

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	<b>02/11/2020</b>
		N/A / attached	<b>Consultation Expiry Date:</b>	<b>15/11/2020</b>
<b>Officer</b>			<b>Application Number(s)</b>	
Nora-Andreea Constantinescu			2020/3971/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
108 South Hill Park London NW3 2SN			See draft decision notice	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Erection of garden outbuilding to provide 1bedroom self-contained residential dwellinghouse (Class C3).				
<b>Recommendation(s):</b>	Refuse planning permission			
<b>Application Type:</b>	Full Planning Permission			

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	Site notices Press notices	<b>21/10/2020-14/11/2020</b> <b>22/10/2020-15/11/2020</b>	No. of responses	<b>0</b>	No. of objections	<b>0</b>
<b>Summary of consultation responses:</b>	No correspondence received from neighbouring occupiers.					
<b>Hampstead Neighbourhood Forum</b>	<p>HNF objected to the proposed scheme on the following grounds:</p> <ul style="list-style-type: none"> <li>• Contrary to Camden Local Plan and Hampstead Neighbourhood Plan policies.</li> <li>• New dwelling infringes on the boundary with Hampstead Heath and fails to address the visual and environment impact the new property would have on Metropolitan Open Land (MOL).</li> <li>• Fails to demonstrate how it responds positively to the character of the area or enhances the property which makes a positive contribution to the conservation area (CA).</li> <li>• Negative impact on local biodiversity.</li> <li>• Impact on the amenity of occupiers at no. 108.</li> <li>• Trees within the Heath may be affected by the development.</li> </ul>					
<b>The Heath &amp; Hampstead Society</b>	<p>The Heath &amp; Hampstead Society objected to the proposed scheme on the following grounds:</p> <ul style="list-style-type: none"> <li>• Contrary to policies.</li> <li>• Detracts from the conservation area.</li> <li>• Detracts from the openness of the Metropolitan Open Land.</li> <li>• Ignores the trees and biodiversity issues.</li> <li>• Visual impact onto the Heath.</li> <li>• Detracts from an exceptional garden.</li> <li>• If approved, could encourage further such development.</li> </ul>					
<b>City of London Corporation</b>	<p>Letter from Metropolis instructed by City of London Corporation objecting to the proposed scheme on the following grounds:</p> <ul style="list-style-type: none"> <li>• The proposed residential dwelling is materially different than what was proposed under the lawful development certificate for an ancillary outbuilding.</li> <li>• Proximity of the residential dwelling to the boundary with the Heath would result in harm to the MOL and character of the conservation area.</li> <li>• Proximity to Hampstead Heath Ponds raises concerns on surface water drainage from the new dwelling and the excavation required to facilitate it.</li> <li>• Bin store, access for fire tenders or emergency services extremely limited.</li> <li>• No information in relation to impact on trees.</li> </ul>					

- Harmful subdivision of the garden to create a self-contained dwelling
- No information to confirm compliance with internal space standards or internal daylight standards.
- Poor accessibility due to the need to use steps.

**Hampstead  
Conservation Area  
Advisory Committee**

Hampstead CAAC objected to the proposed scheme on the following grounds:

- Intrusive building on the edge of the MOL – Hampstead Heath, potential fire hazard close to the publicly accessible spaces.
- Visible from Pond 2 edge.
- Lacks essential location and clear delimitation of ownership on the plans, proximity to the ponds is questioned.
- Outside the PD allowance.
- Greatly excessive in scale for an outbuilding.
- Existing and proposed landscaping details required.
- Insufficient information about details of materials.
- Extensions should be as unobtrusive as possible.
- Sedum roof unlikely to support biodiversity.

## Site Description

The application site is the garden of no. 108 South Hill Park Gardens, located on the north-west side of the road. The site is part of Biodiversity Corridor designation of Hampstead Neighbourhood Plan, as shares its rear and side boundary with Hampstead Heath (designated as Metropolitan Open Land) and Hampstead Ponds. The rear garden is accessed along the side of no. 108 and the proposal would include subdivision of the existing plot. The site is also within a Tier III Archaeological Priority Area.

The site lies within South Hill Park Conservation Area and is covered by the Hampstead Neighbourhood Plan.

## Relevant History

Relevant planning history at the application site:

**2020/3409/P-** Erection of outbuilding incidental to the dwellinghouse (use class C3) – Granted Certificate of lawful development **10/08/2020**

## Relevant policies

- **National Planning Policy Framework 2021**
- **The London Plan 2021**
- **Camden Local Plan 2017**
  - Policy G1 Delivery and location of growth
  - Policy D1 Design
  - Policy D2 Heritage
  - Policy A2 Open space
  - Policy A3 Biodiversity
  - Policy A4 Noise and vibration
  - Policy A1 Managing the impact of development
  - Policy H1 Maximising housing supply
  - Policy H4 Maximising the supply of affordable housing
  - Policy H6 Housing choice and mix
  - Policy H7 Large and small homes
  - Policy T1 Prioritising walking, cycling and public transport
  - Policy T2 Parking and car-free development
  - Policy T3 Transport infrastructure
  - Policy CC1 Climate change mitigation
  - Policy CC2 Adapting to climate change
  - Policy CC5 Waste
- **Hampstead Neighbourhood Plan**
  - Policy DH1 Design
  - Policy DH2 Conservation areas and listed buildings
  - Policy NE1 Local Green Spaces
  - Policy NE2 Trees
  - Policy NE3 Biodiversity Corridors
  - Policy NE4 Supporting biodiversity
  - Policy TT2 Pedestrian environments
  - Policy TT4 Cycle and car ownership
  - Policy HC1 Housing mix

- **Camden Planning Guidance**

- CPG Design
- CPG Housing
- CPG Amenity
- CPG Transport
- CPG Energy efficiency and adaptation
- CPG Biodiversity
- CPG Planning Obligations

- **South Hill Park Conservation Area**

## **Assessment**

### **1. Proposal:**

- 1.1 Planning permission is sought for the erection of a structure in the rear garden of the property at no. 108, to provide a 1 bedroom, 2 person dwelling (Class C3).
- 1.2 The building would have a floor area of 63sqm, and a height of 2.5m to the front elevation and west elevation, increasing up to 4.6m in height to the east elevation as the ground slopes down. The floor area would measure approximately 73sqm.
- 1.3 The north boundary of the proposed building would be adjacent to Hampstead Heath.
- 1.4 A set of revised drawings was submitted during course of the application however they are no different than the initial submission.

### **2. Considerations:**

2.1 The main issues to consider in this application are as follows:

- Principle of development
- Creation of new housing, housing mix, unit size
- Standard of accommodation
- Affordable housing
- Design and heritage
- Trees and vegetation
- Sustainability
- Amenity
- Transport
- Planning balance

### **3. Principle of development**

3.1 The application site is the garden of no. 108 South Hill Park, located on the fringes of the Heath. The garden area extends behind the garden of no. 106 and creates a cut through the edge of Hampstead Heath Park and towards Hampstead Ponds. Hampstead Heath is Metropolitan Open Land (MOL) and therefore the requirements of policy A2 of Camden Local Plan and policy G3 of the London Plan are relevant in this assessment, which state that strong protection is given to maintaining the openness and character of MOL and MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt, and that development proposals that would harm the Green Belt should be refused except where very special circumstances exist. Importantly the protection afforded to MOL under policy A2 will apply to developments adjacent to MOL, as per current submission, as well as those within it.

- 3.2 Policies NE1 and NE3 of Hampstead Neighbourhood Plan describe the rear gardens of the properties within South Hill Park as designated Biodiversity Corridors. The policies highlight the need for strong protection of Hampstead's tree lines and biodiversity corridors, and that development should not diminish the ability of biodiversity corridors to provide habitat and free movement of wildlife, and ecological appraisals should be provided to demonstrate how the proposals would enhance both biodiversity and habitats.
- 3.3 The National Planning Policy Framework (NPPF) paragraph 71. suggests local planning authorities should consider setting out policies to resist inappropriate development of residential gardens. Paragraph 124. indicates that planning policies and decisions should support development that makes efficient use of land, taking into account the desirability of maintaining an area's prevailing character and setting, including residential gardens.
- 3.4 Hampstead Conservation Area Appraisal includes Special Policy Areas in relation to the Hampstead and Highgate ridge, which highlights that the Council seeks to preserve or enhance the character of the Heath and its setting and where existing development has a significant proportion of large gardens and unbuilt land, the Council will resist development at densities incompatible with those in the surrounding area and will seek to ensure that a substantial amount of each site remains unbuilt and is used for landscaping and tree planting.
- 3.5 Policy G1 notes that the Council will focus Camden's growth in the most suitable locations, with limited change being acceptable within areas not identified as growth areas or highly accessible locations. Policy D1 and D2, expects development to respect the character of its surroundings, conserve heritage and provide environmental improvements.
- 3.6 Due to the pattern of development, some of the properties within South Hill Park Gardens, share rear boundaries with Hampstead Heath and Hampstead Ponds areas, similarly to the application site. The application garden extends further into the park with a triangular shape. The proposed new dwelling would extend along 11m of the northern boundary with Hampstead Heath. The proposed structure would sit in an area identified as a Biodiversity Corridor in Hampstead Neighbourhood Plan. As such, the self-contained residential use proposed in this location would result in a harmful intensity of use in this location, which would be detrimental to the openness of character of MOL.
- 3.7 Under application ref 2020/3409/P, a Certificate of Lawful Development (Proposed) has been granted for an outbuilding in this location incidental to the enjoyment of the main house, of the same size and projection as the one proposed. Whilst the applicant could erect such a structure without planning permission for purposes incidental to the main dwelling on site, the self-contained nature of the proposal for the purposes of a single residential dwelling would have an additional impact over and above that of a garden outbuilding. Its appearance associated with self-contained use through its boundary treatment, garden setting and paraphernalia associated with the daily functions of a household and the enjoyment of its property would give rise to an added sense of enclosure and human activity which would further detract from the open and tranquil character of the MOL.

#### **4. Creation of New Housing, housing mix, unit size**

- 4.1 Housing is regarded as the priority land-use of the Local Plan as set out in policy H1 and the Council makes housing its top priority when considering the future of unused and underused land and buildings.
- 4.2 Policy H7 seeks to provide a range of unit sizes to meet demand across the Borough. For market units, table 1 of this policy considers 1 bedroom/studios to have a lower priority, 2 and 3 bedroom units to be of high priority and 4 bedroom (or more) a lower priority.

4.3 The proposed development would provide a new 1 bedroom / 2 person dwelling which is a low priority dwelling size. It is recognised that there is a demand for homes of all sizes; however, this is considered an inappropriate location for a new dwelling, as set out in section 3 of this report, and the development would provide only one low-priority dwelling size, and as such, limited weight has been given to the provision of additional housing.

## **5. Standard of accommodation**

5.1 The proposed dwelling would sit at the far end of the garden at no. 108, at a distance of over 35m from the main street. The approach to the entrance into the dwelling would be along the side of no. 108, passing 12 steps and the property's garden. Given the location and length of the approach, it is likely that this would be dark at night and unwelcoming, unless alterations are proposed improve its quality. As the existing pattern of development is of front doors facing the main street, it is considered that the proposed dwelling would lack adequate accessibility which would be detrimental to the standard of accommodation of future occupiers.

5.2 The approach to the new dwelling would be along the side of no. 108

5.3 The proposed dwelling would include a living area with kitchen and dining of 23sqm, and one double bedroom of 20sqm. The living and bedroom areas would be sufficient for 1 bedroom 2 persons dwelling and would exceed national minimum requirements. The structure would have triple aspect which would provide a good standard of accommodation.

5.4 In relation to the internal levels of daylight and sunlight, no assessment was submitted to demonstrate that the light levels within the dwelling would meet BRE minimum standards. Given the position of the structure, window openings and sun orientation it is likely that this would benefit from sufficient daylight and sunlight throughout the year.

5.5 Waste and recycling facilities have been provided to the front garden of no. 108, at over 30m distance from the front of the proposed new dwelling, which have the potential to contribute to additional waste to be scattered along the way and impact Hampstead Heath. However, details of waste and recycling facilities could have been addressed through further details in the event of a positive decision.

5.6 Overall, the proposed structure whilst significantly set back from the street would provide a good standard of accommodation for future occupiers, subject to further details which would have been secured in the event of a positive decision.

## **6. Affordable Housing**

6.1 Policy H4 of Camden Local Plan 2017 requires contribution towards affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA (Gross Internal Area) or more. As the proposed dwelling would have floor area of 63sqm, this would be below the threshold of 100sqm and therefore no contribution would be required in this instance.

## **7. Design and heritage**

7.1 The Council's design policies D1 and D2 are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy D1 are relevant to the current proposal: Development should consider the character, setting, context and the form and scale of host building and neighbouring ones, and the quality of materials to be used. Policy D2 states that the Council will seek to manage development in a way that retains the distinctive character of conservation areas and will therefore only grant planning permission for development that preserves or enhances the special character or appearance of the area.

- 7.2 Hampstead Neighbourhood Plan highlights under policy DH1 that development proposals should demonstrate how they respond and contribute positively to the distinctiveness and history of the character area 3 – 19th Century Expansion throughout their design and landscaping.
- 7.3 CPG Design at para 4.24 indicates, in relation to development in rear gardens, that this should ensure *the siting, location, scale and design has a minimal visual impact, and its visually subordinate to the host garden, not detract from the open character and garden amenity of the neighbouring gardens and the wider surrounding area, use suitable soft landscaping to reduce the impact of the proposed development, ensure building heights will retain visibility over garden walls and fences, use materials which complement the host property and the overall character of the area.*
- 7.4 South Hill Park Conservation Area Appraisal highlights that the properties on the west side of South Hill Park back on to Hampstead Heath, and that the siting, form, and appearance of development on the fringes of the heath and framing views from it are considered to be particularly sensitive.
- 7.5 No. 108 and adjacent dwellings front the main street and have a definite front and rear building line. As such, there is an established character in the area of residential buildings creating the front boundary line along the street and have a front and rear garden. The proposed structure would be out of context as it would sit at a distance of over 35m from the main road. The proposal would subdivide the existing plot, which would harm the existing pattern of development. This would be contrary to policy DH1 of Hampstead Neighbourhood plan which stresses that development should be sympathetic to established building lines and arrangements of front gardens, walls, railings, or hedges.
- 7.6 Whilst the garden at no. 108 is quite large, the proposed structure would have a floor area larger than the host building and neighbouring ones. The garden is sloping towards Hampstead Heath and Ponds which results in additional mass and height to the structure, emphasising its volume and making it an overly dominant and overwhelming, unbalancing the pattern of development within the area. Given the existing site boundaries with the Heath and neighbouring buildings, the resulting shape of the structure is unusual and it does not follow the existing pattern of development nor proposes an enhancement to it.
- 7.7 The proposed structure would have large, glazed openings to the rear elevation facing Hampstead Ponds, and windows on the southern and western sides. No windows are proposed on the norther elevation facing Hampstead Heath. The structure would be built of London stock brick to match the existing building, would have a flat roof and white uPVC windows. The neighbouring context shows a prevailing character of timber framed windows. As the site lies within the conservation area, particular importance is given to preserving or enhancing the existing character. Therefore, the uPVC windows would be an incongruous addition in this location, out of context and unsustainable given their plastic composition. As such, the shape, detailed design and architectural quality of the proposed building is poor and it does not demonstrate any consideration to the existing context and character of existing dwellings or wider area.
- 7.8 The proposed new dwelling would share one side boundary with Hampstead Heath, and would sit within a Biodiversity Corridor area. Due to its bulk and scale the structure would act as a barrier between the rear garden and the Heath, obstructing its openness as well as vegetation, fauna and flora to evolve and enhance the quality of the biodiversity within this corridor area.
- 7.9 The Council has a duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) to ensure that any proposed development in a Conservation Area either preserves or enhances the character or appearance of the Conservation Area. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are



strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 16).

7.10 The proposed new dwelling, due to its position, bulk and detailed design would be overly dominant and visually intrusive in the host garden, which would detract from its open character and garden amenity of the neighbouring properties, and the wider surrounding area, contrary to policies D1 and D2 of Camden Local Plan and DH1 and DH2 of Hampstead Neighbourhood Plan and this would constitute a reason for refusal.

## **8. Trees and vegetation**

8.1 Policy A3 of the Local Plan states that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value, including proposals which may threaten the continued wellbeing of such trees and vegetation, and it requires that the retained trees and vegetation are satisfactorily protected during the demolition and construction phase of development. It also advises that where the harm to the trees or vegetation has been justified by the proposed development it is expected that development should incorporate replacement trees or vegetation.

8.2 Policy A2 highlights that the Council should protect non-designated spaces including gardens where possible, as they have a significant impact on the character of the area. Furthermore, it states that we will resist development which would be detrimental to the setting of designated open spaces and Metropolitan Open Land (MOL).

8.3 The area of garden where the new dwelling is proposed, is bordered to the north by mature trees and vegetation within Hampstead Heath, MOL, and they hold significant amenity value. Aerial views show that the garden proposed to be developed, has mature trees, landscaping and vegetation which potentially hold significant amenity value, given its proximity to the Heath and being located within a Biodiversity Corridor. No information has been provided in relation to the trees and existing vegetation to establish if the proposed structure in this location would not result in harm to their wellbeing.

8.4 The proposed new dwelling would occupy a significant amount of the garden's boundary with the Heath, reducing the opportunities for planting and vegetation to establish as a buffer between the Heath and residential occupation of the plot. The intensity of residential use in such close proximity to the Heath is considered detrimental to the character of the MOL and general biodiversity of the area.

8.5 The proposed structure due to its size and position would reduce the openness of the MOL and garden setting, cause harm to trees and vegetation of significant amenity value, and this would constitute a reason for refusal.

## **9. Sustainability**

9.1 The proposal would be constructed using contextual brick material, and uPVC for windows which is not considered sustainable due to its plastic components and lack of resilience. The structure would have a flat roof but no green roof is proposed.

9.2 In line with policies CC1 and CC2, the Council will require development to incorporate sustainable design and construction measures. The development is classed as a minor development (< 4 units or 500sqm new floorspace), by the Energy Efficiency and Adaption CPG, and therefore an energy statement is not required; however, performance against carbon reduction targets should be included in a sustainability statement, and development is expected to meet overall carbon reduction targets of 19% below Part L of 2013 Building Regulations. Renewable technologies should be incorporated where feasible.

9.3 No information has been provided about the heating system proposed for the dwelling or whether any renewable technologies would be installed. As such, insufficient information has been provided to demonstrate the structure's resilience as a dwelling in terms of climate change mitigation and adaptation policies, contrary to policies CC1 and CC2 and this would constitute a reason for refusal.

## **10. Amenity**

10.1 The proposal would sit in the rear garden of no. 108, away from other residential buildings. Given its location, no reduction of daylight, sunlight, or outlook would be caused to the occupiers of the adjacent buildings.

10.2 Due to the proposed design, there are no windows serving habitable rooms overlooking the neighbouring gardens, and no overlooking would be caused to the future occupiers of the application building.

10.3 The proposed structure to be used as a single-family dwelling, would intensify the use of this part of the garden, bringing additional noise and light pollution in an area which generally is kept dark and tranquil. However, given the distance from other residential dwellings, it is unlikely that the proposal would harmfully affect the quality of life of neighbouring occupiers.

## **11. Transport**

11.1 In line with London Plan and policy T1, for a 1 bedroom 2 person dwelling a provision of 1.5 cycling spaces is required. The proposed development does include provision of cycling facilities in front of the proposed structure. In order to reach this space, the occupiers would have to walk the bike for 35m and over 12 steps, which is not considered appropriate given the orientation and location of the dwelling.

11.2 As the proposal includes creation of one new residential home, if it were to be approved, in line with T1 and T2, the development would need to be secured as car-free via a section 106 legal agreement. In the absence of an acceptable scheme (and hence no section 106 agreement) this becomes a reason for refusal.

11.3 If the proposals were to be approved, to ensure the construction works would be coordinated and not add to the existing traffic pressure on the surrounding streets, a Construction Management Plan (CMP) and Construction Impact Bond (CIB) would need to be secured via section 106 legal agreement. In the absence of an acceptable scheme (and hence no section 106 agreement) this becomes a reason for refusal.

## **12. Planning balance**

12.1 The provision of new housing development is encouraged and would provide additional housing within the Borough, in accordance with policy H1 of Camden Local Plan. Policy H6 recognises that NPPF guidance supports people who want to build their own homes, by having the required professional servicers or by employing other professionals to build a bespoke home to personal specifications. However, this needs to be balanced against the identified heritage, Metropolitan Open Land, design and amenity impacts as set out below.

12.2 The proposed scheme and the provision of a new one bedroom dwelling has been balanced in line with the statutory duty to ensure that any proposed development either preserves or enhances the character or appearance of the Conservation Area, as required under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013, and protects MOL areas.

12.3 The harm caused by the proposed structure would be less than substantial in relation to the significance of the South Park Hill Conservation area and substantial in relation to the impact on MOL - Hampstead Heath. This would unbalance the current pattern of development, reduces visibility and openness of host garden, neighbouring ones and the Heath. Furthermore, the location of the dwelling would be within a designated Biodiversity Corridor as per Hampstead Neighbourhood Plan, reducing the opportunities for planting and animals to thrive and travel between the Heath and residential gardens. Given the position, bulk and design of the new structure, this is not considered to preserve, nor to enhance the character of the conservation area, Hampstead Heath, nor the wider area. The provision of a new residential dwelling is acknowledged, but given it is a low priority dwelling size and this is an inappropriate location for such a use, this would not outweigh the harm caused.

### **13. Recommendation:- Refuse planning permission**

#### Reasons for refusal:

1. The proposed development by reason of its size, position and detailed design would appear as an incongruous development that would have an adverse impact on the character and appearance of the host building, its garden setting and this part of the South Hill Park Conservation Area, as well as resulting in a loss of openness to the Hampstead Heath – Metropolitan Open Land, contrary to policies A2 (Open Space), D1 (Design), D2 (Heritage) of the London Borough of Camden Local Plan 2017 and DH1 (Design), DH2 (Conservation area and listed buildings) of Hampstead Neighbourhood Plan 2033.
2. The proposed development, by reason of its proximity to mature trees on the open spaces next to Hampstead Heath and location within a Biodiversity Corridor, would in the absence of information in relation to the protection of those trees, be likely to impact upon the visual amenity and biodiversity of the area, contrary to policies A2 (Open Space), A3 (Biodiversity), D1 (Design), D2 (Heritage) of London Borough of Camden Local Plan 2017 and NE1 (Local green spaces), NE2 (Trees), NE3 (Biodiversity Corridors) and NE4 (Supporting biodiversity) of Hampstead Neighbourhood Plan 2033.
3. The proposed development, in the absence of a legal agreement for car-free housing, would be likely to contribute unacceptably to parking stress and congestion in the surrounding area, contrary to policies T2 (Parking and car-free development) of London Borough of Camden Local Plan 2017 and policy TT4 (Cycle and car ownership) of Hampstead Neighbourhood Plan 2033.
4. The proposed development would not achieve required carbon reduction targets, and as such, would not minimise the effects of climate change or meet the highest feasible environmental standards, contrary to Policy CC1 (Climate change mitigation) and CC2 (Climate change adaptation measures) of London Borough of Camden Local Plan 2017.
5. The proposed development, in the absence of a legal agreement securing a construction management plan, would be likely to give rise to conflicts with other road users, and be detrimental to the amenities of the area generally, contrary to policies A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials) of London Borough of Camden Local Plan 2017.