

December 2013

# Town Planning Statement

Former Territorial Army Site, 65-69 Parkhurst Road, Islington, N7 0LJ

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# 1. Introduction

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- 1.1 This planning statement is submitted in support of a full planning application for the redevelopment of the former Territorial Army (TA) centre at 65 – 69 Parkhurst Road in the London Borough of Islington (LBI). The Ministry of Defence (MOD) will retain part of the land and are currently constructing a cadet centre to house their on-going operations. The remainder of the site is therefore surplus to their requirements and will be redeveloped to deliver new housing.
- 1.2 The site is exceptionally well located in proximity to excellent public transport links and the Nags Head Town Centre. However, it is now redundant and therefore an underutilised brownfield site and in line with national, regional and planning policy requirements it presents a significant opportunity where the potential of this site must be optimised to deliver much needed new homes. This is supported by Site Allocation NH5 (adopted in June 2013) which states:

*“The site is outside of the Nag’s Head Town Centre in a predominantly residential area. The majority of the site has potential for intensification for residential accommodation to help meet housing need in the borough. There could be continued Ministry of Defence use on part of the site (regular unit and cadets).”*

- 1.3 The proposed development is for a residential development comprising 150 new homes in a mix of unit sizes, types and tenures, devised by Allford Hall Monaghan Morris (AHMM) Architects, following a careful and detailed contextual analysis of the site and surrounding area and following a significant level of pre-application consultation with LBI and Greater London Authority (GLA) Officers, local residents, and other stakeholders.

## **DESCRIPTION OF DEVELOPMENT**

- 1.4 The application seeks full planning permission for:

*“Demolition of existing buildings and erection of new buildings rising to part 4, 5, 6 and 7 storeys (including a basement on part of the site), to deliver 150 new residential homes (use class C3) in a mix of unit sizes and tenures, together with*

*associated cycle parking, accessible car parking, highways, landscaping and infrastructure works.”*

- 1.5 The application follows pre-application discussions with Officers at the LBI (including presentations to the Members Forum, Streetbook Surgery and Design Review Panel) and the GLA, and consultation with local residents and Tenant Resident Associations (TRA). The LBI Crime Prevention Design Officer has also been consulted.

## **ENVIRONMENTAL IMPACT ASSESSMENT**

- 1.6 On 3<sup>rd</sup> September 2013 Savills wrote to the Council with a request for a screening opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The Council responded on 25<sup>th</sup> September 2013 with their decision which determined that an Environmental Statement is not required for the proposed development. A copy of the Screening Request Letter and the Council's decision is provided at **Appendix 1**. Although the development proposals have evolved since this time, the overall intensity of development has not changed with the number of units remaining within the threshold screened. The storey heights have increased on some parts of the site to up to 7 storeys; however, as explained within this statement this does not result in any significant impacts on the surrounding area. Given that the circumstances of the site and surrounding area remain the same, it is considered the Council's decision remains valid. We therefore request a formal screening response from the Council to confirm this.

## **ACCOMPANYING REPORTS**

- 1.7 This statement describes the application proposals in more detail and relates them to the relevant planning policy framework. It should be read in conjunction with a number of specialist reports which have been prepared in support of the application. These reports include the following:
- Design and Access Statement, prepared by AHMM Architects;
  - Townscape, Visual Impact and Heritage Assessment, prepared by Peter Stewart Consultancy;
  - Market Housing Demand Profile in Islington, prepared by Savills.

- Transport Assessment, prepared by TPP;
- Draft Residential Travel Plan, prepared by TPP;
- Statement of Community Involvement, prepared by Quatro;
- Sustainability Statement, prepared by Wallace & Whittle;
- Energy Strategy Report, prepared by Wallace & Whittle;
- Noise Assessment, prepared by AAD;
- Air Quality Assessment, prepared by Phlorum;
- Daylight and Sunlight Report, prepared by Waldrams;
- Arboricultural Survey, prepared by Middlemarch Environmental;
- Arboricultural Impact Assessment, prepared by Middlemarch Environmental;
- Extended Phase 1 Habitat Survey, prepared by Middlemarch Environmental;
- Bat Survey, prepared by Middlemarch Environmental;
- Health Impact Assessment, prepared by Savills;
- Site Waste Management Statement, prepared by Mansells;
- Utilities Report, prepared by Wallace & Whittle;
- Drainage Assessment Report, prepared by AKT; and
- Ground Investigation Report, prepared by Soiltechnics.

1.8 In addition to the above, we have included the draft section 106 Heads of Terms within section 4 of this statement.

### **STRUCTURE OF THE STATEMENT**

1.9 This report is broken down into the following chapters:

- 1) Introduction (this section);

- 2) Site and Surroundings;
- 3) Background
- 4) The Proposed Development (including Draft Heads of Terms);
- 5) Planning Policy Context;
- 6) Planning Considerations; and
- 7) Summary and Conclusions.

1.10 The appendices referred to within the text are contained at the end of the statement.

## 2. Site and Surroundings

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- 2.1 The site is located at 65-69 Parkhurst Road in the London Borough of Islington, and it comprises the former Territorial Army centre, owned by the Ministry of Defence. The site comprises a main building fronting Parkhurst Road with three other ancillary buildings, ranging from 1 to 3 storeys in height. The remainder of the site is covered in hard-standing, which we understand was used as a marshalling/drill yard.
- 2.2 Further detail about the site and surroundings is provided in the Design and Access Statement. A summary is provided below.
- 2.3 There are a variety of building uses, types and heights along Parkhurst Road and the surrounding area. Uses on Parkhurst Road include: residential accommodation, retail units, community facilities, and a pub restaurant. There are also numerous shops, restaurants and bars on Holloway Road. Building types range from 19<sup>th</sup> century terraces with and without shop-fronts, extensive post-war development and large Victorian houses.
- 2.3 Building heights along Parkhurst Road vary considerably. Adjacent building heights range from large 3-storey dwellings to 4-storey apartment buildings, to mansions blocks at the North of the site being of 5-storeys with a pitched roof. Parkhurst House located opposite the site to the south, is also 5 generous storeys. Along Parkhurst Road, building rise to 4 and 5 storeys.
- 2.4 The Holbrooke Estate to the immediate east of the site rises to 4 storeys, and Tufnell Park Estate to the immediate north rises to 5 storeys with steeply pitched roofs. Security fencing has recently been installed around the Holbrooke Estate to address anti-social behaviour issues, and similarly gates have been locked at the Tufnell Park Estate. A private gated development adjoins the site to the west at Moriarty Close where building heights range from 2 storeys to 4 storeys.
- 2.4 Hillmarton Conservation Area covers much of the area to the south of Parkhurst Road. The adjacent properties at 35 to 63 Parkhurst Road are also within the designated conservation area. The majority of this area was developed in the 1850's and 60's, with 3/4 storey semi-detached villas. There are no statutory listed buildings

in proximity to the site.

- 2.5 The site is in easy reach of London Underground and National Rail services, with a number of stations within walking distance of the site. Holloway Road station (Piccadilly Line) is approximately 890m to the south east of the site. Finsbury Park station (Victoria and Piccadilly Lines) is located 1.3km to the north east, and Tufnell Park station (Northern Line) 1.4km to the west. Upper Holloway station, located 1.1km to the north west provides Overground services. The nearest bus stops are situated to the north east on Parkhurst Road close to Holloway Road. These stops give access to 12 different bus routes. The site therefore benefits from excellent access to public transport, and this is confirmed by its Public Transport Accessibility Level rating of 6a (where 1 relates to the least accessible sites, and 6b relates to the most accessible sites).

### 3. Background

3.1 This section provides a summary of the background to the proposals. A summary of the relevant planning history is provided followed by a brief description of the consultation undertaken by the project team prior to the submission of the application. Further details about the consultation are provided in the Statement of Community Involvement.

#### PLANNING HISTORY

3.2 We have conducted a desk-top search of the planning history records held by the Council for the site and surrounding area. A summary of the key planning history relating to the site and its immediate surrounds is set out in the table below.

Application Number	Description of Development	Decision
<b>The Site</b>		
<i>65-69 Parkhurst Road</i>		
P122481	Construction of single storey cadet centre.	Approved 23rd November 2012.

Application Number	Description of Development	Decision
<b>The Surrounding Area</b>		
<i>Holbrooke Court</i>		
P111596	Installation of new steel doors with screens incorporating caller display panel and 2500mm steel perimeter boundary railings. Installation of 2500m high security vehicle access gates with gerda locks; along with associated works and alterations.	Approved 19 <sup>th</sup> March 2012
P091785	Provision and Installation of new steel doors with screens incorporating caller display panel and 2500mm steel perimeter boundary railings. Provision and Installation of 2500mm high security vehicle access gates with gerda locks. Along with associated alterations	Withdrawn 6th October 2009
<i>Garages at Parkhurst and Tufnell Park Road Estate, Holbrooke Court</i>		
P092158	Erection of one, 4-storey building comprising one 4-bed maisonette and one 2-bed maisonette.	Approved 21 <sup>st</sup> December 2009

<i>83 Parkhurst Road</i>		
P111891	Erection of a single storey rear extension at ground floor level, retention of existing rear extension at second floor level. Conversion of the property from a permitted arrangement of A1 use at ground floor level and residential on upper floors to 3 self contained residential unit (2 x 2 bedroom, and 1 x 1 bedroom) and an A1 unit at part ground floor level.	Refused 15 <sup>th</sup> February 2012
<i>91-93 Parkhurst Road</i>		
P072506	Demolition of existing building and erection of a 4-storey building (plus basement) providing for 1005 sqm D1 (community use) floor space at basement and ground floor levels, 16 flats to upper floors and two on-site disabled parking bays.	Approved 25 <sup>th</sup> October 2007 with conditions and legal agreement.

- 3.3 Until recently, the site was used as a Territorial Army (TA) centre by the MOD. The TA are consolidating their existing facilities onto a smaller parcel of land at the site, which they will retain. A single-storey cadet hut was approved on this retained site by the Council in March 2012 and this is currently being constructed by the MOD. The TA will use the funds from the sale of the surplus land to fund their on-going operations on the site and elsewhere.
- 3.4 With regards to the Holbrooke Court, security fencing has recently been installed following issues with anti-social behaviour arising from non-residents accessing the area. A copy of the officers report to Planning Committee is provided at **Appendix 2**.
- 3.5 The Design and Access Statement supporting the proposal by Homes for Islington (included at **Appendix 3**) stated:
- “There is a continued problem of non-residents accessing the estate and each block on this estate for anti social purposes causing distress and loss of quiet enjoyment for residents of the flats.”*
- 3.6 The same statement was made within the letter from Homes for Islington for the 2009 application; therefore, it is evident that there has been a long-term problem with anti-social behaviour in the area.

## **PRE-APPLICATION CONSULTATION**

- 3.7 The importance of pre-application engagement and front loading is emphasised in the National Planning Policy Framework (NPPF) (March 2012). The NPPF highlights that there is significant potential to improve the efficiency and effectiveness of the planning application system for all parties through early engagement. It states:

*“Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”*

- 3.8 The NPPF encourages local planning authorities to encourage developers to engage with them prior to the submission of a planning application. In addition, it encourages engagement with local communities. Paragraphs 190 and 191 state:

*“The more issues that can be resolved at pre-application stage, the greater the benefits....The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage.”*

### **Public Consultation**

- 3.9 A Public exhibition was held on Wednesday 6<sup>th</sup> November 2013 between 3 pm and 8 pm and on Saturday 9<sup>th</sup> November between 10am and 3pm.
- 3.10 The exhibition was held at the Williamson Street Community Centre, directly across from the application site. A number of exhibition boards were set up for interested parties to view and members of the project team were present at the exhibition to answer queries.
- 3.11 35 persons attended the event, 21 of whom were from Moriarty Close. In general, the attendee’s were supportive of the principle of redevelopment. In summary the issues raised included:
- Occupiers of the adjacent development at Moriarty Close generally support the development but would like to see a reduction in height of the block closest to the Close;

- Residents raised concerns about overlooking, particularly those from Moriarty Close;
- Concern that insufficient car parking is proposed;
- Concerns about the lack of a gate to the entrance inviting illegal parking and loitering; and
- Construction impacts.

3.12 Following the consultation event, the design team revisited the scheme proposals and made revisions to the building height and balcony locations on the block proposed facing Moriarty Close to address comments from adjoining occupiers. In addition, the building line was set back from its originally proposed position to provide greater distance between the existing and proposed building.

3.13 Taking account of the level of interest from residents at Moriarty Close, a further consultation exercise was carried out with these residents on 20<sup>th</sup> November 2013 at the Williamson Street Community Centre to present the changes, where residents broadly supported the revisions made to the scheme.

3.14 Meetings were also held with the Tenant Resident Association representatives from Holbrooke Court and Tufnell Park Estate, and local ward Councillors on 23<sup>rd</sup> October 2013 and 25<sup>th</sup> November 2013;

#### **Consultation with the Local Planning Authority**

3.15 The scheme has been developed in light of extensive pre-application discussions held with Planning and Design Officers at Islington. A number of formal pre-applications meetings were held with Officers at the Council's Planning Department prior to the submission of the application. This included meetings on the following dates:

- 17<sup>th</sup> June 2013;
- 23<sup>rd</sup> July 2013;
- 4<sup>th</sup> October 2013;

- 16<sup>th</sup> October 2013 (Members Forum);
- 6<sup>th</sup> November 2013 (Streetbook Surgery);
- 12<sup>th</sup> November 2013 (Meeting with Officers); and
- 12<sup>th</sup> November 2013 (Design Review Panel).

3.16 The project team engaged directly with Officers at the Council in relation to the design of the development; the scope of the application; transport; sustainability, energy, play provision, waste provision etc. A meeting was also held with the LBI Crime Prevention Design Officer on 30<sup>th</sup> October 2013.

3.17 The development proposals have evolved significantly since conception, and a significant amount of work has been undertaken by the design team, as far as it is feasible, to address the comments made by Officers, particularly in relation to design. A summary of the design evolution and an explanation of how the scheme has evolved to take account of the Council's comments is provided in section 4 of the Design and Access Statement.

#### **Consultation with the Greater London Authority**

3.18 A pre-application meeting was held with the GLA on 18<sup>th</sup> October 2013. Planning, Design and Sustainability Officers were present, together with a representative from Transport for London (TfL). A formal Advice Note was received on 4<sup>th</sup> November 2013 and this concluded that the principle of the redevelopment is acceptable and stated that:

*“the principle of residential redevelopment of this site is strongly supported.”*

3.19 A copy of the formal Advice Note is included at **Appendix 4**.

3.20 A further meeting with the GLA Planning and Design Officer was held on 7<sup>th</sup> November 2013 to discuss amendments made to the proposal since the first meeting. Following this, further revisions were made to widen the strip of land to the rear and to provide front doors on the rear elevation, in order to support the potential for future links through the site north through the Tufnell Park Estate through the existing community gardens.

## 4. The Proposed Development

4.1 The proposed scheme is designed by Islington-based architects, Allford Hall Monaghan Morris (AHMM), who have been involved with a series of high profile, high quality development projects in London, and within the Borough of Islington. The proposal includes the demolition of the existing TA buildings to allow the redevelopment of the site with a modern residential development comprising 150 units.

4.2 Full details of the proposed development are included within the Design and Access Statement and Application Drawings prepared by AHMM Architects. This section provides a summary of the scheme.

### HOUSING

4.3 The development will deliver a total of 150 new residential units in a mix of one, two and three and four bedroom units. All homes have been designed to Lifetime Homes and Flexible Homes Standards and 15 units have been designed to be adaptable for wheelchair users. The wheelchair units comprise 1, 2, 3 and 4 bedroom units and are to be located primarily on the ground floor but one unit is also provided on upper floors. They are provided across a mix of tenures, with one being for social rent and one for intermediate.

4.4 31 of the units will be provided as affordable housing. This is equivalent to 29% on a habitable room basis or 21% on a unit basis. A mix of tenures is proposed, including: social rent and intermediate. The proposed mix is set out in the table below.

	1 Bed	2 Bed	3 Bed	4 Bed	Total
<b>Market</b>	60	47	12	0	119
<b>Social Rent</b>	0	4	7	11	22
<b>Intermediate</b>	5	4	0	0	9
<b>Total</b>	65	55	19	11	150

4.5 The provision of social rent tenure as opposed to affordable rent is a response to Islington's specific and identified need.

4.6 The housing offer has been tested by Gerald Eve as viability consultants.

## DESIGN AND LAYOUT

- 4.7 A design-led approach has been taken to ensure that the layout, scale, massing and architectural style responds appropriately to the site's context. In addition, the scheme has been designed to optimise the potential of the site, whilst respecting neighbouring land uses, the local character and the adjoining conservation area.
- 4.8 The proposed layout contains two blocks, a reverse L shape building fronting Parkhurst Road and a reverse horse-shoe shaped building to the rear providing a south facing internal courtyard. All buildings are set back from the boundary line to varying degrees to ensure neighbouring properties are respected. The existing site access will be retained and improved to provide a shared surface. The proposed building fronting Parkhurst Road rises to 4 storeys with a set back fifth storey. The five storey element turns back into the site along the boundary, before dropping down to three storeys closest to the play space. The U shaped block rises from part 3, part 4 and part 6 storeys on the western edge nearest to Moriarty Close. The block rises to seven storeys at the north eastern corner. The building heights and orientation of the blocks have been designed carefully to take into account surrounding neighbourhood amenity, including overlooking, privacy and daylight and sunlight impact.
- 4.9 All of the upper floor homes will be accessible from generous galleries which will have a width of 1.8m wide, 600mm of which will provide a buffer to the homes. These will be conceived as solid blocks with brick elevations and punched openings to allow light and ventilation through to the windows of the main building. To contrast with the gallery elevation, aluminium panels are proposed on the inner wall.
- 4.10 The landscape strategy for the site comprises a combination of hard and soft landscaping, as explained within section 6 of the Design and Access Statement. The strategy has been developed by AREA Landscape architects, taking into account the pre-application advice particularly from the Council's Streetbook Surgery. The design of the internal courtyard space aims to provide areas for passive recreation, with formal play opportunities provided in a dedicated playground in the north eastern part of the site.

## **DENSITY**

- 4.11 The proposed development will deliver a density of 259 units per hectare, which is equivalent to 753 habitable rooms per hectare. This based on a site area of 0.58 ha.

## **AMENITY AND PLAY SPACE**

- 4.12 In terms of amenity space, all residential units will have access to their own garden (for ground floor units), terraces or balconies. In total private amenity space extends to 1,487 sqm.
- 4.13 In addition, a high quality south facing landscaped communal courtyard is proposed providing approximately 295 sqm, together with a smaller area at the northern end of the access road providing approximately 125 sqm.
- 4.14 The access route through the site from Parkhurst Road is to be provided as a shared surface, prioritising pedestrians and cyclists and providing for a more comfortable environment for the new homes that face onto it.
- 4.15 Further details can be found in the Design and Access Statement prepared by AHMM Architects.

## **ACCESS, PARKING AND SERVICING**

- 4.16 Parkhurst Road will be used to access the site through the existing improved two-way access road. This will provide for on-site servicing, refuse and emergency vehicle access. Due to the borough's policy on car free developments, the proposal has been designed to provide essential drop-off parking and accessible parking only. 14 disabled parking spaces are provided within the basement, with 2 provided on the shared surface access.
- 4.17 276 cycle parking spaces are proposed for the residential users within secure cycle stores, which is equivalent to one space per bedroom.

## **SUSTAINABILITY AND ENERGY**

- 4.18 A number of initiatives are proposed to ensure that a sustainable development is delivered, and these measures are set out in detail in the Sustainability Statement and Energy Statement prepared by Wallace & Whittle. A summary of the measures is

provided below:

- redevelopment of a brownfield site with excellent links to public transport;
- all homes have been designed to achieve Code for Sustainable Homes Level 4;
- the incorporation of passive design and energy efficiency measures, a Combined Heat and Power (CHP) Plant and Photovoltaic (PV) Panels will deliver a 40% reduction in carbon dioxide emissions;
- provision of biodiverse green roofs;
- sustainable transport measures including a car free development, provision of cycle parking, and a commitment to develop a Travel Plan;
- provision of adequate waste and recycling storage;
- a sustainable mix of housing, in a mix of unit sizes and tenures, and housing for wheelchair users; and
- incorporation of sustainable urban drainage systems.

## **SECTION 106 DRAFT HEADS OF TERMS**

4.19 The applicant confirms that they are willing to enter into a Section 106 Agreement with the LBI and will provide solicitor's details on request. Draft Heads of Terms are set out below; however, these will be subject to viability considerations; an assessment against the tests set out in paragraph 204 of the NPPF and the Community Infrastructure Levy (CIL) Regulations (2010, as amended); and further discussions with the LBI.

- On-site provision of affordable housing;
- A contribution towards transport and public realm improvements within the vicinity of the site;
- A contribution towards public open space improvement works within the vicinity of this site;
- A contribution towards sport and recreation facilities within the vicinity of the site;

- A contribution towards community facilities within the vicinity of the site;
- A contribution towards children and young people's informal recreation facilities;
- The repair and re-instatement of the footways and highways adjoining the development;
- Compliance with the Code of Employment and Training.
- Facilitation of work placements during the construction phase of the development, lasting a minimum of 13 weeks. If the placements are not provided a fee of £5,000 per placement not provided will be required;
- Compliance with the Code of Local Procurement;
- Compliance with the Code of Construction Practice, including a monitoring fee of and submission of site-specific response document to the Code of Construction Practice for approval of LBI Public Protection, which shall be submitted prior to any works commencing on site;
- Connection to a local energy network, if technically and economically viable;
- Removal of eligibility for residents' parking permits;
- Submission of a Green Performance Plan;
- Submission of a final Travel Plan for Council approval 6 months after first occupation of the development and an update on progress to be submitted 3 years after occupation; and
- Council's legal fees in preparing the s106 and officer's fees for the preparation, monitoring and implementation of the s106.

## 5. Planning Policy Context

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5.1 Section 38 of the Planning and Compulsory Purchase Act 2004 states:

*“where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”.*

5.2 The Development Plan for the site comprises the London Plan (2011); the LBI Core Strategy (2011), the LBI Development Management Policies Document (2013) and the Site Allocations Development Plan Document (2013). Material considerations include; the National Planning Policy Framework (NPPF); regional and local supplementary planning guidance/documents; emerging guidance and site specific circumstances.

### **NATIONAL POLICY**

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

5.3 The NPPF was issued in final form in March 2012. It replaces the vast majority of the pre-existing national planning policy documents. The Ministerial Foreword of the NPPF says that the purpose of planning is *“to help achieve sustainable development”*, which should work to enhance and improve the places in which we live. In defining sustainable development, the NPPF refers to the UN General Assembly’s definition which is set out below:

*“meeting the needs of the present without compromising the ability of future generations to meet their own needs”.*

5.4 Paragraph 7 of the NPPF sets out three dimensions of sustainable development: supporting a strong, responsive and competitive economy; strong, vibrant and healthy communities and protecting and enhancing the natural, built and historic environment. Paragraph 15 highlights that Local Plan policies should follow the approach of the presumption of sustainable development, whilst paragraph 197 confirms that the presumption needs to be central to the decision-making process.

5.5 Paragraph 9 of the NPPF makes it clear that *“improving the conditions in which*

*people live*” and *“widening the choice of high quality homes”* are central to achieving sustainable development. Housing supply is another key issue which is central to the NPPF. The 2<sup>nd</sup> bullet point of paragraph 7 states that it is one of the responsibilities of planning to provide *“the supply of housing required to meet the needs of present and future generations”*. Paragraph 47 relates specifically to boosting the supply of housing.

- 5.6 Paragraph 50 states that to deliver a wide choice of high quality homes, planning authorities should:

*“plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community”*.

- 5.7 The use of brownfield land is encouraged in paragraph 17 of the NPPF. Paragraph 111 goes on to say that the *“effective use”* of such land should be encouraged, provided it is not of high environmental value. The 11<sup>th</sup> bullet-point under paragraph 17 (Core Planning Principles) refers to managing patterns of growth to make the fullest possible use of public transport, walking and cycling. Paragraph 34 supports this assertion.

- 5.8 Paragraph 56 of the NPPF states that *“good design is a key aspect of sustainable development”* and that it should *“contribute positively to making places better for people”*. Therefore:

*“In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”*.

## **REGIONAL POLICY**

### **The London Plan**

- 5.9 The London Plan provides a planning policy framework until 2031. This document was adopted in July 2011.

## Sustainable Development

- 5.10 Planning policies set out in the London Plan promote sustainable development. Policy 2.1 (London in its Global, European and United Kingdom Context) provides support for the development of London in ways that secure the plan's social, environmental and economic objectives. Policy 5.3 (Sustainable Design and Construction) states that development proposals should demonstrate that sustainable design standards are integral to the proposal.
- 5.11 The Mayor expects all development to make the fullest contribution to the mitigation of climate change. Policy 5.2 (Minimising Carbon Dioxide Emissions) requires that development proposals follow the energy hierarchy: 1) Be lean: use less energy, 2) Be clean: supply energy efficiently, and 3) Be green: use renewable energy. In accordance with Policy 5.6 (Decentralised Energy in Development Proposals), the feasibility of Combined Heat and Power (CHP) systems should be evaluated for development proposals. Policy 5.7 (Renewable Energy) requires the provision of on-site renewable energy generation where feasible to provide a reduction in carbon dioxide emissions, and Policy 5.9 states that particular attention should be paid to the use of passive solar design and natural ventilation in developments.
- 5.12 Policy 5.10 (Urban Greening) states that development proposals should integrate green infrastructure to contribute to urban greening. This can include tree planting, green roofs and soft landscaping. Policy 5.11 (Green Roofs and Development Site Environs) states that major development proposals should be designed to include roof, wall and site planting in order to mitigate climate change. Policy 5.12 (Flood Risk Management) and Policy 5.13 (Sustainable Drainage) relate to national flood risk assessment requirements and the need to utilise sustainable urban drainage systems within development proposals.
- 5.13 Policy 5.14 (Water Quality and Wastewater Infrastructure) outlines that development proposals must ensure that adequate wastewater infrastructure capacity is available with development. Policy 5.15 (Water Use and Supplies) outlines that new development should have proper regard to the impact of the proposals on water demand and existing capacity by minimising the use of treated water and minimising rainwater-harvesting opportunities. In accordance with Policy 5.17 (Waste Capacity), suitable waste and recycling storage facilities should be provided in all new

developments.

- 5.14 Policy 5.18 (Construction, Excavation and Demolition Waste) and Policy 5.21 (Contaminated Land) relates to sustainable waste behaviour and the need to ensure that development does not activate or spread contamination.
- 5.15 Policy 7.19 Policy 7.21 seeks to retain existing trees and states that any loss as a result of development should be replaced following the principles of 'right tree, right place'.
- 5.16 Development proposals should also be devised taking account of Policy 7.14 (Improving Air Quality) and 7.15 (Reducing Noise and Enhancing Soundscapes).

### Housing

- 5.17 Policy 3.3 seeks provision of at least an annual average of 32,210 net additional homes across London up to 2015/2016. Table 3.1 sets housing provision monitoring targets for London boroughs, of which Islington's is 1,170 additional homes per year between 2011 and 2021.
- 5.18 Policy 3.4 (Optimising Housing Potential) states that development proposals that compromise the policy to optimise housing output taking account of local context and character, design principles and public transport capacity should be resisted. The policy justification states at paragraph 3.29 that:

*"While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility..."*
- 5.19 Table 3.2 provides a guidance density range for this Urban site of 200-700 hrph or 45-260 uph. Paragraph 3.28 confirms that *"It is not appropriate to apply Table 3.2 mechanistically."*
- 5.20 Policy 3.5 (Quality and Design of Housing Developments) states that new housing should enhance the quality of local places and should incorporate minimum space standards in general conformity with Table 3.3.
- 5.21 Policy 3.8 requires housing development to offer a range of housing choices, in terms

of the mix of housing sizes and types, taking account of the housing requirements of different groups. This policy also requires all new housing to be built to Lifetime Homes standards and 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The provision of play space is encouraged through Policy 3.6 (Children and Young People's Play and Informal Recreation).

### Affordable Housing

- 5.22 Policy 3.12 (Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes) requires development to deliver the maximum reasonable amount of affordable housing whilst having regard to a number of factors, including current and future requirements for affordable housing; affordable housing targets; the need to encourage rather than restrain residential development; the need to promote mixed and balanced communities; the size and type of affordable housing needed in particular locations; and the individual circumstances of a site for example the developments viability and the availability of public subsidy.
- 5.23 Policy 3.11 (Affordable Housing Targets) states that 60% of the affordable housing provision should be for social rent and 40% for intermediate rent or sale, and that priority should be given to family housing. The policy allows boroughs to set separate targets for social rented and intermediate housing.

### Design

- 5.24 Policy 7.1 (Building London's Neighbourhoods and Communities) states that development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to employment opportunities, commercial services and public transport. New buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood; and should meet the principles of lifetime neighbourhoods. In accordance with Policy 7.2 (An Inclusive Environment) requires development proposals to take account of the principles of inclusive design.
- 5.25 Policy 7.2 states that proposals should aim for the highest standards of accessibility and inclusion and that the design process should from the outset consider how everyone will be able to utilise places and spaces that are proposed, including

disabled and deaf people, older people, and children.

- 5.26 Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating, in accordance with Policy 7.3 (Designing Out Crime). Policy 7.13 (Safety, Security and Resilience to Emergency) also requires development proposals to include measures to design out crime.
- 5.27 Policy 7.4 (Local Character) requires development to provide a high quality design response having regard to the pattern and grain of existing spaces and streets; the urban structure and the surrounding historic environment.
- 5.28 Policy 7.5 (Public Realm) supports development that enhances the public realm.
- 5.29 Policy 7.6 (Architecture) says that new development should be of the highest architectural quality, whilst also being of an appropriate proportion and scale so as not to cause unacceptable harm to the amenity of surrounding land and buildings, especially where these are in residential use. The policy requires development to optimise the potential of sites.
- 5.30 In relation to heritage assets, Policy 7.8 (Heritage Assets and Archaeology) of the London Plan states that where development affects a heritage asset and its setting, it should conserve that asset's significance by being sympathetic in terms of form, scale and materials.

### Transport

- 5.31 Chapter 6 of the London Plan provides policies on highways and transport matters, including Policy 6.3 (Assessing Effects of Development Transport Capacity), which requires the submission of Transport Assessment with major planning applications. Policy 6.9 (Cycling), Policy 6.10 (walking) and Policy 6.13 (Parking), all promote sustainable travel behaviour through encouraging measures to promote walking, cycling and by setting maximum parking standards.

### **Revised Early Minor Alterations to the London Plan (October 2013)**

- 5.32 The Mayor adopted Revised Early Minor Alterations to the London Plan on the 11<sup>th</sup> October 2013. These alterations seek to ensure that the London Plan is fully

consistent with the NPPF and up to date with regards to Government guidance and national legislation enacted since July 2011. The alterations are now operative as formal alterations to the London Plan and form part of the development plan for Greater London.

- 5.33 The alterations insert the following paragraph (3.14A), which emphasises the pressing housing need and limited land availability in London:

*“The Mayor recognises the pressing need for more homes in London and to help boost significantly the supply of housing this Plan sets out the average annual housing targets for each borough until 2021 as a minimum level for delivery. These targets are informed by the need for housing as evidenced by the 2008 Strategic Housing Market Assessment and London’s housing land capacity as identified through the Strategic Housing Land Availability Assessment. Consistent with the recently published National Planning Policy Framework, this approach takes account of London’s locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development.”*

#### **Homes for London: Draft London Housing Strategy 2013**

- 5.34 The draft Housing strategy outlines that the GLA will work with partners to deliver at least 42,000 new homes a year, which is based on population growth and housing need assessment work.

#### **GLA Supplementary Planning Guidance**

- 5.35 The Mayor has also produced a number of supplementary planning guidance (SPG) and best practise guidance (BPG) documents that have been considered in the preparation of the development proposals. These are listed below:

- Sustainable Design and Construction SPG (2006);
- Draft Sustainable Design and Construction SPG (July 2013);
- Accessible London: Achieving and Inclusive Environment SPG (2004);
- Draft Shaping Neighbourhoods: Character and Context SPG (February 2013);

- Draft London Planning Statement SPG (December 2012);
- Housing SPG (November 2012);
- Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012); and
- Wheelchair Accessible Housing BPG (September 2007).

## LOCAL POLICY

### LBI Core Strategy (2011)

5.36 The London Borough of Islington's Core Strategy was adopted on 17<sup>th</sup> February 2011.

5.37 The site falls within the Nag's Head area, and is identified on Map 2.7 of the Core Strategy as a 'Key Area'.

5.38 Core Strategy Policy CS9 (Protecting and enhancing Islington's built and historic environment) seeks to protect and preserve the historic urban environment. Part A promotes the perimeter block approach and states that *"The aim is for new buildings to be sympathetic in scale and appearance and to be complementary to the local identity."* Part B confirms that the Borough's heritage assets will be conserved and enhanced. Part C reiterates the requirement for a perimeter block approach for new development. Part D says that all development will need to be based on coherent street frontages and new buildings need to fit into the existing context of facades. Part F of Policy CS9 says that new homes need to provide dual aspect units with a clear distinction between a public side and a quieter private side. Part G acknowledges that high quality contemporary design can respond to the historic environment as well as traditional architecture. Part E of Policy CS9 states that

*"New buildings and developments need to be based on a human scale and efficiently use the site area, which could mean some high density developments. High densities can be achieved through high quality design without the need for tall buildings."*

5.39 The Council's sustainable design policy is covered in Policy CS10 (Sustainable

Design). This policy seeks to minimise the Borough's contribution to climate change and ensure development respects the environment whilst improving quality of life. The policy promotes zero-carbon development; requiring development to minimise on-site carbon dioxide emissions by achieving an on-site reduction of at least 40% if feasible, and promoting decentralised energy networks.

- 5.40 Part B of Policy CS10 (Sustainable Design) requires all development to achieve the highest feasible BREEAM and Code for Sustainable Homes ratings. Parts C to I of Policy CS10 respectively promote water efficiency; on site ecology; sustainable drainage systems; sustainable-sourced, low impact and recycled materials; sustainable lifestyles; sustainable modes of transport and increasing the energy efficiency of existing homes and businesses.
- 5.41 The Council promotes sustainable waste behaviour through Policy CS11 (Waste).
- 5.42 Policy CS12 (Meeting the housing challenge) outlines the measures LBI will take to meet its housing challenge *“to provide more high quality, inclusive and affordable homes.”* LBI set out an aspiration to meet and exceed their housing target set by the Mayor of London. Part D of this policy says that residential developments should not exceed the density levels set out in the London Plan, whilst Part E requires that a range of unit sizes are provided through residential developments. This includes maximising the proportion of family housing in both affordable and market housing.
- 5.43 Part G relates to affordable housing and sets out a requirement for the maximum reasonable amount of affordable housing, especially social rented housing. This section recognises that the delivery of affordable housing will be subject to financial viability assessments, the availability of public subsidy and site-specific circumstances. A tenure split of 70% social housing and 30% intermediate housing is sought by the policy.
- 5.44 Part H of Policy CS12 says all new housing will comply with flexible homes standards, with at least 10% of new homes provided as wheelchair housing.
- 5.45 In accordance with Policy CS15 (Open Space and Green Infrastructure), development proposals should protect and enhance biodiversity and maximise opportunities to green the borough. Policy CS16 requires new inclusive play space to be delivered as part of new developments.

## **LBI Development Management Policies Document (2013)**

- 5.46 The LBI adopted its Development Management Policies Document in June 2013. Policy DM2.1 requires all forms of development to be of high quality, incorporate inclusive design and make a positive contribution to the character and local distinctiveness of the area, based upon an understanding and evaluation of its defining characteristics. Developments are required to prove how they positively address the site and its surroundings. Permission will be refused for development of poor design that fails to take opportunities for improving the character and quality of an area, or the way it functions.
- 5.47 Policy 2.2 (Inclusive Design) states that all developments shall demonstrate that they: provide for ease of and versatility in use; deliver safe, legible and logical environments; produce places and spaces that are convenient and enjoyable to use for everyone, and bring together the design and management of a development from the outset and over its lifetime. To achieve a safe environment, paragraph 2.8 states:
- “Developments must meet the principles set out in Safer Places (2004) and Secured by Design through consultation with Islington’s crime prevention design advisor; and achieve inclusive design.”*
- 5.48 In accordance with Policy DM2.3 (Heritage) requires new development within the setting of conservations area to be of high quality. Planning applications are required to include a Heritage Statement which demonstrates a clear understanding of the significance of heritage assets affected by proposals and the impact on their significance.
- 5.49 Policy DM3.1 (Mix of Housing Sizes) requires all sites to provide a good mix of housing sizes. It also requires that developments ensure the range of housing sizes needed in the borough are provided.
- 5.50 Policy DM3.4 (Housing Standards) requires all new housing developments to meet specific criteria. These include: accommodation of adequate size, that includes functional and useable space that has good provision for play, amenity and garden space. 10% of all housing is to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Rooms must be designed to function comfortably and efficiently and storage standards are also outlined. Kitchen/diners

should normally be provided as separate from living rooms. Minimum space standards are set out, as well as guidelines for minimums space in relation to accessible parking. New residential units are also required to be dual aspect.

- 5.51 Private outdoor space is considered in Policy DM3.5 (Private Outdoor Space). All new residential development will be required to provide good quality private outdoor space in the form of gardens, balconies, roof terraces, and/or glazed ventilated winter gardens, with minimum standards outlined.
- 5.52 Policy DM3.6 (Play Space) outlines that all major developments are required to provide play space based on anticipated child yield. Provision shall be 5 sqm of private/informal play space per child.
- 5.53 In accordance with Policy DM3.7 (Noise and Vibration), development proposals must demonstrate how potential adverse noise impact on and between dwellings will be mitigated by housing layout, design and materials.
- 5.54 Policy DM6.1 (Healthy Development) states that all major residential development will be assessed for impacts on additional health services utilisation arising from the development and the capacity of existing services. Large development will be required to submit a Health Impact Assessment (HIA).
- 5.55 In accordance with Policy DM6.5 (Landscaping, Trees and Biodiversity) development must protect and enhance the biodiversity values of sites, and should minimise impacts on trees. Green roof provision should also be maximised.
- 5.56 Policy DM7.4 (Sustainable Design Standards) outlines that major new build residential developments will be expected to achieve Code for Sustainable Homes Level 4, up until 2016. It also requires all developments to comply with Islington's Code of Practice for Construction Sites. In accordance with Policy DM7.1 (Sustainable Design and Construction), development proposals are required to integrate best practise sustainable design standards. Decentralised energy networks and the potential for connection to them are considered in Policy DM7.3 (Decentralised Energy Networks), and Policy DM7.5 (Heating and Cooling) outlines the sequential cooling hierarchy.
- 5.57 Policy DM6.6 (Flood Prevention) requires development proposals to demonstrate

how sustainable urban drainage systems have been incorporated.

- 5.58 In order to manage transport impacts Policy DM8.2 (Managing Transport Impacts) requests that a Transport Assessment and Travel Plan are submitted in support of the development proposals. The transport needs of pedestrians public transport users and cyclists are prioritised above those of motor vehicles through Policy DM8.1 (Movement Hierarchy). Policy 8.4 (Walking and Cycling) and Policy DM8.5 (Parking) also promote the reduction of car use. In accordance with Policy DM8.6 (Delivery and Servicing for New Developments) encourages off-street delivery and servicing arrangements.

### **LBI Site Allocations Development Plan Document (June 2013)**

- 5.59 LBI adopted its Site Allocations DPD in June 2013. It sets out site specific policy for main sites where development is expected in the plan period. The application site is identified within this document as site NH5.
- 5.60 The site allocation states that the majority of the site has the potential for intensification for residential accommodation to help meet the housing need in the borough.
- 5.61 With regards to design, the document requires amenity issues to neighbouring residential properties to be satisfactorily resolved. In addition, any development proposals should conserve and enhance the historic character of the area.

### **LBI Supplementary Planning Guidance**

- 5.62 A number of supplementary planning documents (SPD) have also been considered in the preparation of the development proposal. These include the following:
- Accessible Housing SPD (March 2009);
  - Draft Inclusive Design SPD (September 2013);
  - Inclusive Landscape Design SPD (January 2010);
  - Islington Urban Design Guide SPD (December 2006);
  - Planning Obligations SPD (July 2009);

- Draft Planning Obligations SPD (August 2013);
- Environmental Design SPD (October 2012); and
- Streetbook SPD (October 2012).

## 6. Planning Considerations

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6.1 This section assesses the proposals against the planning policy framework for the site. Consideration is given to the principle of the proposed residential use and other planning issues arising from the redevelopment proposal, including:

- Housing Mix;
- Affordable Housing;
- Market Housing;
- Economic Benefits;
- Design Considerations;
- Quality of Residential Development;
- Impact on Neighbouring Amenity;
- Density of Development;
- Transportation considerations;
- Sustainability and Energy;
- Health Impact;
- Noise Impact;
- Air Quality Impact;
- Ecology and Trees; and
- Contamination.

### **PRINCIPLE OF RESIDENTIAL DEVELOPMENT**

6.2 The site has been allocated within the Site Allocations DPD (June 2013) as being appropriate for residential development. The principle of a residential development

on the site has therefore already been considered to be acceptable by the Council. The potential for the site to deliver housing was identified by the Council in 2009 through the work undertaken for the London Strategic Housing Land Availability Assessment (SHLAA) (October 2009) / Housing Capacity Study (HCS) which Islington worked on with the GLA.

- 6.3 The need for housing and the need to boost the supply of housing is well documented in national, regional and local planning policies. Chapter 6 of the NPPF says that Local Planning Authorities need to *“boost significantly the supply of housing”*. Paragraph 49 of this document clearly states that, *“housing applications should be considered in the context of the presumption in favour of sustainable development.”* London Plan Policy 3.3 recognises the *“pressing need for more homes in London”* and part B of the policy sets out a requirement to deliver an annual average of 32,210 net additional homes across London. It is noted that the draft Housing Strategy outlines the Mayor’s intention to increase this annual target to 42,000 as a result of more recent work undertaken by the GLA in relation to housing need and demand.
- 6.4 London Plan Policy 3.4 seeks to optimise housing output, stating that *“Development proposals which compromise this ... should be resisted.”* Table 3.1 of the London Plan requires that a minimum of 1,170 new homes should be delivered in Islington during the plan period of 2011 – 2021. Addressing these regional policies, the GLA in their pre-application report welcome the provision of housing (paragraph 9).
- 6.5 Locally, Core Strategy Policy CS12 states that the Council will meet its housing challenge, to provide more high quality, inclusive and affordable homes by *“seeking to meet and exceed the borough housing target...”* Paragraph 1.122 of the Core Strategy also identifies that there is a clear need for more housing in the borough.
- 6.6 It is noted that part G of Policy 3.3 of the London Plan states that boroughs should monitor housing capacity and provision against the average targets in Table 3.1 of the London Plan. The plan sets Islington a minimum 10 year target of 11,700 units, and an annual monitoring target of 1,170 units. The development proposals optimise the housing output from the site, and this will help the borough to meet and exceed the minimum targets that have been set, addressing the requirements of local, regional and national planning policy.

- 6.7 The proposals will deliver: high quality residential accommodation to a high standard; a flatted development with a mix of unit sizes and types which is appropriate to the site and area; the provision of a mix of tenures to meet local housing needs; and amenity space and landscaping to provide a suitable external environment for the proposed housing. Furthermore the scheme has been designed to ensure that there will be no significant impact on the amenity of neighbouring occupiers and careful consideration has been given to the vehicle and pedestrian access strategy for the site.
- 6.8 The scheme proposes to deliver 150 residential units on a brownfield site in line with the site allocation requirement to intensify the use of the land to deliver residential accommodation to help meet housing need in the borough. There is a predominance of residential uses in the surrounding area. Furthermore, the site also benefits from excellent accessibility to public transport and local facilities. There is an expressed need for housing locally, regionally and nationally; therefore, the principle of a residential use on the site is considered to be acceptable and is wholly in accordance with local, regional and national planning policies.

### HOUSING MIX

- 6.9 In accordance with the aims and objectives of local, regional and national planning policies, the proposed development will deliver a wide choice of high quality homes in a mix of unit sizes and tenures. The scheme will deliver 150 new dwellings, in a mix of one, two, three and four bedroom homes.
- 6.10 The table below provides the percentage mix of the proposed development:

Unit	Proposed Mix	Percentage Split
1 bed flat	65	43%
2 bed flat	55	37%
3 bed flat	19	13%
4 bed flat	11	7%
Total	150	100%

- 6.11 The table above demonstrates that 20% of the homes are provided as family homes (with 3 bedrooms or more) across the tenures. Breaking this down further 81% of the social rented accommodation provides family housing.
- 6.12 As such the proposals comply with the NPPF, London Plan Policy 3.8, part E of Core

Strategy Policy CS12 and DMP Policy DM3.1.

## **AFFORDABLE HOUSING**

- 6.13 31 new affordable units (128 habitable rooms) are proposed. This is equivalent to 21% of the units, or 29% of the habitable rooms. 22 of these units will be provided in the social rent tenure, and 9 in the intermediate tenure. This is equivalent to a tenure split of 71% social rent and 29% intermediate (on a unit basis). The affordable units are designed to be of a high quality and are fully integrated within the overall scheme. The proposals therefore fully comply with Core Strategy Policy CS12. Whilst the tenure split differs from the London-wide target set out in London Plan Policy 3.11, it is noted that the policy allows local authorities to set their own tenure targets, and as such, the proposals are acceptable in this respect.
- 6.14 The Core Strategy expects that new development delivers the maximum reasonable amount of affordable housing taking into account the strategic borough wide target of 50% split between 70% social rented and 30% intermediate. London Plan Policy 3.12 also states that the maximum reasonable amount of affordable housing should be negotiated on individual schemes, having regard to a number of factors including: current and future requirements for affordable housing; affordable housing targets; the need to encourage rather than restrain residential development; the need to promote mixed and balanced communities; the size and type of affordable housing needed in particular locations; and the specific circumstances of the site. The policy states that negotiations should take account of development viability and the availability of public subsidy.
- 6.15 The London Plan policy requirements are reflected in part (G) of Core Strategy Policy CS12 which states that the Council will seek the maximum reasonable amount of affordable housing, whilst acknowledging that the provision will be “*subject to a financial viability assessment...*” The policy also confirms that the availability of public subsidy and the individual circumstances of the site will also be taken into account.
- 6.16 Although below the strategic target of 50%<sup>1</sup>, the proposed quantum and mix of affordable housing reflects viability considerations and the lack of availability of

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<sup>1</sup> The Council's strategic target of 50% is for the whole of the borough and it would include schemes provided 100% affordable housing, which would balance out where some schemes cannot provide a higher proportion because of viability consideration. Paragraph 3.3.17 confirms this: “*It is important to*

affordable housing grant. A Financial Viability Assessment has been prepared by Gerald Eve and has been submitted on a confidential basis in support of the planning application to underpin the viability arguments. This demonstrates that in accordance with local and regional planning policy requirement, the proposals provide for the maximum reasonable amount of affordable housing. The quantum and mix proposed seeks to optimise the delivery of affordable housing within the constraints of viability and taking into account the reduced availability of public subsidy. The proposals are therefore in accordance with local and regional planning policies.

## **MARKET HOUSING**

- 6.17 The NPPF states that housing delivery should reflect local demand (paragraphs 50, 159), as such, the proposed market housing mix has been developed taking account of advice from agents regarding the demand for unit sizes and types in the area.
- 6.18 It is proposed to deliver 60 one bedroom units, 47 two bedroom units and 12 three bedroom units. Whilst this does not follow the guidance mix provided in Table 3.1 of the DM DPD, an up-to-date assessment of market housing demand (Market Housing Profile Demand in Islington) has been undertaken by Savills Research to consider the demand for housing locally. This is submitted in support of the application.
- 6.19 This analysis indicates that the proposed mix is well matched to the profile of active demand in the N7 area and Islington markets. The scheme therefore addresses the requirements of the NPPF.

## **ECONOMIC BENEFITS**

- 6.20 The proposed development will also bring with it economic benefits during the construction and operational phase, as explained within the 'Employment and economic impact of the proposed development of 65-59 Parkhurst Road, paper' prepared by SQW (included at **Appendix 5**). The assessment explains that the proposals are expected to deliver the following economic benefits:
- Creation of approximately 322.7 FTE temporary job years in construction;
  - Creation of approximately 52.6 FTE jobs in consumer services;

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*note that the strategic target relates to the delivery across all sites in the borough, and so includes sites which will achieve 100% affordable housing."*

- The Council will receive approximately £240,000 per annum in council taxes; and
- The Council will be paid a new homes bonus of approximately £1.9 million over 6 years.

## DESIGN CONSIDERATIONS

- 6.21 National guidance, the London Plan and adopted local planning policies all place considerable emphasis on the importance of achieving good quality design to ensure that new developments are appropriate to the shape, size and location of the site. A detailed description of the main design principles underpinning the proposed development are set out in the Design and Access Statement prepared by AHMM. In addition, this section should be read in conjunction with the Townscape, Visual Impact and Heritage Assessment (TVIHA) that has been prepared by Peter Stewart Consultancy which provides an independent expert review of the design proposals and an assessment of the verified local views prepared from locations that were agreed with LBI Officers during the pre-application process.
- 6.22 The site is currently underutilised and it is occupied by a number of utilitarian buildings ranging from 1 to 3 storeys in height, surrounded by extensive hardstanding. The existing buildings do not positively contribute to the street scene or to the character of the area or the setting of the conservation area; therefore the proposed redevelopment offers an opportunity to enhance the character and appearance of the site and the surroundings. This is particularly important because the NPPF states that *“great weight should be given to outstanding and innovative designs which help raise the standard of design more generally in the area.”* The proposed development will deliver a significant improvement offering a number of design and townscape benefits, including the intensification of development on this underused site, the introduction of residential use, provision of a sense of place and architecture of a high quality.
- 6.23 The design and layout of the scheme has been informed by a detailed contextual analysis, which considered the constraints and opportunities associated with the site, surrounding land uses and built form. A design led approach has been adopted to deliver a design and layout which is fully compatible with the urban grain and

character of the surrounding area; and which optimises the potential of the site. The design and layout has also been developed following extensive pre-application discussions with LBI Planning and Design Officers; and also the GLA, who commented:

*“The approach of using the proposed built form to define and overlook the open spaces is supported. The location of a building fronting directly onto Parkhurst Road is welcomed, as this provides good quality street frontage and clearly marks the entrance to the development... (paragraph 27)”*

### **Site Layout, Permeability and the Perimeter Block Approach**

6.24 It is noted that during pre-application discussions both the GLA and LBI have encouraged the potential to enable a north-south link through the site connecting Parkhurst Road to Tufnell Park Road. The design team has given this careful consideration taking account of a number of factors:

- During early discussions with the Council Housing Officers it was confirmed that there were no plans to regenerate the nearby Holbrooke Court and Tufnell Park Estate. Any provision of a north-south link through the site would require a co-ordinated and strategic approach led by the Council across all departments. This is not the case currently and therefore there is no reasonable prospect for a link to be provided for at least the medium-term.
- Whilst a route would be desirable from an urban design perspective, it is not possible to achieve a clear line of site from Parkhurst Road up to the north because of the shape of the site and because of intervening land which is outside of the control of the applicant.
- The Council has recently approved and installed security fencing at Holbrooke Court and similarly at Tufnell Park Road gates have been locked because of anti-social behaviour issues that have been affecting these estates for a number of years. Please see section 3 of this report for further details about the planning permission that was granted in March 2012 for the installation of the new fencing.
- A meeting with the chairs of the Tenant Resident Associations (TRA) at

Holbrooke Court and Tufnell Park Estate indicated that residents of these estates do not support the opening up their estates, and the provision of connections through the site to their estates.

- The Council's Estate Services Co-ordinator who attended the TRA meeting confirmed that he would not support the opening of the estates due to anti-social behaviour issues and future management issues.
- A meeting was held with the Council's Crime Prevention Design Officer who confirmed that the site should be treated as a cul-de-sac and links should not be provided to the estates. Please refer to section 8 of the Design and Access Statement for further information on the meeting.
- The residents of Moriatry Close raised concerns about the lack of a gate at the entrance of the development, which will in their view encourage anti-social behaviour, which they have also been experiencing.
- There are also physical constraints which affect the deliverability of the links, including:
  - the nursery building to the north east has to maintain a secure perimeter due to the nature of the use where the safety of young children must be prioritised;
  - the playground owned by the Council (which has recently been improved and secured with high fencing through significant investment by the Council) is also located to the north east;
  - the Tufnell Park Estate community gardens are located on the western part of the northern boundary and would require part-removal to facilitate the route;
  - there is a level change on the northern boundary of approximately 0.8 metres from the site down to the Tufnell Park Estate; and
  - there are existing mature trees located on the northern boundary and given these are not of poor quality, there is a local and regional policy requirement to retain these which limits the design solutions available.

6.25 Further to the above, when designing the layout the design team have given full

consideration to other design issues that are equally important taking account of planning policy considerations. Amongst other matters, these include:

- the need to orientate buildings to avoid creating overlooking, privacy, overshadowing, daylight and sunlight amenity issues, both within the scheme and in relation to impact on adjoining neighbours;
- the need to provide adequate and high quality amenity and play provision on the site for future occupiers;
- the need to optimise the potential of the site for housing output; and
- the need to provide a high standard of accommodation which is safe and secure for future occupiers.

6.26 Taking account of the above conflicting considerations, the scheme has been 'future-proofed' so that links can be provided in the future. In particular, it is noted that the layout addresses specific comments from the Design Officer at the GLA who asked for the re-orientation of horse-shoe shaped building to provide an adequate strip of land along the northern boundary together with front doors to the rear of this block.

6.27 Further explanation about the consideration of permeability through the estate is provided in permeability study included within the Design and Access Statement. However, for the purposes of this application, appropriate boundary treatments are proposed to provide a safe and secure boundary for future residents to address London Plan Policy 7.3 and 7.12, and to address the concerns of the neighbouring estate residents, the LBI Estate Services Co-ordinator and LBI Crime Prevention Design Officer.

6.28 With regards to the perimeter block approach advocated by Core Strategy Policy CS9, this is intrinsically linked with the constraints identified above. The difficulties of strictly following the perimeter block approach on this irregular shaped and constrained site are explored within the Design and Access Statement. Notwithstanding the difficulties, the design approach will deliver well defined street frontages along Parkhurst Road, along the access route through the site and along the northern boundary. This has been achieved through the provision of front doors onto the street and maximised opportunities for natural surveillance from the units

above. The landscape strategy also forms an important part of the desire to make the internal street a well-used shared space where pedestrians are prioritised, and where residents are directed towards the formal children's play space as they enter the site.

- 6.29 The block fronting Parkhurst Road is generously set back from the pavement, according with the general adjoining building line and grain. A recessed entrance porch provides access to the building, and appropriate defensible space is provided. This will provide an active street frontage to Parkhurst Road which responds to the character of the conservation area.

### **Scale and Massing**

- 6.30 The proposals seek to respect the form, scale and grain of the surrounding townscape, and will make a positive contribution to the character of the area. In addition, as explained above, the buildings have been designed to be of a human scale to ensure that a positive relationship is created at street level.
- 6.31 The buildings will rise to a maximum of 7 storeys in the north west corner of the reverse horse-shoe shaped building at the northern end of the north-south access route. The GLA commented in their pre-application advice<sup>2</sup> that the height of the scheme did not raise strategic concerns; however they felt that it did not reflect the hierarchy of the surrounding streets and spaces. They suggested that an alternative distribution of building heights would involve providing taller elements fronting onto Parkhurst Road and the potential new route through the site<sup>3</sup> in order to create a more legible environment. These comments were carefully considered by the design team in the context of advice from the LBI who considered that the height fronting Parkhurst Road should be restrained because of the adjoining conservation area. As such the building fronting Parkhurst Road will rise to 4 storeys with a fifth storey set back, with the building height rising to 7 storeys fronting the northern end of the potential new route.
- 6.32 Following the public exhibition, the building abutting Moriarty Close was reduced in height to 3 storeys with a fourth storey set back. This addressed concerns that residents attending the exhibition had raised, in relation to overlooking and general

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<sup>2</sup> The GLA advice was based on a scheme comprising additional height along the boundary with Moriarty Close, but with the same storey heights on the rest of the site.

<sup>3</sup> The scheme does propose taller elements along the potential new route.

amenity issues. At a follow-up consultation with Moriatry Close residents, the changes to the scheme were explained to residents, and they were broadly supportive of the revisions made to the scheme.

### **Inclusive Design**

6.33 The creation of an inclusive environment has also been at the forefront of design considerations for both internal and external areas of the development to ensure that the development can be used safely and easily by all. As such an Access Consultant, David Bonnett, was appointed at an early stage of design development.

6.34 The scheme has been designed to achieve Lifetime and Flexible Homes standards, providing 10% of the homes (by unit and habitable rooms) as adaptable to wheelchair standards. Lift access is provided to all blocks. In addition the need to design out crime and create a safe and secure environment for residents (both future and existing neighbouring residents) has been a key consideration (as explained above), and the proposals have been developed taking on board advice from LBI Crime Prevention Design Officer. The proposals are therefore compliant with London Plan Core Strategy and Development Management Policies, providing a safe, secure and inclusive environment.

### **Architectural Quality**

6.35 The proposals have been designed to be of the highest architectural quality in accordance with London Plan Policy 7.6, Core Strategy Policy CS9 and DM Policy 2.1. The carefully proportioned blocks and architectural details will help to activate and define the public realm.

6.36 The building fronting Parkhurst Road has been designed to respond most directly to the character of the conservation area, with the remaining blocks reflecting the key attributes of the conservation area but with a modern approach. Overall a unified approach to the application of materials and detailing is proposed and this is explained further within the Design and Access Statement.

6.37 The predominant material is proposed to be brick and the same brick is proposed throughout the site. Glass and coloured metal facing and reveals are proposed, with warm grey and green colours. To contrast with the brick facade, aluminium panels

will provide the facing material on the inner wall. Projecting balconies will employ coated metal finished, with windows and doors being timber frames internally and faced with aluminium externally.

- 6.38 The TVIHA concludes that the proposed development will enhance the site in terms of architectural quality, urban design and townscape.

### **Heritage and Townscape**

- 6.39 Peter Stewart Consultancy has prepared a Townscape, Visual Impact and Heritage Assessment which assesses the impact of the proposals on the significance of the significance of the Hillmarton conservation area. In respect of impact on heritage assets, the Assessment concludes:

*“The proposed development will not have a harmful impact on any elements of setting that contribute to the significance of conservation areas, listed building, or locally listed building. Where visible from any designated heritage asset the design of the proposed development is such that it will enhance these views.”*

- 6.40 With regards to townscape impact, the TVIHA considers the verified views in detail. The assessment concludes:

*“The visual impact of the Proposed Development is limited to views close to the Site and principally from the main route of Parkhurst Road, which is characterised by a mix of mainly residential developments; and from the routes that follow or align onto the backland area: Holbrooke Court.”*

*“Where visible, the Proposed Development will enhance these views with an appropriately scaled and distinctive urban development of a residential character. The high quality design of the buildings and carefully selected colour palette for architectural elements will animate the brick elevations. The Proposed Development will create a distinctive sense of place on a Site where one does not currently exist.”*

- 6.41 The proposed development will significantly enhance the quality of the townscape of the area, and the townscape setting of nearby heritage assets.

## **QUALITY OF RESIDENTIAL DEVELOPMENT**

- 6.42 In accordance with DMP Policy 3.4, Core Strategy Policy CS12 and London Plan Policy 3.5, a high quality of residential accommodation is proposed. The dwellings have been designed to meet and exceed the minimum space standards set out in the London Plan. Furthermore, adequate play and amenity space has been provided, together with off-street refuse and recycling storage. Consideration has also been given to inclusive design standards and the need to provide an appropriate internal environment in terms of noise and air quality.

### **Internal Space Standards**

- 6.43 The proposed development will deliver a high quality of residential accommodation across all tenures. The units have been designed to achieve the Mayor of London's minimum space standards which are set out in Table 3.3 of the London Plan and the Development Management Policies DPD. In designing the scheme, consideration has also been given to the guidance in the GLA Housing SPG (2012) and Development Management Policies DPD (2013).

### **Aspect**

- 6.44 All of the units provide dual aspect accommodation and as such will ensure that a high quality of residential accommodation is provided in accordance with DMP Policy 3.4 and Core Strategy Policy CS9.

### **Flexible Homes, Lifetime Homes and Wheelchair Housing**

- 6.45 In accordance with London Plan Policy 3.8 and Core Strategy Policy CS12 (H), all of the homes have been designed to meet the 16 criteria of Lifetime Homes standards. In addition, the homes have been designed to take account of the Flexible Homes standards that are outlined in the LBI Accessible Housing SPD (2009). Further details about how the redevelopment will provide for inclusive access is provided within the Design and Access Statement, together with schedules of compliance which assess the homes against the requirements of the Council's adopted and emerging Accessible Housing SPD.
- 6.46 15 units (47 habitable rooms) equivalent to 10% of the units or 11% of the habitable rooms in the development have been designed to be adaptable to wheelchair

standards. The Design and Access Statement provides details on how these homes can be easily adapted to wheelchair accessible housing.

- 6.47 The landscape strategy has also been developed to take account of the guidance contained in the Council's Inclusive Landscape Design SPD (2010) and Streetbook SPD (2012).

### **Amenity Space**

- 6.48 All of the residential units will have access to private amenity space in the form of balconies, rear gardens or terraces. In total, 1,487 sqm of private amenity space is proposed, which is equivalent to an average of 9.9 sqm per home. The private amenity space provision accords with the Mayor's Housing SPG which requires 5 sqm for homes with 1 or 2 occupants, and additional 1 sqm for each additional occupant. All of the balconies are provided with a minimum depth of 1.8m.
- 6.49 Taking account of the requirements of DMP Policy DM3.5, all of the units on the upper floors are provided with private amenity space to comply with the standards. With regards to the ground floor units, private amenity space provision has been maximised within the site constraints through the provision of rear gardens, and this will be supplemented by the communal amenity space provided on the site, which is acknowledged by the Council at paragraph 3.64 of the DMP DPD as a way of dealing with challenging sites. The communal amenity space will be accessible, well maintained and managed.

### **Play Space**

- 6.50 The multifunctional courtyard design will provide for areas of passive play, whilst more formal provision has been provided within the dedicated play space in the north eastern part of the site.
- 6.51 The play strategy has been developed taking account of the GLA SPG on 'Shaping Neighbourhoods: Play and Informal Recreation' (2012), London Plan and DMP Policies. Using the GLA child yield calculator, the scheme has the potential for a child yield of approximately 64 children, of which 17 children would fall within the under 5's age group. In accordance with pre-application advice from the GLA, on-site playspace provision is provided for the under 5's and financial contributions will be

secured within the s106 agreement to deliver provision, or improvement, of off-site play facilities for older children.

- 6.52 The Mayor's SPG requires the provision of 10 sqm per child; therefore, there is a requirement for 170 sqm of playspace on-site for children under 5. As explained within the Playspace Assessment contained at section 6 of the Design and Access Statement, the scheme will deliver a formal play area comprising 190 sqm together with opportunities for informal play and recreation in the landscaped courtyard (comprising approximately 295 sqm) and shared surface areas. It is noted that DMP Policy 3.6 only requires 5 sqm per child for schemes of this size; therefore, based on local standards the proposals will exceed the LBI requirements in respect of playspace for children under 5.
- 6.53 The hub space provides further amenity space and an incidental playspace, allowing for social interaction and providing playable street furniture. This area providing approximately 125 sqm allows an opportunity for older age groups.
- 6.54 The GLA SPG outlines that play space for 5-11 year olds should be within 400 m walking distance of the site, and play space for children over 12 should be within 800 m of the site. Section 6 of the Design and Access Statement explains that Chambers Park is located approximately 260 metres away, and the play areas at Holbrooke Court and at Hollins/McCall House are located 250 metres and 540 metres away respectively.
- 6.55 Further details about existing play facilities within walking distance of the site are provided in section 6 of the Design and Access Statement.
- 6.56 The proposed development is therefore compliant with London Plan Policy 3.6, Core Strategy Policy CS16 and DMP Policy DM3.5 and 3.6.

#### **Internal Daylight/Sunlight**

- 6.57 The Daylight and Sunlight Report includes an assessment of daylight and sunlight levels within the scheme. This concludes that the scheme has been carefully designed to enhance the daylight and sunlight within the scheme and in overall terms the results indicate that the scheme will be acceptable for this urban location taking account of BRE Guidance.

## **Noise**

- 6.58 A Noise Assessment had been prepared by AAD and this is submitted in support of this application.
- 6.59 The Noise Assessment provides details of the measures that are to be incorporated into the detailed design (in relation to facade performance, glazing specification and ventilation) which will ensure that the proposed development will deliver the internal acoustic levels set out within DMP Policy DM3.7.

## **Air Quality**

- 6.60 The site is located in an Air Quality Management Area; therefore, an Air Quality Assessment has been submitted in support of the application. The report concludes that the proposals have been determined to be acceptable in terms of its impact upon, and sensitivity to, local air quality. The proposals are therefore in accordance with London Plan Policy 7.14 and DMP Policy 6.1.

## **IMPACT ON NEIGHBOURING AMENITY**

### **Daylight and Sunlight Impact**

- 6.61 The site layout and scale of the proposed development has been designed taking into account the existing townscape, and to ensure that the impact on neighbouring amenity is minimised.
- 6.62 A Daylight and Sunlight Report prepared by Waldrams is submitted in support of the planning application, and this presents the findings of a comprehensive assessment which has been carried out in accordance with BRE guidelines. The assessment considers the impact of the proposals on the following buildings:
- 18-24 McCall House, Tufnell Park Road;
  - 45-57 McCall House, Tufnell Park Road;
  - Children's Day Centre;
  - 25-30 Moriatry Close;

- 31-36 Moriatry Close;
- 41-60 Moriatry Close;
- 61-62 Moriatry Close;
- 1-24 Holbrooke Court;
- 25-40 Holbrooke Court;
- 41-80 Holbrooke Court;
- 41-52 Parkhurst Road; and
- 57, 59, 61 & 63 Parkhurst Road.

6.63 The assessment concludes that all rooms and analysed in surrounding properties will meet or be sufficiently close to the BRE Guidelines as to be acceptable within the proposal in place. As such the proposals are acceptable in this respect.

6.64 The study also consider the impact of the proposal on neighbouring open amenity spaces, and this demonstrated that all of the spaces will retain sunlight in accordance with BRE Guidelines' criteria.

### **Overlooking and Privacy**

6.65 As noted above, the site layout and scale of the proposed development has been designed to respect the adjoining residential uses to avoid the potential for overlooking. This has been achieved through a number of design measures, including: maintaining reasonable distances between buildings, orientating buildings away from existing buildings and the careful placement and design of windows. The proposals are therefore considered to be acceptable in this respect. This is explained further in section 8.3 of the Design and Access Statement.

6.66 The potential for overlooking was a concern for residents of Moriatry Close and therefore as part of the evolution of the scheme design, the nearest block was set back by flipping the units to provide deck access from the Moriatry Close side and balconies facing into the internal courtyard. As explained above, the height of the building was also reduced by two storeys on this facade from part 5, part 6 storeys to

part 3, part 4 storeys.

### **Noise Impact**

- 6.67 The proposals are for a residential development which is compatible with the surrounding land uses. The principle of a residential development on the site is supported by the LBI and GLA, and also by local residents who indicated their support during the pre-application consultation. As such, it is considered that the development will not give rise to noise impact on the surrounding area.
- 6.68 Any construction noise impact will be mitigated through best practice measures as outlined within the Noise Assessment.

### **DENSITY OF DEVELOPMENT**

- 6.69 London Plan Policy 3.4 encourages proposals to optimise housing output, taking into account local context and character, the design principles in Chapter 7 and public transport capacity. The policy states that development proposals which compromise this policy should be resisted. The proposed density of the scheme is 753 hrph (habitable rooms per hectare) or 259 units per hectare.
- 6.70 As explained above, a design led approach has been taken by AHMM and the density proposed is a product of the design that has evolved following a detailed contextual analysis, and following a number of pre-application meetings with Officers at the LBI and a meeting with the GLA. The design has been prepared to ensure that: the proposals enhance the character of the existing built environment; the amenity of existing residents is maintained; and the proposed residential accommodation is of a high quality. The scheme has evolved and various iterations of the scheme were produced to address comments as they arose during the pre-application consultation. This is explained further within section 4 of the Design and Access Statement. It is noted that the proposed density has reduced following revisions made to the scheme which resulted in reductions in scale, particularly on the block adjacent to Moriarty Close.
- 6.71 In line with the objectives of the NPPF, the proposals seek to make the most efficient use of the site, given its location and exceptional accessibility, whilst respecting the site context. Core Strategy Policy CS9 also seeks to ensure that developments

propose the efficient use of sites, as do adopted policies within the London Plan. The London Plan includes a density matrix at Table 3.2 which provides guidance on appropriate densities at different locations. Para. 3.28 of the London Plan outlines that it is not appropriate to apply the density matrix mechanistically and this was confirmed within the GLA's pre-application advice.

- 6.72 For those sites benefiting from a PTAL of 6a; the indicative density ranges comprise 200 – 700 hrph for urban sites or 45-260 uph. The proposed density is above this guidance range when considering the number of habitable rooms, but at the upper end of the range when considering the number of units per hectare. As stated above the Mayor does not think it appropriate to apply the matrix mechanistically; therefore, due to the location of the site, particularly its accessibility to public transport links and to the Nags Head Town Centre, it is considered that this density level is acceptable for this scheme which delivers a high quality design approach.
- 6.73 It is considered that the design approach to redeveloping the site is robust and the proposals have been prepared following a detailed contextual analysis to ensure that the scheme respects the built environment and does not result in any detrimental impacts on the amenity of existing residents. The proposed design will create a spacious and high quality development for future residents and the siting of the building will not result in any unacceptable impacts on existing properties surrounding the site.
- 6.74 The proposals comply with the Council's sustainable design aspirations providing a car-free development and providing high quality landscaped amenity and play space. Furthermore, the proposed development will not have an unacceptable impact on the daylight and sunlight conditions within neighbouring properties, and will not give rise to any potential for overlooking. Accordingly, the proposals do not exhibit any symptoms of overdevelopment and are entirely appropriate given the site context. The density proposed, being a product of the design is therefore considered entirely appropriate.
- 6.75 In summary, the design has been developed through consultation with LBI and GLA Planning and Design Officers, and has evolved to take into account the concerns raised by Officers and residents as part of the pre-application process. Taking into consideration the above aspects of the scheme and also the excellent accessibility to

public transport and local facilities, it is apparent that the proposed development seeks to make efficient use of the brownfield site, optimising housing output whilst ensuring that high quality living accommodation is delivered. The proposed density, which is the outcome of the design-led approach taken, is therefore considered to be acceptable and is thus in compliance with the prevailing planning policy at all levels.

## **TRANSPORT IMPACT**

- 6.76 The impact of the development in relation to the local highway network, public transport, cycling and the pedestrian environment has been fully considered within the Transport Assessment (TA) submitted in support of this application.

### **Access**

- 6.77 It is proposed that the single vehicle access from Parkhurst Road will be retained. This will also serve to provide access for the cadet centre.

### **Car Parking**

- 6.78 The development will be car-free in accordance with Core Strategy Policy CS10 and DMP Policy 8.5. 15 accessible car parking bays and 1 drop-off space will be provided on-site for the occupiers of the wheelchair homes. 14 of these are to be provided within the proposed basement which will be accessed from a ramp located between the cadet centre site and the internal courtyard. 2 spaces are provided along the access road.
- 6.79 Residents will not be entitled to apply for on-street parking permits and this will be secured as part of the s106 agreement. TfL have confirmed that they support a car free development given the site's exceptionally high public transport accessibility level of 6a.

### **Cycle Parking**

- 6.80 276 cycle parking spaces are proposed to be provided in secure cycle stores located within the basements and at ground level within the landscaped areas. 45 of these spaces will provide accessible cycle parking and 30 will provide or family cycle parking. The provision of cycle parking accords with DMP Policy 8.4, and London Plan Policy 6.9.

## **Servicing**

- 6.81 The TA concludes that servicing trips to the site are likely to be minimal and that servicing can take place on-site as there is provision for a turning head at the end of the access road. The proposals are therefore in accordance with DMP Policy 8.6.
- 6.82 A Delivery and Servicing Plan will be developed for the site as set out within the TA.

## **Highway and Public Transport Impact**

- 6.83 The TA concludes that the development is not expected to have an adverse impact on the public transport and highway. It outlines that:

*“...the development is not expected to have an adverse impact on public transport services.”*

*“Overall, the level of vehicle trips are expected to reduce due to the residential scheme being car free, save for the provision of accessible bays, whereas there are currently large areas of hard standing capable of accommodating parked vehicles.”*

## **Travel Plan**

- 6.84 A Draft Residential Travel Plan is submitted in support of the planning application and will be secured within the s106 agreement. This will help to discourage private car journeys and will promote sustainable travel behaviour in accordance with local and regional policies.

## **SUSTAINABILITY AND ENERGY**

- 6.85 A Sustainability Statement and Energy Statement has been prepared by Wallace & Whittle, which considers the proposals in the context of planning policy requirements, particularly those advocated by the national government, the Mayor of London in the London Plan and SPG on Sustainable Design and Construction, and also those advocated by the LBI in the Core Strategy and Development Management Policies.
- 6.86 The main features of the sustainability strategy are summarised in section 4 of this statement.

- 6.87 The new homes have been designed to be capable of achieving Code for Sustainable Homes Level 4. A pre-assessment for the Code has been undertaken and this is included in the appendix to the Sustainability Statement.
- 6.88 Taking account of the energy hierarchy outlined in London Plan Policy 5.2, the proposed energy strategy comprises:
- the provision of energy efficiency measures;
  - the installation of a gas Combining Heat and Power (CHP) unit; and
  - the installation of Photovoltaic (PV) panels on the roof space on the tallest part of the development
- 6.89 The combined use of high performance building fabric for the whole building, a wide range of efficiency measures, and a low carbon community heating system with a gas fired CHP unit will achieve emissions reductions for the whole scheme of 34.1%. When adding this to the carbon dioxide emissions reduction arising from the provision of PV panels, the overall reduction expected is 40.1%. The proposals are therefore compliant with London Plan Policy 5.2 and Core Strategy Policy CS10.
- 6.90 In addition, the scheme has been designed so that it would be feasible to connect into a district heating system in the future should this become available in accordance with London Plan Policy 5.6 and DMP Policy 7.3.
- 6.91 The proposals are therefore considered to be consistent with the objectives of national planning policy guidance, London Plan, Core Strategy and UDP policies, and also the policies contained within emerging planning policy documents.

### **HEALTH IMPACT**

- 6.92 In accordance with London Plan Policy 3.2, Core Strategy Policy CS19 and DMP Policy DM34, a Health Impact Assessment is submitted in support of this application. It concludes:

*“the proposed development will have no negative direct or indirect influences upon health apart from increasing the demand for local services”.*

- 6.93 The assessment of local health services demonstrates that existing services currently

have sufficient capacity to accommodate the increased demand that would result from the development.

### **AIR QUALITY IMPACT**

- 6.94 Policy 7.14 of the London Plan regarding improving air quality states that development proposals should be at least air quality neutral and should not lead to any further deterioration of existing poor air quality. The Air Quality Assessment prepared by Phlorum concludes:

*“...the Proposed Development has been determined to be acceptable in terms of its impact upon, and sensitivity to, local air quality”*

- 6.95 Any impacts arising from construction traffic and activities are anticipated to be temporary, short-term and negligible in nature, particularly following the implementation of industry good practice mitigation measures.
- 6.96 The proposals are therefore fully compliant with national, regional and local planning policies (DMP Policy DM6.1).

### **ECOLOGY AND TREES**

- 6.97 An Extended Phase 1 Habitat Survey was carried out on the site in September 2013. The survey identified that the key ecological features on the site are the semi-mature scattered trees, and that they contained suitable nesting habitats for birds and foraging opportunities for bats. Furthermore, taking account of potential features for supporting roosting bats in the building, a Bat Survey has been undertaken.
- 6.98 The Bat Survey identified that the main building has features which may support bats, as such it recommends that further survey work is undertaken prior to the demolition of the building.
- 6.99 All of the existing trees are proposed to be retained and they will be adequately protected in accordance with the recommendations of the Arboricultural Impact Assessment. Additional tree planting is proposed as part of the landscape strategy that has been developed by AREA.
- 6.100 Biodiversity green roofs are to be provided on all feasible roof space (except where

amenity roof terraces are proposed). The specification for the green roof will accord with DMP Policy DM6.5.

- 6.101 Recommendations for ecological enhancements are provided in the Phase 1 Habitat Survey and these will be taken into account during the detailed design stage to enhance the biodiversity and ecological value of the site in accordance with DMP Policy DM6.5, Core Strategy Policy CS15, and London Plan Policy 5.11 and 7.19.

### **CONTAMINATION**

- 6.102 The potential for contamination on the site has been assessed using a desk-top study, which was carried out by Soiltechnics. The findings are provided within the Ground Investigation Report which is submitted in support of this application. The report makes recommendation for the remedial measures that should be provided on the site to ensure that the resulting development will provide a safe environment for future users of the site. The proposals therefore accord with London Plan Policy 5.21.

## 7. Summary and Conclusions

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- 7.1 This Town Planning Statement has been prepared on behalf of Parkhurst Road Ltd in support of a planning application for the redevelopment of 65 – 69 Parkhurst Road.
- 7.2 The application proposals seek to deliver a high quality residential development providing 150 residential units in a mix of unit sizes and tenures, and a highly accessible brownfield site.
- 7.3 A design-led approach has been taken by AHMM architects following a detailed contextual analysis of the site and surrounding. The proposals have evolved to take account of discussions with Council and GLA Officers, and discussions with the local residents and other stakeholders.
- 7.4 The development proposals will generate numerous regenerative benefits for the local area and community, including:
- In accordance with national, regional and local planning policy, the proposed development will make efficient use of this highly accessible urban brownfield site;
  - The development proposal will provide 150 high-quality residential units in a mix of unit sizes ranging from 1 bedroom units to 3 and 4 bedroom family units, which will help the Council to meet and exceed housing targets in accordance with planning policy requirements and in accordance with the Councils housing trajectory which acknowledges residential uses on the site;
  - 29% of the housing (by habitable room) will be provided as affordable housing, providing 22 social rented units, and 9 intermediate units. The social rent units provide a high proportion (81%) as 3 and 4 bed units addressing the need for affordable family housing in the borough.
  - The redevelopment will also bring with it economic benefits, including 322 construction job years and 52 jobs in consumer services, and revenue for the Council in the form of £1.9 million New Homes Bonus and £240,000 per year in Council Tax revenue.

- The proposed development will deliver a well defined and legible development, providing front doors onto the street, will promote activity throughout the site, improving the public realm around the site, and will provide the potential for a future link through the site from Parkhurst Road to the north towards Tufnell Park Road.
- The proposals incorporate a number of measures to deliver a sustainable development, including energy efficiency measures, a CHP and PV Panels to reduce carbon dioxide emissions by approximately 40.1%. The new homes have been designed to achieve Code for Sustainable Homes Level 4.

7.5 Overall, the proposed development comprises sustainable development and has been designed taking into account of the site context, pre-application consultation and the requirements of national, regional and local planning policies. This Statement has demonstrated that the proposals have been developed to accord with these policies, and as such, we respectfully request that the Council's Planning Officers recommend that planning permission be granted so that the benefits of the scheme can be realised without delay.