

**Date:** 6<sup>th</sup> June 2013  
**Our Ref:** 2013/1358/PRE  
**Contact: Rob Tulloch:** 020 7974 2516

**Email:** [rob.tulloch@camden.gov.uk](mailto:rob.tulloch@camden.gov.uk)

**Development Control  
Planning Services**  
London Borough of Camden  
Town Hall  
Argyle Street  
London WC1H 8ND

Matthew Blythin  
DHA Planning  
Eclipse House  
Eclipse Park  
Sittingbourne Road  
Maidstone  
Kent  
ME14 3EN

Tel 020 7974 4444  
Fax 020 7974 1975  
[env.devcon@camden.gov.uk](mailto:env.devcon@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Mr Blythin,

**Re: Planning Pre-application advice – 24-28 Argyle Street, London, WC1H 8EG**

Set out in the attached document is a detailed note of the principal issues and what you need to do in order to submit a valid planning application for your proposal.

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.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the Council, you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

I trust the enclosed assessment is a fair representation of our discussion. Should you require any further information please contact me on the above telephone number.

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

Yours sincerely

Rob Tulloch – Planning Officer  
For Director of Culture and Environment

## **Site and Surrounding**

The proposal relates to three linked buildings on the western side of Argyle Street. The buildings were most recently in use as a hostel (Class C2) providing higher end mental health accommodation with 15 bedrooms and associated administration and storage facilities, but are currently vacant. The site is part of a terrace of 13 Grade II listed houses and lies within the Bloomsbury Conservation Area and the Central London Area.

Argyle Street and Argyle Square are characterised by four and five storey listed buildings, a large number of which are in hotel use. There are also residential uses in the form of private accommodation and hostel uses.

## **Proposal**

The proposal is for the conversion of the hostel to seven self-contained flats (2x 4-bedroom maisonettes, 3x 2-bedroom flats, 1x 2-bedroom maisonette, 1x 1-bedroom flat).

## **Planning History**

8500570 Change of use from hotel to hostel with ancillary cluster accommodation. Granted 04/06/1985

8501108 & 8570195 Alteration of roof profile to make loft areas useable plus provision of additional facilities and bedrooms to 3rd floor so formed. Planning Permission and Listed Building Consent Part Approved 19/09/1985

8701931 & 8770270 Alterations and conversion of the buildings to include a new roof extension and extensions at the rear at part basement ground and first floor levels for hostel use. Planning Permission and Listed Building Consent Granted 06/08/1987

### 59 Maygrove Road

2009/4598/P Erection of part four, part five storey building to provide 15 x 1-bedroom supported housing units and 14 self-contained flats (1 x 3 bedroom, 6 x 2 bedroom and 7 x 1 bedroom) all affordable housing (Class C3) (following demolition of existing two-storey building previously used as a car repair workshop). Granted 15/01/2010

## **Assessment**

The buildings' lawful use is as a hostel, and it has operated as such for approximately 20 years. The site is currently vacant and the proposal is to convert the buildings into seven private residential flats.

The main issues of consideration are

- Land use
- Heritage impact
- Standard of proposed accommodation

- Amenity
- Sustainability
- Transport

## **Land use**

### *Loss of hostel floorspace*

The buildings are owned by One Group Housing who state that the site is not fit for purpose as a high end mental health scheme as, among other things, the units are not self-contained, the rooms are small and the building does not meet the necessary security specifications such as a single entrance to the building or having a double door entry system. The listed nature of the building also makes major changes to the layout and plan form problematic as they may impact on the special interest of the building.

The hostel provided accommodation for 18 people, 15 of the residents of the hostel have been relocated to a new hostel at Maygrove Road, whilst the remainder have been released back into the community. The move has been supported by the Mental Health Strategic Commissioners at Camden and the Camden and Islington Mental Health Trust. In addition to the re-provision at 59 Maygrove Road, One Housing Group have also provided further accommodation at Tile House in the Kings Cross development for a further 15 people in self-contained flats. As such the new sites have delivered an increase in capacity of 12 adult mental health hostel places.

The LDF seeks to protect all residential accommodation including hostels. Policy CS6 indicates that Council will seek a variety of housing types suitable for homeless people and vulnerable people. The Council's approach is informed by, among other things:

- the Council's strategy for people with a variety of support needs (e.g. mental illness, learning disabilities), which focuses on supporting people to live in their own homes and lead independent lifestyles;
- the anticipated need for fewer hostels, some remodelling of supported housing for vulnerable people, more intensive support for people with mental illnesses, and some additional tenancies for people with learning disabilities.

Policy DP8 states that the Council will resist development that involves the net loss of accommodation for homeless people or vulnerable people unless either: d) adequate and accessible replacement accommodation will be provided, or e) it can be demonstrated that the accommodation is no longer needed for the particular homeless people or vulnerable people because their needs can be better met in existing accommodation elsewhere, or with alternative types of support; or f) it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards for housing homeless people or vulnerable people.

The proposal would not result in a net loss of hostel accommodation, in fact Maygrove Road and Tile House would result in a 67% rise in places. It is also accepted that the listed nature of the buildings restricts the amount of adaptation the buildings can undergo without harming their special interest. As such the proposal is considered to comply with policies CS6 and DP8.

### *New residential accommodation*

Residential floorspace is the priority of the Council's Local development Framework (LDF). As such the proposal to provide seven new flats is welcomed.

Policy DP8 states that Where the Council accepts that a hostel site or property is no longer appropriate for housing any groups of homeless, vulnerable or older people, the Council will expect its development for self-contained housing, including an appropriate proportion of affordable housing. The site has a floorspace of approximately 650sqm, as such it is not considered to have the capacity to provide 10 units, and as the gross floorspace is less than 1,000sqm there would be no requirement for affordable housing.

The proposal would provide a total of seven flats (2x 4 bedroom units, 4x 2-bedroom units and 1x 1 bed unit). Policy DP5 requires new residential development to provide a combination of large and small units, as well as providing a mix of units in line with the Council's housing priorities. The proposal would provide two large units (3-bedroom or more) which is welcomed as the King's Cross ward is identified in DP5 as being a ward that suffers from a lack of family sized accommodation. DP5 also identifies 2-bedroom market accommodation as being the highest priority, and advises that new development aim for at least 40% of market units as being 2-bedroom. The proposal would provide 57% of the highest priority accommodation whilst also providing family sized accommodation and a smaller unit. As such the mix of units is considered to be appropriate.

### **Heritage impact**

The buildings are part of a terrace of 13 Grade II listed houses c1833-39 which lies within sub-area 13 of the Bloomsbury Conservation Area and no external alterations are proposed. The proposal would return the listed buildings back to their original residential use which is welcomed.

As part of the hostel use the buildings have been linked internally which has resulted in the loss of original fabric and some harm to the plan form. The proposal would retain some of the internal links and is broadly acceptable in terms of its impact on the special interest of the building. However, whilst the proposal would in some ways go toward reinstating the original plan form by closing openings between the buildings at basement, ground and third floor levels, there is concern at the proposed insertion of a staircase to the ground/basement of no. 28. This would not be acceptable from a listed building point of view and it is recommended that the layouts be adapted accordingly. The lateral conversions should provide enough scope for the units to be reconfigured (or the mix altered) without undue harm to the plan.

### **Residential standards**

The proposed dwellings would comply with the Council's and the London Plan's residential development standards in terms of floorspace and bedroom size. The units would be dual aspect, with regular shaped and reasonably sized rooms with

good access to natural light and ventilation. Some of the flats would also benefit from amenity space in the form of internal courtyards and garden.

In line with policy DP6 (Lifetime Homes and wheelchair housing) all new residential development should meet the Lifetime Homes standards. New build accommodation should meet all of the standards, but it is accepted that conversions may not be able to meet all of the standards, and listed buildings have more constraints. Nevertheless, Lifetime Home statements are required to accompany all new residential development and the statement will need to identify which of the criteria cannot be met and give the reasons for non-compliance.

## **Amenity**

The return to a permanent residential use is considered to have less of an amenity impact on neighbouring properties than the former hostel use.

## **Sustainability**

In line with policies DP22 and CS13, conversions to five or more residential units are required to meet “very good” level in a BREEM assessment, however constraints such as the listed nature of a site are taken into consideration. The application would need to be accompanied by a Pre-assessment report, which needs to be compiled by an accredited assessor, and a post-construction review would be secured by a Section 106 Agreement. Further details of the BREEM can be found in Camden Planning Guidance (CPG3 – Sustainability), and more detailed guidance including how to find an assessor can be found at the BREEM website [www.breem.org](http://www.breem.org)

## **Transport**

The site has a Public Transport Accessibility Level of 6b (Excellent) and is within the Kings Cross Controlled Parking Zone (CA-D) and the Central London Area. In line with policy DP18 the proposal would be required to be car-free, which means that occupiers would not be eligible for on-street parking permits. This would be secured by a Section 106 Agreement.

The Council’s parking standards and the London Plan require new residential accommodation to provide adequate cycle storage facilities. Camden’s, and the London Plan’s, parking standards require 1x cycle space for each one or two bedroom unit, and 2x spaces for units of three bedrooms or more. Cycle parking should be designed to meet Camden’s cycle parking design specifications as set out in Camden Planning Guidance (CPG 7 – Transport), again the listed nature of a property will be taken into consideration.

Construction works and construction vehicle movements have the potential to disrupt the day to day functioning of the surrounding highway network, but due to the scale and nature of the [proposal a Construction Management Plan will not be required.

## **Planning Obligations**

Development which results in an increase of five or more dwellings can add extra pressure on the services the Council provides, as such the Council will seek certain financial contributions, via a Section 106 Agreement, to mitigate for the additional demand.

#### Open space

In line with policies CS15 and DP32, and CPG8, if public open space cannot be provided on site, a financial contribution to public open space provision will be required. The current financial contributions are £817 per 1-bed unit, £1,304 per 2-bed unit and £2,642 per 4-bed unit. As such, the proposal would be required to contribute the sum of £11,317.

#### Education

Family sized accommodation creates additional demand for school places in the borough. In line with Camden Planning Guidance CPG8, contributions to education provision are sought for new dwellings of two bedrooms or more, as single bedroom units are unlikely to provide accommodation for children. The current figure for education contributions are £2,213 per 2-bed unit and £21,494 per 4-bed unit, thus the education contribution would be £51,840.

#### **Community Infrastructure Levy (CIL)**

The Mayor of London's Community Infrastructure Levy was introduced on the 1st April 2012. This will be used to raise funds to contribute towards Crossrail. The CIL will apply to all development which adds one or more dwellings or more than 100sqm of floorspace at a rate of £50 per sqm. As the proposal would create new dwellings a CIL contribution would be required based on the proposed floorspace.

Camden is also introducing its own CIL which will be in addition to the Mayor's CIL, and is likely to be introduced in late 2013. Please refer to the Council's website for further information on the Borough's CIL.

#### **Conclusion**

There is no objection in principle to the loss of hostel floorspace, as it is accepted that alternative provision is being provided elsewhere in the borough. The proposal would provide new residential accommodation and housing is the priority of the Council's Local Development Framework. There is no requirement for an affordable housing contribution, however it may be worth exploring the possibility of working with the Council to provide alternative affordable housing on site (please contact Simon Mitchell Affordable Housing Development Co-ordinator, Housing Commissioning & Partnerships 020 7974 2743 [simon.mitchell@camden.gov.uk](mailto:simon.mitchell@camden.gov.uk)).

The proposal would also bring listed buildings back into use, and return them to their original residential use, which is welcomed, but there is concern about how the changes in plan form would affect the special interest of the listed buildings. The proposed flats would provide a good standard of residential amenity and the proposal is not considered to harm the character and appearance of the conservation area, the amenity of any adjoining occupiers or the local transport network.

Rob Tulloch – Planning Officer  
For Director of Culture and Environment  
**6<sup>th</sup> June 2013**