



ALLEN PLANNING Ltd
Town Planning and Development Consultants

Planning, Design, Access & Heritage Statement



In support of an application for a mansard roof extension together with an external stair from ground to lower ground floor (front elevation) and reconfiguration of existing upper floor letting rooms.

**Site at 243 Royal College Street
London
NW1 9LT**

March 2025

1.0 Introduction

- 1.1 This Planning, Design, Heritage and Access Statement has been prepared by Allen Planning Limited on behalf of our client to support a planning application for a mansard roof extension together with a new external staircase from ground floor to basement level – front elevation.
- 1.2 In addition the mansard roof extension would create two letting bedrooms and a bathroom and these proposals also include a reconfiguration of the 5 existing letting rooms on the first and second floors of the building. Overall, if approved, no additional letting rooms would be created.
- 1.3 The proposed stair from ground to lower ground will improve access to this commercial element of the site.
- 1.4 The purpose of this Statement is thereby to describe the relevant site context and surrounding area together with the details of the proposed scheme's development. It also outlines the planning policy context and provides an assessment of those policies that apply.
- 1.5 The building is not listed but does lie within a Conservation Area and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 places a duty on the local planning authority, to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 1.6 This Statement thereby includes a heritage Assessment in terms of the impact of the proposed development on the character and appearance of the Jeffrey's Street Conservation Area.
- 1.7 Support for a development of this nature in principle is provided within the revised framework which at paragraph 125 identifies that planning policies and decisions should amongst other matters:

“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure.”

and

“support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification.”

- 1.8 Furthermore the development plan would support further development on this sustainable site and in addition to this Statement and the necessary plans and forms this application also supported by a Fire Report and also the completed CIL forms.

2.0 Site Location & Planning History

- 2.1 The site forms a mid terraced building on the south western side of Royal College Street which is three storeys in height with a basement also.
- 2.2 The site is located a short walk to the centre of Camden Town offering a wealth of shops and facilities and The Regents Canal is within a close proximity as well as transport links from both Camden Town (Northern Line) and Camden Road (Overground).
- 2.3 the building is in mixed use with a commercial ground and lower ground floors and residential uppers.
- 2.4 The building is not listed but does lie within the Jeffrey's Street Conservation Area which was designated in 2002.
- 2.5 The site has a PTAL rating of 6b which is excellent.
- 2.6 To the rear of the building is a rear garden area and beyond that is that side elevations and rear gardens of residential properties in Ivor Street.
- 2.7 The general location of the site is shown in Figure 1 below.

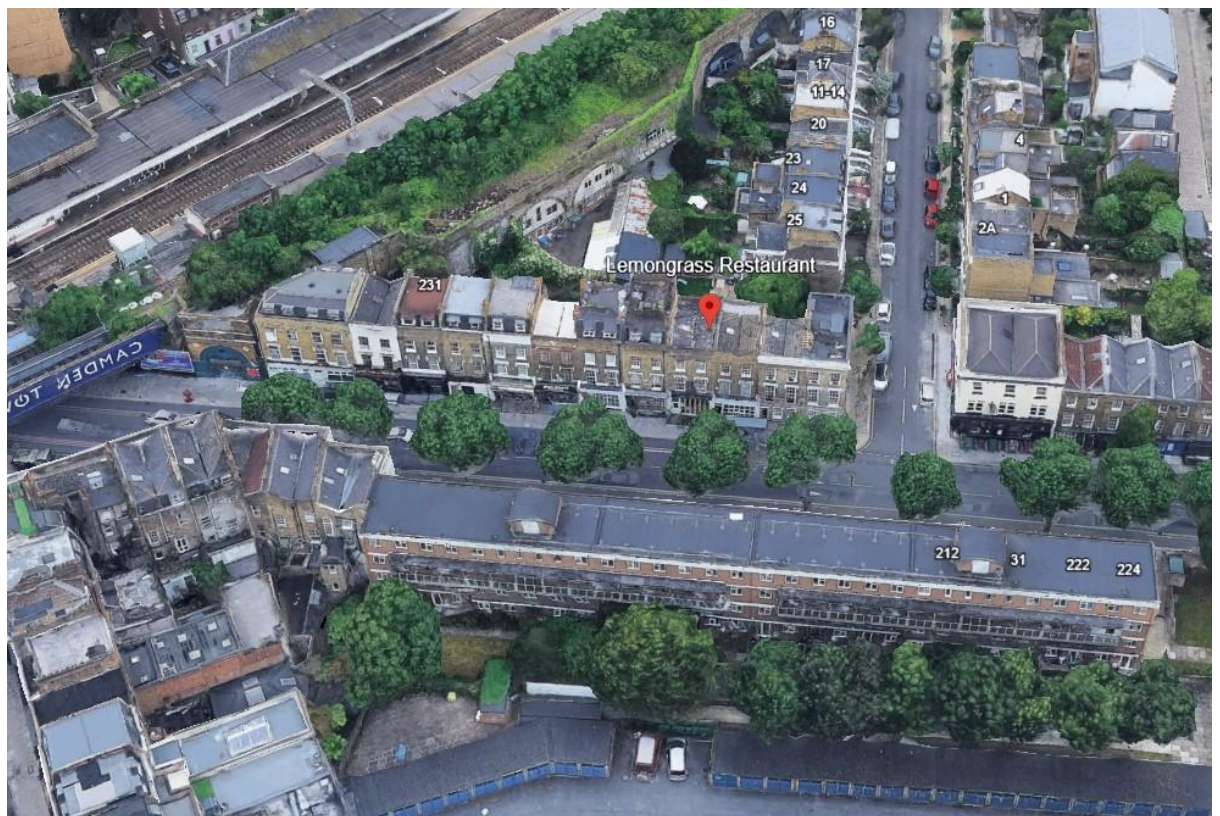


Figure 1 – Site Location

- 2.8 Turning to the planning history of the most recent application on the site was refused and also dismissed on appeal in 2004 for “proposed third floor to form self contained flat and formation of lightwell and stairs at front of premises to give direct access to basement.”

- 2.9 It is noted that a similar roof extension as that now proposed was approved by the LPA in 2002 in terms of No.237 Royal College Street.

3.0 Planning Policy

- 3.1 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004, the Development Plan is made up of the revised NPPF (Dec 2024), The London Plan (2021) and the Camden Local Plan and we set out the key policy matters below.

National Policy - Revised National Planning Policy Framework, December 2024 (amended Feb 2025)

- 3.2 Turning first to national guidance **Paragraphs 7-10** of the NPPF advise:

7. The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs⁴. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection⁵

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11)

- 3.3 Paragraph 11 identifies a presumption in favour of sustainable development for applications set out below:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

i the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or

ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

Housing/Best use of land

- 3.4 Paragraph 73 advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should amongst other matters:

“seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;

support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.”

- 3.5 Furthermore, paragraph 124 adds that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.

- 3.6 In addition amongst other matters paragraph 125 adds that planning policies and decisions should:

“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure.”

and

“support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification.”

Design

- 3.7 In terms of design paragraph 131 of the recently revised NPPF advises that:

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

- 3.8 Paragraph 135 adds:

“Planning policies and decisions should ensure that developments:

will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. “

- 3.9 In addition, p139 advises:

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵⁴, taking into

account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

Heritage

- 3.10 Paragraph 202 advises that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value⁷³. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

- 3.11 Paragraph 207 adds that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

- 3.12 Furthermore, P210 advises:

“In determining applications, local planning authorities should take account of:

the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

the desirability of new development making a positive contribution to local character and distinctiveness.”

- 3.13 in addition P215 adds that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

London Plan 2021

- 3.14 The London Plan was adopted in March 2021 and is thereby up to date. **Policy D3** deals with optimising site capacity through the design-led approach stating:

A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.

B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2

- 3.15 **Policy D4** in terms of delivering good design adds:

Design analysis and development certainty

A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.

B Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:

- 1) include a residential component that exceeds 350 units per hectare; or*

2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building

E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

- 1) design reviews are carried out transparently by independent experts in relevant disciplines*
- 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme*
- 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews*
- 4) design review recommendations are appropriately recorded and communicated to officers and decision makers*
- 5) schemes show how they have considered and addressed the design review recommendations*

6) planning decisions demonstrate how design review has been addressed.

Maintaining design quality

F The design quality of development should be retained through to completion by:

- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development*
- 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design*
- 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter*
- 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.*

3.16 Policy D6 addresses matters of housing quality and standards and states:

Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.

Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.

Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space

- 1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.*
- 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.*
- 3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.*
- 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..*
- 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).*
- 6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.*
- 7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.*
- 8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.*

Private outside space

- 9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1*

G The Mayor will produce guidance on the implementation of this policy for all housing tenures.

3.17 Policy H1 addresses the issue of increasing housing supply stating:

Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.

To ensure that ten-year housing targets are achieved, boroughs should: 1) prepare delivery-focused Development Plans which: allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the

sources of supply listed in B2 enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station³⁹ or town centre boundary⁴⁰ mixed-use redevelopment of car parks and low-density retail parks and supermarkets housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses the redevelopment of surplus utilities and public sector owned sites small sites (see Policy H2 Small sites) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

D Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.

E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development

3.18 Policy H2 addresses matters of residential development on small sites adding: *Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:*

- 1) significantly increase the contribution of small sites to meeting London's housing needs*
- 2) diversify the sources, locations, type and mix of housing supply*
- 3) support small and medium-sized housebuilders*
- 4) support those wishing to bring forward custom, self-build and community-led housing*
- 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.*

Boroughs should:

- 1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
- 2) where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites
- 3) identify and allocate appropriate small sites for residential development
- 4) list these small sites on their brownfield registers
- 5) grant permission in principle on specific sites or prepare local development orders

3.19 **Policy H4** in terms of delivering affordable housing advises:

The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include: 1) requiring major developments which trigger affordable housing requirements 50 50 All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)

2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided

3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners⁵¹

4) public sector land⁵² delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio

5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

3.20 Housing size and mix is identified at **Policy H10** which seeks:

“Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

- 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment*
- 2) the requirement to deliver mixed and inclusive neighbourhoods*
- 3) the need to deliver a range of unit types at different price points across London*
- 4) the mix of uses in the scheme*
- 5) the range of tenures in the scheme*
- 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity*
- 7) the aim to optimise housing potential on sites*

- 8) *the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock*
- 9) *the need for additional family housing and the role of one and two bed units in freeing up existing family housing.*

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:

- 1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households*
- 2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation*
- 3) the impact of welfare reform*
- 4) the cost of delivering larger units and the availability of grant.”*

Camden Local Plan 2017

- 3.21 **Policy H1** Maximising housing supply advises that the Council *will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.*

We will seek to exceed the target for additional homes, particularly self-contained homes by:

- a. regarding self-contained housing as the priority land-use of the Local Plan;*
- b. working to return vacant homes to use and ensure that new homes are occupied;*
- c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing; and*
- d. where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.*

We will monitor the delivery of additional housing against the housing target, and will seek to maintain supply at the rate necessary to exceed the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or capital value of different house types and tenures, and the needs of different groups.

- 3.22 **Policy H10** addresses housing with shared facilities ('houses in multiple occupation') and states:

“The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements.

We will support development of housing with shared facilities (houses in multiple occupation) provided that the development:

- a. will not involve the loss of two or more self-contained homes;*
- b. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing;*
- c. complies with any relevant standards for houses in multiple occupation;*
- d. contributes to creating a mixed, inclusive and sustainable community;*
- e. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity; and*

f. is secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing, having regard to Policy H4 Maximising the supply of affordable housing.

We will resist development that involves the net loss of housing with shared facilities (houses in multiple occupation) or the self-containment of any part of such a housing unless either:

g. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities; or

h. adequate replacement housing with shared facilities will be provided that satisfies criteria (a) to (f) above; or

i. the development provides self-contained social-affordable rented homes.

Where the Council is satisfied that a development involving the net loss of homes with shared facilities is justified, we will expect it to create an equivalent amount of floorspace for permanent self-contained housing (in Use Class C3), secured as a long-term addition to the supply of low cost housing, or otherwise providing an appropriate amount of affordable housing, having regard to Policy H4."

3.23 In terms of design Policy D1 advises:

The Council will seek to secure high quality design in development. The Council will require that development:

a. respects local context and character;

b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;

c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

d. is of sustainable and durable construction and adaptable to different activities and land uses;

e. comprises details and materials that are of high quality and complement the local character;

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

g. is inclusive and accessible for all;

h. promotes health;

i. is secure and designed to minimise crime and antisocial behaviour;

j. responds to natural features and preserves gardens and other open space;

k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,

l. incorporates outdoor amenity space;

m. preserves strategic and local views;

n. for housing, provides a high standard of accommodation; and

o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

3.24 In terms of heritage Policy D2 adds:

"The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed

buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

3.25 Managing the impact of development is addressed via Policy A1:

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- d. require mitigation measures where necessary*

The factors we will consider include:

- e. visual privacy, outlook;*
- f. sunlight, daylight and overshadowing;*
- g. artificial lighting levels;*
- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
- i. impacts of the construction phase, including the use of Construction Management Plans;*
- j. noise and vibration levels;*
- k. odour, fumes and dust;*
- l. microclimate;*
- m. contaminated land; and*
- n. impact upon water and wastewater infrastructure*

4.0 Material Considerations

4.1 The site is highly sustainable and within a mixed use with commercial (Class E use) at ground and lower ground and 5 letting rooms on the upper two floors and principle the provision of further development on the site is supported by both the up-to-date guidance of the Framework and the sustainable housing policies of both the London Plan and the Camden Plan.

4.2 On that basis, it is submitted that the key issues in terms of this application submission are those relating to impacts upon the visual amenities of the locality (including heritage); the quality of accommodation proposed; matters of transportation and also neighbouring dwelling impacts.

Further “development”

4.3 Whilst the overall site is within a mixed use the two upper floors are currently laid out and utilised as five letting rooms with separate communal facilities.

4.4 Whilst the proposed mansard extension would provide for a further two letting rooms it is also proposed through this application to reconfigure the first and second floors reducing the quantum of the current letting rooms on these two existing floors.

4.5 Overall therefore 5 letting rooms would remain even if this application were to be approved and therefore there would be no increase in housing capacity on this highly sustainable site however the overall quality of accommodation would be enhanced.

4.6 The development plan policy relating to housing with shared facilities identifies that such will be supported subject to criteria and these are assessed below

- a. will not involve the loss of two or more self-contained homes;*

That is not the case as the upper floors are already letting rooms

- b. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing;*

The site is not identified for such

c. complies with any relevant standards for houses in multiple occupation;

The additional two letting room are of sufficient size and an additional wc room is provided and the site already possess two communal kitchens.

d. contributes to creating a mixed, inclusive and sustainable community;

The new layout would not increase letting rooms.

e. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity; and

The upper floors of this mixed use building are already in use as letting rooms.

f. is secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing, having regard to Policy H4 Maximising the supply of affordable housing

No additional letting rooms would be provided.

4.7 On that basis the development proposal would be compliant with the criteria under Policy H10 and provide better quality “low cost” housing on this highly sustainable mixed use site.

Design & Visual impacts (Inc Heritage Impacts)

- 4.8 The Framework and the development plan seeks to achieve development of a high standard of design. The main contributing factor to the design rationale is the building's relationship with its immediate surroundings, notably, how the development would sit in the context of the street scene.
- 4.9 Policy In terms of design **Policy D1** advises that the Council will seek to secure high standard of design.
- 4.10 In terms of heritage matters the site is within a designated Conservation Area and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 places a duty on the local planning authority, to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 4.11 On that basis matters of design and heritage are intertwined and a starting point for assessment in terms of the impact of the proposed development on the character and appearance is the Jeffrey's Street Conservation Area Appraisal.
- 4.12 The Jeffrey's Street Conservation Area Appraisal advises that overall, the area is an enclave of quiet, predominantly residential, streets and narrow lanes between the busy thoroughfares of Camden Street and Royal College Street. It consists, mainly, of 18th and 19th century terraced houses set between areas of green open space.
- 4.13 It adds that the character of Royal College Street is quite different from the residential nature of the rest of the Conservation Area as the buildings are predominantly in commercial use at ground floor level with two upper storeys built of plain stock brick above.

- 4.14 The Jeffrey's Street Conservation Area Appraisal advises that south of Ivor Street, the shops have more decorative console brackets and pilasters with ornate capitals. These shops do not have lightwells or railings. Nos. 225-249 have hood mouldings over the first floor windows with unusual console brackets (the mouldings of Nos. 231 & 233 are missing). While there are shopfronts of merit at Nos. 237, 239, 255 and 259, many of the buildings are no longer in retail use and have been converted to residential use. Others retain their original fascias and console brackets but have modern shopfronts; several have been spoiled by insensitive alterations such as poor quality modern glazing, perspex signs, projecting box signs and box fascias covering first floor window cills, roller shutters, inappropriate brick infill where the buildings have been converted to other uses and a plethora of ramps and railings which have been inappropriately placed and designed. On the whole, this part of the Conservation Area appears run down and the buildings are in need of sensitive restoration and regeneration.
- 4.15 Turning initially to the roof extension, the existing building is currently split into two separate uses, the basement and GF operate as a restaurant, and the 1F and 2F are used as letting rooms.
- 4.16 The existing letting rooms are entranced internally via the GF, and is serviced by a private internal staircase.
- 4.17 Visually it is proposed that the new mansard extension will match the existing mansard roof at no.241. Additionally, the rear façade of the building is proposed to be built in brickwork, the dormer cheeks are proposed to be clad in lead, and the roof is proposed to have a slate tile finish.
- 4.18 Furthermore, all new elements of the building i.e. brick, windows, roof tiles etc will be selected to match existing, therefore the new storey will be complementary to the existing building and its surroundings.
- 4.19 In addition the new proposed windows have been aligned with the existing windows, so both the front and rear final elevations have a cohesive façade.
- 4.20 The appearance of this part of the conservation area includes mansard roof extensions and indeed there are similar roof extensions at Nos 239 and 241 and indeed they form part of the appearance of built form on this terrace within the Conservation Area as shown in Figure 2 below.

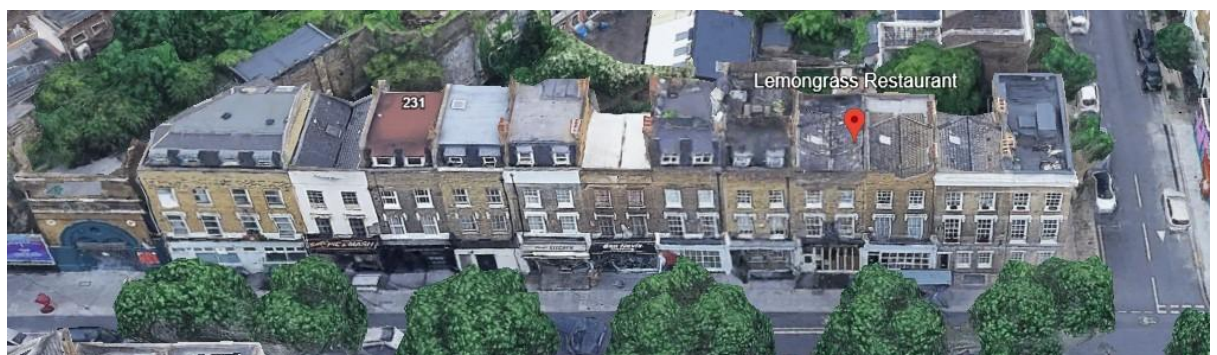


Figure 2 – Roofscape 243 Royal College Street

- 4.21 In terms of the proposed stair from ground to the lower ground, the ground floor frontages of properties on this side of Royal College Street display some diversity. There are a number which have no features, some which have railings defining a front curtilage and some such as next door that possess railings with steps from ground to lower ground as shown in Figure 3 below.



Figure 3 – Street Frontage 241-254 Royal College Street

- 4.22 To the front of the site at GF there is a lightwell providing daylight to the basement. Currently, the only way to access the basement is through the restaurant at GF or through the rear garden. There is already an existing basement door to the front of the property which exits into the lightwell.
- 4.23 It is proposed to construct a new external metal staircase within the lightwell, to the basement of the property. This will provide a secondary escape route in the event of a fire.
- 4.24 The existing basement door and window to the front of the property are to be retained. The proposed staircase is to be metal and black in colour, therefore complementing the existing balustrade, as well as the existing external staircase at no.241.
- 4.25 Visually overall these proposals have been designed in a way which will allow them to blend in successfully with their surroundings, therefore improving the functionality of the site whilst maintaining the character, and not having a negative impact on the aesthetics of Royal College Street.
- 4.26 On this basis the development proposal would avoid any adverse impacts upon the character and appearance of the Conservation and are in accord with the design and heritage policies of the Local Plan.**

Quality of Accommodation Proposed

- 4.27 These proposals, if approved, would provide for two letting rooms in the new roof floor but as a result of reconfiguration of the existing lower floors such would not increase the number of letting rooms on site overall.
- 4.28 At present there are three letting rooms on the first floor with a communal kitchen and also a communal kitchen and also a separate wc and shower room.
- 4.29 The first floor would be reconfigured to provide for one letting room and a communal kitchen and separate communal lounge area. In addition, this floor would have a separate WC and a shower room.
- 4.30 At present there are two letting rooms on the second floor with a communal kitchen and also a communal lounge and also a separate wc/bathroom.
- 4.31 The second floor would be reconfigured to provide for two letting rooms and a separate bathroom.
- 4.32 The proposed letting rooms in the new roof floor would be of 11.6m² and 15.6m². In addition a large store room of 3.5m² would be provided as well as an additional bathroom.
- 4.33 The layout of the proposed new floor is shown in Figure 4 below.

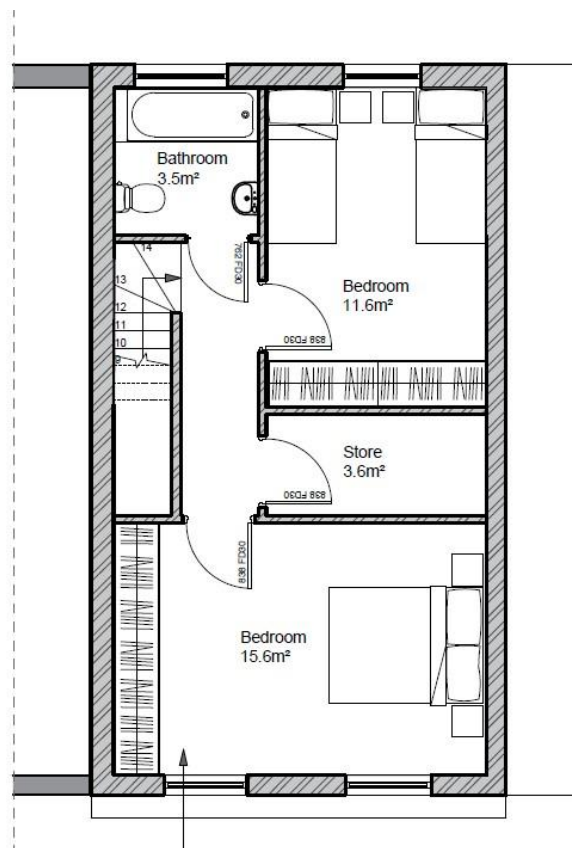


Figure 4 – Proposed New Roof floor layout

- 4.34 The reconfiguration of the existing 5 letting rooms together with the new roof floor would not increase accommodation on site, as such would remain as 5 letting rooms.
- 4.35 **That being said the amended/extended development would result in an approved layout of 5 letting rooms with communal facilities and such would be compliant and indeed exceed the size standards providing such “low cost” housing of excellent quality and as such these proposals are entirely compliant with the relevant development plan policy relating to the quality of new and existing accommodation.**

Transport Impacts

- 4.36 The site has no off-street parking and no additional parking spaces proposed for the site however no additional letting rooms are proposed and the site has a PTAL rating of 6b and therefore is regarded as having an excellent level of access to public transport.
- 4.37 The recently revised NPPF in matters of sustainable development, transport and car parking advises at paragraph 112 advises:

“If setting local parking standards for residential and non-residential development, policies should take into account:

- . the accessibility of the development;*
- . the type, mix and use of development;*
- . the availability of and opportunities for public transport;*

- . local car ownership levels; and*
- . the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

- 4.38 Paragraph 113 adds that:

“maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.”

- 4.39 In terms of assessment P116 adds:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

- 4.40 **Given the high PTAL rating of the site and that no “additional” letting rooms are required it is submitted that this application proposal would result in no harm to any matters of transport or highway safety.**

Impacts upon neighbouring properties

- 4.41 Securing a good standard of amenity for all existing and future occupants of land and buildings is one of the core principles of the NPPF as set out in p135(f). In addition, Policy A1 adds that the *Council will seek to protect the quality of life of occupiers and neighbours adding that we will grant permission for development unless this causes unacceptable harm to amenity.*

We will:

a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;

- 4.42 The proposed development would add a small number of habitable room windows at roof level to serve the two new letting rooms with two windows to the front elevation and two to the rear.
- 4.43 The front windows would face across the public realm of Royal College Street and would not result in any adverse impact to properties opposite in terms of a loss of privacy or daylight/sunlight
- 4.44 Two new windows are proposed in the rear elevation one of which would serve a bathroom and would be obscure glazed.
- 4.45 To the rear of the site is the rear garden area of the property and beyond that is the side elevation of residential properties in Ivor Street. Whilst the additional window would allow for a view over the rear garden areas of properties in Ivor Street such already occurs for the upper floor windows of the application site and its neighbours.
- 4.46 Indeed, this would be a very similar relationship to the neighbouring which already possesses a roof extension.
- 4.47 The site is already within a “multiple” use as commercial and residential letting rooms and the proposed development would not result in any further letting rooms and thereby there would be no increase in “general comings and goings” from the site.
- 4.48 It is concluded therefore that these proposals would not result in any acceptable impacts upon the residential amenities of any properties either on the site or in close proximity to it and the development proposed therefore be compliant with her the requirements of Policy A1 of the Local Plan.**

5.0 Conclusions

- 5.1 The proposed development would increase and improve existing “letting room” housing stock on this sustainable site in accordance with sustainable planning policies.
- 5.2 The proposed mansard roof extension proposed would be in keeping with the building itself and indeed the prevailing character, height and roof forms of key buildings in the vicinity. The previous planning history also establishes the principle of the form of development as proposed.
- 5.3 The proposed design will respect the character of the street scene and ensure consistency with the original design of the building. Moreover, the support attributed

to airspace developments through the adopted development plan with the clear support from central government within the NPPF (see p125), signify that an airspace development is acceptable in this location.

- 5.4 Specific measures have been taken to ensure the proposed development is without detrimental effects on surrounding properties and residents and the sensitive extensions of the existing building as proposed is not considered to result in any detrimental impact on the Conservation Area thereby adhering to policy.
- 5.5 The proposal is a car-free development and afforded a good level of accessibility to public transport.
- 5.6 Given the sustainable nature of the site it is submitted that these proposals would avoid any adverse impacts on matters of highway safety, and the overall scheme also offers reasonable accessibility to public transport, public open space and shops and other services.
- 5.7 Support for these proposals can be demonstrated on sustainability grounds, in that it will make full and effective use of sustainable land within this built up area.
- 5.8 **On the basis of all of the above it is concluded that the development proposed is in accord with the development plan, would successfully use airspace surrounded by built form in order to create good quality residential accommodation in a sustainable location and would therefore be compliant with sustainable development of new housing and the relevant policies for such within the Development Plan.**