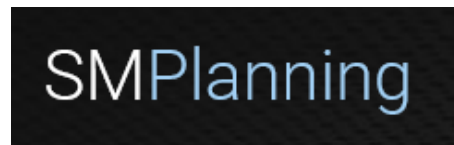


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### **LIVING QUALITY NOTE 22.02.2023**

This note has been prepared in response to case officer concerns regarding the quality of the proposed accommodation. As requested, attached are comparison tables showing how the existing and proposed arrangement against BRE targets, Space Standards, Storage, Aspect and Outdoor Space. Also attached is an addendum to the daylight/ sunlight assessment that contains some additional analysis to inform the assessment of compliance with the emerging London Housing Design Standards.

#### **Policy context:**

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

Policy D6 of the London Plan states that housing development should provide adequately sized rooms, with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners. This includes a requirement for a minimum of 5 square metres of private outdoor space to be provided for 1-2 person dwelling and an additional 1 square metre of space per additional occupant.

Camden Local Plan (CLP) H3 states that the Council aim to ensure that existing housing continues to meet the needs of existing and future households by resisting development that involve the net loss of residential floorspace, protecting housing from permanent conversion to short stay accommodation and resisting development that results in the net loss of two or more homes, unless it enables sub-standard units to be enlarged to meet residential space standards. Policy H6 states that the Council will encourage design of all housing to provide functional, adaptable and accessible spaces, and expect all self-contained homes to meet the nationally described space standards. The CLP advises that private amenity space is also important in adding to residents' quality of life and CLP Policy D1 requires development to incorporate outdoor amenity space.

The London Housing Design and Quality Standards, Nationally Described Space Standards and Camden's Design CPG provides guidance on how development can achieve a high-quality living environment for future occupants.

**Existing flats:**

The existing building comprises 19 flats, across 4 storeys. There is currently no formal cycle parking and no formal waste storage. Eight of the flats have a private balcony and all share the rear garden. In terms of internal space and storage, none of the existing flats meet the nationally described space standards. None of the existing flats meet BRE daylight/sunlight targets. The existing building does not meet current building regulation requirements. Flats 1, 2, 4, 5, 7, 8, L and G are awkwardly divided and laid out resulting in low quality kitchen, living and bedroom spaces.

Lawful Development Certificates have been issued for the amalgamation for two flats into one in each of the properties (references 2021/5276/P and 2021/5301/P). This is a realistic fall back position that must be given weight in the planning balance. For clarity, the resulting arrangement would be 17 flats, most of which would be substandard in respect to internal and external space, storage, light and aspect. The existing situation of no formal cycle parking, no formal waste storage, current building regulation substandard dwellings would also remain.

**Proposed flats:**

The proposal provides 16 flats, facilitating significantly improved the quality of the accommodation at the site, including the provision family sized flats with amenity space. This is a net loss of one dwelling, above that secured by the fall back position (certificate references 2021/5276/P and 2021/5301/P). Formal waste storage and cycle parking is proposed (there is no existing provision). Private courtyards are proposed for flats 1 and 2, private terraces for flats 3 and 4 are enlarged, balconies for flats 6 and 7 are enlarged and balconies are proposed for flats 10 and 11. The balconies to flats 8, 9, 12 and 13 are to be retained. This results in 12 of the flats having access to private amenity space and a communal garden (this is an increase of 4 above the existing situation). All flats continue to have access to the private garden. All but 2 of the proposed flats meet the nationally described space standards with respect to internal space and storage (none of the existing flats meet the standards). Flats 5 and 9 marginally fall below the standards but provide improvements against the space standards when compared to the existing flat, in the part of the building in which they are located.

All of the proposed flats are dual aspect (2 of the 19 existing flats are single aspect). Four of the proposed flats meet the BRE daylight/ sunlight guidance, with flats 7 and 8 failing due to the kitchen/living room result only. The BRE guidance acknowledges that its targets are designed for suburban environments and should be interpreted flexibly. All habitable rooms have at least 1 window and all of the flats have at least 1 habitable room that receives direct sunlight for part of the day. All of the flats meet the London Housing Design and Quality Standards (Part C4 guidance) relating to aspect, orientation and daylight/ sunlight, when read as a whole.

In addition to the above, the proposal will provide water and energy efficient fixtures and fittings throughout, building regulation compliant dwellings (including in relation to fire safety), full digital connectivity and thermal comfort enhancements. All the aforementioned improvements are in accordance with the London Housing Design and Quality Standards.

## Summary

Whilst the proposal does not meet all the BRE guidance targets, the building is an existing building that is constrained by its proximity to neighbouring buildings which are out of the applicants control. The building is also located in a conservation area whereby significant enlargement and alterations to windows is unlikely to be supported. The site currently offers 19 low quality flats (flats that don't meet national minimum space standards, don't meet BRE guidance targets, don't meet London Housing Design and Quality Standards, don't meet current building regulations requirements, don't provide cycle parking and don't provide waste storage). The site also benefits from two lawful development certificates that allow for the loss of two existing dwellings whilst retaining substandard units in respect to internal and external space, light, waste storage, cycle parking and building regulations.

The proposal significantly improves the quality of living accommodation by increasing the number of flats with private amenity space, providing secure cycle parking, providing formal waste storage, flats that meet the nationally described minimum space standards (with the exception of 2 that are improved against the standards), provides flats that meet building regulation requirements and London Housing Design and Quality Standards, when read as a whole. The aforementioned benefits clearly and demonstrably outweigh any perceived harm associated with the loss of 3 substandard flats (1 additional flat that permitted under the fall back position secured by certificate references 2021/5276/P and 2021/5301/P).

The proposal provides a good quality and significantly improved quality living environment for the future occupants of the building. The development accords with paragraph 130 of the National Planning Policy Framework, London Plan Policy D6, Camden Local Plan Policies H3, H6 and D1, the London Housing Design and Quality Standards, Nationally Described Space Standards and Camden's Design CPG. The proposal accords with the adopted development plan, when read as a whole and therefore planning permission should be granted.