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**Our ref: 2021/0983/PRE**  
**Contact: Kristina Smith**  
**Direct line: 020 7974 4986**  
**Email: Kristina.smith@camden.gov.uk**

**Planning Solutions Team**  
**Planning and Regeneration**  
 Culture & Environment  
 Directorate  
 London Borough of Camden  
 2<sup>nd</sup> Floor  
 5 Pancras Square  
 London  
 N1C 4AG

Nexus Planning  
 Holmes House  
 4 Pear Place  
 London  
 SE1 8BT

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Mr Singer,

**Re:** 9-12 New College Parade, Finchley Road, London, NW3 5EP

Thank you for submitting a pre-planning application enquiry for the above property, together with a fee of £5,043.98.

### 1. **Proposal**

The proposal is for:

- Erection of 7 storey building following demolition of existing 2 storey buildings to provide 15 residential dwellings (C3) on floors 1-6 and commercial units plus ancillary residential space at ground floor level; and
- Landscaping works to rear.

### 2. **Site description**

The site is on the north side of Finchley Road close to the junction with College Crescent. The site comprises two double fronted ornate two storey buildings dating from 1916 in commercial use. Together with no's 1-8, a more modern part-commercial, part-residential development of three storeys (in the same ownership as the application site), the building forms part of a noticeably lower section of the street with the established height in the wider area being in the range of 4-6 storeys.

The site is in the Finchley Road Town Centre. To the north east of the application site, there is a Grade II Listed Victorian House, most recently in use as a backpackers' hostel. The site is not within a conservation area.

### 3. **Relevant planning history**

**2004/0311/P** - The construction of a balcony, part demolition of an existing wall to form an opening in front of two new windows and the installation of panelling to the station elevation; together with louvres enclosure for roof top plant as amendments to planning permission dated 13th January 2004 (Ref: 0304067) for the partial demolition of an existing workshop and extension to form a part 3, part 4 storey building comprising light industrial floorspace and 4 residential units - **Granted 2004.**

**2004/3590/P** - Partial demolition of existing workshop and extension to form a part 3 part 4 storey building comprising of Class B1 commercial space at ground and first floor level and 7 residential units (5x 1 bed, 1x 2 bed and 1x 3 bed) at second and third floor levels - **Granted 2006.**

**2003/2039/P** - The retention of 6 no. condenser units on first floor parapet and the installation of an additional 4 units in connection with an existing Class B1 use – **Granted 2004**

#### 4. Relevant policies and guidance

[National Planning Policy Framework 2021](#)

[The London Plan 2021](#)

[Camden Local Plan 2017](#)

G1 Delivery and location of growth  
 H1 Maximising housing supply  
 H4 Maximising the supply of affordable housing  
 H6 Housing choice and mix  
 H7 Large and small homes  
 E2 Employment premises and sites  
 A1 Managing the impact of development  
 D1 Design  
 CC1 Climate change mitigation  
 CC3 Water and flooding  
 CC5 Waste  
 C5 Safety and security  
 C6 Access  
 T1 Prioritising walking, cycling and public transport  
 T2 Car-free development and limiting the availability of parking  
 DM1 Delivery and Monitoring

[Camden Planning Guidance](#)

CPG (Access for all) 2019  
 CPG (Air Quality) 2021  
 CPG (Design) 2021  
 CPG (Housing) 2021  
 CPG (Energy efficiency and adaptation) 2021  
 CPG (Amenity) 2021  
 CPG (Transport) 2021  
 CPG (Developer's Contributions) 2019  
 CPG (Water and flooding) 2019

#### 5. Assessment

The planning considerations material to the determination of any future application are as follows:

- Principle of demolition
- Land use

- Housing
- Design
- Amenity
- Transport
- Energy and sustainability
- Planning obligations/CIL

## 6. Principle of redevelopment

There is potential for additional development on this site given the relatively low heights of the existing buildings relative to the surrounding townscape. Policy G1 supports development that makes the best use of its site and resists development that makes inefficient use of the Borough's limited land, taking into account a variety of factors that shall be considered within this pre-application report. Development is particularly encouraged in highly accessible locations which would include Town Centres like Finchley Road.

Given the adjacent site is within the same ownership, the preferable approach would be to consider the two sites in a holistic manner to optimise the development opportunities. However, it is understood there are leaseholder issues that may prevent this from being possible.

Nonetheless, the proposal involves a substantial amount of demolition and so any development proposal must be mindful of Policy CC1 (Climate Change Mitigation), in particular, points (e) and (f)) which require all proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building which may be preferable on sustainability grounds. Paragraph 8.16 of the Local Plan describes how the construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of altering and extending existing buildings should always be strongly considered before demolition is proposed.

As such, an application to demolish the existing building would need to be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building. Where the demolition of a building cannot be avoided, we will expect developments to divert 95% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. We will also require developments to consider the specification of materials and construction processes with low embodied carbon content.

It is necessary to understand resource efficiency when comparing the overall impact of a new development with that of refurbishing an existing building. The stages to assess include:

- production of materials and components (raw material extraction, material production, wastage and waste processing, transportation);
- construction stage (transport, storage of products, wastage and waste processing, energy and water use in construction, ancillary materials);
- use stage (energy and water used in operation, maintenance, repair, replacement and refurbishment); and
- end of life stage (de-construction or demolition, transport, waste processing, disposal of waste).

When comparing the carbon impacts of a new development and a refurbished scheme, the following should be included within the scope of the assessment:

Refurbished scheme	New development
Embodied carbon of any <u>new</u> materials used within the refurbishment (do not include the carbon content of the existing building materials as these are considered 'spent').	Embodied carbon of all materials used within the development.
Expected operational carbon emissions of the refurbished scheme over the expected lifetime of the building (60 years is typical)	Expected operational carbon emissions from the new scheme over the expected lifetime of the building (60 years is typical)

Embodied carbon is calculated by finding the quantity of all materials needed for the building's lifetime and multiplying this by the carbon factor (expressed in kg CO<sub>2</sub>e per kg of material/product) for each material to produce the embodied carbon figure. Please refer to policy CC1(e) and CPG Energy efficiency and adaptation.

## 7. Land use

The existing site is relatively low density and relevant site history provides support for intensification of development on the site and officers remain supportive of that principle.

The principle of a residential-led mixed use development which retains the existing commercial uses and includes on-site affordable housing meets the key strategic policy aims of the Camden Local Plan 2017, which places particular emphasis on delivering new and affordable housing, and is welcomed.

The provision of self-contained housing is the priority land use of the Local Plan and so the provision of 15 units is supported subject to various considerations around quality of homes, unit mix and affordable housing contribution which will be discussed in more detail in the Housing section of the response.

In terms of the commercial floorspace, Policy TC2 identifies that the Council will seek to protect and enhance the role and unique character of the Finchley Road Town Centre and will ensure that new development is of an appropriate scale and character for the Town Centre. Commercial development is expected to provide for and maintain a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice in the Town Centre. The extension of the commercial offer through incorporation of the existing basement provides an opportunity to increase the diversity of retail offer on-site through the provision of large and small units across the wider site.

## 8. Housing

### *Unit mix*

The proposal would provide 15 units comprising 3 x 3-beds; 8 x 2-beds and 4 x 1-beds. This includes the social rent provision which comprises 2 x 3-beds. The mix accords very well with policy H7 (large and small homes) which requires a.) a mix of large and small homes and b.) for the mix to accord with dwelling size priorities which identifies 2 and 3-beds as

particularly high priority in both market and affordable tenures. A mix of large and small homes would be provided and 73% of the provision would be high priority dwelling sizes which is supported.

#### *Standard of accommodation*

All units would comfortably comply with space standards with efficient layouts and logical stacking, and would provide adequate storage provision. All units would be dual aspect with the exception of two 1-bed units for private sale which would be single aspect but south facing. Given the units are 1-beds, single aspect provision is accepted. All units would have access to private amenity space in the form of balconies for the private units and garden area for the social rent units. Further landscaping details for the garden area should be provided with the application to ensure high quality amenity space can be provided. You should explore how your landscaping proposal can enhance biodiversity and assist in dealing with water runoff.

All habitable rooms would have access to daylight and the potential for natural ventilation although air quality in this location is a concern for the rooms that face Finchley Road and in particular, the 1-bed units which would not have aspect to the rear. See the Air Quality section for further discussion.

The rooflights on the balconies of the second floor units should be frosted to avoid views into the living spaces of the first floor units.

#### *Affordable housing*

Policy H4 expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. For developments that have capacity for fewer than 25 additional homes, a sliding scale target applies starting at 2% for one home and increasing by 2% of for each home added to capacity. A full explanation of the affordable housing calculation can be found in [CPG Housing 2021](#).

The residential uplift would be 1283 sqm which, when rounded to the nearest 100sqm, would be 1300 sqm. The affordable floorspace target would therefore be 26% of 1283 sqm, or 334 sqm. The on-site provision proposed in the form of 2 x 3-bed units would be 261 sqm leaving an area of 73 sqm for which a Payment-in-lieu (PIL) would be applicable. The affordable housing PIL rate is £5,000 per sqm resulting in a PIL of £365,000 for this scheme. Both the on-site housing and the PIL would be secured by a Section 106 legal agreement.

The Council will have regard to the financial viability of the development and if viability poses a challenge then a viability assessment should be submitted with the application which will need to be independently assessed at the applicant's cost.

#### *Wheelchair accessible/ adaptable units*

As the proposals are for a new development, there is a requirement for 90% of units to be built to M4(2) and 10% (i.e. 2 in this case) of units to be built to M4(3). As there is no identified end user, the unit will need to be an M4(3)(2)(a) i.e. be wheelchair adaptable. For the private units at levels 2-6, a lift will enable these units to achieve compliance but consideration will need to be given to how the units are laid out to meet the full criteria. For the first floor social rent units, a lift is not provided within the core which would prevent the units from achieving M4(2) standard. The cost of maintaining a lift that serves only 2 units is

likely to push up service charges impacting negatively on the affordability of the units. In these exceptional circumstances, a balanced decision has to be made between achieving affordability versus accessibility. In this case, officers are willing to support the shortfall in the accessibility of the units given it facilitates two affordable units being provided on site which is a significant priority.

## 9. Design

### *Height and massing*

- The mass and scale of the proposed development, comprising 7 storeys and a basement, is considered appropriate for the site and its surroundings. Although it would be the tallest building in the surrounding context it is considered to fit comfortably with the scale of the street. It is understood the adjacent site (no's 1-8 New College Parade) which is in the applicant's ownership will come forward for pre-application shortly and so the conditions in the immediate area are subject to change and intensification.

### *Layouts*

- The ground floor accommodates a large retail/commercial space that extends into a basement and entrances to both the affordable and market residential as well as to the bin storage. The current design is for long corridors to lead into the main residential core and refuse store at the back. Although it is understood why the core and bin store have been positioned to the rear, you are advised to further consider how much space is given over to each use, for instance the affordable residential entrance is very tight compared to the bin store. It is not clear where the mailboxes would go or whether there would be enough space for two people to cross on the stair and carry bicycles up to the garden store at first floor level.
- As the retail/commercial unit is very large, we suggest the possibility of dividing the commercial space into two smaller units if needed in the future by considering design elements that would allow for this, particularly externally e.g. a second entrance door, signage approach.
- For feedback on residential layouts, please see 'Standard of accommodation' section.

### *Materials*

- The proposed main material for the building is brick, with the top storey material made of a dark metal and contrasting in tone with the lower floors. The choice of brick as the predominant material is appropriate for the site and sits comfortably with the surrounding context of varied brick buildings. The metal clad roof extension should be of a high quality and well detailed material. Indicative metal and brick types should be provided with an application.
- We welcome the variety created by the use of various brick courses and panels for the façade, adding extra detail and interest to the building. The precedents shown in the document are encouraging.
- The three bay articulation of the frontage through small recesses is also considered successful in breaking up the perceived mass of the building and articulating its various elements.

### *Ground floor frontage*

- The proposed ground floor frontage reflects the high street condition found along the street and is considered of the right scale, similar to that of the neighbouring buildings.
- The composition made of various elements brings a level of complexity that is appropriate for a high street and brings interest to the public realm.
- The balustrade of the first floor which extends from the ground floor façade is also considered successful in raising slightly the scale of the ground floor without changing floor to ceiling heights and in creating a privacy screen at first floor. More details of the balustrade will be needed.
- Although it is understood that future development might happen on the adjacent building, the party wall will appear prominent in views approaching the site. Both the proportions and material treatment of this flank wall should be taken into account in the design. The size of the penthouse has been increased to balance out the side profile of the proposal but updated views are needed to assess its impact.
- The service entrance to the bin store needs to be integrated within the façade and creatively respond to the blank frontage to avoid a detrimental impact on public realm, and enhance it instead.
- As shown in the drawing, we expect both residential entrances to share a similar architectural language so as to not distinguish between market and affordable housing.

## **10. Amenity**

There is a residential development to the north east of the application site (39 College Crescent) which is likely to experience a degree of impact from the proposal, particularly as the proposed development would be situated to the south.

The initial pre-application proposal was supported by a planning statement that advised the proposed massing has been informed by daylight and sunlight analysis as well as the surrounding context and planning history of the site. However, no indication of the degree of compliance with BRE standards was provided. Furthermore, the height of the building has increased since this initial submission. As such, a full daylight/sunlight assessment should be submitted with a planning application. The extent of harm on light and outlook to this property will be critical in establishing whether or not the bulk and massing (which is considered acceptable in design terms) can be supported.

The rear of the building incorporates windows and balconies which could afford views into the rear windows and balconies of no.39 College Crescent. Explanation on how this has been avoided as far as possible through design solutions, as well as information on the separation distances between windows, should be provided as part of a planning application. Planning policy seeks to protect the amenity of existing residential from an unacceptable degree of overlooking from new development.

## **11. Transport considerations**

### *Cycle parking*

Cycle stores for both the private residential and commercial elements are shown at basement level in a dedicated cycle store accessed via lift. The bike stores for the social rent units would be at first floor level but this could discourage residents from cycling and you are strongly encouraged to try locate this in a more accessible (step-free) location.

Details of the type of racks and a plan with dimensions would be needed at application stage. The lift appears to be capable of accommodating a cycle, although this should be clarified in the submission.

In terms of provision, cycle parking should be provided in accordance with the quantum specified in the new London Plan. At present, only long stay cycle parking is proposed but some short stay provision should be made available if possible. It is likely a financial contribution shall be sought for this to be provided in a suitable location on-street within the vicinity of the development.

The new London Plan standards for commercial (retail) and residential accommodation are shown below.

	<b>Long-stay (e.g. for residents or employees)</b>	<b>Short-stay (e.g. for visitors or customers)</b>
Class E (Use Class A1 standards of London Plan)	- 1 space per 175 sqm (GEA) for food retail or per 250 sqm for non-food retail	- 1 space per 20 sqm for food retail or 60sqm for non-food retail
C3 dwellings	- 1 space per 1 person 1 bedroom dwelling - 1.5 spaces per 2 person 1 bedroom dwelling - 2 spaces per all other dwellings	- 5 to 40 dwellings: 2 spaces

The proposal would result in the requirement for 28 cycle spaces for the residential element and 2 or 3 spaces for the commercial depending on the nature of the occupier. The proposal only shows provision for 24 cycles at basement level.

You are advised to target 5 spaces for short-stay customer parking and 2 spaces for visitors to the residential element. The Council can work with you to identify a potential location on the public highway.

### *Car parking*

Policy T2 requires all new development to be car-free. This would be secured by way of a Section 106 legal agreement for both residential and commercial elements. For 'car free' developments, the Council will:

- not issue on-street parking permits; and
- use planning obligations to ensure that future occupants are aware they are not entitled to on-street parking permits.

### *Construction Management Plan*



Due to the location of the building in a busy Town Centre location and the scale of the works, a Construction Management Plan (CMP) would be secured plus an implementation support fee of £3,136 and a construction impact bond (£7,500). These would be secured by a section 106 legal agreement.

#### *Transport statement*

Any future full application should include a Transport Statement, which provides the information required as stated in the Council's planning guidance document CPG Transport. This should include information on trips, location of proposed servicing, as well as frequency and vehicle types. Given the location of the site and the existing land uses, it is expected that the additional trips can be comfortably accommodated by the existing transport network but this would need to be demonstrated.

#### *Highway and Public Realm Contribution*

The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development.

We would therefore need to secure a financial contribution for highway works (repaving the footway) directly adjacent to the site as a Section 106 planning obligation if planning permission is granted. This would allow for any damage caused during construction of the proposed development to be repaired. A cost estimate will be requested from the Highways team once a planning application is submitted and will form part of the S106 Agreement if planning permission is granted.

#### *Pedestrian, cyclist and environmental improvements*

New developments also have wider impacts and may increase the demands on a transport network that at certain times already operates above capacity. Traffic problems include congestion, traffic intrusion (e.g. additional traffic on quiet roads), road safety, air quality and the impact of additional traffic on other, especially vulnerable, highway users. Such development also increases the need to improve transport alternatives such as walking, cycling and public transport; this requires further investment so as to make these modes more attractive. Where these are site specific and necessary works to make a scheme acceptable they may be secured through planning obligations.

#### *Servicing and deliveries*

There is a Red Route loading bay directly outside the site on Finchley Road, which is available for use for up to 20 minutes at a time before 7am, between 10am and 4pm, and after 7pm Monday to Saturday, and all day Sunday. As such, it is considered that there is no requirement for a Servicing Management Plan for this development.

## **12. Energy and Sustainability**

The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

The Council promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; it requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met, including zero carbon development; and expects all developments to optimise resource efficiency. All major developments are required to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible, establishing a new network.

The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies.

Policy 5.2 of the London Plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to secure a minimum 35% reduction in regulated CO<sub>2</sub> emissions below the maximum threshold allowed under Part L 2013.

Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. It requires all major developments to achieve zero carbon with a minimum 35% reduction in CO<sub>2</sub> emissions beyond Part L Building Regulations achieved on site and a 20% reduction through renewable technologies (the 3rd stage of the energy hierarchy). A carbon offset contribution would be required for any shortfall, although it is far preferable to see the targets achieved on site. This would be used to secure the delivery of carbon reduction measures elsewhere in the borough.

Developments are also expected to implement the sustainable design principles as noted in policy CC2 by achieving a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

### *Cooling*

All new developments will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design. Any development that is likely to be at risk of overheating (for example due to large expanses of south or south west facing glazing) will be required to complete dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated.

Active cooling (air-conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.

### *Water and flooding*

The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures (policy CC3).

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site.

Policies D1 and CC2 of the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. It is not clear what is proposed at roof level as no roof plan is provided.

### **13. Air Quality**

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.

The site is a major development in an identified area of very poor air quality which would introduce sensitive receptors. Furthermore, the demolition and construction work could have a detrimental impact on local air quality. As such, a detailed Air Quality Assessment should be submitted with an application. For more information, refer to CPG Air Quality.

Initial concerns have been raised with the 1-bed single aspect units which only have outlook onto Finchley Road and include open amenity space. The development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air pollution, or mitigation required. Specifically, the Council would strongly recommend that as a minimum mitigation such as MVHR with filtration and possibly sealed windows and winter gardens should be provided. Future occupiers should be advised of health risks from poor air quality at the site.

Support for the 1-bed units in this location will be dependent on review of the Air Quality assessment and proposed mitigation measures.

### **14. Refuse and recycling**

You are advised to design in adequate facilities for recycling and the storage and disposal of waste for both the commercial and residential elements. A good sized bin store appears to be provided at ground floor level but the measurements of the bin capacity it can accommodate should be provided to ensure it is sufficient. Bin stores should be located where they are easily accessible for all users and for collection. Further information can be found in CPG Design.

### **15. Planning obligations**

The following Section 106 planning obligations may be required if planning permission were granted:

- Affordable housing on site and payment-in-lieu (subject to viability)
- Construction Management Plan (plus associated contributions)
- Highways contribution (£tbc)
- Energy and sustainability plans
- Employment and training opportunities (subject to floorspace)
- Pedestrian, cycling and environmental improvements (subject to floorspace)

### **16. CIL**

You are advised that this proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floorspace exceeds 100sqm GIA or one unit of residential accommodation.

Both CIL's will be collected by Camden after the scheme has started and could be subject to surcharges for failure to assume liability or submit a commencement notice prior to commencement and/or for late payment. We will issue a formal liability notice once the liable party has been established. CIL payments will also be subject to indexation in line with the construction costs index.

## 17. Planning application information

Should you choose to submit a planning application which addresses the outstanding issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full Planning Application
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Planning statement
- Design and access statement
- Daylight and sunlight assessment
- Energy and Sustainability statement(s) including justification for demolition
- Detailed Air quality assessment
- Noise assessment for plant equipment
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received. You are advised to contact your neighbours to discuss the proposals. Major applications are required to be determined by the Planning Committee.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Kristina Smith on **020 7974 4986**

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Kristina Smith

**Principal Planning Officer  
Planning Solutions Team**

