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Dear Alan Power,

Re: 264 Belsize Road, London, NW6 4BT

Thank you for submitting a pre-planning application enquiry for the above property. The required fee of £4,062.00 was received on 16/05/2022 and a meeting took place at the application site on 26/07/2022.

1. Proposal

The proposal is for:

- Change of use from Class F1(f) (Learning and Non-Residential Institutions) to Class C3 (Residential)
- Reconfiguration of the existing building into no.4 two-bedroom duplexes and 1no. three-bedroom duplex
- Alterations to the roof form
- Alterations to the Kilburn Place elevation

2. Site Description

The site is located in Kilburn on the northern side of Belsize Road and is approximately 470sqm in area. The site includes the ground floor of No.264 which is accessed from Belsize Road, leading to a very substantial steel framed two-storey building at the rear which has access to Kilburn Place. The rear portion of the site is completely surrounded, aside from the small elevation on Kilburn Place, by existing buildings. There are no existing windows along the elevations, with natural light provided by rooflights along the perimeter and three along the middle of the roof.

The site is closely located to both main bus routes on Kilburn High Road, as well as Kilburn High Road Overground Station which is under 100m from the site. The site is not located within a conservation area, nor is it near to any listed building.

The site was previously used as a place of worship, but is currently sitting vacant and has been using as a construction staging area for works to the neighbouring hotel. Based on the planning history, its lawful use is assumed to be Class F1(f).

3. Relevant Planning History

2009/2500/P - Retrospective permission for change of use of the premises from office use (Class B1) to non-residential institution (Class D1) – **Granted 05/10/2009**

4. Relevant Policies and Guidance

The National Planning Policy Framework 2021

The London Plan 2021

Camden Local Plan 2017

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- C2 Community facilities
- A1 Managing the impact of development
- A4 Noise and vibration
- D1 Design
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development
- CC1 Climate change mitigation
- CC2 Adapting to climate change

Camden Planning Guidance (2021)

- CPG (Design)
- CPG (Amenity)
- CPG (Housing)
- CPG (Sustainability)
- CPG (Transport)
- CPG (Energy efficiency and adaptation)
- CPG (Developer's Contributions)

5. Assessment

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

- Principle of development
- Dwelling mix
- Affordable housing
- Design
- Neighbouring amenity
- Sustainability
- Refuse and recycling
- Transport
- Sustainability
- Planning obligations/CIL

6. Principle of Development

The proposals involve the creation of new residential flats within an existing institutional building. It would involve the adaptive reuse of the majority of the existing structure, supplemented with a reconfiguration of the roof. A main feature would be the creation of internal lightwells to provide natural light to internal rooms of the two-storey maisonettes.

Policy G1 supports development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, and amenity. The existing building is considered an appropriate location for more housing given it is the predominant existing land use. The addition of new housing is supported by Policy H1, which seeks to increase the housing supply within the borough. However, the site is highly sensitive given the existing surrounding densities and any development would introduce built form in close proximity to existing residents. An intelligent and creative response to the site context is therefore crucial to obtain officer support.

Whilst new housing is encouraged within the borough, Policy C2 of the Local Plan seeks to ensure that community facilities and services are retained, unless the existing premises is no longer required or viable in its existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then the preferred alternative will be the maximum viable amount of affordable housing.

The existing building was used by the International Gospel Community Church who applied for planning permission to use the building as a non-residential institution in 2009. They vacated the site in 2016, moving to a location in Burnt Oak, Edgware, which better serves their needs. Since vacating the site in 2016, no alternative community use has been found to serve the local area nor has a commercial tenant been found, despite marketing the property for over 24 months. Given that the building has been sitting vacant for over seven years, the tests outlined in Policy C2 have been satisfactorily met.

7. Dwelling Mix

The Council requires development to contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes. Policy H7 of the Local Plan includes a Dwelling Size Priorities Table as set out below:

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

Policy H7 seeks to ensure that all housing development:

- contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and
- includes a mix of large and small homes.

The proposal includes the creation of five self-contained flats: 4x two-bedroom units and 1x three-bedroom unit. The mix would provide a mix of large (3-bed) and small (2-bed) homes and both unit sizes are regarded as high priority. Thus, the proposed unit mix is welcomed.

8. Affordable Housing

Policy H4 (maximising affordable housing) requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The policy states that where developments have a capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing. In order to minimise this contribution, an affordable housing viability assessment could be submitted with the formal planning application.

Targets are based on an assessment of development capacity whereby 100 sqm GIA of housing floorspace is generally considered to create capacity for one home and a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity.

Where development has the capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing. A rate of £5000 per sqm GIA is applied. On this basis the contribution for each option would be as follows:

$$[\text{Additional residential floorspace (GIA)} \times \text{target\%}] \times £5000$$

Without a total residential floorspace figure, the affordable housing contribution cannot be provided. However, the above noted equation can be used to calculate the future payment-in-lieu amount.

9. Standard of Accommodation

Policy H6 outlines how the Council will seek to secure high quality accessible homes in all developments that include housing. We will:

- a. encourage design of all housing to provide functional, adaptable and accessible spaces;
- b. expect all self-contained homes to meet the nationally described space standard;
- c. require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and
- d. require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

The proposal consists of five maisonettes: 4no. two-bedroom units (Units 2 through 5) and 1no. three-bedroom unit (Unit 1). The units feature three levels, with two bedrooms at ground floor level (three bedrooms in Unit 1), kitchen and living areas on the first floor, and a loft space on the second level. The creation of the loft level is facilitated by the raising of the existing roof form. To access the units, occupiers would be required to enter through 264 Belsize Road which would provide an entrance lobby with cycle parking, and then up a set of stairs, through a door to a covered corridor from which the front doors to the units are located. This is quite a convoluted and illegible route although the constraints are recognised. Access via Kilburn Place is not provided.

In terms of space standards, units 2 through 5 meet the minimum national space standards for two-bedroom units at 108-114 sqm, with the required being 70-70sqm. Unit 1 also meets the minimum national space standards for a three-bedroom unit at 134sqm, with the required being 108sqm.

Although each of the units exceeds minimum space standards, there are significant concerns with the availability of daylight and sunlight as well as the poor level of outlook afforded by the proposed units. Units 2 through 5 are single aspect at ground floor level, with small internal lightwells being the only available source of natural light to the kitchen / dining spaces at ground floor level and each of the bedrooms at lower ground floor level. This is contrary to CPG Housing which outlines that new dwellings should be dual aspect and provide sufficient outlook. The existing rooflights along the north and south ridge of the roof will be refurbished and will provide a limited level of natural light which will illuminate the communal corridor and spill through the glass privacy barrier into the lightwells. The raised roof will allow for additional windows facing south, which will provide natural daylight and sunlight to the loft level, with some spill into the first-floor rooms.

Unit 1 features the same three level floorplan but has the advantage of being dual aspect as it has an elevation along Kilburn Place to the north. Along that elevation there are windows at ground and loft levels, as well as a balcony terrace from the living and kitchen areas. Concerns are still raised that two of the ground-floor bedrooms will have a poor level of daylight/sunlight and outlook into a small lightwell. The first and second levels are considered to have a suitable level of outlook.

A future application should provide an internal daylight study to demonstrate the ground and first floor levels will provide sufficient daylight and sunlight throughout the year. Design options should also be explored which will provide the residential units with a better outlook as the current proposal is determined to be very poor in this regard. The proposal is extremely inward looking and the lightwells are so tight and constrained they would provide extremely restricted levels of outlook and daylight.

Majority of the rooms have no outlook into the public realm, aside from the loft levels with face south directly into the rear elevations of residential dwellings along Belsize Road and the north elevation into Kilburn Place from Unit 1. Whilst an improvement on Units 2-5, it is noted that Kilburn Place, which is mainly a service road for commercial properties along Kilburn High Road, does not provide the best outlook for a residential property.

10. Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area.

Camden's Design CPG emphasises Camden's commitment to design excellence, and expects development schemes to consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials;
- Creating well connected public spaces and good quality public realm
- Opportunities for promoting health and well-being
- Opportunities for improving the character and quality of an area

The majority of the shell of the building will be retained, with the roof structure reconfigured and raised on the north portion of the site in order to create a loft level and additional south facing windows. As the existing building lacks any elevations or fenestration, aside from the Kilburn Place portion, much of the design alterations are at roof level.

The proposed roof form, which at present is a low-pitched roof with large rooflights, will be removed along the south portion to facilitate the creation of the five lightwells. The existing rooflights along the southern roof edge will be retained and refurbished, as are the rooflights along the north roof edge. The north portion of the roof will be raised by 2.3 metres and will feature south facing windows. In principle, the increased height and bulk of the roof form is considered to be acceptable given the building is surrounded by built form and would not be perceptible from the public realm and only limited private views. However, the design does not seem compatible with residential use and it feels like it has been driven by the desire to fit in as many units as possible. For residential units to be supported in this location, the design should feel more domestic and allow for generous lightwells that bring in a level of daylight that will allow occupiers to enjoy their homes. Amenity space is also extremely limited and of poor quality given it will be largely in shade. This is contrary to Policy D6 of the London Plan which outlines that 5sqm of private outdoor space should be provided for 1-2 person dwellings, with an additional 1sqm for each additional occupant.

Along the Kilburn Place elevation, the existing service door and plant fixtures will be replaced with a three-storey elevation with windows and a balcony terrace to Unit 1. It is considered that the proposed increase in height along this elevation is appropriate, however further design details should be explored.

11. Amenity

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include: visual privacy, outlook; sunlight, daylight and overshadowing; artificial lighting levels; noise and vibration; odour, fumes and dust; and impacts of the construction phase, including the use of Construction Management Plans. Careful consideration of amenity impacts is particularly crucial on this site given the close proximity of residential units at relatively high densities.

Concerns are raised that the only outlook from Units 2 through 5 through the south facing loft level windows is directly into neighbouring residential dwellings located on Belsize Road. The loft levels of the five units will therefore have new direct and unobstructed views into habitable rooms of neighbouring residences, which is considered unacceptable and not in compliance with Policy A1 of the Local Plan. In addition, the minimum distance between residential units, as outlined in CPG Amenity, shall ideally be no less than 18m. The proposed distances are between 13.5m and 15m, which is considered contrary to established guidance. The outlook from Unit 1 into Kilburn Place is not anticipated to have any impact on neighbouring residential amenity as there are no residential units within the immediate vicinity.

The existing first floor residential units along Belsize Road currently enjoy a north facing outlook onto the roof of the subject building. This includes views of the sky through the opening at the northeast corner. It should be demonstrated that the increased height from the roof alterations will not negatively affect the existing levels of light and outlook from the residential units along Belsize Road. A daylight and sunlight assessment should therefore be submitted with any future planning application.

Within the development, it is considered that the privacy of the first-floor kitchen / living areas and garden at ground floor level will be severely compromised by the glazed communal corridor. Even with a balance of obscure and non-obscure glazing, in order to provide natural light, it is anticipated that the amenity of future occupiers would be negatively affected.

It is likely that there would be some disruption during the construction period. Measures to reduce the impact of demolition / construction works should be outlined in a draft Construction Management Plan (CMP), which is likely to be secured by section 106 legal agreement if an application is approved. CPG Transport includes a link to the Council's CMP Pro Forma.

12. Transport Considerations

The site has a PTAL score of 6a which indicates that it has an excellent level of accessibility by public transport. The nearest London Overground station is Kilburn High Road, located just south of the site, whilst the nearest bus stop is located immediately outside the property.

In line with Policy T1 of the Local Plan, it is expected that cycle parking be provided in accordance with the standards set out in the London Plan. Based on the proposed unit mix (4x two-bedroom units and 1x three-bedroom unit), the number of required cycle parking spaces would be 10. Cycle parking is proposed to be provided in accordance with the standards in the entry area of the building on ground floor level. To be considered acceptable, this should be designed in accordance with the guidance in CPG Transport.

In accordance with Policy T2 of the Local Plan, which seeks to secure car-free development cross the Borough, it will be necessary to secure any proposed residential units as car free by means of a s.106 legal agreement. This will prevent any future residents from adding to existing on-street parking pressure, traffic congestion, and air pollution whilst encouraging the use of more sustainable modes of transport such as walking, cycling, and public transport. No car parking is currently provided on site, and none is proposed.

13. Sustainability

Policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. The current proposal would result in the retention and refurbishment of the existing building which is welcomed.

All developments involving five or more dwellings and/or more than 500 sqm of (gross internal) floorspace will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction. All new residential development will also be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). This can be demonstrated through an energy statement or sustainability statement.

As part of the assessment of resource efficiency, all developments involving five or more dwellings and/or more than 500 sqm gross internal floor space are encouraged to assess the embodied carbon emissions associated with the development within the energy and sustainability statement. Where such an assessment has been completed we would encourage that the results are logged on the WRAP embodied carbon database in order to contribute to the embodied carbon knowledge base.

The sustainability of residential development arising from conversions, extensions and changes of use can be assessed through the use of BREEAM domestic refurbishment. We will encourage developments of five or more dwellings or 500 sqm of residential floorspace or above resulting from conversions, extensions and changes of use to achieve an 'excellent' rating in BREEAM domestic refurbishment.

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

Policies D1 and CC2 of the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. The inclusion of a green roof is therefore welcomed, as are the installation of solar panels.

14. Refuse and Recycling

You are advised to design in adequate facilities for recycling and the storage and disposal of waste. Further information can be found in CPG Sustainability.

Camden Local Plan Policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments. Any proposal should demonstrate that the development would include facilities for the storage and collection of waste and recycling.

15. Conclusion

Although the Council would support the principle of additional housing in this location, the proposed development is considered overdevelopment. The result of trying to squeeze too many units is a substandard level of accommodation for all units, particularly with regards to daylight/sunlight and levels of outlook. Owing to the increase in massing, the proposed development is also anticipated to harm the amenities of existing occupiers on Belsize Road, especially with regards to overlooking and potentially impacts on daylight and outlook. Further design development is needed to ensure the proposed development would be of a high standard of design which would provide high standard dwellings with appropriate levels of daylight/sunlight, as well as sufficient levels of outlook. It is recommended that further pre-application advice is sought prior to submission of a full application.

16. Planning Application Information

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

- Completed form – Full Planning Application
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Planning Statement (including affordable housing offer)
- Design and Access Statement
- Energy and sustainability statement
- Daylight and Sunlight assessment (for both the proposed units and existing)The appropriate fee
- Please see [supporting information for planning applications](#) for more information

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

Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

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

If you have any queries about the above letter or the attached document, please do not hesitate to contact Daren Zuk on **020 7974 3386**.

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

Yours sincerely,

Daren Zuk

**Senior Planning Officer
Planning Solutions Team**