					1 miled on: 12/05/2015 07.
Application No:	<b>Consultees Name:</b>	<b>Consultees Addr:</b>	Received:	Comment:	Response:
2015/1858/P	North Camden Town Neighbourhood Forum Steering group	3 Ivor Street NW1 9PL	30/04/2015 16:42:17	OBJ	<ol> <li>Pre- Application advice</li> <li>The application form Pre-Ap advice (11/09/2014) stated:</li> <li>I can confirm that providing that your application is not contrary to planning policies and guidance</li> <li>This appears to have been incorrect advice from the Council. No attention has been given to Camden's policies for protecting local business.</li> <li>The business did not close because it was isolated. It closed because the owner retired.</li> </ol>
					2. Camden Road neighbourhood
					<ul> <li>The property lies within Camden Road neighbourhood centre and is designated A1.</li> <li>Camden's Retail and Town Centre Study in 2013 noted: <ul> <li>The Government supports community involvement in the redesigning of their high streets to reinvigorate areas of decline, to increase footfall and encourage people to live in their town centres.</li> <li>The London Plan requires LPAs to identify town centre boundaries, primary and secondary shopping areas and set out policies for each type of centre, and also identify smaller centres to provide neighbourhood centres to serve day to day shopping needs. Declining centres should be managed proactively, considering the scope for consolidating and strengthening centres and promoting diversification.</li> <li>The GLA Town Centres SPG encourages town centres to develop their strengths to fulfil their strategic role and potential. Where retail assessments identify retail capacity, local plans should facilitate the extension of the retail offer.</li> <li>Policy DP10 sets out the Council's ambition to encourage the provision of small shops. Independent occupiers must be encouraged through affordable rents. Councils will also resist granting planning permission for the net loss of retail floorspace outside designated centres.</li> </ul> </li> <li>The property is within Camden Town place planning area</li> </ul>
					Camden Town Place Plan (2010, 2013) emphasises the importance of Camden town for the economy (22 000 jobs), its role for retail shopping and also its heritage assets.
					The area is characterised by a varied built environment with a large number of historic buildings and built heritage.
					Maintaining a balance of uses and activities is essential to retaining the area's attractiveness as a place to live, work and visit
					Camden Town Unlimited area includes the northwest side of Royal College Street.

4. Camden's own policies support independent shops.

CPG5. Camden will use planning conditions and / or s106 planning obligations / legal agreements to support the provision of affordable shop premises suitable for small or independent retailers. The priority will be for shops in the A1 use class.

In Camden's Draft Local Plan (TC2)

d. support and protect Camden's Neighbourhood Centres, markets and areas of specialist shopping, local shops;

We will resist schemes that would result in more than three consecutive premises being in non-retail use.

We will also take into account any history of vacancy in shop units and the prospect of achieving an alternative occupier for vacant premises.

In Policy TC3 Protecting shops outside of centres

The Council will seek to protect shops outside centres.

We will only granting planning permission for development that involves loss of a shop outside designated centres provided: b. there is clear evidence that the current use is not viable;

5. Heritage.

253 Royal College Street is included in the list of buildings that make a positive contribution to the Conservation Area (p17).

As a shopping street, the houses did not have front lightwells. Some have been subsequently introduced, but this has been contrary to Camden's policy for Jefferys Street Conservation Area.

The Conservation Area Statement says JS1 Extending into basement areas will only be acceptable where it would not involve harm to the character of the building or its setting.

This is locally important, and has been an accepted criterion for refusal of lightwells in adjacent Camden Broadway conservation area.

## 6. The application is inadequate

The Application claims that the shop's net tradable area to be lost is 24.5sqm and 'other' non-residential floorspace of 60.5sqm, with a total site area of 110sqm. This does not seem right. The

two upper floors are already residential; the ground and lower floors are for the shop.

No evidence is provided that the site is not commercially viable. The shop was trading as a newsagent in 2014 and shows on Camden's Retail Survey. There has been no attempt to let the property commercially.

It is proposed to lower the existing storage to form a new basement for habitation. No consideration is made of Camden's basement policies (eg basement impact assessment requirement), nor is there any building schedule – it is likely that there are no existing deep foundations in this Georgian building.

This is yet another application to make money out of spiralling residential prices with no concern for the local environment and residents.