

Application ref: 2022/4312/PRE
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Dear Sir/Madam

Pre-application Minor Development Pre-application Advice Issued

Address:

**71 Camden High Street
London
NW1 7JL**

Proposal: Change of use of part ground, first and second floor from retail (Class E) into residential (C3), erection of first and second floor rear extension, new mansard roof extension with an additional third floor and stepped rear additions.

Drawing Nos: 2022-EX-001, 2022-EX-002, 2022-EX-003, 2022-FE-004, 2022-FE-005, 2022-FE-006, 2022-FE-007, 2022-FE-008 and Design Statement

Site constraints

- Article 4 Basements
- Article 4 B1a to C3
- Camden Town Conservation Area
- Camden Town Local Centre
- Underground development constraint - Slope Stability

Relevant planning history

No relevant site history

67 and 67a Camden High Street, London, NW1 7JL

2016/4496/P - Erection of mansard roof extension to 67 and 67A Camden High Street to create 2 two-bedroom flats. (Granted 15/05/2022)

2018/1849/P - Variation of Condition 3 (approved plans) of planning permission ref: 2016/4496/P dated 15/05/2017 for Erection of mansard roof extension to 67 and 67A Camden High Street to create 2 two-bedroom flats; namely alterations to ground floor frontage and installation of separate residential door to No. 67 Camden High Street. (Granted 11/01/2019)

Relevant policies and guidance

National Planning Policy Framework (NPPF) 2021

The London Plan 2021

Camden Local Plan 2017

Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy D1 Design
Policy D2 Heritage
Policy G1 Delivery and location of growth
Policy H1 Maximising housing supply
Policy H6 Housing choice and mix
Policy C1 Health and Wellbeing
Policy CC1 Climate Change Mitigation
Policy CC2 Adapting to Climate Change
Policy CC3 Water and flooding
Policy CC5 Waste
Policy DM1 Delivery and monitoring

Camden Planning Guidance:

Amenity CPG 2021
Design CPG 2021
Energy efficiency and adaptation CPG 2021
Housing CPG
Transport CPG 2021
Water and Flooding CPG

Site and surroundings

The site contains a commercial building situated on the west side of Camden High Street within the Camden Town Conservation Area.

It should be noted that both the east and west side of Camden High Street in the stretch between Mornington Crescent and Delaney Street is generally characterised by three-storey terraces or rows of buildings, which comprise a mixture of surviving early 19th century buildings and rebuilds largely dating from the 20th century. There is the odd anomaly, such as the tall and bulky building housing Argos which stands roughly opposite the site in question, but the street continues to be defined on both sides by three-storey buildings. Although No 71 falls in a stretch of 20th century rebuilds, the roofline is predominantly defined by horizontal parapets above the second floor. It is acknowledged that Nos 67 and 67A, a couple of properties to the south, have been extended upwards with a mansard storey following an approval granted in 2016, but they are adjacent to some taller Victorian buildings, thereby creating a cluster of taller buildings.

ASSESSMENT

The principal planning considerations are the following:

1. Change of Use principle
2. Design and Heritage
3. Quality of Accommodation
4. Unit Mix
5. Affordable Housing
6. Neighbouring amenity
7. Transport
8. Energy and sustainability
9. Air quality
10. Community Infrastructure Levy

1. Change of Use Principle

Policy E1 aims to secure a successful and inclusive economy in Camden by creating the conditions for economic growth to support residents and local businesses. This is achieved through maintaining premises that are suitable for a variety of businesses, supporting local enterprise and business, promoting Knowledge Quarter as a location and directing new offices to growth areas

Policy TC2 promotes the successful and vibrant centres throughout the borough by seeking to protect each of their characters, provide a range of services and shops, protecting residents against harmful impacts of food and drink uses and provide bespoke objectives for each centre. The policy also aims to provide a certain mix and balance of uses.

Policy TC4 ensures that development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre. This policy will consider the effect of development, expectations for mix and balance of uses, support for independent shops, noise and vibration and other amenity impacts.

From retail records and planning history it appears that the site contains a class E use. In this instance there will be a fairly significant loss of retail/commercial space to accommodate the entrance doorway on the ground floor and for the new units on the first and second floors. While this would result in a reduction of Class E space within Camden Town Local Centre, it might not harm the function, character or success of the area as it still maintains the same supply of shops within the area and provides 74sqm of retail space on the ground floor. There might be a possibility to keep the first floor as retail as well. However any full application should have a supporting statement which demonstrates the loss of retail on these floors is not harmful to the local centre.

2. Design and Heritage

- The contribution the building makes to the conservation area, on balance, is considered to be neutral. The building consists of three storeys, and is two bays wide, occupying the equivalent of an historic plot width as found on many sites in this section of the conservation area. It is constructed from a light brick with a shopfront at ground-floor level and square casement windows on the first and second floors. Although the architecture of the frontage is unremarkable, the building generally adheres to the established urban grain and scale of the area, giving the building its neutral status.

- As such, there is scope to improve the external appearance of the building, as is also the case with its contemporaneous neighbours, but it is necessary to take care in the design of any proposed alterations or extensions to ensure that they do not detract from the character and appearance of the conservation area.

Mansard Roof Extension

- Although No 71 falls in a stretch of 20th century rebuilds, the roofline is predominantly defined by horizontal parapets above the second floor. It is acknowledged that Nos 67 and 67A, a couple of properties to the south, have been extended upwards with a mansard storey following an approval granted in 2016, but they are adjacent to some taller Victorian buildings, thereby creating a cluster of taller buildings. The extension includes multiple residential amenity terraces secured by railings, significant amount of glazing to the rear for the connecting link and residential units.
- It is therefore considered that an additional mansard storey on top of No 71 would set an unwelcome planning precedent for further mansards in an untouched stretch of the terrace. The additional height and bulk of a further floor would noticeably increase the height of the host building as well as providing precedent for wholesale development of several buildings (Nos 69-89 (odd)), which in turn would alter the sense of enclosure in the street as well as change the balance of building heights on either side of the street.
- The buildings are all visible in long views up and down the street as well as at the rear, as buildings on the west side of the street are immediately visible from the post-war housing estate directly behind which fronts onto Arlington Road.
- Architecturally the extension is to be carried out in zinc cladding with aluminium powder coated window framing. The materials are considered to complement the existing.

First and Second Floor Extension

- With regard to the proposed stepped rear extensions, it is considered that a full-width development above the existing ground-floor extension is unacceptable in principle. Such a development is contrary to CPG and may potentially have amenity impacts on neighbouring buildings. It is noted from the submitted information, that the existing buildings are currently flat-backed at upper-floor level, as are several of their neighbours, particularly to the north. As with the building heights, this characteristic also contributes to the urban grain of the conservation area, and it should be noted that the backs of the properties are visible from the housing estate directly behind. The roof extension itself is proposed to be black metal cladding the main roof slope facing south is opened up to accommodate a box form extension, also with full length windows.
- It is not clear what the materials are for the extension however matching brick and timber frames for the windows are recommended.

3. Quality of Accommodation

All units would well exceed the national space standards in terms of overall GIA. Below a table shows the GIA of each flat, with the nationally described space standards.

| Flat Number | Overall GIA |
|---------------------------------|--------------------|
| First Floor Flat (2b3p) | 64sqm |
| Second Floor Flat (1B/2P) | 50sqm |
| Mansard Extension Flat (Studio) | 42sqm |

As stated above all the new units reach the requirement however concern is raised over the mansard roof extension and ceiling heights. The minimum requirement for a studio is 39sqm with a minimum ceiling height of 2.3m. As stated in the National Space standards document (point i) *the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area*. Whilst the principle of the mansard is discussed earlier in the report, this needs to be respected otherwise the unit would be substandard.

The minimum requirement for amenity space for the three units is 5sqm. No amenity space is proposed for any of them. If any full application is forthcoming options need to be presented for potential ways of incorporating amenity space or full demonstration none can be provided on site. It might be difficult for the roof extension unit but still evidence should be shown.

In terms of internal configuration most of the units appear acceptable and the layout seems appropriate and considered. The units are all dual aspect and therefore outlook is of acceptable quality for all units.

In terms of waste storage and collection, the details are listed below:

Waste collection in Camden

8.10 The Council currently offers waste collection of the following minimum volumes per dwelling with three bedrooms or less, per week:

- 120 litres of bin, box or sack volume for general waste or 'refuse'
- 140 litres of mixed dry recycling
- 23 litres of food waste

These standards need to be incorporated into both the residential and retail elements.

4. Unit Mix

Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The policy requires that all housing development, including conversion or extension of existing homes and non-residential properties contributes to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT) (see below); and includes a mix of large (3 or more bedrooms) and small homes.

Table 1: Dwelling Size Priorities

| | 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 |

The Council considers that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall. In terms of policy H7, the application would also provide one 2 bedroom market flats, one 1 bedroom market flat and one studio market flat. Whilst the unit mix contains one type of high priority unit, due to the size and potentially of the site, this dwelling mix is considered acceptable.

5. Affordable Housing

Policy H4 aims to maximise the supply of affordable housing. The Council expects a contribution towards affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floor space of 100sqm GIA or more

The Council will assess the capacity for additional homes on the basis of multiples of 100sqm GIA, rounding the additional residential floor space to the nearest 100sqm GIA so the assessed capacity will always be a whole number. 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 or 100sqm added to capacity.

It is not clear if there isn't existing residential properties on site as there is a bedroom listed on the existing second floor however the statement also lists these floor as ancillary storage space for the Class E unit on the ground floor. For the purposes of the pre-app it is assumed that the first and second floor are still ancillary Class E space. The expected provision is then calculated as a percentage of the overall uplift of residential floor space. The conversion provides an additional 99sqm GIA of floor space which equates to a capacity for 1 additional homes at a 2% contribution. The Council's current adopted multiplier for calculating a payment-in-lieu (PIL) with market residential schemes is £5,000 per sqm. Using the sliding scale formula and multiplier (2% of 99 GIA x £5,000 per sqm), this means that £10,000 would be required as payment-in lieu for affordable housing.

6. Neighbouring 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.

To the front, there is relatively little change with only the mansard becoming visible. Therefore any issues relating outlook, increased sense of enclosure, privacy, daylight/sunlight and overlooking are not considered to be significant.

In terms of the rear elevation and the first, second and mansard extensions, the full width nature means that there is a potential for occupants on either side (no.69 and no.73) to be significantly impacted. Although it is not clear due to the drawings, it appears to show the neighbouring windows on the first floor failing the 45 degree line and the on the second passing. This will need to be demonstrated fully at application stage however as the extensions need to be taken in anyway because of design and heritage concerns there are ways to overcome this.

Construction Management Plans are discussed in the 'Transport' section.

7. Transport

Policy T1 aims to promote sustainable transport by prioritising walking cycling and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities and finally improving links with public transport. All these measure are in place to ensure the Council meets their zero carbon targets.

Policy T2 limits the availability of parking in the borough and requires all new developments in the borough to be car-free. This will be done through not issuing parking permits, resisting development of boundary treatments and using legal agreements to secure these actions.

The 3 new residential units would need to be car-free in accordance with Policy T2, which includes limiting the availability of both off-street and on-street parking. This would be secured by a legal agreement if planning permission is granted, and would prevent future occupiers from obtaining on-street parking permits.

Cycle parking should be provided in accordance with Policy T1, cycle facilities section of CPG Transport, and the London Plan. The London Plan standards are shown below. 4 long-stay cycle spaces would be required. The applicant would have to include cycle storage facilities in the plans.

The applicant should note the following:

- We do not support vertical cycle parking spaces as they are not accessible to all users.
- Cycle parking should be covered and accessible (step-free).
- Please read [CPG Transport 8 Cycling Facilities](#)

| | Long-stay (e.g. for residents or employees) |
|-----------------------|---|
| C3-C4 dwellings (all) | <ul style="list-style-type: none"> • 1 space per studio or 1 person 1 bedroom dwelling • 1.5 spaces per 2 person 1 bedroom dwelling • 2 spaces per all other dwellings |

Camden High Street is a busy road however vehicles are able to load and unload directly outside the site on Mon-Sat 8am-4pm and Sun 8am-1pm (max 20 mins). A Construction Management Plan (CMP) and bond would not be necessary but TfL's opinions should be taken into consideration.

8. Energy and Sustainability

The Council requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The Council promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met, including zero carbon development; and expects all developments to optimise resource efficiency. All major developments are required to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible, establishing a new network.

Policy CC1 requires all development to reduce carbon dioxide emissions by following the steps in the energy hierarchy; supports and encourages sensitive energy efficiency improvements to existing buildings; and expects all developments to optimise resource efficiency.

Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013. The Council expects zero carbon development, with at least 35% reduction to be made on-site. A carbon offset contribution would be required for the shortfall. This would be used to secure the delivery of carbon reduction measures elsewhere in the borough.

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

Policy CC2 requires all development to adopt appropriate climate change adaptation measures such as:

- A. the protection of existing green spaces and promoting new appropriate green infrastructure.
- B. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- C. incorporating bio-diverse roofs, combination green and blue roofs, and green walls where appropriate; and
- D. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

No details of energy or sustainability measures have been provided as part of the pre-application documents.

Active cooling, especially for the residential units will not be supported in any full application and should not be included in a proposal.

Retrofitting the building with more energy efficient measures to minimise energy consumption (draught-proofing, thermally efficient windows and insulation) should be considered and involved as part of any refurbishment works.

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

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

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

9. Air Quality

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

Owing to the site's location near to a Rosslyn Hill and in the context of the reason for refusal in the previous application there is the possibility that new occupants will be exposed to poor air quality. Furthermore, the demolition and construction work could have a detrimental impact on local air quality. As such, a basic Air Quality Assessment should be submitted with an application. For more information, refer to CPG Air Quality

10. Community Infrastructure Levy

If the proposal was deemed acceptable it would be liable for both Mayoral and Camden CIL. This would be based on Mayor's CIL2 (MCIL2) and Camden's latest CIL charging schedule from 2020. As the proposal includes an uplift of 99m², the CIL estimate is:

MCIL2 = £80 x 99m² = £7,920

Camden CIL (Zone C) = £644 x 99m² = £63,756

Total CIL = £7,920+ £63,756= £71,676

Officers note that the floor areas and calculations above are approximate and sums are indicative. Final payable contributions would be calculated (following any potential approval of the scheme) by the Council's CIL officers.

CONCLUSION

It is considered the principle of the change of use could be acceptable and some form of rear additions however the principle of the mansard and scale of extension proposed is not acceptable.

Given the sensitive nature of the site itself, it is recommended you begin early consultation and engagement with local resident groups, societies and the CAAC to ensure local residents are consulted

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable, nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries about the above letter or the attached document, please do not hesitate to contact **Ewan Campbell**

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