



18th July 2023

London Borough of Camden

2nd Floor, 5 Pancras Square

c/o Town Hall, Judd Street

London

WC1H 9JE

31 Agar Grove, London, NW1 9UG – Ground floor rear extension to facilitate conversion of a 3-bedroom duplex flat to 1x3 bed flat at ground floor and 1x studio flat at first floor

Dear Sir or Madam,

This proposal seeks to respond to a recent appeal decision at the property (Ref: APP/X5210/W/22/3303899), which saw a proposal to subdivide a three-bedroom duplex flat into a two bedroom flat and studio dismissed. The primary reason for the refusal and dismissal was the loss of a three-bedroom family unit, which was found to outweigh the acknowledged benefit of the additional single person unit. This revised proposal seeks to extend the ground floor property to provide an additional bedroom, thereby retaining a family sized unit with access to garden space, in addition to the new studio unit.

The proposals directly address the primary reason for refusal with minimal impact on neighbours and on the character of the Conservation Area. It is recognised that the secondary reason for refusal related to parking and this can be addressed through a Unilateral Agreement preventing access to car parking permits for both units. This would be another benefit of the proposal, helping to relieve parking pressure in the area.

Application Site

The application site is a four-storey semi-detached townhouse located in Camden in Central London. The site is within London Underground Zone 2 and is walking distance (600m) from



Camden Road Overground Rail Station where there are local shops and services.

The area around the site is predominantly residential in character and made up of similar townhouses, the majority of which are subdivided into multiple flats. The adjoining property at 29 Agar Grove is subdivided into four self-contained flats, with one on each floor.

The rear gardens of the properties on this part of Agar Grove are of varying size as the plots narrow towards the apex at the junction of St Augustine's Road. The application site therefore benefits from a larger garden to 27 and 29 Agar Grove and 6, 8 and 10 St Augustine's Road. A similar arrangement occurs at 1-7 Agar Road where the plots narrow towards the apex at the junction with Stratford Villas. Ground floor extensions of various sizes can be found in the surrounding area, many of which are under permitted development and some via the planning process. Most recently that includes an approved extension of the Garden Flat at 6 St Augustine's Road (Ref: 2022/5219/P).

The application site is within the Camden Square Conservation Area, which is described as a primarily nineteenth century inner London suburb. 31 Agar Grove is a period property in a good state of repair and is considered to contribute positively to the area. Immediately to the east of the appeal site there is a 20th Century Local Authority block of affordable housing which is considered to be a negative feature. The rear garden of the application property is not visible from any public areas within the Conservation Area.

The site is in a sustainable location and has a PTAL of 3 which indicates good public transport accessibility. The site is in Flood Zone 1 (Low Risk).

Planning History and Background

The planning history of the property is listed below:

- 2021/3573/P – Change of the lower and upper ground floor from 1x3 bed flat to a self-contained 1x2 bed flat and 1 x studio flat – Application refused and appeal dismissed.
- 2021/3573/P - Conversion from one 3 bedroom flat and 4 bedsits to one 2 bedroom flat and three 1 bedroom flats (Refused on 15/11/2021)
- 2013/5196/P - Change of use from 4 x Housing in Multiple Occupation (HMO) (Use Class C4) at lower ground and ground floor levels to 1 x 3 bed maisonette (Use



Class C3), including erection of a single storey rear plus side extensions at lower ground floor level; retention of 4 x HMO units at first and second floor levels (Use Class C4) including replacement windows on front, side and rear elevations.

(Granted 06/11/2013)

- 2012/0101/P An application for the entire property to change HMO use to C3 was submitted in 2012 then withdrawn. At that time the submitted plans showed that the property contained 8 bedsits.

The application proposal is second attempt to rework the 2021 proposal (2021/3573/P) to subdivide the upper and lower ground floor flats as well as converting the HMO on the upper floors to C3 use. That proposal was refused due to the “*loss of supply of lower cost housing in the Borough*” (i.e. the HMO) contrary to Policy H10; and the “*loss of a larger three bedroom family home*” contrary to Policy H7. The application proposal now retains the HMO, provides more low cost housing and retains the family unit. This is considered to represent the most efficient use of land with a very modest ground floor extension that does not impact on the usability of the garden space.

Proposal

The proposal seeks permission for the conversion from 1x three-bedroom duplex flat with garden access, to two self-contained flats including 1x three-bedroom flat with garden access and 1x studio flat.

The proposal necessitates a 3m ground floor rear extension to create sufficient floorspace to accommodate an extra bedroom. The extension would have rooflights to provide additional daylight and sunlight into the space, which would be set within a green roof to provide urban greening; sustainable urban drainage; enhanced biodiversity; cooling in the summer and insulation in the winter.

Internal rearrangements have been made to make the most efficient use of the space and to ensure that all minimum standards are met and that the units provide good quality internal accommodation. They would both be dual aspect and have good internal daylight levels, with the lower ground floor unit living area opening out into the garden space.



There is no off-street parking proposed and it is intended that the scheme to be completely car free, with agreement to restrict residential parking permits. Secure cycle parking is provided for both properties, with the family unit benefitting from separate access to the rear garden via a side gate. There is ample space to the front of the property to accommodate the additional refuse and recycling requirements of the studio unit.

The application is partially retrospective as some of the works took place as part of a refurbishment prior to the decision being issued on the previous application.

Planning Policy

The development plan for the area consists of the London Plan (2021) and the Camden Local Plan (2017) and policies map. The relevant policies of the Local Plan are as follows:

- Policy H1 Maximising Housing Supply
- Policy D1 Design
- Policy D2 Heritage
- Policy H7 Large and Small Homes
- Policy H10 Housing with Shared Facilities
- Policy T1 Prioritise walking, cycling and public Transport
- Policy T2 Parking and Car Parking
- Policy A1 Management the impact of development
- Policy DM1 Delivery and Monitoring

The following documents are material considerations:

- Camden Planning Guidance (CPG)
- CPG Housing (January 2021)
- Camden Square Conservation Area Appraisal and Management Strategy 2011
- National Planning Policy Framework 2021
- London Plan

Policy H1 of the London Plan and H1 and H4 of the Camden Local Plan seek to maximise the provision of housing on brownfield land, particularly within PTAL zones 3-6. The policies



expect the Council to both meet and exceed the current annual target of 1,038 homes for Camden, of which 328 should be from small sites. London Plan Policy G1 highlights the requirement for Camden to meet their housing targets and to make the most efficient use of a limited amount of land in Camden.

Planning Assessment

The main planning considerations set out in the officer's report are as follows:

- Unit Mix
- Impact on amenity
- Design and Conservation
- Quality of Accommodation
- Transport Considerations

These are considered in turn below.

Unit Mix

The loss of a three-bedroom unit is considered to be unacceptable based on the Policy H7 of the Local Plan. The proposal therefore seeks to retain this provision whilst also adding a more affordable unit for single occupancy. There is a stated need for all types of housing across the Borough and as such the positive benefit of a new unit is a material consideration that should be given substantial weight alongside the retention of the family unit. Policy H1 and H4 seek to maximise residential development across the borough and Policy H7 acknowledges that *“there is a need and/or demand for dwellings of every size shown in Table 1.”* (Paragraph 3.190).

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



Impact on Amenity

The proposal will not materially change the use of the land and will only lead to an increase in the occupancy of the site by one person. As such there would be unlikely to be any impact in terms of the principle of the subdivision of the unit. The main impact to assess is in relation to the proposed extension. In this regard it should be noted that there is already a ground floor extension to the property which abuts the boundary to the neighbouring properties. The impact of this is already accepted and the addition will be minor and not cause any unacceptable additional harm. As the gardens are all north facing and close to 3-4 storey buildings they would not benefit from sunlight other than when the sun was directly overhead. As such the adjacent properties and associated amenity space will not be affected in any way by loss of daylight and sunlight or overshadowing. The extension will simply extend the boundary between the properties, which already has a high fence on both sides. As a result there would be little or no impact on the adjacent properties.

In terms of the impact on the existing amenity space, it is noted earlier that this property benefits from a larger garden area than its neighbours to the west. The required extension is achievable whilst retaining over 30sqm of useable accessible garden space. In a dense urban environment this is a good level of provision. The proposed double set of bifold doors will provide an inside/outside amenity space that opens up the house to the garden and improves the usability of the space for a family.

Design and Conservation

The site is within the Camden Square Conservation Area for which there is a Conservation Area Appraisal and Management Strategy. The appraisal expresses concern over extensions but exclusively refers to basements, side extensions, roof extensions, two storey rear extensions and pressure on parking. There is no restriction proposed for ground floor rear extensions throughout the document. This stands to reason as such proposals are not usually visible from public areas and can have very little impact on the character of the area by definition. In this instance the proposal would be entirely contained to the rear and would not be visible from anything other than an aerial view. Even then, the green roof would mitigate that impact. The proposal will utilise matching materials and will be read in the same way as the existing extension, with the addition of the green roof providing visual relief as well as supporting



biodiversity, improving drainage and better insulating the roof. This modest extension will preserve and indeed enhance the conservation area.

Quality of Accommodation

The proposed units meet minimum space standards and provide good quality internal accommodation. They would both be dual aspect and have good internal daylight levels, with the lower ground floor unit living area opening out into the garden space. The internal layouts demonstrate that all necessary furniture can be accommodated and that there are sufficient kitchen units and storage spaces. The studio unit does not provide any external amenity space but is close to a number of local amenities including public and private areas of open space and recreation such as Caledonian Park, Market Road Football Pitches, Regents Canal and Cantelows Gardens all within a 500m radius. The family sized accommodation provides over 30sqm of garden space accessible from the main living area. As stated earlier the double set of bifold doors will open up the space and provide a pleasant outdoor/indoor environment for all year round use.

Transport Considerations

It is proposed that the development would be car free. A Unilateral Undertaking was drafted for the appeal and will be adapted for the revised proposal.

The Application

The application consists of the following

- Planning Statement (this letter)
- Planning Drawings prepared by Tone Architecture including:
 - Location Plan and Site plan (Drawing No: 21034/A/1000/P/1)
 - Existing Lower/Upper Ground Floor Plans (Drawing No: 21034/A/1001/P/1)
 - Existing First and Second Floor Plans (Drawing No: 21034/A/1002/P/1)
 - Proposed Lower/Upper Ground Floor Plans (Drawing No: 21034/A/1101/P/1)
 - Proposed First and Second Floor Plans (Drawing No: 21034/A/1102/P/1)
 - Existing Front and Rear Elevation (Drawing No: 21034/A/2001/P/1)
 - Existing Side Elevation (Drawing No: 21034/A/2002/P/1)
 - Proposed Front and Rear Elevation (Drawing No: 21034/A/2101/P/1)



- Proposed Side Elevation (Drawing No: 21034/A/2102/P/1)
- Complete Application Forms and Certificate A
- Completed CIL Form 1

Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully,

Ben Kelly MRTPI
Director
07872590069