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Ms S Taylor
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Our Ref: 2014/1927/PRE
Contact: Seonaid Carr
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Date: 05 June 2014

Dear Ms Taylor,

Re: Change of use to part of the basement level from A3 to C3 and reconfiguration of upper levels to provide 7 self contained flats (5 x 1 bed and 2 x 2 bed) together with two storey extension at second and third floors, roof extension and alteration to windows throughout.

I write with regard to your pre application request for the above proposal at Carlton House, 64 Grafton Way, London, W1T 5DP and following our meeting of Friday 11 April 2014. I have provided a response below based on the plans provided within your submission and the additional plans received from Nick Hinge on 07 May 2014.

Policy:

The policy context for the proposal is provided by the following policies:

Local Development Framework Core Strategy

- CS1 (Distribution of growth);
- CS3 (Other highly accessible areas);
- CS5 (Managing the impact of growth and development);
- CS6 (Providing quality homes);
- CS9 (Achieving a successful Central London);
- CS11 (Promoting a sustainable and efficient travel);
- CS13 (Tackling climate change through promoting higher environmental standards);
- CS14 (Promoting high quality places and conserving our heritage);

Local Development Framework Development Policies

- DP2 (Making full use of Camden's capacity for housing);
- DP5 (Homes of different sizes);
- DP6 (Lifetime homes and wheelchair homes);
- DP16 (The transport implications of development);
- DP17 (Walking, cycling and public transport);

- DP18 (Parking standards and limiting the availability of car parking);
- DP19 (Managing the impact of parking);
- DP22 (Promoting sustainable design and construction);
- DP23 (Water);
- DP24 (Securing high quality design);
- DP25 (Conserving Camden's heritage);
- DP26 (Managing the impact of development on occupiers and neighbours);
- DP29 (Improving access).

Supplementary Planning Guidance

- CPG1 (Design)
- CPG2 (Housing)
- CPG6 (Amenity)
- CPG7 (Transport)
- CPG8 (Planning Obligations)
- Fitzroy Square Conservation Area Appraisal and Management Plan (2010)

On a regional and national level the London Plan (2011) policies and the National Planning Policy Framework (March 2012) would also be relevant.

Proposal:

Pre application advice is sought in respect of the following works:

- Change of use from A3 at basement and ground floor and 3 x 2 bed self contained units to A3 at part basement and ground floor and 7 residential flats at basement and first to fourth floors (5 x 1 bed and 2 x 2 bed);
- Erection of a two storey extension to the Whitfield Street elevation at second and third floor levels with chimney stack to house extraction;
- Raising the roof ridge of the main roof with the creation of two inset terraces to the Whitfield Street elevation;
- Removal of pavement lights to open up lightwell to the Whitfield Street elevation and
- Alterations to windows throughout the building.

Having regard to the proposed development, the main issues are:

- Land Use
- Design and impact on character
- Impact on neighbouring amenity
- Accessibility
- Transport
- Waste
- Sustainability
- The planning application

Land Use

With regard to land use at present the ground and basement levels are occupied by a restaurant (Use Class A3), with residential accommodation above. The proposal would change the use of part of the basement level to residential, to provide a single self-contained one bed unit within part of the basement area, with the remaining basement area being used as the kitchen for the A3 use at ground floor.

In terms of principle, no objection would be raised to part of the A3 unit being lost as the remaining A3 floorspace would still be sufficiently sized for A3 use. However the proposal to have a self-contained unit within the basement area is not likely to be

supported by the Council, namely in terms of the standard of accommodation this would provide. Concern is raised in terms of unit size, light levels, outlook and noise and vibration with the unit being directly adjacent to the kitchen of the A3 and below the restaurant area itself. In terms of light levels, it would need to be demonstrated by way of daylight and sunlight assessment that the unit would receive a sufficient level of light in accordance with BRE guidelines. With regard to outlook, I don't consider the outlook that would be achieved from within the unit would be sufficient for a residential dwelling, the unit would be single aspect and served by two windows, the one to the main habitable accommodation would be partly obscured by the external steps leading from the basement to ground floor thereby obstructing views from the window. Even if this stair wasn't in situ, I don't consider the views that would be experienced from within the unit at basement level would be acceptable.

Given the siting of the unit adjacent to and below the A3 accommodation, I am concerned in respect of the noise and vibration that would be experienced from within the proposed unit, from the general activity of the A3 unit and the equipment that would be required to serve the unit. Furthermore the proposals include utilities and bin store within the vaults across from the basement level flat which would increase noise and disturbance to this unit. In light of these points I would strongly advise that the basement level does not contain any residential accommodation.

In terms of the standard of the remaining accommodation, in respect of unit sizes the Council would adhere to the London Plan standards given these were adopted after the Council's CPG. As such all 1 bed 2 persons units should have a minimum size of 50sqm and 2 bed 3 person units should be 61sqm. The one person 37sqm unit apply more to studios than 1 bedrooms. Based on these figures none of the units would meet the required space standards. The 1 bed units range from 31.4sqm (Flat 2) to 39.5sqm (Flat 7) and the 2 beds would measure 49.7sqm and 46.9sqm. I would therefore advise that the internal layout is reconfigured to accommodate the required space standards.

With regard to levels of light and outlook that would be experienced by future occupiers, no objection would be raised to flats 1, 3 or 6. With regard to flats 2 and 4 the opening to the living area appears limited in terms of light and outlook. It would need to be demonstrated that these habitable areas would receive sufficient light. In respect of flat 5 the windows serving bedrooms 1 and 2 appear small limiting light and outlook which raises concern.

With regard to unit mix, Policy DP5 requires at least 40% of market accommodation to be 2 bed units which are in the highest demand. The proposal would provide only 25% 2 bed units. As such I would advise the mix of units is altered in line with the requirements stated in the priority table of DP5.

In light of the above, I consider there needs to be some considerable changes to the unit mix, layout and size for the development to be acceptable.

Design and Impact on character:

The application site comprises a four storey corner building located on the corner of Grafton Way and Whitfield Street. The building is noted in the conservation area appraisal as providing a landmark at the junction of the two streets with its prominent gables and decoration and is considered a positive contributor to the surrounding conservation area.

The overarching aim of Policies CS5, CS14, DP24 and DP25 are to secure high quality design that safeguards the heritage of the Borough. CPG4 also provides detailed design advice on acceptable forms of development.

During the course of the pre-application process an amendment was received from the architect Nick Hinge revised on 07/05/2014, this demonstrates an alteration to the roof form of the two storey extension to the Whitfield Street and an alignment of the windows within the extension with the windows in the main body of the building. This alteration is an improvement on the original proposal and I wouldn't raise objection were it to be submitted as an application, however please note that in general our CPG guidance notes that extensions above a single storey should be set a storey below the eaves, which this proposal wouldn't do however I feel in this instance it would appear acceptable as proposed.

In terms of the raising of the roof ridge, no objection is raised subject to the increase in height being retained to a level where it would not be perceived from street level. With regard to the other works at roof level, the inset terraces should be set in from the gable ends, which would narrow the terrace area itself and the railings should be set behind the parapet to reduce views.

At roof level at the point of the proposed railings on the Whitfield Street elevation, it is proposed to remove the existing detailed parapet and build up the wall, this would not be supported. The detailing of this building is what adds to its character, as noted in the conservation area appraisal, the removal of such detailing in such a prominent location would be to the buildings detriment and also fail to preserve or enhance the character and appearance of the conservation area. I would strongly advise this element of the design is removed.

No objection is raised to the removal of the pavement lights on the Whitfield Street elevation to open up the lightwell area, however please note within your application who the owner of this area of land is.

Any works to the windows within the existing building should be an improvement of the current situation and any replacements should be of timber construction, we would not support PVC or metal framed windows on a building of this nature. The reinstatement of more traditional formed windows to the ground floor level is an welcomed alteration.

Impact on neighbouring amenity:

As per Policy DP26, the Council seeks to ensure development protects the quality of life of occupiers and neighbours with regard to issues such as outlook, daylight, sunlight and sense of enclosure.

Due to the nature of the proposed development I don't consider the development would impact on neighbouring residents' amenity in terms of outlook, daylight, sunlight and sense of enclosure.

Accessibility:

Policy DP6 states that all new homes should comply with Lifetime Homes criteria as far as possible, 10% of homes developed should meet wheelchair housing standards or be easily adapted to meet them. As part of the application you will be required to submit a Lifetime Homes assessment which addresses how the proposal would meet each of the 16 criteria, however it is acknowledged that as the building is existing it may not be possible to meet all 16 criteria but the development should seek to meet the standards as far as possible and demonstrate why it is not possible to meet particular criteria.

Transport:

The application site is located within an area with a PTAL score of 6b(excellent) and is located within Controlled Parking Zone CAE. As per Policy DP18, the development will be required to be car-free and no parking permits will be allowed for future residents. The development will be secured as car-free by means of a Section 106 legal agreement.

In respect of cycle parking, the Council would expect the provision of one cycle space per unit if they are 1 and 2 bed units and 2 spaces per 3 bed unit, (as per London Plan standards), to encourage sustainable transport. Cycle parking should be located off-street, within the boundary of the site and needs to be accessible and secure, ideally it should be provided with level access. You are advised to consider the advice of Chapter 6 of the London Plan to appreciate the expectations for cycle provision.

Waste:

The Council will seek to ensure development includes facilities for storage and collection of waste and recycling, in accordance with Policies CS18 and DP26. You are advised to refer to section 10 of CPG1 (Design) in respect of the Council's requirements for refuse provision. You would be required to provide space for both mixed recyclables and non-recyclable waste. At present you are proposing to store waste within a vault at basement level. I don't consider this would be acceptable, in terms of it not being level access and also the impact it would have on the occupiers of No.7. I would advise considering guidance within CPG1(Design) to ensure the proposed storage would accord with the guidance. Given you are proposing 7 dwellings, you are also advised to contact Camden Street Environment Services prior to making an application to determine the best means of storage and collection for the development. Within your application, you should submit a statement describing the proposed waste storage and collection arrangements, as agreed with Street Environment Services.

Sustainability:

The Council would require development to incorporate sustainable design and construction measures. You are advised to submit a statement demonstrating how relevant measures have been incorporated into the design and proposed implementation as per Policy DP22.

Section 106 Obligations:

CPG8(Planning obligations) provides full details of planning obligations which would be likely as a result of development, to mitigate its impact. Given the scale of the proposed development, namely the provision of 7 units with a net increase of 4 units from the existing situation, it is anticipated the following contributions will be requested:

Car Free – it is likely a Section 106 would be used to ensure all units are car capped so no future occupiers could attain parking permits.

Construction Management Plan - given the location fo the application site it may be considered necessary to secure a Construction Management Plan to be secured via a S106 to monitor the construction process.

There will also be a processing and monitoring charge of £365, details of this are found in paragraphs 2.33-2.36 of GPG8.

Obligations may also be requested for transport grounds and public open space, please note the contributions above are a starting point and you should be minded these may change.

Community Infrastructure Levy (CIL):

Given your proposal would result in four additional dwellings (as there is already three onsite) the development would be liable towards the Mayoral CIL. The CIL contribution is calculated at £50 per m2.

The Planning Application:

Please ensure that you submit all the required information in accordance with the validation checklist. More details can be obtained from our website as to the requirements of a valid application these can be accessed at <http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application>

Conclusion:

In light of the above advice, I consider the principle of the proposed development acceptable, subject to alterations to the design and internal configuration of the building.

This document represents the informal initial officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice the decision of any subsequent planning applications submitted.

If you have any queries about the above letter or the attached document please do not hesitate to contact **Seonaid Carr** on **020 7974 2766**.

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our [pre application enquiry survey](#)¹. We will use the information you give us to monitor and improve our services. Thank you for using Camden's pre-application advice service.

Yours sincerely

Seonaid Carr
Senior Planning Officer
West Area Team

¹ <https://consultations.wearecamden.org/culture-environment/259f41ed>