

PLANNING STATEMENT

In respect of

11-15 KINGS TERRACE, LONDON, NW1 0JP

On behalf of

Greg Caplan

Planning Statement
June 2021

Document status

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1 INTRODUCTION

Background

- 1.1 This Planning Statement has been prepared by RPS for our client, Greg Caplan, and is submitted to London Borough of Camden Council (hereinafter “the Council”) in support of a planning application submission in respect of development proposals at 11-15 King’s Terrace NW1 0JP.
- 1.2 The proposal will comprise of the partial demolition and rebuild of nos.11-13 and the demolition and rebuild of no.15 King’s Terrace. The proposals for nos.11-13 include the creation of a basement, the partial retention of office space (Class E) on the basement and ground floor and the partial change of use from office space (Class E) into residential (Class C3) of the first and second floors. The proposal for no.15 King’s Terrace includes the change of use from office space (Class E) into a residential property (Class C3) with the creation of a basement.
- 1.3 A previous request for pre-application advice was submitted for the demolition of no.11-13 and no.15 King’s Terrace with the rebuild of one single three storey property with a basement and the rebuild of the other two units with office accommodation over a basement, second floor level and 1 x two bed residential apartments on the third floor. A response was received from the Council in April 2020. Whilst supportive in principle, Officers raised concerns to those proposals in relation to the demolition of the building as well as the height, bulk, mass and detailed design of the proposed replacement building. It was considered that due to the bulk and mass of the proposal a detrimental impact would be had on neighbouring occupiers. The scheme submitted under this application addresses the Officers concerns, which are discussed within Section 6 of this statement.

Scope of this Planning Application

- 1.4 This Planning Statement sets out the key planning policies in relation to the site and assesses the proposed development against each of these policy considerations. It should be read alongside the drawings submitted, prepared by BB Partnership Ltd, and the following reports:
- Design and Access Statement prepared BB Partnership Ltd;
 - Ground Investigation and Basement Impact Assessment prepared by GEA;
 - Daylight and Sunlight Report prepared by BVP;
 - Energy and Sustainability Statement including BE Green Checklist prepared by E & S Bristol Ltd;
 - Environmental Noise Survey and Acoustic Design Statement Report prepared by Hann Tucker Associates; and
 - Heritage Statement prepared by BB Partnership Ltd.
- 1.6 This Planning Statement is structured as follows:
- Section 1: Introduction
 - Section 2: Site Context
 - Section 3: Planning History
 - Section 4: Proposed Development
 - Section 5: Planning Policy Context
 - Section 6: Planning Assessment
 - Section 7: Conclusions

2 SITE DESCRIPTION AND CONTEXT

The Site and Surrounding Area

2.1 The application site is located at 11-15 Kings Terrace, which runs parallel to Camden High Street (Figure 1).

Figure 1: Site Location

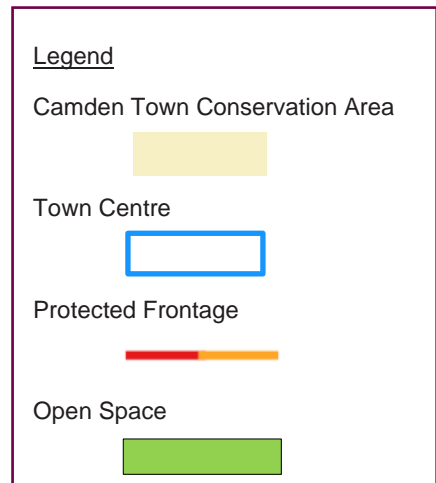
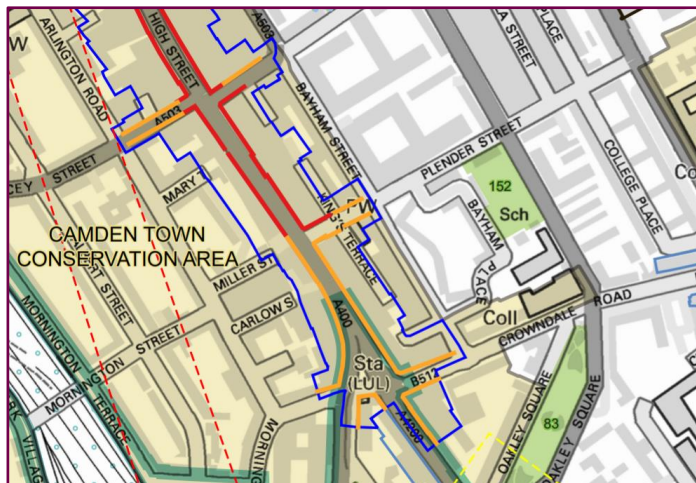


(Google Maps ©2020)

2.2 The Site is currently occupied by two separate three-storey office/light industrial buildings (Use Class B1), comprising nos.11-13 and no.15. The rear of properties 28-32 Camden High Street adjoin the site immediately to the rear and comprise ground floor retail with residential on the upper floors. Residential properties and flatted developments surround the site on King’s Terrace with the exception of no.17 which includes commercial development at ground floor.

2.3 The Camden Local Plan Policies Map (Figure 2) identifies the site as being within the boundary of Camden Town Centre and within the Camden Town Conservation Area. There are no local or statutory listed buildings within or adjacent to the site.

Figure 2: Local Policy Designations



(Camden Local Plan Policy Map Extract - May 2020)

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- 2.4 The site is located in Flood Zone 1 which means there is a low risk of flooding and has a Public Transport Accessibility Level (PTAL) of 6b, where 6b is best and 0 is worst. London bus services are available 200m from the site with bus stops on Camden High Street heading North and on Bayham Street (Plender Street) heading South. Mornington Crescent London Underground Station is located 250m from the site and provides access to the Northern Line.
- 2.5 The built form of the surrounding area comprises a mix of commercial and residential buildings of varying heights up to four storeys.

3 PLANNING HISTORY

Site Planning History

3.1 The following planning history record for the application site is considered relevant to the proposal:

Reference	Description of Development	Decision Date	Decision
26511	“Continued use of the first floor for light industrial purposes.”	Granted with Conditions	05-10-1978
26672	“Continued use of the ground floor for the manufacture and finishing of clothing.”	Granted with Conditions	05-10-1978

Lawful Planning Use

3.2 The historic planning applications confirm that the property at 11-13 King’s Terrace has been in Class E (previous Class B1) use since 5th October 1978.

3.3 There are no planning records available for the adjoining property at 15 King’s Terrace. The Government’s online Valuation Office Agency (VOA) service describes the property as ‘office and premises’ and therefore for the purposes of planning, the lawful use is assumed to be Class E also.

3.4 Planning permission is required for a change of use falling outside of the E Use Class as defined in The Town and Country Planning (Use Classes) Order 1987 (as amended).

Relevant Planning History

3.5 The following planning history record is for surrounding developments that have been approved and are considered relevant to the proposal:

Reference	Address	Description of Development	Decision Date	Decision
2012/1309/P	3 King’s Terrace	Change of use of garage/storage unit to residential to create a single dwellinghouse (Class C3) with first floor and associated alterations at ground floor level including replacement of garage door with windows and replacement of door with window.	19-07-2012	Granted
2010-3893/P	37-39 King’s Terrace	Change of use from office (Class B1) to 3 no. flats (Class C3), erection of a new mansard roof and alterations to front elevation	29-07-2010	Granted Subject to Section 106 Legal Agreement

4 PROPOSED DEVELOPMENT

Overview of development

- 4.1 The proposed development includes the partial demolition and rebuild of nos.11-13 and the demolition and rebuild of no.15 King's Terrace. The proposals for nos.11-13 include the creation of a basement, the partial retention of office space (Class E) on the basement and ground floor and the partial change of use from office space (Class E) into residential (Class C3) of the first and second floors. The proposal for no.15 King's Terrace includes the change of use from office space (Class E) into a residential property (Class C3) with the creation of a basement.
- 4.2 The office space proposed in nos.11-13 will be shared across the basements and ground floors. The basements proposed measure between 46 and 55 sq.m and are accessible via the street-front access for no.11. An internal stairwell will provide access between the floors.
- 4.3 The dwellings proposed at nos.11-13 will be accessible via separate street-front access and front door leading to a main stairwell. A large open plan kitchen/dining space is proposed for each dwelling with new roof lights in nos. 11-13 to enable increased daylight to reach the kitchen area. For both dwellings, a dual aspect with windows located along the front and rear elevations at first and second floor level is proposed.
- 4.4 The dwelling proposed at no.15 will be arranged over four storeys with the basements proposed measuring between 46 and 55 sq. m and accessible via a front door at street-level. A large open plan kitchen/dining space is proposed and dual aspect with windows located along the front and rear elevations at first and second floor level is proposed.
- 4.5 For all three dwellings, there will be access to a private external amenity space at second floor level. The dwellings at nos.11-13 both have a balcony measuring 9sq.m. at the front of the property and no.15 has balcony measuring 9sq.m. to the rear.
- 4.6 All three of the residential dwellings and associated bedrooms either meet or exceed the Nationally Described Space Standards for internal space. An area schedule has been submitted with the application.
- 4.7 New cycle parking storage will be provided with two spaces for each dwelling located at the front entrance of the properties at ground floor/street level.
- 4.8 It is proposed that for nos.11-13 the materials will be in keeping with the original building and the wider Conservation Area. For no.15, materials will be drawn from the surrounding traditional mews, incorporating modern features including patterned perforated aluminium and larger scale areas of glazing.
- 4.9 The proposed development has been revised in order to take into consideration Officer's comments in the pre-application response dated 6th April 2020.
- 4.10 Further details are shown on the proposed drawings and within the submitted Design and Access Statement.

5 PLANNING POLICY CONTEXT

- 5.1 This section provides an overview of the planning policy and guidance which is of relevance to the proposed development. The Statement demonstrates how the development complies with key objectives of planning policy and guidance at national and local level.
- 5.2 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.3 The relevant Development Planning documents for London Borough of Camden comprise:
- London Plan (2021);
 - Camden Local Plan (2017); and
 - Camden Local Plan Policies Map (2020).
- 5.4 In addition, the following local supplementary planning documents have also been considered relevant to the proposed development:
- Access for All CPG – March 2019;
 - Amenity CPG March 2018;
 - Basements CPG – March 2018;
 - Design CPG – March 2019;
 - Employment sites and business premises CPG – March 2018;
 - Energy efficiency and adaption CPG – March 2019;
 - Interim Housing CPG – as amended March 2019;
 - CPG 2 Housing – as amended March 2019;
 - Town centres and retail CPG – March 2018; and
 - Transport CPG – March 2019.
- 5.5 The National Planning Policy Framework (NPPF), published in February 2019, and the Planning Practice Guidance (PPG) are also material considerations.

National Planning Policy Framework (NPPF) (February 2019)

- 5.6 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, whilst paragraph 8 sets out the three dimensions to sustainable development: economic, social and environmental.
- 5.7 Paragraph 8 also states that these roles should not be undertaken in isolation and it outlines that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning systems. Paragraph 10 states that a presumption in favour of sustainable development is at the heart of the NPPF.
- 5.8 Paragraph 68 outlines that small and medium size sites can make an important contribution to meeting the housing requirement of an area, and that 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.
- 5.9 Paragraph 122 notes that planning policies and decisions should support development that makes efficient use of land.

- 5.10 Paragraph 127 states that 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;
 - Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; 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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Relevant Policies

- 5.11 The following local policies within the Camden Local Plan Documents are considered to be relevant to the proposal:
- 5.12 The following section of this report assesses the proposed development against these policies.

Camden Local Plan (2017) Policies:

- Policy H1: Maximising Housing Supply;
- Policy H2: Maximising the supply of self-contained housing from mixed-use schemes;
- Policy H6: Housing choice and mix;
- Policy H7: Large and small homes;
- Policy C6: Access for all;
- Policy E2: Employment premises and sites;
- Policy A1: Managing the impact of development;
- Policy A5: Basements;
- Policy D1: Design;
- Policy D2: Heritage
- Policy CC1: Climate change mitigation;
- Policy TC2: Camden's centres and other shopping areas;
- Policy TC4: Town centre uses;
- Policy T1: Prioritising walking, cycling and public transport; and
- Policy T2: Parking and car-free development.

London Plan (2021) Policies:

- Policy SD6: Town centres and high streets
- Policy SD3: Optimising site capacity through the design-led approach
- Policy D4: Delivering good design
- Policy D6: Housing quality and standards;

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- Policy D10: Basement development;
- Policy H1: Increasing housing supply;
- Policy H4: Delivering affordable housing;
- Policy H10: Housing size mix;
- Policy E1: Offices;
- Policy HC1: Heritage Conservation and Growth
- Policy SI2: Minimising greenhouse gas emissions;
- Policy T5: Cycling; and
- Policy T6: Car Parking;

6 PLANNING POLICY ASSESSMENT

Achieving Sustainable Development

- 6.1 The NPPF includes a presumption in favour of sustainable development (paragraphs 10 and 11). This means approving development proposals that accord with an up-to-date development plan without delay.
- 6.2 The Council's development plan is up-to-date with the objectives set out in the Local Plan focusing on delivering high quality growth that will facilitate the development of more sustainable places, which are equipped to respond to the impacts of climate and economic change. The Council is committed to securing development that improves the economic, social and environmental conditions in the borough.
- 6.3 The proposal will deliver the social objectives of sustainable development by supporting increased housing delivery through the provision of a high-quality residential development and assisting Camden to become a more sustainable place to live.

Principle of Development (Change of Use)

- 6.4 London Plan SD6 (Town Centres and High Streets) outlines that the vitality and viability of London's varied town centres should be promoted and enhanced by locations for mixed-use or housing-led intensification to optimise residential growth potential, securing a high quality environment and complementing local character and heritage assets.
- 6.5 London Plan Policy E1 (Offices) states that improvements to the quality, flexibility and adaptability of office space of different sites should be supported by new office provision, refurbishment and mixed-use development. In addition, it sets out that the redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of G and H of the policy.
- 6.6 London Plan Policy H1 (Increasing housing supply) states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions and seeks the creation of 10,380 additional homes in Camden over the period 2019/20-2028/29.
- 6.7 Local Plan Policy TC2 (Camden's centres and other shopping areas) states the Council will pursue the individual planning objectives for each centre, as set out in supplementary planning document Camden Planning Guidance on town centres and retail.
- 6.8 Local Plan Policy TC4 (Town centre uses) states the Council will ensure that the development of other town centre uses do not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.
- 6.9 Local Plan Policy H1 (Maximising Housing Supply) supports residential development and states the Council will seek to exceed the target for additional homes by regarding self-contained housing as the priority land-use of the Local Plan and expecting the maximum reasonable provision of housing on sites that are underused or vacant. In order to support this aim, Local Plan Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) encourages any development to include a proportion of self-contained housing.
- 6.10 Local Plan Policy E2 (Employment premises and sites) states the Council will resist development of business premises for non-business use unless it is demonstrated to the Council's satisfaction the site or building is no longer suitable for its existing business use and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

- 6.11 The site and its existing buildings are currently in commercial use however, when looking at a combination of surrounding area uses, which have become predominately residential over recent years, and the housing need for Camden, it would seem reasonable that a partial change of use to residential would be appropriate.
- 6.12 Whilst part of the office floor space is being retained, there will be a loss of approx. 46%. It is proposed that there will be a total of 187.7 sqm office floor space shared between the basement and ground floors.
- 6.13 Given recent change of use to residential within and surrounding King’s Terrace, it could be argued that there is local evidence of a falling demand for commercial/office use in the area. The retention in part provides the opportunity for small scale businesses, which is likely to be of more interest and provide the best chance of occupation.
- 6.14 The site is in a highly accessible location, situated within walking distance of regular bus services along Camden High Street, tube services from Mornington Crescent and the various facilities and services available in Camden Town Centre.
- 6.15 The proposed development would help to contribute to London Borough of Camden’s housing targets set out in the London Plan, Camden Local Plan and Draft London Plan, whilst also helping to sensitively develop on brownfield land. It is for this reason the loss of office space on the site would instead provide a significant residential and social benefit to Camden Town Centre.
- 6.16 The proposed total of residential floorspace will be 408.4sqm which equates to 68% of the total floorspace.
- 6.17 In light of the above, the principle of development is considered acceptable and is supported by the relevant Local Plan and London Plan policies.

Housing Type and Mix

- 6.18 London Plan Policy H10 (Housing size mix) sets out that schemes should generally consist of a range of unit sizes. The policy states applicants should have regard to the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.
- 6.19 London Plan Policy D6 (Housing quality and standards) states that housing development should be of high quality design.
- 6.20 Local Plan Policy H6 (Housing choice and mix) seeks to secure quality accessible homes and states the Council will expect all self-contained homes to meet the nationally described space standard.
- 6.21 Local Plan Policy H7 (Large and small homes) seeks to secure a range of homes of different sizes and states the Council will ensure all housing developments including conversion of non-residential properties contributes to meeting the priorities set out in the Dwelling Size Priorities Table (Figure 2). The policy goes on to state a flexible approach will be taken, having regard to site size, and any constraints on developing the site for a mix of homes of different sizes.

Figure 2: Dwelling Size Priorities Table

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

- 6.22 The proposed development provides two 2-bedroom and one 3-bedroom self-contained residential units. The proposed housing mix therefore contributes to meeting the identified market need for 2-bedroom and 3-bedroom units set out in the Local Plan.
- 6.23 The submitted Schedule of Accommodation includes the internal measurements of the proposed units. The three proposed residential units exceed the nationally described space standard for internal space. Each of the proposed dwellings would provide dual aspect.
- 6.24 In light of the above, the proposed housing type and mix is in accordance with the relevant Local Plan and London Plan policies.

Affordable Housing

- 6.25 London Plan Policy 3.13 (Affordable Housing Thresholds) states Boroughs should require affordable housing provision on a site which has capacity to provide 10 or more homes. Part B of the policy enables Boroughs to seek a lower threshold where this can be justified.
- 6.26 London Plan Policy H4 (Delivering affordable housing) sets out that the strategic target is for 50 per cent of all new homes across London to be genuinely affordable and should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstance.
- 6.27 Local Plan Policy H4 requires a contribution to affordable housing from all developments that provide one or more additional homes. Part i) states where affordable housing cannot practically be provided on site, or offsite provision would create a better contribution (in terms quantity and/ or quality), the Council may accept a payment-in-lieu of affordable housing.
- 6.28 It is not practical to provide affordable housing due to the size of the development and therefore it is proposed a payment-in-lieu of affordable housing be made in line with policy requirements.

Design

Design and Heritage Considerations

- 6.29 London Plan Policy D4 (Delivering good design) seeks to set out processes and actions which will help ensure development delivers good design.
- 6.30 London Plan Policy D6 (Housing quality and standards) sets out that housing development should be of high quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- 6.31 Local Plan Policy D1 (Design) states the Council will seek to secure high quality design in development and require that development respects local context and character and preserves or enhances the historic environment and historic assets. Development is required to be sustainable and use materials of high quality. Housing developments should provide a high standard of accommodation and incorporate outdoor amenity space.
- 6.32 Following the pre-application response, the design of the proposed development has been altered to take into consideration officer comments. The proposed development has been designed to retain the positive features of no.11-13 including the ground floor windows and brickwork and using the original building to inform the development proposal by maintaining the small-scale industrial characteristics and form. In addition, the proposed roof alterations are much reduced and now do not exceed the height of the existing ridgeline. The proposed development now retains the existing plot widths and integrates with its neighbours.
- 6.33 The modern style proposed for no.15 reflects ongoing modern development around Camden which draws from and respects the architecture of the conservation area. The new building sits

comfortably within the terrace and picks up fenestration forms and details to complement its neighbours.

- 6.34 The private amenity space for the proposed development has been altered to reflect concerns from the previous pre-application advice. The private external amenity space is proposed for all three units at second floor level. The units at nos.11-13 both have a 9 sq. m. balcony at the front of the property and no.15 has a 9 sq. m. balcony to the rear. The balconies sit within the envelope of the building and do not protrude beyond the building line, thereby protecting the amenities of the existing neighbouring occupiers and the future occupiers of the proposed development.
- 6.35 London Plan Policy D3 (Optimising site capacity through the design-led approach) outlines that all development must make the best use of land by following a design led approach that optimising the capacity of sites.
- 6.36 Furthermore, Policy D3 states that development proposals should 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.
- 6.37 London Plan Policy HC1 (Heritage Conservation and Growth) sets out that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the asset's significance and appreciation within their surroundings.
- 6.38 Local Plan Policy D2 (Heritage) states the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas. Development within conservation areas is required to preserve or, where possible, enhance the character or appearance of the area.
- 6.39 Following pre-application advice for an earlier scheme, the design has been changed to respond in a greater degree to the local context, character and materials of the conservation area. The main alteration is the retention of the form of no. 11-13 within the terrace with the key industrial style features retained or altered sensitively to accommodate the proposed residential use. The replacement of no. 15 is considered an enhancement to the area.
- 6.40 The proposed development has been designed to contribute positively to the conservation area with the design of the building being of high quality and enhancing the existing site. The proposal provides a positive relationship with the surrounding area and is therefore in compliance with the relevant Local Plan policies.
- 6.41 The submitted drawings, visuals, Design and Access Statement and Heritage Statement provide further details.

Basement Development

- 6.42 London Plan D10 (Basement development) sets out that Boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally.
- 6.43 Local Plan Policy A5 (Basements) states basement development will only be permitted where 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.
- 6.44 The Policy sets out detailed criteria for basement developments in terms of the siting, location, scale and design and states they must be subordinate to the host building. The Policy also includes the requirement of a Basement Impact Assessment (BIA) and a Construction Management Plan for basement developments.

- 6.45 The proposed basement development has been designed in accordance with the criteria set out in Policy A5 and would not cause harm to the building, the neighbouring properties or the Camden Town Conservation Area. Furthermore, the site is in Flood Zone 1 and which means the area is at low risk of flooding.
- 6.46 The Ground Investigation and BIA submitted with the application assesses ground conditions and ground movement, and includes details of the construction sequence, including temporary and permanent works, are also included.
- 6.47 The BIA summarises that it is unlikely that the proposals will result in any specific land or slope stability issues, groundwater or surface water issues.

Residential Amenity

- 6.48 London Plan Policy D3 (Optimising site capacity through the design-led approach) sets out that development proposals should deliver appropriate outlook, privacy and amenity and help prevent or mitigate the impacts of noise and poor air quality.
- 6.49 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours. The factors the Council will consider include visual privacy, outlook, sunlight, daylight and overshadowing, noise and transport impacts, including the construction phase.
- 6.50 As noted within the design section of this assessment, all three proposed dwellings will have private external amenity space. It should be noted that in order to protect any harm to neighbouring properties, the proposed balcony of no.15 does not extend beyond the rear elevation.
- 6.51 A Daylight and Sunlight Assessment is submitted with this application which confirms that the amenity values of daylight and sunlight to the neighbouring residential properties would be retained to a level that would satisfy the BRE criteria. In addition, the proposed accommodation would receive daylight in excess of the BRE recommended values in all locations.
- 6.52 An Environmental Noise Survey and Acoustic Design Statement have also been submitted as part of this application concluding that appropriate target internal noise levels have been proposed for the development and are achievable through the use of conventional mitigation measures.
- 6.53 The proposed building envelope does not vary significantly from the existing and therefore there is no visual impact in terms of overshadowing or outlook.
- 6.54 It is anticipated that there would be no residential amenity impacts as a result of the proposed development. The proposal is therefore in accordance with the relevant Local Plan and London Plan policies.

Transport, Access and Parking

- 6.55 London Plan Policy T5 (Cycling) states that development should secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking in line with the minimum standards set out in the London Plan. The Minimum Cycle Parking Standard for residential developments is 2 long-stay cycle parking spaces per 2-bed unit.
- 6.56 London Plan Policy T6 (Car Parking) states that car-free developments should be promoted in locations with high public transport accessibility. The site has a PTAL of 6b which is the highest level.
- 6.57 Local Plan Policy T1 (Prioritising walking, cycling and public transport) states the Council will ensure that development provides for accessible secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within the supplementary planning document Camden Planning Guidance on transport.

- 6.58 Local Plan Policy TC2 (Parking and car-free development) states will limit the availability of parking and require all new developments in the borough to be car-free. The Council will not issue on-street or on-site parking permits in connection with new developments and will use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits.
- 6.59 It is proposed that each residential unit will have secure and covered cycle storage in the form of two cycle parking spaces within the entrance of each property. This level of provision is in accordance with the Minimum Cycle Parking Standards set out in the London Plan. Pedestrian and cycle access will remain as existing via King's Terrace.
- 6.60 There is currently no car parking provision at the site and the proposed scheme is car-free. There would be no impact on the surrounding highway network or its capacity as a result of the development.
- 6.61 There would be no material impact on the surrounding highway network as a consequence of the proposed development and appropriate cycle parking facilities are provided. The proposal is therefore in accordance with the relevant Local Plan and London Plan policies.

Energy and Sustainability

- 6.62 London Plan Policy SI2 (Minimising greenhouse gas emissions) sets out that residential development should achieve an on-site minimum reduction of at least 10 per cent for residential development and 15 per cent through energy efficiency measures.
- 6.63 Local Plan Policy CC1 (Climate change mitigation) seeks to require development to minimise the effects of climate change and to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy and expects all developments to optimise resource efficiency.
- 6.64 An Energy Statement is submitted with the application and details how the proposal will improve upon the building regulation requirements through passive design and a fabric first approach, with high levels of insulations and energy efficient services and fixings specified. Solar PV Panels and an air source heat pump have also been included in the design to meet a 20% saving in CO2 emissions. The statement concludes that the proposed development is in accordance with the above policies.

7 CONCLUSION

- 7.1 The proposal will comprise of the partial demolition and rebuild of nos.11-13 and the demolition and rebuild of no.15 King's Terrace. The proposals for nos.11-13 include the creation of a basement, the partial retention of office space (Class E) on the basement and ground floor and the partial change of use from office space (Class E) into residential (Class C3) of the first and second floors. The proposal for no.15 King's Terrace includes the change of use from office space (Class E) into a residential property (Class C3) with the creation of a basement.
- 7.2 The proposed development has considered the previous pre-application advice and addressed the comments on office space, design and neighbour amenity.
- 7.3 The proposed development will help to meet the Council's housing targets, as required for its Town Centre location, and will retain an area of office floorspace that is considered sufficient for the location and demand.
- 7.4 The proposal is of a similar height to the existing buildings and retains key features, and as a whole is considered to enhance the conservation area.
- 7.5 The proposed basement development would not cause any harm to the building, the neighbouring properties, or the Camden Town Conservation Area.
- 7.6 There will be no adverse impact on the amenities of the proposed or existing neighbouring development.
- 7.7 Given the above, we consider that the proposed development is compliant with national and local policy.