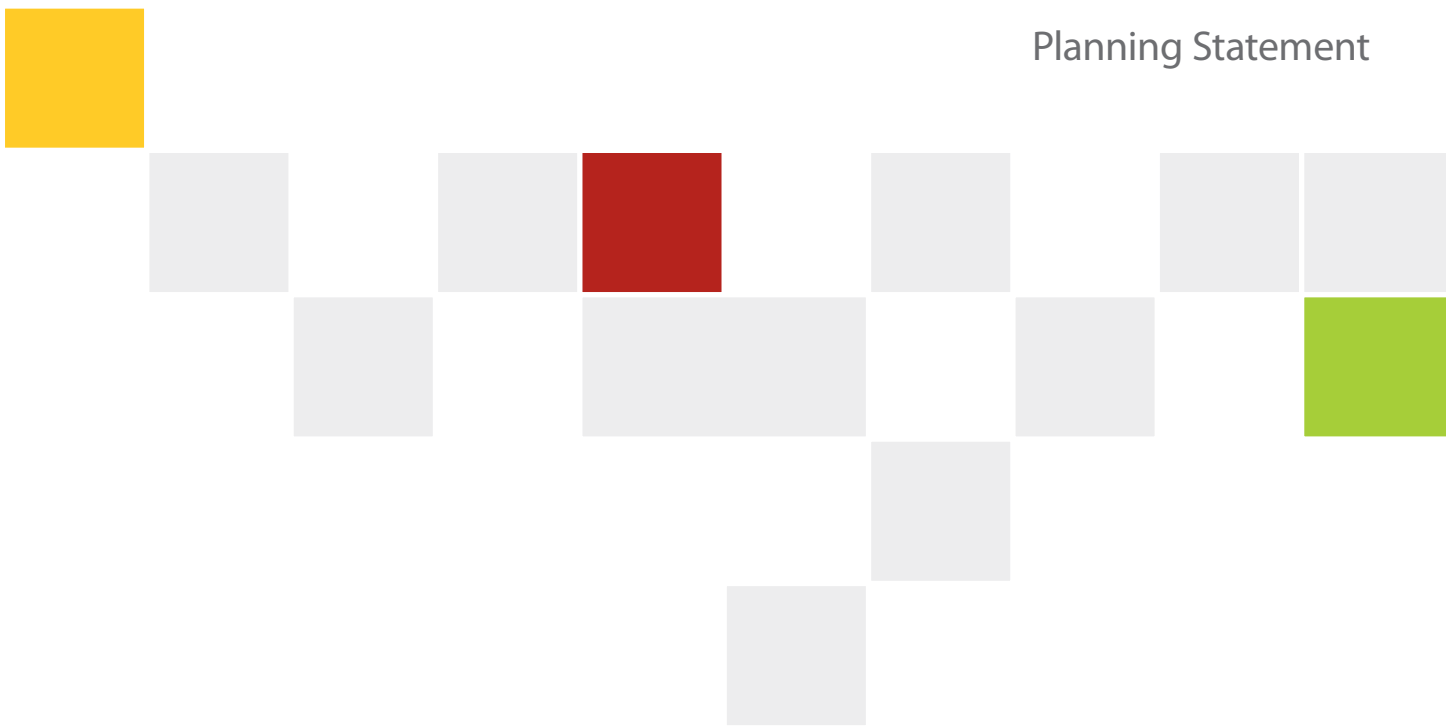


# 13 Blackburn Road

Planning Statement



# Boyer

## Report Control

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## EXECUTIVE SUMMARY

This Planning Statement is prepared on behalf of West Hampstead Investment Partnerships to support the planning submission for development the Clockwork Factory Apartments at 13 Blackburn Road.

The proposed development would utilise a highly accessible brownfield site, located within the West Hampstead Interchange area to deliver a residential led, mixed used scheme. The proposed comprehensive development, comprising all buildings within 13 Blackburn Road is encouraged by Camden Council. This support has influenced the comprehensive redevelopment of the site which would deliver a number of public benefits including;

- Regeneration and optimisation of a highly sustainable and accessible brownfield site
- Demolition of existing buildings which are tired and in need of renovation
- Construction of new buildings of high quality architecture which will enhance the local area and the surrounding context
- Provision of 53 new 1, 2 and 3 bedroom homes (of these 53 new units, 29 will be replacement for the existing provision within the Clockwork Apartments)
- A contribution towards the delivery of affordable housing
- Provision of 4,802sqm of new commercial space, reinstating and enhancing the former use of the Site
- Creation of an active and accessible street frontage
- Opening up a new public square within the development
- Public realm improvements within the site and on Blackburn Road including widening and improvements the footway, provision of street furniture, street trees and improved lighting
- Improvements to Billy Fury Way through passive surveillance from new frontage development
- Incorporation of sustainability and energy efficiency measures across the development

The planning application is supported by suitable technical documents and is assessed against the relevant planning policies and guidance. It concludes that the proposed development is sustainable and should be granted planning permission without delay.

## 1. INTRODUCTION

- 1.1 This Planning Statement is prepared on behalf of West Hampstead Investment Partnerships (WHIP) Ltd. (the Applicant) in support of a planning application for proposed redevelopment of the Clockwork Factory Apartments, 13 Blackburn Road, West Hampstead, NW6 1RZ (the Site).
- 1.2 The planning statement sets out the proposed development and assesses the proposals against the development plan.
- 1.3 The proposed description of development is as follows;

*Demolition of existing building and construction of three buildings between 1 and 9 storeys (plus basement) in height comprising 53 residential dwellings, up to 4,802sqm of commercial floorspace, publically accessible space, landscaping and resident's facilities including cycle and refuse facilities.*

- 1.4 The planning application is accompanied by the following documents;

Document	Consultant
Site Location Plan	Stiff and Trevillion
Existing site plans and elevations	Stiff and Trevillion
Proposed site plans and elevations	Stiff and Trevillion
Design and Access Statement	Stiff and Trevillion
Acoustic Report	ION Acoustics
Air Quality Assessment	AECOM
Basement Impact Assessment	Elliott Wood
Construction Management Plan	WHIP
Daylight Sunlight Assessment	Point 2
Delivery and Servicing Management Plan	TTP
Drainage Report	Elliott Wood
Energy Report	Chapmans
Flood Risk Assessment and SUDs statement	Elliott Wood
Landscaping Plan	Camlins
Sustainability Statement	Chapmans

Transport Assessment	TTP
Travel Plan	TTP
Waste and storage collection details	TTP
Ecological Statement	Clarkson Wood

1.5 This statement is structured as follows;

- Section 1 introduces the proposals
- Section 2 provides an overview of the site and surrounding area
- Section 3 outlines the planning history
- Section 4 gives an overview of the consultation that has been undertaken
- Section 5 gives the planning policy context
- Section 6 appraises the development
- Section 7 concludes the report

### ***Background***

1.6 The Applicant, West Hampstead Investments Partnership (WHIP) has owned the Site since the 1990's. They originally operated the Site as the headquarters of the ACCURIST Watch business before converting the office building to residential under permitted development in 2014. They have successfully managed the operation of the residential facilities since that time.

1.7 The Applicant also developed and initially operated the student housing building next door on Blackburn Road before selling it to its current operators, Nido Student Living. The Applicant has accordingly had a longstanding interest in Blackburn Road.

1.8 A full overview of the Planning History is provided in Section 3.

### ***Proposed Development***

1.9 The proposed development comprises the demolition of the existing buildings at 13 Blackburn Road and construction of three blocks (A, B and C). The layout and mix of uses is outlined in the table below.

Block	Use	Floor area GIA (sqm)
A	Commercial (LG and GF)	1,284
	Residential (upper floors)	2,001
B	Commercial (LG and GF)	268
	Residential	1,948
C	Commercial	3,252

1.10 Blocks A and B will comprise commercial space at the basement and ground floor and will house residential units at the upper floors. These blocks stand at 5 storeys (block A) and 6 storeys (block B) and are positioned to front Blackburn Road. A total of 53 residential units are proposed across Blocks A and B. The proposed units comprise a mix of one, two and three bedroom dwellings. A breakdown of the proposed mix is detailed in the table below;

Building	Unit Size	Quantum	%
A	1b1p	16	30
A	2b4p	4	7.5
A	3b5p	6	11.3
B	1b1p	9	17
B	1b2p	17	32
B	3b5p	1	1.8
TOTAL		53	

1.11 At the rear of the site is the proposed Block C which will stand at 9 storeys and comprises 3,252sqm (GIA) of commercial floorspace. This block comprises the commercial floorspace and will be linked through a single storey entrance pavilion. The pavilion will be a lightweight structure which links the public square and the proposed development.

1.12 A basement is proposed across the scheme which will link the three blocks.

1.13 In the centre of the development, a new public square is proposed. This space will comprise high quality landscaping and public realm improvements and will link the scheme to the surrounding streetscene.

1.14 More detail of the proposals can be found in the accompanying Design and Access Statement.

## 2. THE SITE AND THE SURROUNDING AREA

- 2.1 The application Site comprises 13 Blackburn Road, a former office building and warehouse.
- 2.2 The former office building, previously known as Asher House, is located at the front of the site and fronting Blackburn Road. It was built as a BT telephone exchange in the 1980s, and acquired by the Applicant in the 1990's. Following acquisition the Site was then operated as the headquarters of the Applicant's watch business, ACCURIST, until 2014. This use was vacated in 2014 following which the building was converted into 29 residential units (15 x studio units, 13 x 1 bed, 1 x 2 bed units) under permitted development. The Applicants renamed the building the Clockwork Factory Apartments in recognition of its former use for watch manufacture and repair. The existing floor area of this block comprises 1,998sqm split over 4 storeys.
- 2.3 The single storey warehouse to the rear of the Site, which was also used by ACCURIST for storage ancillary to its office use, provides 445sqm of floorspace. It backs onto to Billy Fury Way with the railway beyond. This building is vacant but its lawful use remains as Class B1(a) being ancillary to the main former office building.
- 2.4 The Site is adjacent to West Hampstead District Centre and has a mixed surrounding context. Along Blackburn Road a number of town centre and residential uses exist. To the east is the Nido Student accommodation, a 9 storey building providing purpose-built student accommodation.
- 2.5 A number of commercial uses exist along Blackburn Road including the O2 centre to the east, as well as Homebase, Finchley Road Audi and a large Sainsbury's. Opposite the site is a builder's yard and depot.
- 2.6 Blackburn Road is bound by railway lines to the north and South and is accessed from West End Lane to the west and the A41 to the east.
- 2.7 To the north of the site is Billy Fury Way, an underused walkway which provides access from West End Lane to Finchley Road and Frognaal Station. The quality of Billy Fury Way is poor and it does not realise its potential as a convenient link between West End Lane and Finchley Road.
- 2.8 As mentioned above, the area surrounding the Site is mixed in uses and character. Along West End Lane which is the trunk of the West Hampstead District Centre there a number of town centre uses including shops, food and drink uses and commercial uses. The location of the Site is well situated with good access to a range of residential amenities within West Hampstead Interchange area.
- 2.9 The roads off West End Lane mainly comprise residential properties. The grain of properties is mixed. A number of terraced properties are noted on the surrounding roads however, along West End Lane there are a number of flatted developments which have introduced various residential forms and increased the building height within the surrounding area.



- 2.10 In terms of accessibility, the Site benefits from an excellent PTAL of 6a whereby 0 is the worst and 6b is the best. The Site is situated approximately 150m east of West Hampstead Interchange which provides a number of overground and underground rail services. From West Hampstead Station, the Jubilee line provides services into Central London and north to Stanmore. West Hampstead Overground station is situated approximately 100m north of the Site and West Hampstead Thames Link Station is situated approximately 200m north on West End Lane. Approximately 500m to the east is Finchley and Frognal station. There are a number of local buses which serve West End Lane and the surroundings.
- 2.11 The Site is not within a conservation area, although West End Green Conservation Area is to the north beyond the railway line and South Hampstead Conservation Area to the south beyond the underground line. The building is old and outdated, it is not listed or locally listed and it is not of architectural merit.
- 2.12 The Site is located in Flood Zone 1 and is considered to be at the lowest risk of flooding.

### ***Evolving Context***

- 2.13 In terms of the emerging context and designations, the Site is situated within the West Hampstead Interchange Area which is identified in the London Plan as an Area for Intensification. The details of the designation and the requirements are discussed in more detail in Section 5. In summary, the allocation of the Site confirms that 13 Blackburn Road is a site prime for mixed-use redevelopment. The Site is sustainably located near to a number of residential amenities and benefits from excellent public transport accessibility.
- 2.14 A number of other planning applications have recently been approved as well as completed developments which further reiterates the changing context of this area.
- 2.15 In 2014, permission was granted for the comprehensive redevelopment of a site at nearby Liddell Road. These proposals are now under construction with some parts nearing completion and provide a 9 storey tower comprising 100 flats as well as workspace and a new primary school.
- 2.16 In 2016, LB Camden approved an application at 156 West End Lane for comprehensive redevelopment to provide 164 residential dwellings, 763sqm of flexible non-residential use (use class A1-A3/D1/D2), 1093sqm of employment floorspace and 63sqm of community meeting space in buildings of 3-7 storeys.
- 2.17 Plans are also progressing for the redevelopment of the O2 centre to the east of the Site. This parcel is identified in the Local Plan as a suitable development site and the current landowners are progressing with development plans.

2.18 In summary the designations and the evolving context noted by a number of recent planning permissions and developments confirm the changing character of the West Hampstead Interchange area. It is noted within the adopted and emerging planning policy (discussed in detail below) that this area is suitable for mixed use development. It is therefore confirmed that the Site is within a highly sustainable location which is identified as an area for increased development through the Development Plan.

### 3. PLANNING HISTORY

3.1 The relevant planning history for the Site is included in the table below;

Reference	Description	Decision
2014/1671/P	Change of use from office to 25 residential units (2 x studio, 21 x 1 bed, 2 x 2 bed)	Grant prior approval, May 2014
2014/4587/P	Prior Approval Application for the change of use of building from offices(B1a) to 29 residential units(C3), comprising of 15 x studio units, 13 x 1 bed, 1 x 2 bed units.	Granted, September 2014 (IMPLEMENTED)
2014/5414/P	Alterations to the external of the building by blocking up existing windows and creation of new windows along the North elevation, new fire escape exit on the roof and the installation of windows and ramp on the ground floor east elevation	Granted, November 2014

#### *Neighbouring planning applications*

- 3.2 Whilst not directly related to the application site, there are a number of relevant planning applications within the immediate vicinity which are important for reference and are summarised below.
- 3.3 **Nido Student Housing; 2017/7072/P;** Extensions at roof level *to provide 41no additional student bedrooms; comprising dormer roof extension to purple block on Blackburn Road, two storey roof extension to red brick block on Blackburn Road; single storey roof extension to middle east seven storey block; and associated alterations including re-cladding existing zinc roof elements; replacement of timber infill panels, alterations to windows, re-cladding of ground floor plinth; and landscaping works to adjacent area.*
- 3.4 This application was pending a decision at the time of submission but is understood to be supported by officers in principle.

- 3.5 **11 Blackburn Road; 2015/3148/P** Demolition of existing single storey office building (Class B1) and replacement with 6 x two-bed houses (Class C3) (part 3/part 4 storey); refurbishment of Victorian warehouse (Class B1) and landscaping and associated works.
- 3.6 This application was approved in May 2017 but has now lapsed without any effort made to implement it. It is therefore of no material weight in the determination of the current application.
- 3.7 **14 Blackburn Road ; PWX0202103** planning permission was granted in 2004 for redevelopment of whole site by the erection of a 4 storey eastern block comprising two Class B8 and eight Class B1 units with associated service yard, together with a 4 storey plus basement western block comprising 8 dwellinghouses and 6 self-contained flats with associated underground car parking. This planning permission was lawfully implemented a number of years ago however has not been fully built out.

## 4. PRE-APPLICATION ENGAGEMENT

### *Pre-application discussions*

- 4.1 The Applicant has engaged with the Local Authority on a number of occasions to discuss the principle of development and the detailed design of the proposals.
- 4.2 The initial pre-application meeting was undertaken in 2018. At that stage it was intended that only the warehouse to the rear of the Site would be developed, although the pre-app submission did indicate how a future redevelopment of the Site including the main former office building (now in residential use) might come forward for development. Through the response officers indicated a strong preference for a comprehensive redevelopment of the Site including a replacement residential element to front Blackburn Road and improve that fragmented streetscene once and for all. The Applicant agreed to completely re-cast their proposals accordingly. The result was a the comprehensive proposal involving more than tripling the quantum of development and introducing a new architect who could better articulate the new challenges of optimising the residential use of the Site and addressing the public-facing elements of Blackburn Road.
- 4.3 Following a period of substantial re-design, the Applicant engaged with the Council for a second pre-application meeting in May 2019. In this meeting, officers confirmed they were supportive of the proposed land use and quantum of each use. Detailed discussions around design and how the development responded to the surrounding areas followed and the feedback has been incorporated into the design of the application scheme.
- 4.4 Following the second pre-application meeting, the applicant was encouraged by Officers to participate in the Council's Design Review Panel. This process was undertaken in September 2019. Following the panel review, the architects underwent a comprehensive analysis of the comments raised and utilised these to inform the scheme revisions. A full overview of the design evolution in response to the DRP comments is provided in the DAS.
- 4.5 In January 2020, the Applicant engaged with the Council for a third round of pre-application discussions. This meeting focused on the detailed design of the proposal and how it would interact with the surrounding areas.
- 4.6 Following the publication of the Sites Allocation Local Plan Documentation in early 2020, the Applicant team submitted representations to Chapter 09 (West Hampstead Interchange Area) of the draft documentation. The representations critiqued the development capacity of the application site and the surrounding areas as well as commenting on other proposed site allocations.
- 4.7 Prior to submitting these representations, and to inform the discussions, Boyer met with LB Camden to discuss the emerging document and how the Site was referred to within that document. The discussions were informal however provided an opportunity for the applicant team to engage with officers in regards to the design guidance for this area.

*Public Consultation*

- 4.8 Through the preparation of this planning application, the Applicant has engaged in a number of initiatives for public engagement. This included the Council's formal pre-application processes including Development Management Forum, as well as hosting a public consultation event on site to discuss the proposals.
- 4.9 On the 18<sup>th</sup> November, the Applicant presented the proposed development to the Council's Development Management Forum. This event was open to the public and allowed the project team to present the scheme to local people with a question and answer session facilitated by Planning Officers. A number of Local and Ward Councillors were present and were broadly supportive of the development.
- 4.10 The Applicant held their own public consultation event on the 4<sup>th</sup> December. The event was held at the Site and was advertised to people living and working within a 500m radius of the site. An independent leaflet drop service was utilised and two separate leaflet campaigns were employed. This approach was utilised to ensure as many people in the vicinity were notified of the proposals as possible. The leaflets distributed provided an overview of the project and provided contact details of relevant consultants so anyone who could not attend the event could be informed of the proposals.
- 4.11 The event was well attended with the majority of people being supportive of the development. A number of people raised questions following the event which Boyer responded to appropriately.
- 4.12 It was noted that the most public responses were raised through the Development Management Forum and this set up facilitated the most focused discussion.
- 4.13 In February 2020, the Applicant attended the Developer's briefing. This event was held at the Council and was attended by members of the Planning Committee, officers and the Applicant team.
- 4.14 Alongside these discussions, the Applicant team has had involvement with the West Hampstead Neighbourhood Forum. The Applicant has proactively engaged with members of the Neighbourhood Forum to inform them of the proposals and the planning status of the scheme.
- 4.15 Concurrent to all the formal consultation events that have been undertaken, the Applicant has continuously engaged with surrounding landowners and neighbours to inform them of the emerging proposals. Conversations have been focused on the owners of Nido Student Building, number 11 Blackburn Road and the Builder's Depot at number 14.
- 4.16 In regards to Nido, the Applicant has proactively engaged with the operators of the building and fully informed them of the proposed development. They have been party to the emerging plans and proposals and they have not raised any comments or objections to the proposals.

- 4.17 Given the proximity to number 11 Blackburn Road, the applicant has also proactively engaged with the landowner there. As has been addressed in the preceding section, a now expired planning permission was present at this site. Until May 2020, there was opportunity for this landowner to implement their permission but that never came forward.
- 4.18 Throughout the pre-application process the Applicant has maintained a dialogue with the owners of 11 Blackburn Road. These discussions have included two full presentations of the proposals with both the owner and members of the professional team in attendance. Discussion at these meetings has included reference to the relationship of the proposed scheme to the now lapsed consented scheme as well as high level discussions on alternative development proposals at number 11.
- 4.19 Following each presentation the adjoining owners were invited in writing to comment on the proposals and put forward any suggestions of matters they would wish to be considered in the finalisation of the plans. No comments have been received from them and no objections raised by them to any part of the presented proposals
- 4.20 The Applicant has also engaged in discussions with the owner and occupier of the Builder's Depot at 14 Blackburn Road. As above, efforts have been made to engage them in the development process and gauge their views on the proposals. The Applicant has met with the owners of number 14 on a number of occasions and discussed the emerging proposals at length. The landowners were extremely encouraging of the proposals in terms of land use and design and were pleased to see the continued regeneration of the area. In regards to their own site, they acknowledged the ongoing viability issues of the builder's yard and advised the Applicant team that they were in the early stages of appointing a design team to explore development options on their site. No objections were raised throughout this process.
- 4.21 Further to communicating with surrounding neighbours, the Applicant team has also discussed the proposed development with Local Councillors. An approach was made to Cllr Nazma Rahman, Cllr Peter Taheri and Cllr Shiva Tiwari to inform them of the proposals. Given Cllr Rahman's position on the Development Management Committee, she did not engage with the applicant to maintain impartiality. However she was present at the Technical Briefing.
- 4.22 At the Development Management Forum, Cllr. Tiwari was in attendance and the Applicant team took time to have discuss the scheme with him. He was generally supportive of the proposals and recognised the public benefits that would be realised as a result of the proposals. Particular reference was made to the impact on Billy Fury Way and any improvements to this area were to be encouraged and supported.
- 4.23 In summary, the Applicant has engaged proactively with the Local Community, surrounding residents and Local Councillors. Every effort has been made to proactively engage with the relevant stakeholders and give them the opportunity to discuss the proposals and raise any concerns that they have. Overall the response has been positive and no immediate neighbours have raised objections to the proposed development.

## 5. PLANNING POLICY CONTEXT

### *Development Plan*

- 5.1 Planning legislation requires that planning applications should be determined in accordance with the Development Plan unless material considerations consider otherwise. The Development Plan for Camden comprises the following documents;
- The Local Plan (2017)
  - The London Plan (2016)
  - Fortune Green and West Hampstead Neighbourhood Plan (DATE?)
- 5.2 At the time of writing, the Mayor was in the advanced stages of preparing the new London Plan which will replace the 2016 version. Given the advanced nature of this document, the emerging policies are assessed and given due weight as it is anticipated that by the time of determination, the plan will be adopted.
- 5.3 The relevant policies from the Development Plan are listed in the table below;

Camden Local Plan	Fortune Green and West Hampstead Neighbourhood Plan	The London Plan
H1 Maximising housing supply	Policy 1 Housing	Policy 2.13 Opportunity Areas and Areas for Intensification
H2 maximising the supply of self-contained housing from mixed use schemes	Policy 2 Design and Character	Policy 2.15 Town Centres
H3 protecting existing homes	Policy 4 West Hampstead Growth Area	Policy 3.3 Increasing Housing Supply
H4 Maximising the supply of affordable housing	Policy 5 Public Transport	Policy 3.4 Optimising housing potential
H5 Protecting and improving affordable housing	Policy 6 Public Transport Facilities	Policy 3.5 Quality and design of housing developments
H6 Housing mix and choice	Policy 7 Sustainable Transport	Policy 3.6 Children and young people's play and informal recreation facilities
H7 Large and small homes	Policy 8 Cycling	Policy 3.7 Large Residential Developments
C1 Health and wellbeing	Policy 9 Pavements and Pedestrians	Policy 3.8 Housing Choice
C2 Community Facilities		



<p>C3 Cultural and leisure facilities</p> <p>C5 safety and security</p> <p>E1 Economic Development</p> <p>E2 Employment premises and sites</p> <p>A1 Managing the impact of development</p> <p>A4 Noise and vibration</p> <p>A5 Basements</p> <p>D1 Design</p> <p>CC1 Climate change mitigation</p> <p>CC2 Adapting to climate change</p> <p>CC3 Water and flooding</p> <p>CC4 Air quality</p> <p>CC5 Waste</p> <p>TC4 Town centre uses</p> <p>T1 Prioritising walking, cycling and public transport</p> <p>T2 parking and car free development</p>	<p>Policy 12 Business, Commercial and Employment Premises and Sites</p> <p>Policy 13 West Hampstead Town Centre</p>	<p>Policy 3.9 Mixed and balanced communities</p> <p>Policy 3.10 Definition of affordable housing</p> <p>Policy 3.11 Affordable Housing Targets</p> <p>Policy 3.12 Negotiating affordable housing</p> <p>Policy 3.13 Affordable housing thresholds</p> <p>Policy 4.1 Developing London's Economy</p> <p>Policy 4.3 Mixed use development and offices</p> <p>Policy 4.4. Managing industrial land and premises</p> <p>Policy 5.1 Climate change mitigation</p> <p>Policy 5.2 Minimising carbon dioxide emissions</p> <p>Policy 5.3 Sustainable design and construction</p> <p>Policy 5.5 Decentralised energy network</p> <p>Policy 5.6 Decentralised energy in development proposals</p> <p>Policy 5.7 Renewable energy</p> <p>Policy 5.9 Overheating and cooling</p> <p>Policy 5.10 Urban greening</p> <p>Policy 5.11 Green roofs and development site</p>
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### ***Other Material Considerations***

#### ***National Planning Policy***

- 5.4 The National Planning Policy Framework (NPPF) was updated in March 2019 and sets out the strategic planning aspirations for development within England. This along with National Planning Practice Guidance (NPPG) are material considerations in determination of planning applications. The documents set out the Government's economic, environmental and social planning policies and guidance and identifies that the purpose of the planning system is to promote sustainable development. The NPPF advises that the primary aim of development management is to foster the delivery of sustainable development, not to hinder or prevent development from taking place. The NPPF supports applicants engaging in pre-application discussions.
- 5.5 Paragraph 11 of the NPPF identifies the core planning principles which should underpin both plan making and decision making, this includes being genuinely plan led, not simply being about scrutiny, proactively driving and supporting sustainable economic development, seeking to secure high quality design and a good standard of amenity, promoting the vitality of urban areas, supporting the transition to low carbon futures and promoting mixed use developments.
- 5.6 The NPPF supports a presumption in favour of sustainable development and sets out at Para 11 that 'for decision taking this means: approving development proposals that accord with the development plan without delay'.

#### ***Supplementary Planning Documents***

- 5.7 To support the Local Plan, Camden have adopted a number of supplementary planning documents. Of relevance to this proposal are the following documents;
- Air Quality CPG 2018
  - Amenity CPG 2018
  - Basements CPG 2018
  - Community uses, leisure and pubs CPG 2018
  - Design CPG 2019
  - Developer Contribution CPG 2019
  - Employment Sites and business premises 2018
  - Energy efficiency and adaptation 2019
  - CPG2 Housing 2019
  - Public open space CPG 2018

- Transport CPG 2019
- Water and flooding CPG 2019

### ***Emerging planning policy***

5.8 At the time of submission, there are a number of emerging planning documents that are currently under consideration. These are summarised below.

#### *Draft London Plan*

5.9 As outlined above, the Mayor is in the advanced stages of preparing the new London Plan. The Intend to Publish version of the plan was published in December 2019. Given the advanced nature of the documentation, the relevant policies are reviewed and given due weight throughout this submission. The policies of relevance to this development are listed below;

- Policy SD1 Opportunity areas
- Policy CG1 building strong and inclusive communities
- Policy GG2 making the best use of land
- Policy GG3 creating a healthy city
- Policy GG4 delivering the homes Londoner's need
- Policy D1 London's form, characteristics and capacity for growth
- Policy D3 Optimising site capacity through the design led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive Design
- Policy D6 Housing Quality and Standards
- Policy D7 Accessible Housing
- Policy D8 Public Realm
- Policy D14 Noise
- Policy H1 Increasing housing supply
- Policy H2 Small Sites
- Policy H4 Delivering Affordable Housing
- Policy H7 Monitoring of Affordable Housing
- Policy H9 Ensuring the best use of stock

- Policy H10 Housing size mix
- Policy S4 Play and informal recreation
- Policy G1 Green Infrastructure
- Policy G5 Urban Greening
- Policy SI1 Improving air quality
- Policy SI2 Minimising Greenhouse gas emissions
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI12 Flood risk management
- Policy SI13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T3 transport capacity, connectivity and safeguarding
- Policy T4 assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 car parking
- Policy T6.1 Residential parking

*Draft Local Planning Documents*

- 5.10 The London Borough of Camden has a number of emerging planning documents which are relevant for the proposed development.
- 5.11 In early 2020, the Council consulted on a Draft Sites Allocations' document. This document outlined a number of potential development sites across the borough and was open for comments and representations from interested parties. The Applicant submitted representations to the draft document with particular focus on Chapter 9- West Hampstead Interchange Area. In their response the Applicant commented on the proposed development capacity that had been outlined in the document and stated that this should be increased in line with the London Plan density matrix and area for intensification.

## 6. ASSESSMENT OF THE PROPOSALS

- 6.1 The following section assesses the proposed development against the Development Plan and any other material considerations relevant to determination of the application.

### *Principle of Development*

#### *Location of development*

- 6.2 The principle of mixed use development at this location is considered acceptable and in line with the adopted and emerging planning policies.
- 6.3 The NPPF outlines the importance of making good use of land in Chapter 11. Furthermore, the London Plan highlights the importance of utilising brownfield land. Policy 3.3 (increasing housing supply) states that boroughs should realise the potential of brownfield land. Moreover, the draft London Plan Intend to Publish version (December 2019) states that in order to make successful and sustainable places, development on brownfield land should be encouraged. Furthermore, in order to increase housing supply (policy H1) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans.
- 6.4 The Site is located within the West Hampstead Interchange which is identified as a Growth Area in the Local Plan (Policy G1) and an Intensification Area in the London Plan (Policy 2.13). These designations seek to promote development around existing transport connections to secure uplift in development capacity. The sustainable location of such sites is a focus for new development and local authorities should seek to secure high quality development on such sites (Policy G1).
- 6.5 Overall the allocation of the Site in both the Local Plan and the London Plan confirms the acceptability of mixed use development in this location.

#### *Commercial space*

- 6.6 The need for high quality commercial space across London is outlined in the London Plan. Policy 2.13 (Opportunity Areas and Areas for Intensification) and the supporting information states an indicative employment capacity of 400 new jobs within the West Hampstead Interchange allocation. This requirement confirms the principle of providing commercial floorspace within this area.

- 6.7 At the local level, the importance of high quality commercial space is also reiterated. Local Plan Policy E1 (Economic development) seeks to secure a successful and inclusive economy by creating conditions for economic growth. The policy seeks to support businesses of all sizes, maintain a stock of premises, direct new office development to growth areas, central London and town centres and support proposals for intensification of employment sites. Policy E2 (Employment premises and sites) seeks to protect sites suitable for business use and will consider higher intensity redevelopment of premises suitable for business use provided that: the level of employment floorspace is increased or maintained; the premises include floorspace suitable for start-ups, small and medium enterprises and managed workspace where viable.
- 6.8 Policy G1 identifies a need for 695,000sqm of office floorspace and key locations of growth for such space includes West Hampstead Interchange which this Site sits within. The supporting justification of this policy confirms that a key priority in addition to provision of housing is to support business and job provision by providing or retaining suitable premises.
- 6.9 The importance of employment provision and economic development is also set out in the Neighbourhood Plan. Policy 12 of the Neighbourhood Plan supports developments that provide sites and premises for business, commercial and employment use and sets out a presumption in favour of retaining existing employment sites with the level of floorspace retained or increased.
- 6.10 The Site was previously in B1a office use. The proposals would retain and intensify that use, which is in line with policy requirements seeking to protect such uses. Given the Site's location within a Growth Area, with excellent accessibility to public transport, and an area identified as appropriate for locating new office development it is considered that the redevelopment of the Site to deliver an increase in B1a office floorspace in the form of a modern and efficient office building of high quality design, would be appropriate for the location and in line with the overarching policy approach to retain or improve existing employment sites.
- 6.11 In addition, the proposed offices would be designed to provide space that would appeal to small and medium sized enterprises with ability to include co-working space and space for start-up events. The provision of commercial floorspace as part of this development would accord with the Local Plan policy aims.
- 6.12 There is a demonstrable demand for commercial development within the Borough of Camden and specifically within the West Hampstead Interchange Area. The provision of such space at this development site is therefore acceptable in principle.

#### *Residential*

- 6.13 Further to the need for employment space across the borough, Camden has an identified housing need which is outlined in the adopted and emerging Local Plan. The London Plan (Policy 2.13) states that the West Hampstead Interchange Area (Site 45 of the Plan) has the capacity to accommodate a minimum of 800 new homes.

- 6.14 The emerging London Plan has reviewed and assessed the housing requirements across London. For Camden, the revised figure sets a 10 year housing target of 10,380 dwellings across the plan period. This is an annualised target of 1,038. Furthermore the Housing Delivery Test (HDT) results published in February 2020 give an overview of the 2019 delivery and any sanctions. For Camden, their delivery was 87% of their previous target. As this delivery fell below the threshold, the Local Authority are required to put an 'Action Plan' in place to address how the shortfall will be addressed. At the time of writing, Camden had not published their Action Plan.
- 6.15 The need for housing is also outlined in the Local Plan. Policy H1 of the Local Plan sets a housing target of 16,800 additional homes across the plan period. The priority provision will focus on self-contained homes and the Local Authority will seek an additional 11,130 self-contained homes to be delivered in the borough.
- 6.16 The proposed development will include 53 residential units split across two blocks. The 2014 Prior Approval consent at the Site establishes that the principle to residential development at this site is accepted in principle.
- 6.17 In summary, the proposed development would comply with policies 2.13 of the London Plan as well as the emerging housing policies in the draft London Plan. The proposed development accords with Policies H1, H2 and H3 of the Local Plan and will see the delivery of 53 high quality dwellings which will contribute towards the borough's housing targets. The proposals are therefore considered to be compliant with the strategic targets and planning policies with regards to housing.
- 6.18 Overall, the proposed mix of residential and commercial floorspace accords with the requirements of Policies G1 and H2 as outlined above. In terms of amount, it is considered that the provision of uses is balanced and appropriate for the site and the surrounding context. This quantum has been assessed by the Council through the pre-application discussions and officers have been supportive of the provision.

### ***Housing Mix***

- 6.19 The importance of delivering a good mix of residential dwellings is expressed in planning policy. Both the adopted and draft London Plans require proposals to deliver a good mix of housing in terms of unit size. When determining the appropriate mix, applications should have regard to local need for housing.
- 6.20 Camden has adopted a dwelling priority table as part of Policy H7 of the Local Plan. For market housing, the priority units are 2 and 3 bedroom dwellings. However the Council recognises that all dwellings, of all sizes are required across the borough so the table is not a prescriptive guide and should be used to inform dwelling mix in new developments. It is noted that Camden only apply their mix policies to **uplift** of dwellings.



6.21 When assessing the mix, it is important to remember that the proposals provide an uplift of 24 units, the remaining 29 units are a like for like replacement of existing provision. Of the existing 29 units, 28 comprise 1 bedroom apartments and there is one 2 bedroom unit. As such, the established unit mix is predominantly one bedroom (studio units) units.

6.22 The proposed mix of dwellings is outlined in the table below;

Unit size	Number	%
1 bed 1 person	25	47
1 bed 2 person	17	33
2 bed (4 person)	4	7.5
3 bed (5 person)	7	13.2

6.23 The proposed mix, as demonstrated above comprises a balanced mix that is suited to the location and accords with the existing mix established on the site. Given the central location (between railway lines) the high PTAL and accessibility as well as the pressing need for new homes, this Site lends itself to a higher density development and as such a higher proportion of smaller units is acceptable.

6.24 In summary, the Site lends itself to high density living which is better suited to smaller unit sizes. As such, the proposed development would deliver an appropriate mix of unit sizes.

***Standard of residential accommodation***

6.25 Policy 3.5 of the London Plan (and draft Policy D6) states that all housing developments should be of the highest quality internally, externally and in relation to their context and wider environment. Furthermore, the design of new developments should enhance the quality of local places and take into account the physical context, local character, density, tenure and land use mix.

*Unit sizes*

6.26 The London Plan sets out minimum space standards for new dwellings which align with national space standards. All of the proposed residential units would meet or exceed the nationally described space standards and would deliver high quality living spaces.

*Aspect*

6.27 Of the 53 units proposed 68% benefit from dual aspect outlooks. There are no single aspect north facing units proposed as part of the scheme. All of the proposed units would benefit from good levels of outlook and daylight and sunlight.

*Amenity space*

- 6.28 The London Plan seeks 5sqm per 1-2 person dwelling and additional 1sqm for each additional occupant to be provided as external private amenity space. Furthermore, Policy A2 of the Local Plan outlines the Council's approach to open space. The Council will seek the protection of existing open space and will encourage the provision of private amenity space in new developments.
- 6.29 All units proposed would have access to private amenity space. Full details of the breakdown of provision is provided in the supporting accommodation schedule.

*Daylight and Sunlight*

- 6.30 In accordance with the Council's requirements, a Daylight and Sunlight Assessment has been submitted to support the application. This has assessed both the internal and external DLSL levels as a result of the development.
- 6.31 Internally, the report confirms that the development delivers a good standard of daylight and sunlight for proposed dwellings when assessed against the BRE Guidance and British Standard.

*Internal Layout*

- 6.32 The proposed development has been carefully designed to ensure a high quality of residential accommodation. As is shown on the supporting plans, both blocks A and B would have their own entrance and core which serves all levels of the block.

*Noise*

- 6.33 Policy A4 of the Local Plan relates to noise and vibration. The Council will seek to manage and control noise and vibration and all developments must take account of the Council's Noise and Vibration thresholds.
- 6.34 In accordance with the policy, an acoustic assessment has been undertaken and supports this planning application. The report, commissioned by Ion Acoustics confirms that with suitable consideration of the relevant facades, appropriate internal noise levels can be achieved. Subject to specific planning conditions, the development is acceptable in regards to noise.

*Design*

- 6.35 The importance of good design is prescribed through all levels of planning policy. The NPPF outlines how the creation of high quality buildings and places is fundamental to what the development process should achieve (paragraph 124). Design should be considered throughout the development process and discussions between the Applicant, Council and other stakeholders should be considered (paragraph 128).

- 6.36 The London Plan (Policy 3.5) states that all developments should be of the highest quality internally, externally and in relation to their surrounding context. Proposals should enhance the quality of local places taking into account the physical context, local character, density, tenure and land use mix.
- 6.37 The Camden Local Plan also has specific policies relating to design within the borough. Policy D1, states that new developments must be of a high quality design. The council will require proposals to respect local context and character; preserve and enhance the historic environment and heritage assets; be suitable in terms of construction mechanisms and method, utilise high quality materials that complements local character; is inclusive and accessible for all, promotes health; is secure and designed to minimise crime and anti-social behaviour; incorporates outdoor amenity space; and provides a high quality of accommodation.
- 6.38 As is outlined in the supporting DAS, care and attention has been paid to ensure that the design of the proposed development is appropriate for the surrounding context. A detailed character study has been undertaken which has resulted in a comprehensive assessment of the prevailing character to ensure the proposals are well designed for the surrounding areas.
- 6.39 Further details of the design matters of the proposals are assessed below.

#### *Layout*

- 6.40 The layout of the proposed development has evolved through the preparation of this application and in response to local consultation. The proposed layout will comprise three blocks, linked by a lower ground floor that extends across the whole of the site.
- 6.41 Blocks A and B front Blackburn Road and will comprise commercial space at the ground floor with residential units at the upper floors. Block C, located at the rear of the Site (backing onto the railway line) is a narrow block comprising commercial space at all levels.
- 6.42 Between the blocks is a large area of publicly accessible open space which increases the permeability of the development and improves the public realm. The layout provisions is in accordance with the requirements of Policy D1 which seeks to improve pedestrian permeability.
- 6.43 Blocks A and B are set back resulting in a widened footway along Blackburn Road. This provision is assessed in further detail through the landscaping and public realm discussion.

#### *Scale and Mass*

- 6.44 In order to support the development, a full character and context study has been undertaken to understand the surrounding area. Full details of this are provided in the supporting Design and Access Statement.

- 6.45 The proposed development comprises three blocks standing at 5, 6 and 9 storeys (plus basement). Given the height of Block C, it is necessary to refer to the relevant tall buildings policy. Attention must be paid to how the building relates to the surroundings (at the base and roof level), the historic context of the surroundings, the relationship to surrounding buildings as well as the impact on over shadowing of public spaces. Furthermore, proposals must reference how they contribute to increasing the pedestrian permeability and improved public access.
- 6.46 Block A comprises 5 storeys and fronts Blackburn Road. This block has a wider floorplate than Block B which is taller and slightly narrower. This provision has been considered to ensure the views through the site are retained and Block C remains visible and central focus. The height of Block A is considered appropriate for the surrounding area and the neighbouring buildings.
- 6.47 Block B stands at 6 storeys and has a narrower floorplate compared to Block A. The gradient of Blackburn Road ensures that the increased height of Block B is acceptable and reads appropriately with the adjacent student accommodation building. The height of Block B is appropriate given the relationship with the Nido Student Building which is situated to the east of Block B and comprises 9 storeys.
- 6.48 Block C is the tallest block in the development and stands at 9 storeys. The height of the development has been strategically placed at the rear of the site as this backs onto the railway line and is further away from surrounding buildings. Block C has a narrow floorplate so the silhouette of the block is elegant and visible through the scheme.
- 6.49 Further details of the proposed height of the development is provided in the DAS.
- 6.50 It is considered that the proposed height of the development and the massing and scale of Blocks A, B and C is appropriate for the site and the surrounding context. The proposals accord with the requirements of Policy D1 and are considered acceptable.

#### *Basement*

- 6.51 The proposed development incorporates a lower ground floor across the footprint of the 3 blocks.
- 6.52 Camden's Local Plan provides guidance on basements through Policy A5. The policy states that basements must not cause harm to neighbouring properties, the structural, and ground or water conditions of the area, the character or amenity of the area, the architectural character of the building or any surrounding significant heritage assets.
- 6.53 In accordance with the requirements of Policy A5, a Basement Impact Assessment (BIA) has been prepared in support of the application. The document, prepared by Elliott Woods has been written in accordance with Camden's Basement Impact Assessment Pro-forma.

- 6.54 The report outlines the results of the ground investigation and details the site description, history and screens and scopes the proposed works. The report confirms that the BIA has not indicated any concerns regarding the effects of the proposed basement on the site and the surrounding areas, it is concluded that the impacts identified can be mitigated by appropriate design and standard construction practices.

*Landscaping and public realm improvements*

- 6.55 Policy D1 of Camden's Local Plan requires all development to provide a high standard of landscape design which is contextual.
- 6.56 The proposed development is supported by a detailed landscaping plan which sets out the proposed improvements. The main improvement proposed as part of the development is the provision of publicly accessible landscaped space in the centre of the development which will soften and green the surrounding area. Additionally the proposals widen the existing footway on Blackburn which will make marked improvements to the public realm in this area.
- 6.57 Full details of the proposed landscaping are provided in the supporting plans and documentation prepared by Camlins.

***Neighbouring residential amenity***

- 6.58 Policy A1 (managing the impact of development) outlines how the Council will protect the amenity of neighbours through developments. The Council will grant permission for development unless this causes unacceptable harm to surrounding amenity. Particular reference will be paid to visual amenity including privacy and outlook; daylight and sunlight; transport impacts, noise and vibration levels, impact to infrastructure as well as impacts such as dust, odour and fumes.
- 6.59 The overarching theme of the policy is to ensure that the quality of life of surrounding residents is protected to ensure strong and successful communities.
- 6.60 This development has been designed with these amenity principles at the centre of the process. These items are addressed in detail below.

*Relationship with neighbouring sites*

- 6.61 In the design of the proposed development, attention has been paid to the relationship with surrounding neighbours and potential development sites. The location of the blocks is considered to make the best use of the site whilst not adversely impacting on neighbouring sites.
- 6.62 The proposed blocks are positioned to ensure good separation distances both between themselves and with surrounding buildings. The separation between Block A and the closest surrounding building is 8.3m. For Block B the distance is 13. It is noted that this distance is a reduction compared to the existing building. Block C has been strategically placed to ensure no impact on surrounding residential amenity

*Daylight and Sunlight*

- 6.63 To ensure no negative impact on the surrounding buildings in regards to daylight and sunlight, a full assessment has been undertaken by Point 2. The report assesses the impact of the development against surrounding neighbours and confirms that the scheme is respectable in regards to the impact on surrounding neighbours. Any impacts are within the BRE guidelines and when balanced with the need for inner city housing are considered to be acceptable.

***Transport and Servicing****Car parking*

- 6.64 The NPPF outlines the importance of considering highways and transport requirements at the earliest stage of development (paragraph 102), and this approach has been undertaken through this application. A Transport Statement has been prepared by TTP and accompanies this application. The Transport Statement sets out in detail how the proposed development meets policy requirements in relation to transport.
- 6.65 Policy T2 requires all new developments to be car free. The proposed development accords with the policy requirement and is car free. The only parking spaces provided onsite comprise the 5no. of disabled parking bays located to the east of Block B for use by mobility impaired occupants of the residential buildings or working in the commercial accommodation.
- 6.66 The development will commit through S106 agreement to ensure that any new residents cannot access residential parking permits for the surrounding streets.
- 6.67 Additionally, TTP have prepared Travel Plans for both the residential and commercial uses. The travel plans outline management tools deemed necessary to enable residents and visitors to make more informed decisions about their travel, which at the same time, minimises the adverse impacts of their travel on the environment. Full details of the measures outlined are provided in the accompanying Travel Plans.

*Cycle parking*

- 6.68 A total of 176 cycle parking spaces are proposed as part of the development. This comprises both residential and commercial cycle storage.
- 6.69 The residential cycle storage is provided at the ground floor of Block A. This provision is lockable and covered in accordance with London Plan requirements.
- 6.70 The commercial cycle storage is provided at the lower ground floor of Block C. This is also served by showering and changing facilities. These amenities are well situated to actively encourage employees and visitors of the commercial floor space to travel to and from the site by bike.

### *Servicing*

- 6.71 Policy A1 of the Local Plan seeks to manage the impact of development on surrounding occupiers and neighbours. Part h of the policy refers to how development must make provisions for appropriate servicing through suitable management. Furthermore, developments are encouraged to provide onsite servicing provisions where possible to protect the existing highway network.
- 6.72 To support the application, TTP have prepared a draft servicing plan (the final version is intended to be secured via planning condition). The initial draft outlines that delivery and servicing activity will take place in a combination of on-site provision using the loading area and on-street in accordance with the existing situation.
- 6.73 Based on TRICs data, it is anticipated that the proposed development will yield an additional 3 deliveries per day. The plan states that these would usually take place using LGVs, cars or bikes and the majority of vehicles will be able to stop on site.
- 6.74 For commercial deliveries, these will occur between 8am and 6pm Monday to Friday whereas the residential deliveries will be more ad hoc and cannot be restricted.

### ***Construction Management***

- 6.75 Further to managing servicing arrangements through new developments, the Council will manage the delivery and movement of goods through the construction process. Policy T4 of the Camden Local Plan will promote sustainable movement of goods and materials and will seek to minimise the movement of goods via roads.
- 6.76 In accordance with this Policy, a Construction Management Plan (CMP) has been prepared by TTP Consulting. The report, which follows the Council's pro forma, sets out the measures that will be taken to ensure the development is appropriate through the construction phase. The applicant has a sound understanding of the construction constraints along Blackburn Road having been involved in the development of Nido and the conversion of 13 Blackburn Road. This experience has informed the CMP and will inform the ongoing strategy for management.
- 6.77 The completion of the CMP in accordance with the Council's pro-forma complies with the requirements of Policy T4 and should be accepted.

### ***Sustainability and Energy***

- 6.78 The London Plan includes policies relating to energy and sustainable development. Policy 5.2 states that development proposals should make the fullest contribution towards minimising carbon dioxide emissions in accordance with the energy hierarchy be lean, be clean be green. It goes on to set out carbon reduction targets that major developments would be required to meet. Policy 3.5 of the London Plan seeks the highest standards of sustainable design and construction. This approach is also reiterated through the draft London Plan in policy SI2.

- 6.79 Local Plan Policy CC1 outlines the approach to climate change mitigation in the borough.
- 6.80 In order to ensure the development is sustainable and promotes sustainable practices, an energy and sustainability reports have been prepared by Chapmans. For energy, the report outlines how the development incorporates measures to meet both the London Plan energy hierarchy as well as Camden's targets. The development will achieve the following targets;
- 10% and 15% reduction in regulated carbon emissions through energy efficiency measures (Be Lean) for the domestic and non-domestic areas of the proposed development
  - An on-site reduction of 35% beyond Part L 2013 for the proposed development; and
  - A renewables contribution of 20%
- 6.81 These targets are met through a number of passive design features such as high levels of insulation to limit heat loss, airtight construction, thermal bridging, optimising glazing to solid levels to minimise heat loss as well as efficient double glazing. Additional sustainable construction methods are also being explored to improve the sustainability and energy efficiency of the development.
- 6.82 These measures mean the development achieves a 16% and 26% reduction in regulated carbon emissions for the 'Be Lean' scenario respectively. The proposed development achieves an overall reduction of 59% carbon emissions over Part L using SAP10 carbon factors and a 35% renewable contributions.
- 6.83 For the non-residential parts of the development, a BREEAM assessment has also been undertaken by Chapmans. The report confirms that the pre-assessment has been undertaken and this will allow for the non-domestic elements of the development to achieve a score of approximately 70.3% on the BREEAM scale.

### ***Air Quality***

- 6.84 Policy 7.1 of the adopted London Plan seeks to improve air quality in London and requires development proposals to minimise exposure to poor air quality, promote sustainable design and construction and be at least air quality neutral. Emerging Policy SI1 seeks to improve the air quality across the city.
- 6.85 Local Plan Policy CC4 outlines the Council's approach to ensuring good air quality across the borough. In accordance with the policy, an Air Quality Assessment (AQA) has been undertaken to support the development.
- 6.86 The assessment, undertaken by AECOM confirms acceptability of the development in air quality terms.



### ***Flood Risk and SUDs***

- 6.87 Policy CC3 of the Local Plan refers to water and flooding. The Council will seek to ensure that development is not at risk of flooding and does not increase the flood risk elsewhere. Developments should incorporate water efficiency measures, avoid harm to the water environment and improve water quality, incorporate flood resilient measures and utilise sustainable drainage measures.
- 6.88 To support the development, a SUDs strategy has been incorporated and is set out in the Structural Engineering Report and Subterranean Construction Method Statement prepared by Elliott Wood. The report outlines the two main approaches to drainage will be the provision of blue roofs and/or an attenuation tank in the basement.

### ***Biodiversity and Ecology***

- 6.89 Policy A3 of the Local Plan refers to Biodiversity. The policy states that the Council assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the proposals. Furthermore any demolition or construction phases must be planned to reduce the impact on surrounding habitats.
- 6.90 In order to inform the development, an ecology report has been undertaken by Clarkson & Woods. Their report concludes that the proposed development is not anticipated to adversely impact any ecological receptors, with the potential exception of roosting bats and nesting birds. However avoidance and mitigation measures are proposed which ensure reduced impacts. The report confirms compliance with Policy A3.

### ***Ground Contamination***

- 6.91 Policy 5.21 of the London Plan supports the remediation of contaminated land and will support proposals that bring contaminated land back into beneficial use. Appropriate measures should be taken to ensure that development does not activate or spread contamination.
- 6.92 GEA were instructed to undertake a Ground Contamination assessment to inform the foundation design. The report informs the Basement Impact Assessment and provides an overview of the ground conditions.

### ***Inclusive Design***

- 6.93 Policy 7.2 of the London Plan seeks new development to achieve the highest standards of accessible and inclusive design. The supporting DAS provides details on the accessibility of units and commercial spaces in accordance with the Building Regulations.

### ***Crime Prevention***

- 6.94 The development has been carefully designed having regard to the principles of the Secured by Design initiative. Bin and cycle stores would be secured and sheltered reducing opportunities for crime. Similarly, residential entrances do not include blind spots or other features which might allow for anti-social behaviour or crime.
- 6.95 It is considered that the proposals have incorporated appropriate design features to minimise crime and antisocial behaviour and would represent a safe development and environment for future residents.
- 6.96 As well as introducing crime prevention measures within the development, the proposals improve the public safety of the surrounding areas. The quality of Billy Fury Way has been heavily referenced in pre-application discussions as well as through public consultation events. The proposed development would enhance the passive surveillance over Billy Fury Way which is a recognised method of improving the safety and security of public spaces.
- 6.97 At the Blackburn Road frontage, the development will also improve the public safety. Currently the street lighting is poor quality and the road is often in darkness with a number of blind spots being present. The proposals will increase the lighting levels along Blackburn Road as well as increasing the passive surveillance and footfall. These provisions will improve the safety and security of Blackburn Road and should be a welcome benefit of the development.

## 7. CONCLUSION

7.1 This Planning Statement has been prepared on behalf of West Hampstead Investment Partnerships Ltd. for the proposed development at 13 Blackburn Road.

7.2 The proposals comprise;

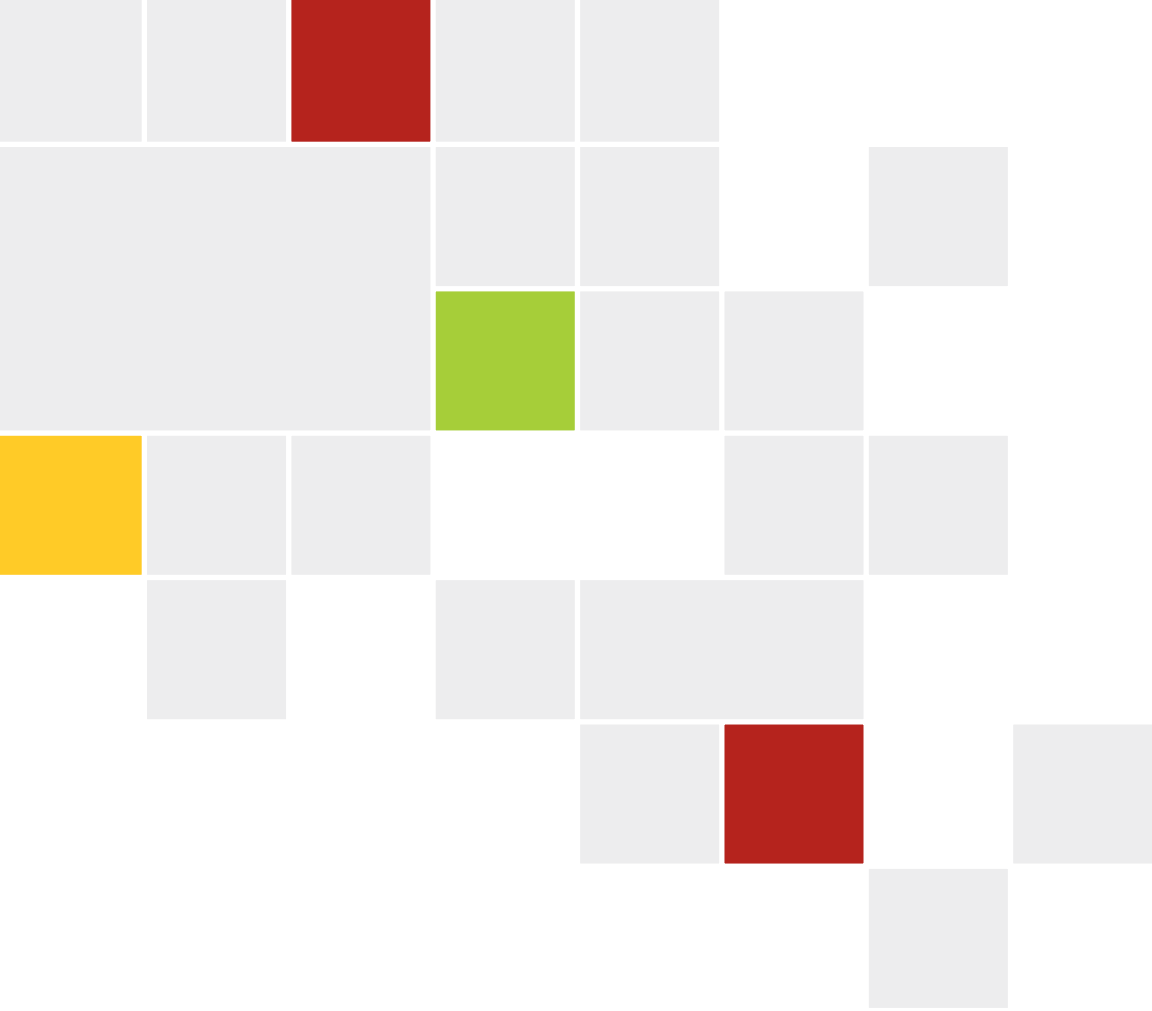
*Demolition of existing building and construction of three buildings between 1 and 9 storeys (plus basement) in height comprising 53 residential dwellings, up to 4,802sqm of commercial floorspace, publically accessible space, landscaping and resident's facilities including cycle and refuse facilities.*

7.3 The propose development comprises a number of public benefits including;

- Regeneration and optimisation of a highly sustainable and accessible brownfield site
- Demolition of existing buildings which are tired and at the end of their useful life
- Construction of three no. blocks (A, B and C) comprising 5, 6 and 9 storeys (plus lower ground floor) as well as a single storey linking 'pavilion'
- Inclusion of high quality architecture which is appropriate for the site and the surrounding context
- Provision of 53 new 1, 2 and 3 bedroom homes across Blocks A and B
- A contribution towards the delivery of affordable housing
- Provision of 4,802sqm of new commercial space located at the ground and lower ground floors of Blocks A and B and throughout Block C
- Reinstatement of an active and accessible street frontage
- Creation of a new public square within the development site
- Public realm improvements within the site and on Blackburn Road including widening and improvements the footway, provision of street furniture, street trees and improved lighting
- Improvements to Billy Fury Way through passive surveillance and lighting from new frontage development
- Incorporation of sustainability and energy efficiency measures across the development

7.4 The Site is identified within an opportunity area as outlined in the London Plan. Furthermore, the Camden Local Plan identifies the potential of the area to accommodate residential and commercial growth. The allocation of the Site confirms the acceptability of mixed use development in this area.

- 7.5 The proposed combination of commercial and residential uses in this location is considered to comply with the aims of the development plan and supporting guidance. The mix and quantum of each use has been confirmed as acceptable by officers through the pre-application discussions and this provision assists the borough in meeting both residential and commercial floorspace targets.
- 7.6 The development will deliver 53 high quality dwellings comprising a mix of 1, 2 and 3 bedroom units. This represents an uplift of 24 dwellings on the current baseline. Of this uplift, a proportion are to be affordable housing. All units will be of high quality exceeding space standards, having access to private amenity space and benefiting from good levels of daylight and outlook.
- 7.7 The development is well designed and responds well to the surrounding area. Comprehensive assessments of the surrounding context have been undertaken by Stiff and Trevillion and the findings are outlined in the supporting Design and Access Statement. It is considered that the proposed layout, massing and scale of the development is suitable for the site and the surrounding area and makes best use of the brownfield site.
- 7.8 The impact of the development on neighbouring properties has been fully assessed and is acceptable under the relevant policies and guidance.
- 7.9 The basement provision has been appropriately assessed by Elliott Wood and confirms with the requirements of Camden's Basement Pro-Forma.
- 7.10 The proposed development will be car free and the Applicant will enter into a s106 agreement to ensure the proposed residential units remain 'permit free'. This provision accords with the Local Plan Policies. TTP have also assessed the servicing arrangements of the proposals as well as presenting Travel Plans. These provisions are developed in line with the adopted policies and are considered acceptable.
- 7.11 The development has been assessed against other technical disciplines and is considered acceptable in regards to daylight and sunlight, noise, flooding and SUDs, contamination and air quality.
- 7.12 In summary the proposed development will deliver high quality residential development and commercial space on a highly accessible brownfield site. This provision accords with the aspirations of the development plan and should be considered acceptable. The development has been appropriately assessed and is considered to comply with the relevant policies and guidance.
- 7.13 We therefore respectfully request that planning officers grant planning permission without delay.



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