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80-83 Long Lane
London, EC1A 9ET

Via Planning Portal Only

4th October 2022

Dear Sir/Madam

FULL PLANNING – THE TOWN AND COUNTRY PLANNING ACT 1990

ERECTION OF BLOCK OF 6 FLATS

139 - 147 CAMDEN ROAD, LONDON, NW1 9HA.

Please accept this covering letter as an accompaniment to this planning application for the erection of a block of 6 flats and associated works. This letter provides a summary of the site and the proposed development.

Please also find enclosed a completed application form accompanied with a full set of existing and proposed plans and elevations, Design and Access Statement, arboricultural impact assessment, noise and vibration assessment, contamination assessment, energy statement, completed construction management proforma and a CIL questions form.

The Site

The site is located on the north-western side of Camden Road, to the north of the junction with Sandall Road. The site comprises an underused car park associated with an existing car maintenance building. The site is bounded to the north-west by the railway line, to the north-east by Cantelowes Skatepark, to the south-east by Camden Road with residential dwellings beyond and to the south-west by the existing single storey vehicle maintenance building.

Cantelowes Gardens is a designated open space with semi-mature trees in close proximity to the application site.

The site is not located in a conservation area or within the setting of any listed buildings. It is located in an area with a Public Transport Accessibility Rating of 4, within Flood Zone 1 of the Environment Agencies Flood Risk Map for Planning and in a Controlled Parking Zone. Camden Square Conservation Area is located to the south of Camden Road.

Planning History

In 1953, permission was refused for a petrol sign on the boundary wall.

In 1960, permission was granted for petrol signs.

On the 7th of April 1964, planning permission (reference TP/103479/1374) was refused for a replacement 2 storey petrol station.

On the 1st of February 1965, planning permission (reference TP/103479/2146) was granted for alterations to existing petrol-filling and service station.

On the 9th of March 1988, planning permission was granted (reference 8700796) for the redevelopment of the petrol station.

On the 5th of September 1991, planning permission (reference 9100216) was approved for the redevelopment for a single storey petrol station.

On the 11th of August 2008, planning permission (reference 2006/3570) was granted for the demolition of the existing building and canopy structure and erection of a new single storey building in connection with the change of use from a petrol filling station (Sui Generis) and motor vehicle sales yard (Sui Generis) to a motor vehicle maintenance and repair place (Class B2) and associated parking.

On the 10th of June 2009, a planning application (reference 2009/2810/P) for the demolition of the existing building and canopy structure and erection of a new single storey building in connection with the change of use from a petrol filling station (Sui Generis) and motor vehicle sales yard (Sui Generis) to a motor vehicle maintenance and repair place (Class B2) and associated parking was withdrawn.

On the 11th of March 2011, Planning permission (reference 2010/5596/P) was refused for the 'Erection of new 6 storey building on vacant land, to provide 9 x self-contained residential units (4 x 2 bedroom flats and 5 x 4 bedroom flats) (Class C3).

On the 22nd of December 2011, planning permission (reference 2011/5226/P) was refused for the Erection of new 5 storey building on land to east of existing motor vehicle maintenance and repair centre (Class B2) to provide 9 (1x studio, 4x1 bed, 2x2 bed and 2x3 bed) self-contained residential units (Class C3) and retention of part of the ground floor parking (reduction from 9 to 3 spaces) associated with existing motor vehicle maintenance and repair centre.

On the 3rd of June 2016, a planning application (reference 2016/3132/P) was withdrawn for the erection of a new 5 storey building on land to east of the existing motor vehicle maintenance and repair centre for office use of the first to fourth floors with retention of part of the ground floor for parking.

On the 4th of August 2022, pre-application advice was sought with respect to the erection of a block of 7 flats (reference 2022/1367/PRE). The advice concluded that:

- Subject to demonstrating that the loss of the car parking spaces would not compromise the existing car maintenance business there would be no objection to the principle of the development.
- There would be preference for the inclusion of a 3 bedroomed unit in the proposed housing mix.
- A legal agreement will be required to secure a financial contribution to affordable housing in Line with the Affordable Housing SPD.
- The application would need to be accompanied by a site contamination survey and a noise report
- The size of units, layout and amenity space provision is acceptable
- The building should consider the generous green buffer that is typical of Camden Road and be suitably scaled to reflect typical building heights in the locality
- The application will need to demonstrate that the proposal does not harm nearby trees
- It is not envisaged that the proposal would have any adverse neighbour amenity impacts.
- It would be preferable if a construction management plan was submitted with the application. A detailed S106 and associated bonds and monitoring contributions will need to be secured by legal agreement alongside a highway contribution for any necessary highway works
- The proposal will need to be car free, secured by legal agreement and cycle parking will be required in accordance with Local and London Plan requirements.
- An application would need to be accompanied by an Energy Statement that demonstrates how the proposal will achieve a 19% reduction in carbon emissions above current building regulations requirements.

In response to the pre-application feedback, the application scheme has been comprehensively revised. Revisions include reducing the height of the building from 5 storeys to 4 storeys, the frontage of the property has been reconfigured to incorporate a low-level boundary wall and landscaping, symmetry has been introduced to the facades fenestration and detailing, providing a modern interpretation of the prevailing Georgian character of the properties on the opposite side of Camden Road. The application is also accompanied by an operational statement, contamination assessment, noise report, arboricultural impact assessment, energy statement and a completed construction management plan proforma. The proposal comprehensively addresses all comments made at pre-application stage.

The Proposal

The proposal is to erect a 3 storey block of residential flats, with a recessed 4th floor, comprising 6 dwellings. The proposed housing mix includes 2 x studio's, 3 x 1 bedroomed flats and a two bedroomed flat (table 1). Long stay cycle parking and bin storage is integrated into the building at ground floor level. Short stay cycle parking is proposed in the front garden. Each flat has a private balcony/ terrace. The proposal is for car free development. Please refer to the supporting plans for full details.

Table 1: Schedule of proposed accommodation.

Unit number:	Number of bedrooms/ persons	Bedroom floor area	NDSS minimum floor area	Proposed floor area	NDSS minimum floor area	In built storage	NDSS minimum storage
1	1b/2p	14.3	11.5	55.6	50	1.5	1.5
2	1b/1p	N/A	7.5	40.30	37	1	1
3	1b/2p	12	11.5	54.1	50	1.5	1.5
4	1b/1p	N/A	7.5	40.3	37	1	1
5	1b/2p	12	11.5	54.1	50	1.5	1.5
6	2b/4p	13-14.6	11.5	90.49	79	1.6	2

Planning Policy:

National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social. The following sections are relevant to the consideration of this application; Section 11 (making effective use of land), Section 12 (achieving well designed places) and Section 16 (Conserving and enhancing the historic environment).

Local Planning Policy

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017), Kentish Town Neighbourhood Plan (2016) and associated Supplementary Planning Guidance. The following policies are considered relevant to this proposal:

London Plan (2021) (LLP)

- Policy D3 – Optimising Site Capacity Through a Design Led Approach
- Policy D4 – Delivering Good Design
- Policy D6 – Housing Quality and Standards
- Policy D12 – Fire Safety
- Policy HC1 – Heritage Conservation and Growth
- Policy T5 – Cycling
- Policy T6.1 – Residential Parking

Camden Local Plan (2017) (CLP)

- Policy A1 – Managing the Impact of Development
- Policy D1 – Design
- Policy D2 – Heritage
- Policy E2 – Employment premises and sites

- 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 CC1 – Climate change mitigation
- Policy CC2 – Adapting to climate change
- Policy CC3 – Water and flooding
- Policy CC4 – Air quality
- Policy CC5 - Waste
- Policy T1 – Prioritising Walking, Cycling and Car-Free Development
- Policy T2 – Parking and Car-Free Development

Kentish Town Neighbourhood Plan (2016) (KTNP)

- Policy D3 – Design principles

Supplementary Planning Guidance Documents (SPDs)

- Design (2021)
- Home Improvements (2021)
- Amenity (2021)
- Transport (2021)
- Trees (2019)
- Energy Efficiency and Adaption (2021)

Planning Analysis:

Principle of development

Planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.

Policy G1 of Camden Local Plan (CLP) sets out that the Council will deliver growth by securing high quality development and promoting the efficient use of land and buildings by supporting development that makes the best use of sites when taking into account: quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility, and other considerations and resisting developments that fail to make efficient use of land.

CLP Policy H1 sets out that Camden has an objectively assessed need for 16,800 new homes by 2031 and seeks to exceed this target by working to return vacant homes to use and resisting alternative development of existing self-contained housing unless it can be demonstrated that the site is no longer developable for housing.

CLP Policy E2 sets out that the Council will protect sites that are suitable for continued employment use by resisting developments for non-business uses unless it can be demonstrated that the site is no longer suitable for the existing business use and the possibility of retaining, re-using or redeveloping the site for a similar or alternative business use has been fully explored over an appropriate period of time.

The proposal does not result in the loss of the existing business use. The vehicular servicing operation will continue to operate irrespective of the presence of the car parking area to which the application relates. The proposal would provide much needed new housing, including family housing and would not conflict with Local Plan Policies G1, H1 and E2.

Housing mix

Policy H6 states that the council will require 90% of new build dwellings to be accessible and adaptable in accordance with building regulations M4(2) requirements and 10% to be for/ be adaptable for wheelchair users in accordance with building regulations M4(3) requirements. Policy H7 advises that the Council will aim to secure a range of homes of different sizes with 2 and 3 bedroomed homes being of the highest priority for market and social dwellings and 1 bedroomed dwellings being highest priority for intermediate tenures.

The proposed housing mix is 5 x 1 bedroomed units, 1 x 2 bedroomed duplex units. The proposal contributes positively to the housing mix in the borough.

Affordable housing

Policy H4 states that the Council will seek to maximise the supply of affordable housing and will expect a contribution to affordable housing from all developments that provide 1 or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The policy continues to set out that where developments have capacity for fewer than 10 dwellings, the Council will accept a financial contribution in lieu of on-site provision. The Council's Housing CPG, at section 6, sets out how to calculate the level of affordable housing contribution required for a new development.

The affordable housing contribution is calculated based on new dwelling capacity with a dwelling being 100 square metres of gross internal floorspace. The CPG sets out the capacity calculated is rounded to the nearest 100 square metres. The proposal is for 6 new dwellings with a combined GIA of 334.9sqm, giving a capacity of 3 dwellings and a percentage target of 6%. When applying the percentage target (6%) to the proposed floorspace (334.9sqm) gives an affordable housing floorspace target of 20.09 sqm. The Council's Housing CPG sets a £5,000 per square metre of new residential floorspace contribution towards off site affordable housing provision. This yields an affordable housing contribution of £100,470. This could be secured by legal agreement.

Design, visual and heritage impacts

Case law dictates that decision makers are required to give great weight to any harm to the significance of a heritage asset. Section 16 of the NPPF reflects the statutory duty insofar as it requires a consideration as to whether the proposal preserves and enhances the significance of the heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset.

Paragraph 130 of the NPPF outlines that decisions should ensure that developments are visually attractive and are sympathetic to local character.

LP Policy D3 sets out that all development must make the best use of land by following a design-led approach. The policy also states that developments should enhance local context, respect local character and be of high-quality architecture. Policy HC1 require development proposals that affect heritage assets, and their settings should conserve their significance and appreciation within their surroundings.

CLP Policy D1 requires development to be of the highest architectural and urban design quality, have regard to design and visual impact and to the context within which it is placed, and the contribution it makes to the landscape qualities of the area. CLP Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.

Camden's adopted design guidance sets out that new development should be designed to integrate well with the surrounding area and respond to existing heritage assets.

The application site comprises an underused area of hard standing that is currently used as ancillary parking/storage for the adjoining vehicle maintenance business. The site currently detracts from the character and appearance of the area. The character of the part of Camden Road in which the application site is located is varied including large institutional buildings, commercial buildings, a public park, blocks of residential flats and C1900 villas. The opposite side of Camden Road has a more uniform character. Generally, buildings are set back between 4 and 10 metres back from the highway edge with varying degrees of landscaping to the frontages. Owing to the sites location adjacent to the railway line and Cantaloves Park its immediate open setting is markedly different from the character of the wider area which is characterised by rows of buildings in perimeter block layouts (figure 1 and 2).



Figure 1: Google maps arial view image of the application site.

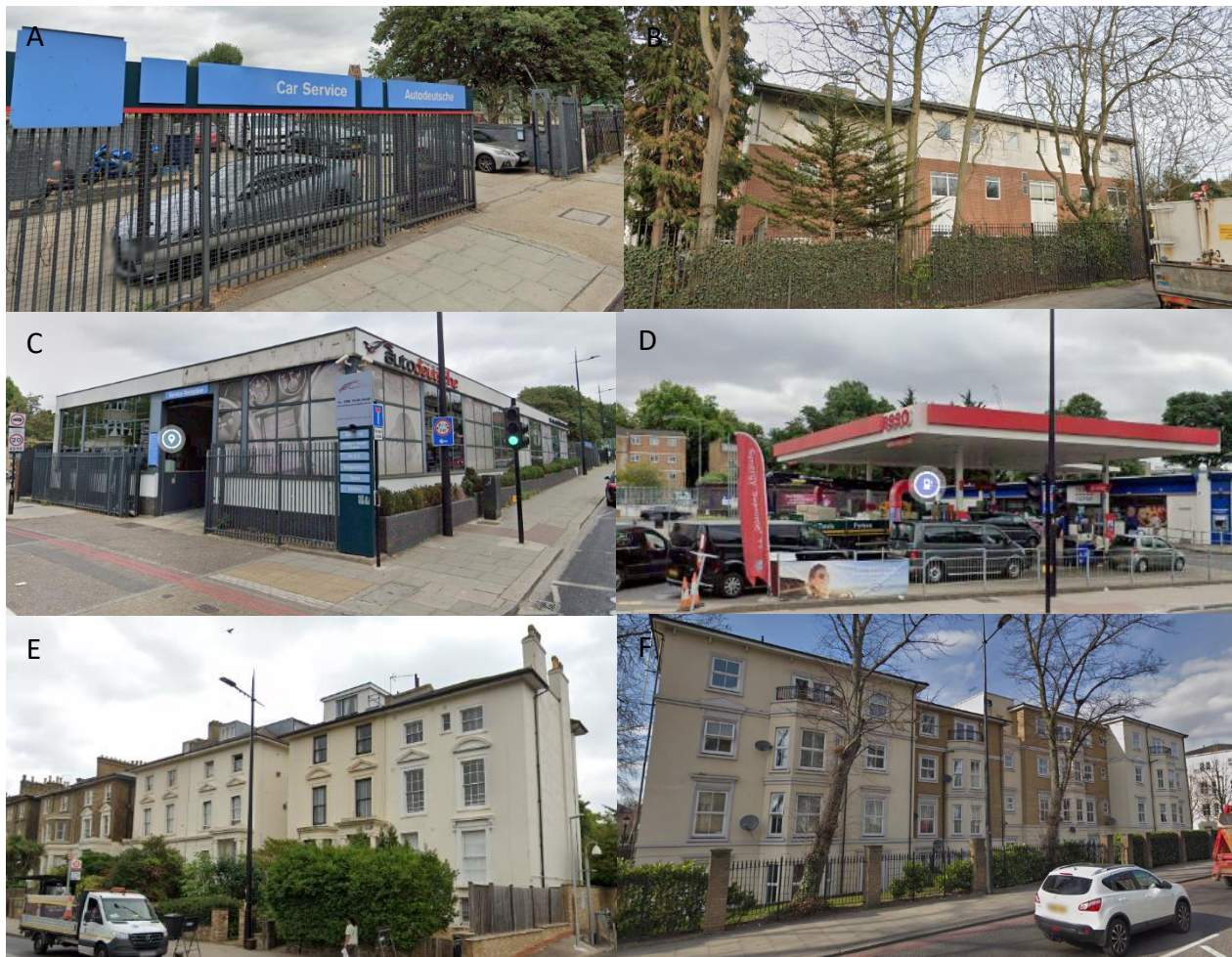


Figure 2: Google maps street view image of the buildings nearest to the application site.

To the southern side of Camden Road is the northern boundary of the Camden Square Conservation Area. The character and significance of the conservation area is centred on Camden Square at the heart of the grid of streets running parallel and perpendicular to Camden Road. The streets comprise of semi-detached and terraced properties dating back to the 1840's having small front gardens, semi-basements, steps to front doors and rear gardens of varying length formed at a time of London's expansion into the suburbs. The conservation area appraisal makes no specific mention of the contribution the setting of the conservation area makes to its significance and describes the area as having a *'self-contained identity centered on Camden Square'*.

Owing to its scale and limited visibility from key views into and out of the conservation area, the existing vehicle parking area has no impact on the setting of the nearby conservation area and makes no meaningful contribution to the setting or significance of the conservation area.

The surrounding residential character is one of 4 storey detached/semi-detached villas, with landscaped frontages, enclosed by low level boundary treatments. Many properties on the street have dormer windows in the roof, providing a 5th floor of habitable accommodation. Predominant finishes include brick, stucco, sash windows with stucco window surround and band detailing. The school buildings to the south-west, flats to the north-east depart from this character insofar as they have greater scale and massing and less ornate finish. The commercial buildings in the sites immediate context significantly depart from the prevailing character insofar as they are single storey in height of considerably greater bulk and are functional in appearance.

The proposed building seeks to respond positively to the established character. The building is sited to mediate between the adjoining commercial building that is pressed against the highway edge and the block of residential flats on the other side of Cantelowes Gardens. The frontage of the building is enclosed by a low level boundary wall with landscape planting, similar to that of the existing commercial building and following the prevailing character of residential frontages. The building, at 3 storeys in height with a recessed 4th floor is wholly in keeping with the scale of residential buildings on the street. The façade treatments comprise regularly placed and symmetric fenestration, brick and window surround detailing that provides a modern interpretation of the villa aesthetic and successfully breaks up the massing of the flank elevations (figure 3).



Figure 3: 3D visuals of the proposed building when viewed from Camden Road.

The scale and design of the building is wholly in keeping with the character of the street. The proposal will enhance the street scene and preserve the contribution that the site currently makes to the setting of Camden Square Conservation Area.

The proposal is in line with the aspirations of LP Policies D3 and HC1, CLP Policy D1 and D2 and KTN Policy D3.

Neighbour amenity

Paragraph 130 of the NPPF sets out that decisions should create places which are safe, inclusive and accessible which promote health and well-being, with a high standard of amenity for existing and future users.

Policy D3 of the LP states that proposals should deliver appropriate outlook, privacy and amenity. Policy D6 sets out that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

CLP policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and ensuring that development protects the quality of life of occupiers and neighbours by not granting permission that would give rise to amenity harm to neighbouring residents.

The proposal is located at least 28 metres from the nearest residential neighbours, on the opposite side of Camden Road. The proposal would not harm neighbour amenity with respect to loss of daylight, sunlight, privacy, outlook, overbearing impacts or other noise or disturbance.

The development meets the amenity aspirations of LP Policy D3, CLP Policy A1 and the Councils adopted Amenity CPG (2021).

Living conditions for future occupants

Paragraph 130 (f) of the NPPF states that planning decisions should 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.

Policy D6 of the London Plan states that housing development should provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners.

CLP Policy H6 states that in all developments the Council will encourage design of all housing to provide functional, adaptable and accessible spaces, and expect all self-contained homes to meet the national derived space standards. The CLP advises that private amenity space is also important in adding to residents' quality of life and CLP Policy D1 requires development to incorporate outdoor amenity space.

Camden's Housing Design Guidance requires development to provide high quality housing that is secure, well lit and has well designed internal layouts.

The application site close to an existing rail line. The application is accompanied by a noise and vibration assessment that sets out, with suitable mitigation measures (enhanced double glazing with trickle vents), the internal and external noise environment would be comfortable for the future occupants and below the recommended limits set out in World Health Organisation, BS 4142, BS6472 and BS8233:2014 guidance.

The new dwellings meet the nationally described space standard requirements with respect to internal space. All habitable rooms are served by at least 1 window, which will ensure that suitable levels of daylight and sunlight are achieved in all habitable rooms. All dwellings are at least dual aspect. Secure and convenient cycle parking and waste storage is provided within/ to the front of the building. The dwellings have access to a private amenity space of at least 5 square metres. The site is well located with respect to access to existing public open spaces, services and facilities by sustainable modes of transportation. The proposal would provide high quality accommodation for the future occupants, in line with LP Policy D6 and CLP Policy D1.

Highway and parking impacts

CLP Policy T1 sets out that the Council seek to encourage sustainable transport by requiring developments to provide cycle parking that meets or exceeds the requirements set out in the London Plan. Policy T2 advises that the Council limit parking availability by requiring all developments to be car free.

The application site is located within a CPZ, restricting parking between the hours of 8.30 and 18.30 Monday – Friday. The site is located in an area with a Public Transport Accessibility Rating of 4, reflecting its reasonable

proximity to existing train and bus connections. The proposal is for car free development which will be secured by legal agreement. Covered secure cycle parking is provided within the building and short stay cycle parking is proposed to the front of the building. The proposal does not hamper the existing access arrangements for the vehicle service centre, which is currently accessed off Sandall Road. The proposal would have no adverse impact on highway safety. The proposal accords with LP Policy T5 and CLP Policies T1 and T2.

Waste storage and collection

Local Plan Policy CC5 requires all new developments to include facilities for the storage and collection of waste and recycling.

An enclosed communal bin store to the front of the property, capable of accommodating 2 x 1100 litre bins (one each for refuse and recycling) and a 360 litre bin for food waste. Sufficient space exists within the properties for temporary waste storage, in accordance with Camden's technical guidance for recycling and waste. The communal store is located to the front of the site, readily accessible by users and collection operatives. The waste storage arrangements would be suitable for a weekly collection. The proposal complies with policy CC5.

Trees

Local Plan Policy A3 sets out that the Council will protect and enhance sites of biodiversity value and protect trees of amenity value.

Whilst the application site does not contain any trees. There is a group of trees, close to the north-eastern boundary, within Cantelowes Skatepark, that could be affected by the proposed development. The application is accompanied by a detailed arboricultural impact assessment that demonstrates that the proposed development can be undertaken without harming the nearest trees. Whilst the proposal is located within the root protection area of these trees, trial pits revealed that the foundations for the intervening boundary treatment form a barrier to root ingress and therefore the proposal would not impact any roots of significance to the health of the adjoining trees. There would be no conflict with Local Plan Policy A3.

Land contamination

CLP Policy A1 sets out that the Council will only grant permission for development unless this causes unacceptable harm to amenity. The policy continues that consideration will be given to contaminated land.

Historically the site was a petrol filling station. The fuel tanks were cleared and filled pursuant to the planning permission (2006/3570) for the adjoining vehicle maintenance business. Notwithstanding this, a petrol station is a potentially contaminative use, and the proposed residential use is particularly sensitive to contamination. A contaminated land assessment accompanies the submission and confirms that there is a moderate/low risk of a significant contamination at the site although some localised remedial work may be required in the vicinity of the underground fuel storage tanks. It is recommended that further ground investigation is carried out. This investigation alongside any recommended remedial works can be secured by appropriately worded planning conditions.

Construction management

CLP Policy A1 sets out that the Council will only grant permission for development unless this causes unacceptable harm to amenity. The policy continues that consideration will be given to construction impacts.

Given a lead contractor has not been appointed yet it is not possible to provide a detailed construction management plan at this stage. However, it is envisaged that the contractor will follow best practices with respect to construction management and neighbour consultation. A completed construction management proforma has been submitted with the application and a detailed construction management plan can be secured by way of legal agreement.

Energy and water efficiency

CLP Policy CC1 requires all development to minimise the effects of climate changes and encourages all new development to meet the highest environmental standards that are financially viable. CLP Policy CC2 requires all development to be resilient to climate change and to adopt appropriate climate change adaptation measures.

The energy efficiency and adaption CPG requires new residential development of between 5 and 9 dwellings to achieve a 19% reduction in carbon emissions above current building regulation requirements. The energy statement that accompanies this application demonstrates that, through the adoption of a fabric first approach (highly efficient glazing, high levels of thermal insulation and air tightness, highly efficient gas boilers) energy efficient fixtures and fittings and the use of solar panels (0.68 kWp), carbon reductions are achieved above that required by policy (a circa 42% reduction in carbon emissions above that required by 2013 part L). Through the use of water efficient fixtures and fittings, it is envisaged that water consumption will be below the higher water efficiency standard of 110L per person/per day.

Closing comments

For the reasons set out in this letter it is considered that the proposed development constitutes sustainable development in accordance with the National Planning Policy Framework. The proposal is in accordance with the adopted development plan and there are no over-riding material planning considerations which suggest the development should not be determined anything but positively in accordance with the adopted development plan.

I trust this letter and the enclosed documents provide you with sufficient information for you to provide detailed advice and look forward to hearing from you with respect to suggested meeting dates. If you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Stuart Minty', is written over a light grey rectangular background.

Stuart Minty - Director - SM Planning