

Design & Access Statement

CONVERSION OF AN EXISTING COMMERCIAL PROPERTY TO 2no
RESIDENTIAL UNITS AT 22-24 PRINCE OF WALES ROAD, LONDON NW5



November 2015

Prepared by

BB PARTNERSHIP LTD
CHARTERED ARCHITECTS

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1.0 INTRODUCTION

1.1 This Design and Access Statement has been prepared by BB Partnership Ltd in support of the full planning application and change of use application for the conversion of the existing commercial unit on the ground floor of 22-24 Prince of Wales Road, London NW5 3LG to 2no self-contained residential units.

1.2 The statement is to be read in conjunction with the following documents:

- Location Plan
- Existing and Proposed Drawings
- Accompanying photograph sheet
- Accompanying Planning Statement



Aerial view of the property location and the surrounding area

2.0 THE EXISTING BUILDING AND THE SURROUNDING AREA

- 2.1 22-24 Prince of Wales Road (hereafter referred to as “the site”) is situated on the north side of Prince of Wales Road in the London Borough of Camden, between Grafton Road and Ryland Road.
- 2.2 The ground floor of the property is currently taken up by the Beardsmore Art Gallery. It was established in a previous request for Pre-Application Advice (ref.2014/5959/PRE) that the gallery falls under A1 use.
- 2.3 Prince of Wales Road comprises stretches of Victorian terraced and semi-detached properties. The frontages to the majority of properties along the road have largely retained their original proportions, materials and detailing, generally comprising brick frontages with render detailing surrounds to openings.
- 2.4 The building itself is a four storey, Victorian property dating from the mid-nineteenth century and forms a terrace of four buildings with 20-26 Prince of Wales Road. The application however only relates to the ground floor of the property, to which there is a modern ‘shop-front’ style extension extending to the pavement of Prince of Wales Road at the front which is documented to have been constructed around 1983.
- 2.5 The site is situated within the Inkerman Conservation Area, designated by the London Borough of Camden on 31.10.01. The Inkerman Conservation Area Statement first published by the London Borough of Camden in March 2003 has been referred to extensively during the design process, and describes the area as “*a dense and homogenous environment in the heart of Kentish Town*”.
- 2.6 The building itself is not listed. The closest listed building is the Grade II listed St Pancras Public Baths building situated at the corner of Grafton Road and Prince of Wales Road, approximately 50m from the site. The building is however considered to make a “*positive contribution to the character and appearance of the Conservation Area*” as described on page 20 of the Inkerman Conservation Area Statement. It is also stated on page 17 that the Grafton Arms Public House which adjoins the property makes a “*striking contribution to the Conservation Area*”.
- 2.7 The area surrounding the site is predominantly residential in character, as stated on page 9 of the Inkerman Conservation Area Statement, with local convenience shops on the corner of Prince of Wales Road and Castlehaven Road approximately 50m away. Kentish Town Road is the principal shopping centre due east of the site. The building uses in the surrounding area are indicated on drawing FJS_120 accompanying the application, clearly showing that the main use in the area is residential.
- 2.8 The site itself is roughly rectangular in shape, measuring approximately 190m².

3.0 PLANNING HISTORY

- 3.1 A search of the planning history for the property on Camden's website lists the following applications:
- 3.1.1 **2015/3488/P** (July 2015)
Prior Approval Application for the Change of Use from A1 to C3 (Withdrawn)
 - 3.1.2 **36834** (August 1983)
Change of Use of the ground floor to offices, installation of a new frontage (Approved)
 - 3.1.3 **22271** (February 1976)
Change of Use, including alterations and conversion, to provide a self-contained flat and maisonette (Approved)
- 3.2 The Prior Approval application withdrawn in July 2015 was also made by BB Partnership on behalf of the same client following advice from a Pre-Application advice request (detailed below). It was however withdrawn due to the building being sited within a Conservation Area. Following further consultation it was decided to submit this application.

Pre-Application Advice

- 3.3 A pre-application advice request was submitted in July 2014, and advice was provided by Hugh Miller (ref.2014/5959/PRE). The scheme submitted was for the *'demolition of single-storey extension at ground floor level front, change of use and conversion of ground floor level from retail A1, including excavation to provide new basement floor plus lightwells at the front and rear, to provide 4 x 2bed self-contained flats Class C3'*.
- 3.4 A copy of the response letter is included with this Design and Access Statement however the main points are outlined below and expanded on in the accompanying Planning Statement:
- 3.4.1 It was stated that the Beardsmore Gallery is considered to fall under A1 Retail use as its predominant use is as a premises to provide sales of artwork from the hours of 11am to 5pm Monday to Saturday.
 - 3.4.2 There was no objection by the planning officer to the loss of retail floorspace in this instance due to the proximity of the site to Kentish Town Centre.
 - 3.4.3 There was no objection in principle to the provision of new residential accommodation on the site owing to the already residential character of the building. It was however noted that the dwelling mix needs further investigation and all units must provide an acceptable standard of accommodation in terms of internal layout, unit and room sizes and amenity space as well as Lifetime Homes compliance in accordance with Policy DP6 of the LDF.

- 3.4.4 It was considered that the proposed scheme would have no negative impact on the amenity of residential occupiers within the host building or to adjacent buildings, and it is considered that this still applies to the scheme submitted with this application. There were concerns that the proposed basement living space in the scheme submitted at Pre-Application would have unacceptable levels of sunlight/daylight, ventilation or outlook and would not comply with DP26. The basement has now been omitted from the proposals as a result.
- 3.4.5 Concerns were raised over the proposal to set back the Prince of Wales façade from the pavement, mainly relating to how it would compromise any basement living space and the resultant positioning of the lightwells. As mentioned, the basement has now been omitted from the scheme and furthermore it is considered that the proposed setback actually provides a number of benefits to the scheme and enhances the character and appearance of the conservation area. This is achieved by providing both a ‘buffer zone’ and the opportunity for the reinstatement of a traditional boundary wall treatment between the scheme and the pavement.
- 3.4.6 The planning officer also stated he had no objections to reducing the size of the unofficial ‘roof terrace’ above the ground floor extension as there is no record of it being granted planning approval and it is the least likely suitable location for a roof terrace.



View of the building from Prince of Wales Road

4.0 THE PROPOSED SCHEME

- 4.1 The planning application seeks full planning permission and change of use for the redevelopment of the existing Beardsmore Art Gallery on the ground floor of the property (A1 use) to 2no self-contained residential units (C3 use). The first, second and third floors of the property are all currently in residential (C3) use as flats and do not form part of this application.
- 4.2 The proposal seeks full residential use for the site with new areas of external amenity space to the front.
- 4.3 The proposals are set out over the following drawings:
- FJS_101 Location Plan and Existing Site Plan
 - FJS_110 Existing Floor Plan and Front Elevation
 - FJS_111 Existing Rear Elevation and Section
 - FJS_120 Building Uses in the Surrounding Area
 - FJS_201 Proposed Site Plan
 - FJS_210 Proposed Floor Plan and Front Elevation
 - FJS_211 Proposed Rear Elevation and Section
 - FJS_215 Proposed Front Elevation showing Railings
- 4.4 The area schedule for the proposed scheme is as follows:

GROSS INTERNAL AREA (sqm)	
EXISTING	
Retail	121
Communal Residential	27
TOTAL	148
PROPOSED	
Private Residential	117
Communal Residential	18
TOTAL	135
TOTAL CHANGE IN GIA	-13

GROSS EXTERNAL AREA (sqm)	
Total Existing	164
Total Proposed	149
TOTAL CHANGE IN GEA	-15

- 4.5 Flat 1 has a proposed GIA of 54sqm and Flat 2 has a proposed GIA of 57sqm.

- 4.6 The Inkerman Conservation Area Statement states on page 24 that *“the Council supports good new design where the quality of development enhances the character of the Conservation Area”* but goes on to say that there are on the other hand instances where development has had a neutral or even negative effect on the character and appearance of the area for reasons such as poor design, loss of character and original features, inappropriate development sites and detracting from the existing streetscape character.
- 4.7 Any development in the Conservation Area should therefore comply with the requirements of Policy EN31 of Camden’s Unitary Development Plan, which states that *“The Council will seek to ensure that development in conservation areas preserves or enhances their special character or appearance, and is of high quality in terms of design, materials and execution”*.
- 4.8 The building at 22-24 Prince of Wales Road is considered on page 20 of the Inkerman Conservation Area Statement to *“make a positive contribution to the character and appearance of the Conservation Area”* in order to ensure the Conservation Area *“retains its homogenous mid-19th century architectural character”*. The Statement goes on to say that *“proposals to demolish these buildings should be assessed against the same broad criteria as proposals to demolish listed buildings”* as set out in PPG15 paragraphs 3.16 to 3.19.
- 4.9 It is proposed to partially demolish the 1980s front extension to the property, allowing the building line of the proposed scheme to be set back from the pavement. It should be noted though that the 1980s extension does not contribute to the area’s homogenous 19th century architectural character, and is therefore considered to be acceptable under the requirements of the Inkerman Conservation Area Statement and UDP Policy EN32 and SPG Demolition Guidelines.
- 4.10 The Inkerman Conservation Area Statement states that in relation to the properties along Prince of Wales Road *“unfortunately, alterations to front boundaries, coupled with missing front railings and other features, have affected the architectural setting of this group of properties”* (page 15). Paragraph Ink8 – Front Gardens and Boundaries of the Statement goes on to say that:
- “Boundaries in the Conservation Area are predominantly formed by traditional iron railings, in some cases mounted on low walls... Proposals should respect the original style of boundary and these should generally be retained and reinstated where lost.”* (Page 27)
- 4.11 The proposed scheme recognises that the 1980s extension is likely to have resulted in the loss of front boundary railings. By setting back the proposed elevation to Prince of Wales Road this enables the reinstatement of a traditional boundary treatment between the pavement and the property, positively enhancing the character and appearance of the area and the setting of the building. The image below shows the traditional style railings to the neighbouring building boundary wall, which would be reinstated in the proposed scheme.



- 4.12 Setting the new façade back 1.2m from the existing line also means private amenity space can be created to the front of the property and also helps form a 'buffer' between the street and the building. This helps provide more privacy to the windows overlooking the street and also improves security to the property.
- 4.13 It is not proposed to remove or alter any existing original architectural features or detailing that contribute to the character of the Conservation Area. The only visible external alterations to the Prince of Wales Road elevation relate to the modern ground floor extension. This complies with the requirements of paragraph Ink14 (Materials and Maintenance) of the Inkerman Conservation Area Statement. Where necessary original brickwork will be repaired and repointed (matching the original mix and profile). Any replacement brickwork required will match the existing brickwork.
- 4.14 Although the modern front extension does not contribute to the homogenous 19th century character and appearance of the area it can be argued that the design is appropriate for the area in terms of design, scale and appearance. It is therefore proposed to retain the architectural style of the existing ground floor extension, with the new set back façade to Prince of Wales Road utilising the same window details, brickwork style and render details in order to ensure the character of the

area is maintained and enhanced. This is in keeping with paragraphs Ink33 and Ink34 of the Inkerman Conservation Area Statement.

- 4.15 Proposed new residential floorspace is a key objective for the Council, as outlined in CS6 and DP2 of the LDF. It is proposed to create 2no high quality, self-contained, one bedroom flats that meet and exceed all of Camden's requirements for accommodation and the requirements of the London Plan.
- 4.16 Camden's LDF Policy DP5 states that residential development should make contributions to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT). Although this indicates that single bedroom market housing is a lower priority it is considered that 2no one bed flats is the appropriate solution for the site for the following reasons:
- 4.16.1 The London Plan sets out a minimum GIA of 50sqm for one bed, two person units and 61sqm for 2 bed, 3 person units. The constraints of the existing building mean that whilst it is almost possible to achieve the required floor area for 2no two bed units the positioning of existing windows and the shape of the site results in inefficient internal layouts with awkward shaped rooms. Rooms would also not meet the minimum standards for widths and areas as set out in the London Plan. It was therefore considered more appropriate to provide 2no efficient, well thought out, high quality flats that would benefit the local area and be a valuable addition to Camden's housing stock.
 - 4.16.2 It was also considered that two smaller units would be a better solution than one large unit in order to better contribute towards helping Camden achieve their housing targets set out in the Housing CPG. This is further expanded on in the accompanying Planning Statement.
- 4.17 Each unit comprises one generous double bedroom with ancillary dressing space, a bathroom, utility room, storage space and a large, open plan kitchen and living space. Each room meets the size requirements set out in the Housing SPG of the London Plan as well as all Lifetime Homes requirements where possible due to the constraints of the existing building. Private external amenity space is also provided to each unit at both the front and the rear.
- 4.18 It is considered that the proximity to The Grafton pub would not have any adverse impact on any new residential units, and the principle of residential use has already been accepted for the ground floor in the Pre-Application response.
- 4.19 The existing retail unit is likely to have been residential originally, highlighted by the internal layouts that appear suited to residential use and the residential character of the rest of the building and the neighbouring properties. The proposals should therefore be seen as restoring the property back to its original use in a sympathetic manner and positively enhancing the Inkerman Conservation Area.
- 4.20 It was suggested during the Pre-Application discussions that a scheme whereby the front extension was removed in its entirety would be favourable. This was considered during the design process however this would result in two units of approximately 35sqm GIA, well below the required unit

sizes as defined by the London Plan and Camden's own housing design guide. It was therefore considered that the most beneficial option would be the partial set-back of the façade in order to enable two high quality units to be created with no adverse impact on the street scene.

- 4.21 Secure cycle storage and refuse storage will be located within the private curtilage of each dwelling and is identified on the accompanying floor plans.
- 4.22 Each house type has been designed so that all 16 design standards of the Lifetime Homes criteria can be met. This is expanded on in the accompanying Planning Statement.

5.0 ACCESS STATEMENT

- 5.1 Planning policy provides guidance on promoting accessibility. It states that new development should be designed to make provisions for both people and goods by all forms of transport. It also promotes high standards of road safety within the surrounding area.
- 5.2 The site has a PTAL rating of 6(a) and is located within a controlled parking zone (CA-H). Policy DP18 of the LDF states that the Council will expect developments to be car-free in Town Centres that are easily accessible by public transport. Camden Planning Guidance 7 (Transport) also states that the Council expects car-free development where development could lead to on-street parking problems. As such the proposed flats are proposed to be car-free.
- 5.3 In line with Policy DP17 (Walking, cycling and public transport), new development is required to provide cycle storage, ideally secure and at ground floor level. Secure cycle storage is proposed in the external courtyards to the rear of the property, in accordance with the requirements of CPG7.
- 5.4 There is no current vehicular access to the site and none is proposed.
- 5.5 Pedestrian access to the building from the pavement of Prince of Wales Road will be maintained, and a level threshold will be provided at the entrance to the building in accordance with Lifetime Homes and approved document Part M.
- 5.6 Access to each flat is via communal corridors, currently used as residential access to the upper floor flats. No alterations are proposed to the communal residential entrance to the building.
- 5.7 Circulation within each dwelling has been designed to comply with Lifetime Homes requirements where possible and also Part M requirements.



Image showing the existing access to the building from Prince of Wales Road

6.0 CONCLUSION

- 6.1 The proposal has been designed to suit local policy, government and development plan guidance which has been outlined in this document.
- 6.2 It has been demonstrated at pre-application stage that the principle of converting the building from A1 (Retail) use to C3 (Residential) use would be accepted subject to the proposed development being acceptable in design terms.
- 6.3 The proposed residential development has been designed to make optimum use of the site in order to contribute towards the Council's housing targets whilst still exceeding the local and national requirements for new homes in terms of design, layout and accessibility.
- 6.4 The comprehensive high quality design proposal responds to both the site constraints and the comments arising from the pre-application process, and it is considered that the reinstatement of the traditional boundary treatment and the proposed design improves and enhances the appearance and character of the Conservation Area.
- 6.5 It is therefore considered that the application should be approved.

APPENDIX A

Pre-Application Response

Ref. 2014/5959/PRE

22nd December 2014

Date: 22 December 2014
Our Ref: 2014/5959/PRE

Contact: Hugh Miller: 020 7974 2624

Email: hugh.miller@camden.gov.uk

Development Management
London Borough of Camden
Town Hall
Argyle Street
London WC1H 8ND

Tel 020 7974 4444
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env.devcon@camden.gov.uk
www.camden.gov.uk/planning

Mr. Brian Bowman,
Ringley Limited Chartered Surveyors
349 Royal College Street
LONDON
NW1 9QS

Dear Bowman,

Request for Planning Pre-Application Advice
Planning enquiry regarding: 22 Prince of Wales Road; London, NW5

Thank you for your email request of 2nd July 2014 for written pre-application advice about the following proposal:

Demolition of single-storey extension at ground floor level front, change of use and conversion of ground floor level from retail A1, including excavation to provide new basement floor plus lightwells at the front and rear, to provide 4 x 2bed self-contained flats Class C3.

Set out in the attached document is my observation on the proposal as related to the principal issues and what you need to do in order to submit a valid planning application for your proposal.

Please be aware that this is an informal officer opinion, which cannot prejudice any decision of the Council following the submission of a formal application.

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

Hugh Miller –Planning Officer
For Director of Culture and Environment

Pre-Application Proposal Ref. 2014/5959/PRE

22 Prince of Wales Road London, NW5

Proposal: Demolition of single-storey extension at ground floor level front, change of use and conversion of ground floor level from retail A1, including excavation to provide new basement floor plus lightwells at the front and rear, to provide 4 x 2bed self-contained flats (Class C3).

1.0 Site & Surroundings

The host building (nos.22-24) forms a terrace of 4 buildings nos.20-26 Prince of Wales Road. Nos. 20 -24 are 4-storey in height and include a single-storey extensions at the front that align with no.22 a public house that projects forward of principal building line and form an end of terrace located at the junction of Grafton Road and Prince of Wales Road.

The host buildings have a mix uses of residential on the upper floors and art gallery + office at ground floor level. The applicant has referred to the ground floor as retail A1 use; and together with the public house form a small non-designated retail parade on the north side of Prince of Wales Road. The character of the immediate area is largely residential with a relatively small retail element; and Kentish Town Road being the principal shopping centre that lies due east of the site.

The ground floor of no.22 is identified on the website as 'Beardsmore' gallery; and the applicant has confirmed that no.24 is used as 'gallery' rather than as office floorspace. Number 22 is advertised as paintings for sale and provides a list of artists' publications available for purchase. The website state that the gallery is opened from Monday to Saturday between 11.00 – 5.00pm or by appointment; and the premises provide sales of artwork and based on this information it is considered that the use is within retail A1 (Use Class).

The applicant state that the commercial tenants will shortly vacate the ground floor; and seeks guidance on the options below to introduce residential accommodation in the building by either redevelopment of refurbishment.

2.0 History

July 1976 **PP Granted** - Change of use, including alterations and works of conversion, to provide a self-contained flat and maisonette, ref. 22271.

October 1983 **PP Granted** - Change of use of the ground floor to offices and conversion for two self-contained residential units on the first, second and third floors and the installation of a new frontage; ref. 36834

3.0 Relevant Policies

LDF Core Strategy and Development Policies

CS1 – (Distribution of growth)

CS5 – (Managing the impact of growth and development)

CS7 – Promoting Camden's centres and shops

CS8 – (Promoting a successful and inclusive Camden economy)

CS11 – (Promoting sustainable and efficient travel)

CS13 – (Tackling climate change through promoting higher environmental standards)

CS14 – (Promoting high quality places and conserving heritage / conservation areas)

DP10 – Helping and promoting small and independent shops

DP12 – Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses

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)

DP21- (Development connecting to the highway network)

DP22 – (Promoting sustainable design and construction)

DP23 Water

DP24 – (Securing high quality design)

DP26 – (Managing the impact of development on occupiers and neighbours)

DP27 - Basement and lightwells

Camden Planning Guidance 2011:

CPG1 – Design (Extensions, alterations and conservatories); CPG2 – Housing; CPG

3 - Sustainability

CPG4 – Sections 1 – 2.

CPG6 (Amenity);

London Plan 2011

National Planning Policy Framework 2012

3.0 - Assessment

The main planning issues associated with the proposed development have been identified as the following:

The main issues are: **a]** loss of retail A1 floorspace; **b]** provision of new residential use, mix & numbers of units **c]** Design and impact on the appearance of the building and retail parade **d]** neighbour amenity; **d]** Transport

Land Use /Loss of retail floorspace and provision of new residential use

LDF policy DP10 (*Helping and promoting small and independent shops*) states, The Council will seek to protect shops outside centres by only granting planning permission for development that involves a net loss of shopfloor space outside designated centres provided that:

- d) alternative provision is available within 5-10 minutes' walking distance;
- e) there is clear evidence that the current use is not viable; and
- f) within the Central London Area, the development positively contributes to local character, function, viability and amenity.

Similarly, LDF policy CS7 (*Promoting Camden's centres and shops*) seeks to promote and protect and enhance centres throughout the borough.

The host buildings are located close to the Kentish Town Centre and the buildings are not within a designated centre; and there is no objection in principle to the loss of retail floorspace in this instance.

Provision of new residential use

The proposed new residential floorspace is a key objective for the Council, as outlined in CS6 and DP2, and as such new residential floorspace is welcomed.

Policy DP5 **a)** states that residential development should make contributions to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT). The DSPT indicates that market housing with 2 bedrooms is a 'medium' priority.

Policy DP6 states all new homes should comply with Lifetime Homes criteria as far as possible.

Policy DP26 (h) states the Council will require developments to provide an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space. The submitted plans indicate various 3 options- 2 units at ground floor only and 4 units at basement and ground floors. The new flats must comply with CPG guidance on minimum residential space standards.

The eventual number and mix of units will depend on a satisfactory basement impact assessment of the proposed basement floor. It should be noted however that the proposed flats and in particular those at the basement floor level must be in compliance with the Council's CPG guidelines – residential standards (flat & room sizes, internal headroom height, layout, stacking, daylight etc.). In particular the basement level flats need to receive adequate daylight, outlook and ventilation and the proposed enclosed lightwell will compromise amenity and is considered unsatisfactory.

Bedroom sizes: Drawing no. 30005008-0PT1-02 (2x 2beds) show mixed bedrooms sizes, between 6.37sqm (single) and 13sqm (double) which would comply with CPG residential standards. Drawing 30005008-0PT2-02- (2x 1bed) bedroom sizes approx.15sqm comply with CPG residential standards. Drawing 30005008-01- (2x 2beds) bedrooms, both single beds and range between 6.87sqm & 8.11sqm and 6.32sqm & 9.3sqm, which does not comply with CPG owing to bedroom sizes and mix. Please review CPG2 – Housing, section 4 (Residential development standards) to ensure compliance with the Council's guidelines.

You will need to provide domestic refusal storage facility or explain how you propose to manage it.

There is no objection in principle to the provision of new residential accommodation here, owing to the largely residential character of the host buildings. It is noted however that the numbers and mix of units would be related to the option considered most acceptable; see discussion below.

New residential flats – Option 0

The applicant has indicated that 2x1bed self-contained flats could be provided under permitted development by virtue of applying the provisions of Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014, allowing the change of use of a building from retail (Class A1) or financial and professional services (Class A2) to a dwelling house (Class C3) and the rights also permit any building operations that are reasonably necessary for the conversion.

The lawful use of the ground floor appears to be retail A1 use. If as indicated, the premises are within the permitted development criterion, the Council has no control to the proposed change of use as noted above. A change of use would be considered by way of a Prior Approval application to be submitted to the Council to regularise the change of use.

Design

Options 1 - half-setback

(The ground floor frontage being set half way between the frontage of 'The Grafton' and no 26 Prince of Wales Road).

No.26-34 has shallow depth front gardens and low brick plinth front boundary walls part enclosed with largely timber fence between brick piers. These houses all have basement floors and lightwells at the front. Small front garden space separates the shallow depth lightwells and the front boundary walls of the terrace of properties.

The existing single-storey extension is considered to be an unsympathetic addition, has resulted in the loss of detailed design features and has negative impact on the appearance of the host building's principal elevations and the terrace of which it forms part. Notwithstanding, it is considered that the proposed half-setback extension is the least desirable scheme because **a]** the opportunity to reinstate the substantive details to the front elevation of the host buildings would not materialised; and **b]** there are concerns about residential standards relating to day/sunlight to habitable rooms, outlook and views; **c]** the visible lightwell directly behind the front boundary wall is not part of the prevailing character of a street- new lightwells should be discreet and not harm the architectural character of the building, or the character and appearance of the surrounding area, or the relationship between the building and the street. The introduction of the front lightwell is not considered a suitable replacement and would not be in compliance with CPG guidance on lightwells. On these bases, I consider that option 1 is unacceptable in principle.

Option 2 - full setback

(The ground floor frontage taken all the way back to the upper portion of the building line and loss of roof terrace).

The proposed plan (No.30005008-OPT2-02 Rev PA1) show a proposed lightwell of shallow depth set behind the garden area and the front boundary wall. The section BB drawing (30005008-OPT2-03 Rev PA1) show full-depth front lightwell excluding any garden space; and enclosed rear lightwell.

Camden Planning Guidance CPG4, para.2.69 states " Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the building, or the character and appearance of the surrounding area, or the relationship between the building and the street".

Owing to the prevailing character of the front gardens it is considered that a full-depth front lightwell (*section BB drawing 30005008-OPT2-03 Rev PA1*) would be not in compliance with the Councils policy or CPG4 and is unacceptable. Should the proposed lightwell mirror the setback lightwell as shown on the option 2 floor plan (*No.30005008-OPT2-02 Rev PA1*) it is considered satisfactory. I also have concerns about the rear basement room lit only by rooflight and that this will harm occupiers' amenity and would not be in compliance with CPG guidelines.

A scheme comprising both a lightwell and garden space is considered more appropriate and sympathetic in appearance and would harmonise with the established streetscape. Owing to the enhancement of the front elevations by the reinstated details to windows and door openings of the host buildings, I raise no objection in principle to the removal of the single-storey extension and the associated roof terrace. The replacement front elevation would match the details of no.26 and would enhance the appearance of the host buildings and the terrace also the streetscape. Of the two options, this is considered the preferred scheme as it would contribute most to the established street character.

The roof terrace appears to be lawful owing to the four year rule as there is no planning record of it being granted planning approval. Irrespective of its planning background, I raise no objections to the loss of the roof terrace as this is the least likely suitable location for a roof terrace.

Basement & lightwells

The proposed excavation of the cellar to increase the internal headroom height to provide habitable floorspace is considered acceptable in principle provided adequate habitable space in terms of light and ventilation can be provided. Notwithstanding the above, an accompanying Basement Impact Assessment (BIA) in keeping with policy LDF DP27 and also CPG4 (*Basements & lightwells*) would be required to ensure the excavation has no impact on the area's hydrology and land stability. The proposed lightwells at the front may be considered in keeping with existing front sunken gardens at nos.26-34; and therefore it is not considered as a negative harm to the streetscape. There is no objection to the proposed rear enclosed lightwell.

Transport / Other matters

The site has a Public Transport Accessibility Level (PTAL) of 6(a) and is located in a Controlled parking Zone (CA-H). Policy DP18 (Parking standards and limiting the availability of car parking) states that the Council will expect development to be car-free in Town Centres and areas that are easily accessible by public transport. The CPZ is identified as suffering from parking stress, and Camden Planning Guidance (CPG7 – Transport) also states that the Council expects car-free development where development could lead to on-street parking problems. As such the proposed flats would be expected to be car-free as the proposal would add to parking stress. This would be secured by a Section 106 Legal Agreement.

In line with policy DP17 (Walking, cycling and public transport), new development is required to provide cycle storage. Ideally this should be secure and at ground floor level. Please refer to CPG7 for further details of cycle storage and design.

Where it's considered expedient and necessary a Construction Management Plan (CMP) would be required to manage the developments impact on the highway network. The proposal includes significant excavation works; and it is considered that a CMP would be required.

A financial contribution will be required to repave the footway directly adjacent to the site, especially if the footway is in a poor state of repair. Repaving the footway would also allow the Council to repair any damage caused as a result of the proposed

scheme. The financial contribution would be secured as a Section 106 planning obligation.

Community Infrastructure Levy (CIL)

The Mayor of London's Community Infrastructure Levy is used to raise funds to contribute towards Crossrail. The CIL applies to all development which adds one or more dwellings or more than 100sqm of floorspace at a rate of £50 per sqm. If the proposal adds more than 100sqm of floorspace, or the property has been vacant for more than six of the previous twelve months before development commences, the proposal will be CIL liable.

Camden is also introducing its own CIL which will be in addition to the Mayor's CIL, and is likely to be introduced by **April 2014**. If an application is submitted before the Council's CIL takes effect, but has not been decided, it will be liable for the new CIL. Please refer to the Council's website for further information on the Borough's CIL.

Amenity

The proposed residential use is not considered to cause any negative impact on residential occupiers' amenity within the host building occupiers in adjacent buildings. Owing to the proposal having largely internal alterations, it is considered that it would not cause harm to adjoining occupiers in terms of loss of privacy, views/outlook or sun/daylight. There is concern however about the proposed enclosed basement room only lit by rooflight at the rear and that it would not provide acceptable levels of sun/daylight, outlook and ventilation to occupants and is therefore not in compliance with DP26.

Conclusion:

1. As can be seen from the discussion above, subject to confirmation regarding the setback location of the front lightwell, satisfactory residential standards and satisfactory BIA report, option 2 is considered to be the most likely suitable scheme as it would re-establish features destroyed and would enhance the character and the appearance of the host buildings and the streetscene. New flats will be subject to a car-free legal agreement.
2. Option 1 is the least desirable proposal for all the reasons discussed above and is unacceptable.
3. Please note you will need to submit a daylight report to demonstrate satisfactory compliance with the Council's CPG standards on daylight to the basement rooms.
4. Option 0 is subject to compliance with the GPDO criteria and a change to residential use would subject to Prior Approval application and would be subject to 'carfree' legal agreement.