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**Our Ref:** JNP1902  
**Your Ref:** 2008/3265/INVALID &  
2008/3264/INVALID

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**Date:** 5<sup>th</sup> August 2008

Head of Planning Services  
London Borough of Camden Council  
5th floor, Camden Town Hall Extension  
Argyle Street  
London  
WC1H 8EQ

Dear Madam

**Re. Lifetime Homes 32 and 34 Swinton Street, London. WC1X 9NX**

The proposals relate to existing properties and the provision of a flat in each property at roof level. The flats will not be wheel chair accessible.

The London Plan 2004 and Policy H7 of the Camden UDP require 10% of all new housing developments to be wheelchair accessible or easily adaptable for wheelchair users. This Policy accepts therefore, that 90% of new housing developments will not be wheelchair accessible. Due to these proposed flats being at roof top level, and the constraints of the existing internal building design, it is not possible to provide full wheelchair access to the proposed flats. Nonetheless, the units could be suited to someone with impairment.

The Camden Planning Guidance 2006 understands that some of the Lifetime Homes standards may not be able to be applied in all cases, particularly in some conversions and changes of use. Within the constraints of the building, the flats have been designed to meet as far as possible, Lifetime Home requirements.

There is no scope within or outside the building to provide a lift and this is not a Lifetime Home requirement.

Space for on site car parking does not exist. On street car parking exists in front of the sites with level access at least 900mm wide, to the existing covered and externally illuminated front doors of the properties.

The existing stair cases will need to be used to access the proposed flats. Hand rails are provided and if they need to be they can be adapted to meet Lifetime Home requirements.

All proposed door openings have a minimum 800mm width and 300mm nib.

As explained it is not essential that the flats are wheelchair accessible and in this case with the constraints of the building it is unlikely that the flats will be wheelchair accessible. Nevertheless, there is adequate turning space for a wheelchair in the living and dining rooms. All rooms including the living rooms and bedrooms are at the flat entry level.



The bedrooms are capable of accommodating the requirements of Lifetime Homes – “a single bed-space, space for a single wardrobe or small chest of drawers and a bedside cabinet. An electrical socket should be available within the space. The position should also allow convenient temporary screening from the rest of the room. “

The walls of all rooms will be capable of taking handrails etc and wall reinforcements (if required) can be located between 300mm and 1500mm from the floor.

There is no stairs within the proposed flats and therefore a stair lift is not necessary.

Bedrooms are next to bathrooms and a hoist could be provided between the two rooms.

Window heights are designed to befit the external appearance of the building which is in a conservation area. Lowering the cill heights would affect the balance of mansard roof windows in the street scene. The cill heights are at 850mm above floor level and this is considered reasonable in the circumstances. Sash windows are required which may make handling difficult but measures for improved handling can be assessed and incorporated.

Switches, sockets, (ventilation and service controls where provided) will be at a height usable by all (i.e. between 450mm and 1200mm from the floor).

The schemes endeavour to meet the Lifetime Home standards. But as recognised by Camden Planning Guidance, not every requirement can be fully met this being a constraint working with an existing building over 100 years old and the need to ensure the external appearance does not compromise the character and appearance of the conservation area. The schemes are designed to meet Part M of the Building Regulations.

Yours sincerely  
For RPS

A handwritten signature in black ink, appearing to read 'Adrian Butler'.

**Adrian Butler**  
Senior Planner



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**Date:** 1<sup>st</sup> July 2008

Head of Planning Services  
London Borough of Camden Council  
5th floor, Camden Town Hall Extension  
Argyle Street  
London  
WC1H 8EQ

**For the attention of Victoria Lewis**

Dear Madam

**Re. Proposed mansard roof to accommodate a one-bedroom flat – 32 Swinton Street, London. WC1X 9NX**

Please find attached a planning application that proposes an extension to form a mansard roof that will accommodate a one-bedroom flat. This letter comprises a planning statement in support of the scheme. It also addresses relevant matters contained in the Council's validation checklist.

The submission follows the refusal of application no. 2007/4237/P and advice offered by Victoria Lewis in her letter dated 11 January 2008 (your reference CA/2007/ENQ/20064).

The submitted scheme responds to the advice by:

- Providing a true mansard roof that reflects the guidance in the Camden Planning Guidance 2006
- Provides timber sash windows
- Annotates the proposed materials on the plans (materials will consist of a matching brick, natural slates and white painted timber sash windows)
- Provides details of the existing and proposed roof plans
- No new side elevation windows are proposed
- The flat has internal floor space of 32.5 sq m being in excess Camden design guidance of 32 sq m
- One cycle parking space is provided
- The applicant is prepared to enter into a legal agreement to secure the flat as car parking free should the Council consider this is necessary

The existing building is divided into self-contained bedsits/flats. There is a suggestion by the Council that 4 of these units may be unauthorised and that a CLEUD could be submitted. This proposal has no bearing on the existing units and would not be affected should the existing units need to revert to non-self contained units. This proposal can be considered and determined on its own merits and the submission of a CLEUD is not necessary for the determination of this proposal. Should this application be permitted the Council would not be committed to agreeing any subsequent CLEUD application or the existing internal layout of the building.



### Principle of Development

The refusal notice for application 2007/4237/P did not contain any concerns relating to the principle of adding dwellings to the building. Circumstances have not materially changed. It is considered that the principle of forming additional accommodation on the site accords with housing policies in the London Plan and Camden Council's UDP in that it provides a much needed smaller, more affordable residential unit and adding to the range of housing in terms of mix, size and type. Policy S1 of the UDP states, "housing is a priority use of the UDP". Policy S6 seeks a mix of housing in terms of size and type. All housing is to be designed to high standards and to protect and enhance its surroundings (policy S7). The proposal accords with these policies.

The flat has floor space in excess of the minimum requirement set in the Camden Planning Guidance 2006 being greater than 32 sq m. It now accords with that guidance and Policy H8 of the UDP.

### Conservation Area Appraisal and Design

The proposal seeks to make better use of previously developed land having regard to the character, scale, density and amenity of the surrounding area. The design has been devised following consideration of advice in the Bloomsbury Conservation Area statement, the draft Bloomsbury Conservation Area appraisal, design policies in the UDP and having regard to the numerous other mansard roofs in the area including Swinton Street. The mansard roof is the most practicable and least disruptive way of accommodating additional floor space. The addition would be visible in the context of 5-storey buildings with mansard roof additions and against the larger Royal National throat, nose and ear hospital plus the greater massing of the Derby Lodge flats in Wicklow Street to the north. The proposal preserves the character and appearance of the Conservation Area.

The extension would complement the building with the proposed use of matching materials (stock brick and natural slates would be used on the roof) and retaining the detailing on the facades that exist together with existing features such as sash windows.

The addition complements surrounding properties most of which are now 5-storeys, as mansard roofs have been added to them. An opportunity will be taken to improve the appearance of the building and enhance its contribution to the street scene and character and appearance of the conservation area. There is no impact on the setting of any listed buildings many of which already have mansard roof additions.

Further support for the design is given in the Design and Access Statement.

### Daylight/Sunlight Assessment

No adverse overlooking or overshadowing of any neighbour will occur. This is acknowledged in the planning officers report associated with the refused scheme. The Council in permitting other mansard roof additions in this same terrace has agreed similar relationships, as would occur here with other properties in Swinton Street and the Derby Lodge flats.

To the west a car park exists on the other side of the railway line. No new windows are proposed in the side elevation. There would be no adverse overlooking of 34 Swinton Street or the hospital beyond the car park.

There is no overlooking of the building immediately behind 28 and 30 Swinton Street. The rear rooms in the mansard roof addition look over that building and not into it. The underground rail system passes beneath and beside the site. All windows will be glazed with thermal double glazing to attenuate this and other traffic noise.

The proposed mansard roof does not project beyond the line of any neighbouring windows and therefore causes no overshadowing.

### Car Parking & Transport

The current site has no on site car parking and no opportunity exists to form any although secure cycle parking can be provided with one cycle space for the flat proposed. This is a highly accessible site with excellent public transport links close by including a regular bus service along Swinton Street and a short walk away on Kings Cross Road and Grays Inn Road. St Pancras and Euston stations are a 5-minutes walk from the site. A good range of local services including different shops, restaurants and takeaways exist within a 5-minute walk.

On street car parking controls exist in the form of double yellow lines and a residents parking permit scheme. A car parking free scheme is proposed and can be supported in these circumstances. The site is within the low parking provision area of the Borough. In this area the maximum amount of car parking required is 0.5 spaces per dwelling.

As this is a highly accessible site it is anticipated that the flat will appeal to an occupant without a car. Visits to the site suggest that the on street residents parking is not fully used and therefore, in accordance with Policies T8 and T9A of the UDP this proposal is unlikely to place demands on existing on street car parking and if it does, the very limited possibility of this flat generating on street parking could be accommodated and a planning obligation restricting residents access to a parking permit should not be necessary.

However, the applicant would be prepared to enter into a legal agreement to prevent future occupants from obtaining a permit for the residents parking area should officers consider planning permission could not be granted in its absence. Please let me know if it is necessary to enter into a legal agreement.

### Heads of Terms

Should the planning officers consider it necessary the applicant commits to:

- Not permitting future occupants to obtain permits for the controlled parking zone
- Advising future occupants that they will not be eligible for parking permits

### Statement of Community Involvement

The applicant has not consulted local residents but consideration has been given to comments received in connection with the previous application. The existing side window helps break the appearance of the side gable. The side gable proposed would be similar in appearance to other end of terrace gables in the immediate locality i.e. those in Swinton Place.

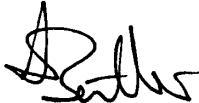
The planning application is accompanied by the following supporting documents and plans:

1. This covering letter
2. Planning application forms
3. Certificate of ownership
4. Design and access statement
5. Site location plan
6. Plan no's:
  - 3032 (PRE\_LAY) 100 – lower ground floor plans
  - 3032 (PRE\_LAY) 101 – ground floor plans
  - 3032 (PRE\_LAY) 102 – first floor plans
  - 3032 (PRE\_LAY) 103 Rev B – second floor plans
  - 3032 (PRE\_LAY) 104 Rev C – proposed loft plan
  - 3032 (PRE\_LAY) 105 – roof plan
  - 3032 (PRE\_LAY) 200 Rev B – front elevation
  - 3032 (PRE\_LAY) 201 Rev B – rear elevation
  - 3032 (PRE\_LAY) 202 Rev B - Side elevation, section, floor levels and levels

A fee is not required in this case, as the proposal is by the same applicant, for the same site and same type of proposal and is submitted within 12 months of the refusal of the last planning application no. 2007/4237/P.

Please let me know if you have any questions. I look forward to receiving your support for this proposal.

Yours sincerely  
For RPS



**Adrian Butler**  
Senior Planner