

February 2016

# **Planning, Design and Access Statement**

**317-319 Kentish Town Road**

**Prepared by Savills (UK) Ltd.**

Savills UK  
33 Margaret Street  
London  
W1G 0JD



# Contents

1.	<b>Introduction</b> .....	<b>3</b>
2.	<b>Site and Surroundings</b> .....	<b>4</b>
3.	<b>Planning History</b> .....	<b>7</b>
4.	<b>Proposals</b> .....	<b>9</b>
5.	<b>Planning Considerations</b> .....	<b>10</b>
6.	<b>Conclusions</b> .....	<b>19</b>

# 1. Introduction

---

- 1.1 This statement has been prepared in support of a planning application for nos. 317-319 Kentish Town Road.
- 1.2 The proposed works include the re-arrangement of the existing shop at ground floor level, the erection of a mansard roof on the frontage building and the provision of two storeys above the existing rear single storey building in order to create 4 additional residential units.
- 1.3 This report has been prepared following an examination of the site and surroundings, research into the planning history of the property, an examination of relevant policy documents and following consideration of pre-application advice received relating to the development (ref. no. 2015/3351/PRE).
- 1.4 This report is accompanied by a daylight and sunlight report produced by Right of Light Consulting.
- 1.5 This statement provides background information on the site and an assessment of the proposals in relation to planning policy and other material considerations, and is set out under the following sections:
- **Section 2** outlines the site and its context within the surrounding area
  - **Section 3** provides an overview of the planning history
  - **Section 4** provides an outline of the proposals
  - **Section 5** examines the main planning considerations
  - **Section 6** draws our conclusions in respect of the proposals

## 2. Site and Surroundings

---

- 2.1 The site is located on the western side of Kentish Town Road on the corner of Kentish Town Road and York Mews. Kentish Town Road is a main street within a town centre whilst York Mews is a short access road that runs behind the retail units on Kentish Town Road. The site sits between the two and is fully covered by buildings.
- 2.2 The frontage building is three storeys in height and drops down to single storey height at the rear. This contrasts with the building immediately adjacent, no. 321 Kentish Town Road, which is four storey at the front (including mansard) and three storey at the rear; a development that was approved in 1996.

### *Application site and street scene*



*Rear of York Mews*



- 2.3 The surrounding area is mainly characterised by 3-4 storey Victorian buildings and the frontage building at the site is typical of this. The predominant uses in the area are commercial uses including retail / restaurant / offices at ground floor level and office / residential above.

317-319 Kentish Town Road



- 2.4 The building heights along York Mews vary from single storey to three storey. The existing single storey structure at the rear of the pre-application site is bland and unattractive in appearance and makes no positive contribution in terms of visual amenity.

*Birdseye view of York Mews*



- 2.5 Internally, the ground floor of the site comprises a retail unit at the front which is currently occupied by a hairdressing salon. At the rear is a betting shop which has separate access to the side of the existing shopfront. The upper floors of the frontage building are in residential use comprising 2 x 2 bedroom flats.
- 2.6 The site falls within the Core Frontage of the designated Kentish Town Centre. The building is not listed, nor is it located in a conservation area. The site falls within flood risk zone 1 and an Archaeological Priority Area.

### 3. Planning History

---

3.1. The table below sets out the relevant planning history to the site:

Ref. no.	Description	Decision	Determination date
2014/3850/P	Erection of two storey roof extension and additions to create 2 x 2 bed flats.	Withdrawn	
2013/0684/P	Change of use from retail (Class A1) to Financial and Professional Services (Class A2) at part ground floor level, including alterations to shop front.	Refused at appeal	30.10.10
2009/5054/P	Change of use of offices (Class B1) at first and second floor levels to two self-contained two bedroom residential units (Class C3).	Approved	28.01.10
2009/2167/P	Change of use of offices (Class B1) at first and second floor levels to three residential units (Class C3) (two 1-bedroom, one 2-bedroom).	Withdrawn	

3.2. In addition to this there have been two rounds of pre-application discussions on the site. The first round related to alterations to the frontage building only (ref no. 2014/0873/PRE). The second related to alterations and extensions to both the front and rear buildings in order to provide five additional residential units (2015/3351/PRE). The extensions comprised a mansard roof on the frontage building and the addition of two floors on the existing single storey building at the rear.

3.3. The key points arising in the latter pre-application response are as follows:

- The principle of the provision of additional residential accommodation is acceptable;
- Proposed mix of units providing a majority of 1 bed flats should be amended to provide more 2 and 3 bedroom units;
- The external works are acceptable in design terms subject to some minor tweaks;
- The loss of the betting shop to the rear at ground floor level is acceptable;
- The windows on the ground floor at side and rear should be re-designed to provide more traditional windows with better outlook;

- The development needs to demonstrate no harmful impact on daylight and sunlight to neighbouring residents;
- The roof terraces are acceptable in principle but detail on the design of the screening to be provided in order to ensure no overlooking to no. 315 KTR.



## 4. Proposals

---

4.1. The following works are proposed:

- Provision of additional floor in the form of a mansard on the frontage building;
- Provision of two additional floors on the single storey rear building (top floor in the form of a mansard);
- Internal re-arrangement of the ground floor by removing the betting shop to enable side access to the flats along with space for cycle and refuse storage;
- Provision of 4 additional residential units (1 x 1 bedroom, 2 x 2 bedroom and 1 x 3 bedroom).

4.2. The proposals have been amended since the last pre-application response in order to address comments made by the officer. In particular, the following changes have been made:

- Design of mansards amended from flat roofed to true mansards
- Thickness of dormer cheeks reduced
- Mix of units amended to provide more 2 and 3 bed units
- Windows at ground floor level to the side and rear amended to be more traditional in appearance and provide more outlook.
- More detail regarding the screens surrounding the terraces provided

## 5. Planning Considerations

---

- 5.1. This section outlines the relevant national and local planning and listed building policies against which the proposals are considered.

### **National Planning Policy Framework**

- 5.2. The National Planning Policy Framework (March 2012) sets out the Government's planning policies for England and replaced the majority of the existing Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs).

- 5.3. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14). It states, at paragraph 17, that planning should proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs.

### **Local and Regional Policy**

- 5.4. S38(6) of the 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan unless material considerations indicate otherwise

- 5.5. In this case the development plan comprises the London Plan (adopted March 2015), the Camden Core Strategy adopted November 2010 and the Development Policies Document also adopted November 2010.

- 5.6. The following section sets out the considerations of the proposed development at both properties in relation to planning policy and guidance under the following headings:

- Land Use
- External alterations
- Transport

### ***Land Use***

#### **Loss of Betting Shop (Class A2)**

- 5.7. Core Strategy policy CS7 (Promoting Camden's Centre's and Shops) sets out that 'the council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors by:

e) seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;

f) providing for, and maintaining a range of shops, services, food, drink, entertainment and other suitable uses, to provide variety, vibrancy and choice;

i) supporting and protecting Camden's local shops, markets and areas of specialist shopping.

5.8. Policy DP12 of the Development Policies is also relevant as it seeks to support strong centres and manage the impact of various uses to ensure the town centre's function, vitality and viability is retained.

5.9. The proposal would result in the loss of the betting shop at the rear of the retail unit. The betting shop is a small unit which makes little contribution to the vitality or viability of the town centre. Its loss enables the provision of much needed residential accommodation whilst maintaining and enhancing the retail unit on site.

5.10. The proposals bring with them significant benefits to the existing retail unit as the shop area would be widened as a result of the loss of the corridor currently providing access to the rear. This would also enable the shopfront to be enlarged thereby enhancing the shop's presence in the street.

5.11. The acceptability of this loss of the betting shop is confirmed in the Council's pre-application response which states:

"As the loss of the betting shop does not result in the loss of a shopfront on the core shopping frontage and the proposal seeks to retain the existing retail unit at the front part of the building and return it into use, this is considered acceptable".

5.12. As the proposal does not result in the loss of a retail unit and, indeed, enhances the existing retail unit, it is in full accordance with the relevant policies contained within the Core Strategy and the Development Policies Document.

### **Principle of Residential (Class C3) at Upper Levels**

5.13. Policy DP2 (Making Full Use of Camden's Capacity for Housing) states that the council will "seek to maximise the supply of additional homes in the borough".

- 5.14. London Plan policy 3.4 seeks to optimise housing potential and states that development should optimise housing output for different types of location and makes reference to the density matrix (table 3.2) which indicates that denser development should be located within town centres.
- 5.15. The site is located in a 'Town Centre' area as indicated on the proposals map. Within these areas of the Borough, residential is considered to be a suitable use given the good public transport accessibility, as is the case with Kentish Town Road.
- 5.16. The immediate area is predominantly characterised by commercial uses at ground floor and office or residential uses at upper floors; indeed there are already two residential units on the upper floors on this site. The principle of residential use at upper floors in this location is therefore in keeping with the character of the surrounding area.
- 5.17. The development successfully optimises the use of the site by providing 4 additional residential units in a town centre location with high public transport accessibility levels (Pta 6a) whilst ensuring the character and appearance of the area is retained and that there is no harm to neighbouring residential amenity.

### **Design**

- 5.18. Core Strategy Policy CS14 states that the Council will require development of the highest standard of design that respects local context and character; and preservation and enhancement of Camden's rich and diverse heritage assets and their settings, including conservation areas.
- 5.19. This is supported by Development Policy DP24 which also requires all developments to be of the highest standard of design and will expect developments to consider the character, setting, context and the form and scale of neighbouring buildings; the character and proportions of the existing building and the quality of materials to be used.
- 5.20. The proposals for the frontage building comprise the provision of a mansard roof to provide an additional residential unit. Since the last pre-application scheme, the mansard has been amended so that rather than being flat-topped, it is a true mansard. The dormer cheeks have also been reduced in size in response to the pre-application advice. The principle of the mansard has been agreed by the council and the design amendments mean that the detailed design is appropriate to its context and accord with the Council's design guidance on mansards set out under CPG1.

- 5.21. Equally careful consideration has been given to the design of the rear building to ensure that it is sympathetic to the character of York Mews. York Mews itself is characterised by a mixed scale of buildings from single storey to three storey with a three storey building situated immediately adjacent to the site at no. 321 Kentish Town Road.
- 5.22. The proposals have been designed to reflect the adjacent building. The floor levels of the proposed rear building would line through with the floor levels and window heights of the adjacent building. In response to the pre-application advice, the mansard roof design has again been amended from flat roofed to a true mansard as set out in CPG1.
- 5.23. We are of the view that the proposal would be a visual enhancement in comparison to the existing unremarkable single storey building that sits here and would be in keeping with the adjoining development at no. 321 Kentish Town Road.
- 5.24. The proposal as a whole brings with it design benefits to the shopfront by removing the existing entrance that provides access to the betting shop. The removal of this access means that the shopfront to nos. 317-319 can be enlarged which would increase the presence of the retail unit within the street. The existing shopfront is unattractive in appearance. Whilst there are no detailed proposals for the shopfront as part of this application, it is proposed to install a new shopfront as part of the development and this would be sympathetically designed to ensure that it enhanced the street scene.

#### **Unit Mix**

- 5.25. In response to the pre-application advice, the unit mix for the development has changed from 1 x studio, 3 x 1 bed and 1 x 2 bed to 1 x 1 bed, 2 x 2 bed and 1 x 3 bed to ensure that the development meets the Council's 'priority' housing needs.
- 5.26. Core Strategy Policy CS6 sets out the Council's intention to maximise the supply of additional housing within the Borough and to create mixed communities by seeking a range of accommodation types from all developments. Development Policies DP5 specifically sets out the Council's aim to provide homes of different sizes and to meet demand for those homes that are most required. It indicates that the Council are seeking a mix of homes to suit single people, couples, small families and large families.
- 5.27. The accommodation comprises a mix of unit sizes suited to a range of people such as single people, couples and families. 50% of the units are 2 bedroom (very high priority) and 25% are 3 bedroom (medium priority) – 75% of the accommodation therefore is for priority unit sizes. As such, the development accords with policy DP5 and CS6 referred to above.

### Quality of Accommodation

- 5.28. The units all accord with the internal space standards set out in the Mayor's Draft Interim Housing SPG relating to unit sizes as set out in the table below:

Flat number	Number of bedrooms	Size required by GLA	GIA of unit
2	3	74	101.83
4	1	50	58.21
5	2	61	78.37
6	2	61	64.57

- 5.29. All the units would receive adequate levels of daylight and sunlight and all are dual aspect. Since the pre-application submission the high level windows proposed on the ground floor have been amended to be more traditional in appearance and at a more regular height to ensure adequate outlook levels from this flat. As the units have been designed so that all the habitable room windows are on the side or rear of the property, the new units achieve good levels of privacy.
- 5.30. With regard to outdoor amenity space provision, Camden Planning Guidance 'Housing' sets out that 'all new dwellings should provide access to some form of private amenity space, e.g. balconies, roof terraces or communal gardens.'
- 5.31. The site is located in a highly urban area (with a Ptal of 6a) on Kentish Town Road where a large proportion of existing residential units do not have any form of external amenity space. The constraints of the site are such that it is not possible to provide amenity space for each unit. However, two terraces are proposed of approximately 8 sq m each to serve units 5 and 6. There is a large public open space (Talacre Gardens) located less than a 10 minute walk from the property (0.4 miles). Given the highly built-up surroundings characterised by residential accommodation with no amenity space, the constraints of the site and the proximity of a local park, it is considered that the provision of two small terraces for two of the flats is acceptable. This is also in line with line with the Draft Interim SPG which states that:

“in exceptional circumstances, where site conditions make it impossible to provide private open space for all dwellings, up to 5% of dwellings in a development may instead be provided with additional internal living space equivalent to the private open space requirement, added to the minimum GIA and the minimum combined living area of the dwelling.”

5.32. The proposed internal living spaces all meet and exceed the Mayor’s Housing Standards as set and therefore comply with the GLA Housing Design Guide.

5.33. Access to the existing flats on the upper floors of the frontage building is via a side entrance and it is proposed that this entrance becomes the main entrance for all the flats. In the pre-application response, officers considered this acceptable, advising as follows:

“Normally, access to flats above shops should be provided from the high street. In this case, the access to the upper floors of the front building is already established and it is therefore sensible to keep it and use it for the other new flats. However, this point of entry should not be re-arranged to a lower point within the mews for safety reasons, as at this point, visibility of front entrance (on the side elevation), is still considered relatively good.

5.34. The location of the residential access has not changed since the pre-application submission and as such, the proposed access arrangement remains appropriate.

#### **Neighbouring Residential Amenity**

5.35. Development Policy DP26 outlines that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors that Camden will consider as part of any new development include:

- a) Visual privacy and overlooking
- b) Overshadowing and outlook
- c) Sunlight, daylight and artificial light levels

5.36. Core Strategy Policy CS5 (Managing the Impact of Growth and Development) states that the Council will protect the amenity of Camden’s residents and those working in and visiting the borough by:

- d) Making sure that the impact of developments on their occupiers and neighbours is fully considered;

- e) Seeking to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities, and;
- f) Requiring mitigation measures where necessary.

- 5.37. Regard has also been had to CPG2: Housing in relation to residential amenity. Camden's Development Policies policy DP26 sets out that the Council will protect the quality of life of occupiers and neighbours by only granting planning permission for developments that do not cause harm to amenity. One of the factors that will be considered when assessing whether a proposal should be granted permission is whether sunlight daylight and artificial light levels are adequate.
- 5.38. The proposed additional floor on the frontage building would have no implications for existing residential occupiers with regards to light, privacy or outlook.
- 5.39. Whilst the proposals for the rear of the site would be visible from the rear windows of the flats at no. 321 Kentish Town Road, given the distances and angles of view, the proposals would not result in loss outlook to these properties.
- 5.40. With regard to the existing residential units at no.317-319, the flats have windows at the rear which serve a kitchen and a bedroom at first floor level and a kitchen at second floor level. Although it would be possible to view the development from these windows, the angle from the first floor windows to the development is less than 20 degrees and at second floor level, it's approximately 10 degrees. These angles demonstrate that there would be no harmful loss of outlook or increased sense of enclosure arising from the additional floors at the rear.
- 5.41. With regard to privacy, the scheme has been designed so that there are no habitable room windows proposed in the elevation of the rear building facing the existing flat and, therefore, no windows directly facing the windows of the existing flats at no. 317-319.
- 5.42. A Daylight and Sunlight Report prepared by Right of Light Consulting assesses the impact of the development on the daylight and sunlight currently experienced by neighbouring occupiers. The report concludes that the proposal satisfies the guidelines with regard to daylight and sunlight as set out in the BRE's Guide: Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice".

### **Transport**

- 5.43. As required under Development Plan Policy DP8, the additional units resulting from the development would be car permit free through a S106 agreement.



- 5.44. Policies CS11 and DP7 support cycle parking provision and Camden's parking standards for bicycles requires one cycle space units of up to two bedrooms. Two cycle parking spaces are required for 3 bed units and above. The plans make provision for 5 cycle parking spaces as required under policy CS11.

#### **Access**

- 5.45. The proposal would accord with Part M of building regulations.

#### **Sustainability**

- 5.46. Policies CS13, DP22 and DP23 are relevant to the consideration of the application and relate to sustainability. Policy CS13 promotes higher environmental standards to tackle climate change whilst Policy DP22 promotes sustainable design and construction and DP23 relates specifically to reducing water consumption.
- 5.47. With regard to the detailed design of the development, the material specification will detail, where possible, materials that are A or A+ rated under the BRE's green guide, in order to select resources with a lower environmental impact throughout their lifecycle. In addition, all materials for the site will be responsibly sourced.
- 5.48. Materials used within the building fabric have a high impact on the energy performance of the development. Therefore, materials will be selected with good thermal performance properties. All materials used on site will have low conductivity values in order to achieve high insulation standards for all building elements. In addition, emphasis will be given to the thermal mass of all materials in order to achieve high thermal comfort levels.
- 5.49. The design of the proposed development will incorporate a range of efficiency measures for water consumption. Low flow rates will be specified to all sanitary fittings (kitchen taps, wash hand basin taps, wcs, showers, baths) in order to achieve a water consumption of 105 litres per person per day.
- 5.50. In order to maximise energy efficiency and thus reduce energy demands, the development will follow certain design principles such as providing efficient space and water heating services, ventilation and control systems and energy efficient lighting. As well as looking at ways of reducing energy demand, the applicant is also willing to the installation of pvs on the property to provide low carbon, renewable energy.

- 5.51. The revised Waste Framework Directive provides a hierarchy of options for managing wastes. The prevention of waste creation is given top priority. If waste is created, top priority is then given to waste re-use, then to recycling and energy recovery. Disposal of any waste should only be considered when the waste minimisation options have been exhausted.
- 5.52. During the construction phase of the development low levels of waste production will be targeted. This will be achieved through the implementation of a Site Waste Management Plan for the site to ensure that as much waste as possible is diverted from landfill.
- 5.53. In addition, consideration has been given to the operational waste of the site, hence waste facilities will be provided, in line with the Local Authority's requirements. The site will be designed to provide appropriate waste/recycling segregation storage facilities. Bins for the separation of recyclable and landfill waste will be provided.
- 5.54. The site will sign up to the Considerate Constructors Scheme (or equivalent) to ensure it adheres with construction best practice and highlight where the site goes beyond statutory requirements. Areas assessed under the current Considerate Constructors Scheme (launched January 2013) include:
- Enhancing appearance
  - Respecting community
  - Protecting the environment
  - Securing everyone's safety
  - Caring for the workforce
- 5.55. With all these measures in place, it is considered that the development accords with Policies CS13, DP22 and DP23.

## 6. Conclusions

---

- 6.1. The proposal provides a development that would optimise the use of the site to provide additional residential accommodation whilst ensuring no harm to either visual or neighbouring residential amenity.
- 6.2. The development provides 4 much-needed residential units providing a good mix of accommodation with 75% of the units being either two bedroom or three bedrooms – unit sizes of very high and medium priority respectively.
- 6.3. The development has been sympathetically designed in order to achieve these additional units and the context of the site has been carefully considered in drafting the proposals. The development brings with it significant design benefits such as improving the appearance of the building at the rear of the site, and whilst not proposed in this application, enabling the provision of a more sympathetic shopfront.
- 6.4. Whilst the proposal results in the loss of the betting shop at the rear of the ground floor, this is acceptable given that the retail unit at the front would not only be retained but improved as a result.
- 6.5. The proposal has been carefully designed to ensure that it would not have a harmful impact on neighbouring residential amenity in terms of light, outlook or privacy and the proposed new units offer a high standard of accommodation.