated refuse and recycle storage area is to be provided at ground floor level adjacent to the main entrance to the site with sufficient capacity to accommodate the proposed residential units on site.
- 6.47 Waste collection and servicing is proposed to take place from West End Lane which allows for ease of collection. Moreover, the storage point is within the maximum recommended for residents' disposal and kerbside collection.
- 6.48 Overall, it is considered that transport and servicing requirements have been met on site without raising any highway issues.

Basement Impact

- 6.49 Local Plan Policy A5 requires all developments proposing a basement level to assess the impact of the development on drainage, flooding, groundwater conditions and structural stability.
- 6.50 The application has been submitted with a Basement Impact Assessment (BIA) prepared by Ridge and Partners LPP which sets out the proposed construction method of basement level as well as a structural monitoring strategy to control any potential impacts the construction will have on neighbouring structures.

- 6.51 In addition, the BIA contains relevant information on the impact of the proposed subterranean development on the surrounding area and presents suitable mitigation measures where appropriate.
- 6.52 The proposed basement level on site will provide high quality, habitable space with natural daylight and ventilation. In addition, it will be suitably landscaped providing amenity space for the residents with no detriment impact on the amenity of neighbouring properties or the character of the area.
- 6.53 Overall, it is considered that the proposal is in line with policy requirements in terms of basement proposals.

Sustainability

- 6.54 Chapter five of the London Plan sets out a comprehensive range of policies to underpin London's response to climate change. This is supported by local plan policies CC1, CC2, CC3 and CPG Energy efficiency and adaptation seeks to improve the sustainability of development proposals by setting general standards to increase the site's resilience to climate change and energy and water efficiency.
- 6.55 The scheme proposes to incorporate considerations to reduce environmental impact in both construction and operational use primarily achieved through a design to include a highly insulated building fabric and low air permeability.
- 6.56 Local plan policy confirms that development proposals should maximise water efficiency and incorporate SuDS measures in order to improve the management of surface water.
- 6.57 The application site is located within Flood Zone 1, an area not at risk of flooding. Accordingly, the proposed residential unit is located in an appropriate location for residential development which is not at risk of flooding.
- 6.58 The existing garages on site are built on hardstanding so offer little in the way of drainage, therefore, the redevelopment of the site is an opportunity to improve upon this and reduce flood risk in the area.

- 6.59 The proposal includes the provision of green roofs and a net increase in green areas and permeable surfacing wherever possible. The proposed roof will add mass and insulation to the buildings and reduce heating as well as reduce rainwater run-off and create wildlife habitats.
- 6.60 A SuDS Drainage Assessment with Outline FRA prepared by Create Consulting Engineers accompanies this application which proposes a surface water drainage strategy to include the use of green roof and tanked permeable paving that ensures water flow attenuation and provides appropriate pollution control, therefore, confirms that the scheme will be constructed with adequate drainage to ensure flood risk to surrounding areas is not increased and surface water drainage is sustainable.
- 6.61 Overall, it is considered that the proposal mitigates against the causes of climate change and adapts to the effects of climate change in line with the requirements of Local Plan Policies CC1, CC2, CC3 and CPG Energy efficiency and adaptation and therefore meets the requirements of policies relating to sustainable design, construction, resource and environmental protection, and as such should be considered acceptable.

SECTION 7: CONCLUSIONS

- 7.1 This Planning Statement has been prepared by JMS Planning & Development Ltd on behalf of AG Homes in support of a full planning application for the demolition of the existing garages and the erection of a residential building, with associated amenity space, new landscaping, cycle store, bin store and other associated works at garages to the south of 27A West End Lane, West Hampstead, NW6 4QJ.
- 7.2 It is considered that the application is of considerable benefit to LB Camden, namely it:
- Provides additional residential “*car free*” units to help meet LB Camden’s housing need;
 - Represents sustainable development and provides high quality new homes on previously developed land making a better, more efficient use of the application site;
 - Creates a substantial improvement to the pedestrian environment;
 - Improves natural surveillance and security around the site; and
 - Presents the opportunity to create a high quality building which improves this part of West End Lane.
- 7.3 The application has been submitted with a full suite of supporting documents including a Basement Impact Assessment (BIA) which confirms the proposal is fully acceptable in respect to all aspects of a basement development as well a Daylight/Sunlight Assessment to confirm the application proposal provides high quality internal amenity for future occupants. Full details of the design approach and the acceptability of the design, scale and massing of the proposal is set out within the accompanying Design and Access Statement prepared by Atomik Architecture.
- 7.4 Overall, it is considered that the proposal will present an appropriate designed scheme for the site providing valuable new housing for the London Borough of Camden.
- 7.5 Overall, it is considered the application proposal is of significant merit.