



Town & Country Planning Act 1990 (As amended)

**PLANNING STATEMENT
ON BEHALF OF THE APPLICANT**

In connection with a planning application

submitted by

Mr D. Murphy

for

**The creation of 7 bedsits and a one bedroom flat incorporating a balcony and replacement of a window
to provide an entrance door and internal alterations**

at:

**The Golden Lion PH
88 Royal College Street
London**

Date: September 2015

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1.0 Introduction

- 1.1 Jones Town Planning Ltd has been instructed by CG Architects to prepare a planning policy statement in relation to the planning application to the London Borough of Camden for the creation of 7 bedsits and a one bedroom flat incorporating a balcony and replacement of a window to provide an entrance door and internal alterations at The Golden Lion PH, 88 Royal College Street, London.
- 1.2 The statement should be read in conjunction with the all the planning application documentation.

2.0 Site and Surroundings

- 2.1 The application site comprises a four-storey building with a basement and is located on the eastern side of Royal College Street, at the junction with Pratt Street (to the north). It is currently in use as a public house (The Golden Lion). The property occupies a corner plot.
- 2.2 The wider area is in mix use with residential properties including flats and also commercial uses including the tyre fitting business adjacent to the application site. In addition, the character of the buildings in the area varies. The pub is significantly higher than the surrounding buildings. Therefore, there is no uniform character to the area. This accepted by the Council who described the area previously as follows, "The surrounding area comprises a mix of uses, including residential, commercial and industrial uses. Residential properties are located opposite the site on Royal College Street and Pratt Street (to the west) and beyond, including on the junction of Pratt Street and St Pancras Way (to the north east). To the north is St Pancras Commercial Centre, a series of two-storey brick built commercial units. To the north-west a three storey electricity switch house is in the process of being constructed on the diagonally opposite junction of Royal College Street and Pratt Street. To the south is a two-storey high car repair centre, beyond which is a two-storey parcel sorting office and depot. This use also has an expansive associated yard and car park, which creates the eastern boundary to the site."
- 2.3 The site is located within a neighbourhood renewal area within the St Pancras and Somers Town ward. The Public Transport Accessibility Level (PTAL) rating of the site is 6a, which means it is located within a highly accessible location. It is also within a controlled parking zone. The site is located outside a 200m buffer zone in relation to the High Speed 2 safeguarding area.
- 2.4 It is also identified that the site is located within an area susceptible to slope (in) stability and groundwater flow, two of the three hydrogeological constraint areas (as detailed within Camden Planning Guidance 4). Furthermore it is identified as having potential for contaminated land. Finally,

2.5 The site is not located within or adjacent to a conservation area. The application property is not a statutory listed building. However, the site is located on the Council's local list therefore would constitute a non-designated heritage asset.

2.9 The site is described in full with appropriate maps and photographs within the applicant's design and access statement submitted with this appeal

3.0 Planning History

3.1 The relevant planning history for the site is summarised as follows:

- 2013/4793/P – Retention of public house at basement and part ground floor level (Class A4) and change of use from public house (Class A4) at part ground and first, second and third floor levels to provide 4 (3x2, 1x3 bed) residential units (Class C3), erection of three storey (including roof level dormer) extension on north (Pratt Street) elevation, extension at basement level, alterations to provide ground floor entrances on Pratt Street elevation, and associated alterations. Not determined. Subsequently dismissed at appeal (APP/X5210/A/14/2218740) on 2/10/2014.
- 2012/6655/P – Change of use from public house (Class A4) to 8 (3x1, 4x2 and 1x3 bed) self-contained flats (Class C3), erection of three storey (including roof level dormer) extension on north (Pratt Street) elevation, extension at basement level to create a lightwell incorporating glazed blocks and a metal grille on Pratt Street frontage, provision of solar photovoltaic panels on east and south roof slopes and associated alterations. Refused. 12/3/13. Subsequently dismissed at appeal (APP/X5210/A/13/2199667) on 12/12/2013.
- 2014/0952/P - Change of use of basement and ground floor from A4 (drinking establishment) to A2 (financial and professional services). Certificate of Lawfulness application. withdrawn on 19/05/14 after email from agent of the applicant on 15/05/14, prior to a decision being issued by the Council

4.0 Planning Policy

4.1 Both national and local planning policies have been important considerations in the preparation of the proposal and details of the relevant policies against which the application falls to be considered are set out below. The implications of these policies and other material considerations are addressed in this statement and the design and access statement, which sets out our planning case.

4.2 In summary the planning framework is

- National Planning Policy Framework 2012 (NPPF)
- London Plan FALP 2015

- Core Strategy 2010
- Development Policies 2010

The London Plan 2011

4.3 The relevant policies are listed below.

- Policy 3.3 Increasing Housing Supply
- Policy 3.4 Optimising Housing Potential
- Policy 3.5 Quality and Design of Housing Developments
- Policy 3.8 Housing Choice
- Policy 5.1 Climate change mitigation
- Policy 5.2 Minimising carbon dioxide emissions.
- Policy 5.3 Sustainable design and construction
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.9 Cycling
- Policy 6.13 Parking
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.6 Architecture
- Policy 7.8 Heritage Assets

Camden Local Development Framework

4.4 Core Strategy 2010

CS1 (Distribution of growth)

CS4 (Areas of more limited change)

CS5 (Managing the impact of growth and development)

CS6 (Providing quality homes)

CS10 (Supporting community facilities and services)

CS11 (Promoting sustainable and efficient travel)

CS13 (Tackling climate change through promoting higher environmental standards)

CS14 (Promoting high quality places and conserving heritage)

CS15 (Protecting and improving our parks and open spaces and encouraging biodiversity)

CS16 (Improving Camden's health and well-being)

CS17 (Making Camden a safer place)

CS18 (Dealing with our waste and encouraging recycling)

CS19 (Delivering and monitoring the Core Strategy)

4.5 Development Policies 2010

- DP2 (Making full use of Camden's capacity for housing)
- DP5 (Homes of different sizes)
- DP6 (Lifetime homes and wheelchair homes)
- DP9 (Student housing, bedsits and other housing with shared facilities)
- DP15 (Community and leisure uses)
- DP16 (The transport implications of development)
- DP17 (Walking, cycling and public transport)
- DP18 (Parking standards and the availability of car parking)
- DP20 (Movement of goods and materials)
- DP21 (Development connecting to the highway network)
- 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)
- DP27 (Basements and lightwells)
- DP29 (Improving access)

4.6 Copies of the above planning policies have been submitted by the Council and are not repeated to avoid duplication, reference will be made to the policies in the planning assessment.

4.7 In addition, Camden Council has also produced various Supplementary Planning Guidance, which will be referred to where relevant.

National Planning Policy/Guidance

4.8 In addition, guidance in the National Planning Policy Framework is also of relevance. Reference will be made to extracts within the planning assessment, where necessary.

5.0 Planning Assessment

Previous Schemes

- 5.1 As a starting point it is important to consider the two recent schemes which were refused planning permission and more importantly were considered at appeal. It is important consider what these dismissed schemes were seeking to achieve and why they were dismissed. Based on an understanding of these schemes and their issues has led to the current proposal. In this statement we shall therefore seek to show how the current proposal addresses the issues for the previous schemes.
- 5.2 2012 Appeal Reference APP/X5210/A/13/2199667 – “Change of use from public house (Class A4) to 8 (3x1, 4x2 and 1x3 bed) self-contained flats (Class C3), erection of three storey (including roof level dormer) extension on north (Pratt Street) elevation, extension at basement level to create a lightwell incorporating glazed blocks and a metal grille on Pratt Street frontage, provision of solar photovoltaic panels on east and south roofslopes and associated alterations”.
- 5.3 The Inspector did not raise any objections to the physical components of the conversion scheme including the solar panels and lightwells and living conditions for future occupiers. The key issue related to the loss of a community facility contrary to the development plan.
- 5.4 2014 Appeal Reference APP/X5210/A/14/2218740 – “Change of use from public house (Class A4) with ancillary accommodation to public house and function area at ground and lower ground floors respectively and 4 flats (3 x 2 bedroom/3 person and 1 x 3 bedroom/5 person)(Class C3); erection of a 3 storey extension (at 1st and 2nd floors and within the roofspace) on the Pratt Street frontage; lowering of existing basement by 600mm.”
- 5.5 In this case although amended to address the above dismissed appeal, The Inspector still considered that the proposal would lead to the loss of the of pub as a community facility. In reaching this conclusion he considered the loss of a community meeting room on the first floor and also the loss of some space in the bar area when considered together were sufficient to undermine the community value of the pub. These were not outweighed by the provision of a replacement space in the basement. Furthermore, the provision of entrances behind roller shuttered doors was considered harmful to the character of the area and the property.
- 5.6 One important issue that was accepted by both Inspectors was the need or the public house to seek ways to retain its viability and existence as a public house. In addition, the pub needed some improvements and investment and one particular aspect the improved toilet facilities was a positive. Therefore, this implies a do nothing option is not possible and will ultimately lead to the loss of the pub and the community facility and use that is trying to be retained.

5.7 Therefore based on this analysis the keys issues for consideration in the current application are:

1. Whether the proposal retains the public house as an appropriate community facility to meet the needs of the community?
2. Whether any external alterations are harmful to the character and appearance of the area or the property itself.

1. *Whether the proposal retains the public house as an appropriate community facility to meet the needs of the community?*

5.8 Firstly and of fundamental importance the proposed scheme does not involve the loss of the public house. The scheme seeks to retain the pub use as part of a mixed use scheme. Therefore, in principle the proposal meets the objectives and aims in adopted planning policies and the conclusions of the Planning Inspectors.

5.9 However, as discussed above the 2014 appeal also considered the quality of the accommodation being retained for use as a public house and meeting the needs of the local community. Much was made of the need to provide an appropriate community meeting room and whilst the 2014 scheme did this with a replacement facility in the basement it was considered that this was not appropriate when compared to the "attractive" first floor room. The current proposal has had regard to these comments and does not seek to remove the first floor room used by community groups, this facility as retained as part of the proposed scheme. Whilst it is accepted that the proposed layout involves the loss of a small part of this room to provide residential accommodation it still retains a large room of approximately 28 square metres. It also retains the more attractive parts of the room and allows the community room to benefit from the existing windows therefore providing light and outlook. In conclusion it retains an attractive useable space for local community groups.

5.10 With regard to the main pub area the previous scheme had proposed changes which the Inspector felt would lead to an unsatisfactory separation of the area and possibly harm aspects such as darts and piano areas. The current proposal addresses this concern by effectively leaving the ground floor bar without significant change. The existing toilet area is relocated to the basement, this allows for improved facilities and does not reduce the bar area. This area is used to accommodate a separate access to the upper floors and the bedsits. There is the loss of a narrow 1.5m strip to the left of the bar. However, it is not considered significant as this area would provide significant use as it is effectively the route to the existing toilets. Therefore, there is no significant loss of useable bar space and the resulting bar area retains its current character and open aspect to allow for a range of pub uses such as games and music.

5.11 The proposal involves the redesign of the basement area from the current myriad of store rooms to provide a far more functional space with an office, good sized kitchen to meet modern pub requirements, plant and store rooms and improved toilet facilities. This would enhance the quality of the pub to its users. There are no other alterations to public areas. Therefore, the pub retains its current offer with useable space but improved facilities. As such the proposed development complies with NPPF AND London Plan Policies, in addition it complies with Core Strategy Policy CS10 and Development Policy DP10.

2. *Whether any external alterations are harmful to the character and appearance of the area or the property itself.*

5.13 It is noted that the building is not statutorily listed but is on the Council's local list. Therefore, care has been undertaken to retain the character of the property.

5.14 As detailed previously the proposed development unlike the 2012 appeal and to all intents and purposes the 2014 appeal does not provide any external extensions with only two minor external alterations proposed. The first being in the front elevation facing onto Pratt Street at the eastern end of the building. There is currently a small window which provides light to the corridor entrance to the toilets. The window is significantly smaller in height and width to the main pub windows. It is proposed to replace this window with a door to allow access to the residential accommodation above. The door has been carefully designed to reflect the character of the pub details. As such it is not considered that the loss of the window and the replacement with a suitably designed door is harmful to the character of the building or the wider area.

5.15 The second alteration is the provision of a new balcony and balustrade on the top of the ground floor part of the north elevation. The balustrade is proposed in glass and has a lightweight appearance and therefore does not form a dominant feature on the property. In addition given the mixed character of the area the proposal is not harmful to the character of the area.

5.16 The other alterations are internal at first and second floor but these only incorporate minor wall changes and do not adversely affect the character of the property. Access is provided to a balcony area which overlooks the yard area of the pub. There are no changes at third floor level. Furthermore, no objections were raised in either appeal regarding internal changes to the pub, thereby safeguarding the quality of the non-designated heritage asset.

5.17 As such the minor external alterations are in accordance with Policy CS14 of the Core Strategy and to Policies DP24 and DP25 of the Development Policies.

The Principle of Development

5.18 The application site is located in a mixed use area including a significant level of residential accommodation including flats within the built up urban area where the principle of development is acceptable.

5.19 Furthermore, policy 3.4 of the London Plan states,
“Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.”
The appeal site is in highly sustainable location, PTAL 6a and as detailed previously in close proximity to numerous forms of public transport.

5.20 The above policy requirements are also pursued by Camden Council in considering development proposals. The application seeks to provide additional residential development within an established residential area, therefore avoiding the need for new development on more sensitive sites.

Housing Need

5.21 Although the Government has removed the requirement for local authorities to prepare housing targets, the London Plan 2011 recognises the Mayor’s view that there is a need to increase housing supply within the London. Policy 3.3 sets out to achieve this and provides an indicative housing target for each Borough. In the case of Camden this is 8892 dwellings over 10 years. The London Plan requirement post-dates of the Core Strategy, however, the principle of Policy CS6 identifies that the Council will be seeking to meet or exceed this target. Therefore, it is accepted by the Council that there is a need to provide new housing in the Borough; therefore, the proposed scheme of 8 units (net gain of 7) will make a valuable contribution to the housing need of the Borough.

5.22 Therefore, the proposed scheme complies with London Plan policy and Local Plan policy to increase the housing supply in Camden.

Development as a HMO

5.23 The property benefits from a lawful use as a pub with residential rooms above. It is a common feature of such uses for the rooms to be rented out in various forms of tenancy. The accommodation being ancillary to the pub use. The proposed use will provide 1 No. one bed flat and 7 bedsits with shared communal facilities and as such comprise a HMO arrangement.

5.24 Policy DP 9 states,

Policy DP9: Student housing, bedsits and other housing with shared facilities

The Council will support development of housing with shared facilities (other than housing designated for older people, homeless people or vulnerable people) and student housing provided that the development:

- a) will not involve the loss of permanent self-contained homes;
- b) will not prejudice the supply of land for self-contained homes, or the Council's ability to meet the annual target of 437 additional self-contained homes per year;
- c) does not involve the loss of sites or parts-of-sites considered particularly suitable for affordable housing or housing for older people or for vulnerable people, particularly sites identified for such provision in our Camden Site Allocations Local Development Framework document;
- d) complies with any relevant standards for houses in multiple occupation (HMOs);
- e) will be accessible to public transport, workplaces, shops, services, and community facilities;
- f) contributes to creating a mixed and inclusive community, and
- g) does not create an over-concentration of such a use in the local area or cause harm to residential amenity or the surrounding area.

5.25 The current proposal meets all the relevant criteria above and in line with the positive attitude of the Council to such bedsit developments would be in accordance with DP9.

Quality of Accommodation

5.26 The Council have guidance on space standard for HMO/ bedsit rooms ("MINIMUM HMO STANDARDS for HOSTELS Housing Act 2004 Effective December 2008"), such schemes are considered on their merits as to whether they provide a satisfactory living environment. The proposed scheme comprises rooms of the following sizes, which meets the above guidance.

Room 1	12 sqm
Room 2	20 sqm
Room 3	10.5 sqm
Room 4	14.5 sqm
Room 5	9 sqm
Room 6	9 sqm
Room 7	16 sqm
Flat	45 sqm with 19.5 sqm balcony amenity space

- 5.27 In addition, there is a large communal kitchen, 2 communal bathrooms and a cloakroom. Therefore, as can be seen above the accommodation is spacious and will provide an appropriate living environment for the future occupiers.
- 5.28 With regard to daylight/sunlight and outlook the scheme has been carefully designed to ensure that each habitable room has a suitable window facing either the front or rear elevation. Therefore, the future occupiers will benefit from adequate daylight/ sunlight and outlook.
- 5.29 Therefore, in conclusion the proposed development provides a satisfactory form of residential accommodation for all future occupiers complying with policy DP 9 of the Camden Development Policies Document.

Impact on amenity of adjoining occupiers

- 5.30 The proposed scheme does not provide for any external alterations and additions and therefore will not have an adverse impact upon the amenity of the neighbouring properties. The proposed balcony overlooks the rear pub yard and road therefore will not lead to a loss of privacy. The proposed development therefore accords with Policy DP 26 of the Camden Development Policies Document.

Transport

- 5.31 The site is located in highly sustainable location with a PTAL rating of 6a, there is excellent access to bus and train public transport with extensive connections to wider areas. No parking is proposed off street or on street, but given the PTAL rating a car free development is considered acceptable. In addition, it is considered that HMO bedsit accommodation will not give rise to a significant level of car usage. Secure cycle storage can be provided if required. Therefore the proposed scheme would comply with Policy DP18 of the Development Policies Document.

6.0 Conclusion

- 6.1 The proposed development is considered to be an appropriate form of development that complies with national and local planning policies. It provides a satisfactory standard of accommodation and meets an identified need for small affordable residential units. At the same time it retains the principle and quality of the community use whilst safeguarding the character of non-designated heritage asset.
- 6.2 As such the Council is respectfully asked to support the proposal and grant planning permission as requested.

