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Application Ref: **2015/5752/PRE**
Please ask for: **Fiona Davies**
Telephone: 020 7974 **4034**

14 March 2016

Dear Sir/Madam

Pre-application Minor development - Pre-application Advice Issued

Address:
69 Kentish Town Road
London
NW1 8NY

Proposal:
Commercial extension & 3 new residential units

Thank you for your pre-application enquiry.

Please note that this document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

Drawings submitted and reviewed

- Site plan and location plan
- Proposed ground, basement, second, first, third floor plans
- Proposed lower and upper ground floor plans of proposed rear addition
- Proposed rear elevation and section
- Perspectives (rear elevation views)
- Pre-application statement



Site description and context

The application site is a two storey property with lower ground floor. The ground floor unit is currently commercial premises with residential flats above similar to adjacent properties. The site is not listed nor does it lie within a Conservation Area. Nevertheless it sits within a parade of four consecutive properties that are similar in scale and all of which maintain original valley roofs. The site lies within the TfL Underground Zone of Influence and is within the Kentish Town 2010 town centre area.

Furthermore the site lies within a Hydrological constraints layer, a layer of surface water flow and flooding and slope stability underground development constraints. This is worth noting with regard to any proposal for extension at basement level and will be mentioned further on within this advice letter.

Also of relevance is that the site lies within the CIL (Community Infrastructure Levy) of Zone B. As new units are being proposed, the proposal will be CIL liable.

Site Constraints

- Hydrological constraints layer
- Surface water flow and flooding
- Slope stability – underground development constraints
- TfL Underground Zone of Influence

Relevant Policies:

National Planning Policy Framework 2012

The London Plan March 2015, consolidated with alterations since 2011
Policy 3.5 The Quality and Design of Housing developments
Policy 6.9 Cycling

LDF Core Strategy and Development Plan Policies 2010

CS1 – (Distribution of growth)

CS2 – (Growth Areas)

CS4 (Areas of more limited change)

CS5 – (Managing the impact of growth and development)

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)

DP1 – (Mixed Use development)

DP13 – (Employment premises and sites)

DP17 – (Walking, cycling and public transport)

DP18 – (Parking standards and limiting the availability of car parking)

DP19 – (Managing the impact of 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 / conservation areas)

DP26 – (Managing the impact of development on occupiers and neighbours)
DP27 – (Basements and lightwells)
DP28 – (Noise and vibration)

Camden Planning Guidance

CPG 1 (Design) 2014
CPG2 (Housing) 2015
CPG3 (Sustainability) 2015
CPG4 (Basements and Lightwells) 2015
CPG 5 (Town centres) 2013
CPG 6 (Amenity) 2011
CPG 7 (Transport) 2011
CPG8 (Planning obligations) 2015

Relevant planning history

No planning history at the application site.

Principle of development

The proposal seeks to optimise the development potential of the premises through the provision of:

- A basement extension to provide additional storage and sales area for the ground floor A1 retail premises
- Ground floor extension to retail premises to provide office space for A1 retail unit
- one bedroom flat at first floor level with an extension over the ground floor extension
- stepped back extension at second floor level in association with provision of a two-bedroom maisonette
- Mansard roof extension to create a living/kitchen space with a roof terrace at this top level
- A rear addition (ground and basement level) to provide a new flat

Elements to be discussed:

- **Proposed mansard roof**
- **Rear addition - ground and basement extension**
- **Requirements for development at basement level**
- **Closet wing proposed at ground, first and second floor level**

Mansard roof extension

We understand that there is a desire to create a mansard roof extension. However this aspect of the proposals would not be considered acceptable in principle. The host property sits within a row of properties where the parapet line remains consistent and unaltered. The parade of shops remains consistent.

While there are mansard roofs on the opposite side of the road further along Kentish Town Road these are part of a larger and different style of property and form part of the original properties.

However conversely, the host property forms part of an unbroken run of valley roofs. Section 5.8 of the Camden Planning Guidance 1 on roof extensions, advises that:

“A roof alteration or addition is likely to be unacceptable in the following circumstances where there is likely to be an adverse affect on the skyline, the appearance of the building or the surrounding street scene:

- *There is an unbroken run of valley roofs”*

The disruption of an unbroken run of valley roofs is strongly discouraged due to the adverse effect on the skyline and the loss of this heritage feature.

Furthermore paragraph 5.8 of the Camden Planning Guidance 1 details that roof extensions are likely to be unacceptable when:

- Complete terraces or groups of buildings have a roof line that is largely unimpaired by alterations or extensions, even when a proposal involves adding to the whole terrace or group as a co-ordinated design

CPG1 also advises that when proposing roof alterations and extensions the main considerations should be:

- The scale and visual prominence;
- The effect on the established townscape and architectural style;
- The effect on neighbouring properties

We would advise that the proposal of a mansard roof in this location will be inappropriate in this context in terms of scale and visual prominence, will have a negative impact on the established townscape, the consistent roof line and the architectural style of the host property and the surrounding terrace within which it sits.

Furthermore paragraph 5.14 of CPG1 states that mansard roofs form are only considered acceptable where it is the established roof form in a group of buildings or townscape. However mansard roofs are not an established roof form in the group of buildings within which the application site sits. Instead valley roofs are and Camden Policy seeks to preserve valley roofs.

For further guidance particular attention should be given to **Section 5** of Camden Planning Guidance 1 (**CPG1**) that provides detailed guidance on design considerations for roof extensions.



Perspective provided with pre-application enquiry

Extension of existing basement

The proposal seeks to extend the existing basement to provide additional floor space at basement level to provide additional storage space for the ground floor retail unit. In addition development at basement level is proposed in association with the creation of a separate stand-alone residential unit at the rear of the property: Flat 3.

The submitted proposed basement plan does not clearly show the full extent of development at basement level indicated on the Perspective drawings provided.

We would advise that at planning application stage clear existing and proposed plans are provided to convey the full extent of the development at basement level being proposed by showing a block plan of the full extent of development being proposed.

Basement level – rear addition

While the proposal seeks a modest extension of the existing basement the new unit being created will mean additional development at basement level creating additional floor space of c. 34.3sqm and associated footprint of c.45-50sqm. This is significant development at

basement level and therefore a Basement Impact Assessment will be required in line with Council policies.

It is important that we draw your attention to Camden's Basement Policies and Guidelines.

The Camden Core Strategy policy CS14 outlines our overall strategy to promoting high quality places. It seeks to secure development of the highest standard of design which respects local context and character. **Policy DP27** helps to deliver this by setting out our detailed approach to basements and lightwells. Therefore we would draw your attention to this policy in respect of the proposed basement extension and lower level terracing.

Basement Impact Assessment required

While the principle of a basement extension in this location may be acceptable, please note that basements in the borough require a Basement Impact Assessment (BIA). You would need to at least submit the first stage of the BIA (Basement Impact Assessment) in the form of a screening to identify any matters of concern which should be investigated.

Please also note that the submitted BIA would need to be independently assessed. The independent assessment is arranged by the Council but at the applicant's expense. Further guidance on Basements and Lightwells can be found in Camden Planning Guidance 4 (CPG4).

Please note that the site constraints found at the application site that are relevant to the proposal for basement development are as follows:

- The site forms part of a terrace and the area is relatively built up
- The site lies within a Hydrological constraints layer
- The site lies within a layer of surface water flow and flooding
- The site falls within a layer of slope stability underground development constraints

In particular, please note the importance for BIAs to be undertaken by suitably qualified professionals (see CPG4 and the Arup report for details of the required qualifications). In addition please be aware that all BIA information is required prior to registration of the application.

Please see the following link for more information:

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/basement-developments/basement-developments.en>

Rear extension

We appreciate that the proposal seeks to maximise the potential of the currently disused garden space.

We acknowledge that a number of surrounding properties are significantly built up to the rear. This combined with the depth of the existing garden at the site, means there is scope for a rear extension. However, the proposed rear extensions at first and second floor, in addition to the proposed rear addition would introduce dominant built form on the rear elevation of the property.

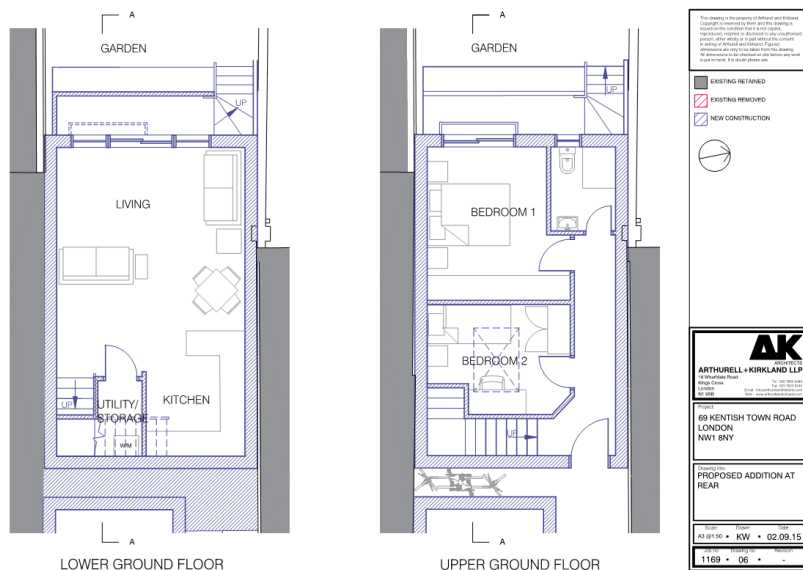
Extension proposed at second floor level

As advised on site visit, paragraph 4.12 of CPG1 states that with regard to the height of rear extensions, in order for new extensions to be subordinate to the original building, their heights should respect the existing pattern of rear extensions, where they exist. Therefore, in most cases, extensions that are higher than one full storey below the roof eaves/parapet level, or that rise above the general height of neighbouring projections and nearby extensions, will be strongly discouraged.

Thus we advise that the rear closet wing extension proposed over the ground, first and second floor will need to be reduced by removing at least one full storey: the proposed extension at second floor level. This will make the proposed rear extensions more subordinate to the original building and more acceptable.

Extension proposed at first floor level

Similarly, closet wings at first floor level are out of character for this area. The closet wing to the first floor level at the adjacent property at no. 67, the public house is less than half width and set much lower in height. This makes it a relatively small and more subordinate feature on the rear elevation of this adjacent property. However the proposed closet wing at first floor level at the host property will significantly wider measuring greater than half-width, and much taller in height causing it to appear much more dominant on the rear elevation. We would recommend that this extension at first floor level adds additional bulk and built form. Its omission from the proposal will help in reducing the dominance of the proposed extensions on the rear elevation of the host property.



Lower and upper ground plans of rear addition proposed provided with pre-application enquiry

Proposed rear addition

We would advise that the proposed rear addition needs to be reduced in bulk and massing. First and foremost, this can be achieved by reducing the proposed depth. As proposed, it is too deep and its depth would need to be reduced at least to no further than the depth of the extension at the adjacent property at no. 71.

It is also worth noting that whilst there are existing rear extensions at adjacent properties in particular that at the immediately adjacent property at no. 71, not all of these developments benefit from recent planning permission.

At present there is a sense that the current proposed scale will create a sense of overbearing effect with potential negative impacts on residential amenity and the potential to result in over development at the site.

Furthermore it appears that the height of the proposed two-storey rear extension would exceed the height of the rear extension at the adjacent property no. 71. We would advise the height of this extension is reduced to reduce the massing of this extension.

Design of rear addition

We note that the current proposal seeks to create a separate addition to the rear. We would advise that this creates an awkward gap between the existing property and the proposed new rear addition at ground and basement level. We would advise that the proposal could be redesigned to remove what could become an awkward gap between two buildings and incorporated as a rear extension. The proposed cycle parking could be relocated either to the rear garden or to an internal storage space. A gap between the existing property and the new rear addition could still be maintained but without making the rear addition a separate building. We would recommend that the new unit to the rear is formed by a rear extension to the existing property.

Balcony proposed to rear addition at ground floor level

We note that a balcony is proposed at ground floor level to the rear addition. Firstly we recommend that a Juliette balcony (a non-projecting balcony) may be more appropriate here. This balcony may introduce some over-looking concerns with regard to surrounding properties. This includes the residential flats located to the rear of the site which are within close proximity. The proposed balcony could introduce overlooking into the windows of these flats which serve habitable rooms.

Technical Housing Standards and Quality of accommodation

With regard to minimum internal space standards you are directed to review the National Technical Housing Standards for guidance and the Housing Design Guide which is supplementary guidance to the London Plan 2015 consolidated with minor alterations.

Please note that the new rear addition 2-bedroom unit is below the recommended minimum space standard for 2-bedroom units.

The proposed 2-bedroom flat will measure c. 61.5sqm in floor space. Please note that the guidelines for minimum gross internal floor areas recommends that a 2-bed 3 person 2-storey dwelling should have a minimum floor space of 70 sqm and a 2-bed 4person 2-storey dwelling should have a minimum floor space of 79sqm. Thus the floor space of the proposed unit is below the recommended guidelines.

At 11.7sqm in area, the proposed double bedroom meets the standard for double rooms which is 11.5sqm. The second bedroom measures 8.4sqm in floor area. This meets the minimum floor space requirement for a single room and also exceeds the minimum width of 2.15sqm but it is worth noting that this would fall short of the floor space requirement for a double room.

Please ensure that all rooms and floor space sizes across the proposed development meet the minimum floor space standards.

Quality of accommodation

Lack of outlook for second bedroom in flat 3

We note that the second bedroom in the new unit (Flat 3) proposed will only be served by a roof light and therefore will have no outlook. This is not an ideal situation and will not provide the best living environment.

Deep plan to living room/kitchen

Furthermore, the proposed living room/kitchen space at basement level will be deep in plan meaning daylight might be limited and the space could be potentially dark to the back of the plan. This is of particular concern in this single aspect space.

The London Housing Design Guide notes that in single aspect dwellings with more than two bedrooms, it is difficult to achieve adequate ventilation and daylight to all rooms in an efficient plan layout which avoids long internal corridors. Even where this is possible, the outlook will lack variety and many ancillary spaces will be internal.

Green roof to two storey extension and roof light

In order to improve on the resulting environment at the site, we would advise that the large expanse of roof over the two storey basement/ground extension is a green roof. Please note it is unlikely that the Council will support any proposal to create a roof terrace at this level.

CPG3 advises that all development should incorporate green and brown roofs. These support biodiversity. In addition, as development densities increase, brown roofs, green roofs and green walls can provide valuable amenity space, create habitats and store or slow down the rate of rain water run-off, helping to reduce the risk of flooding. Please see **Camden Planning Guidance 3** which provides guidelines on green roofs.

In addition, we would advise that the proposed roof light to this extension is designed to be flush with the roof plane of the flat roof.

Green roofs

We encourage the incorporation of green roofs into schemes where appropriate in design terms (see chapter on Green roofs and walls in CPG3, Camden Planning Guidance note on Sustainability. Development Policy DP22 states that schemes must incorporate green or brown roofs and green walls wherever suitable. Due to the number of environmental benefits provided by green and brown roofs and green walls, where they have not been designed into a development the Council will require developers to justify why the provision of a green or brown roof or green wall is not possible or suitable.

The Council will expect all developments to incorporate brown roofs, green roofs and green walls unless it is demonstrated this is not possible or appropriate. This includes new and existing buildings. Special consideration will be given to historic buildings to ensure historic and architectural features are preserved.

Thus we would particularly recommend that a green roof is incorporated to the rear extension/addition to create a new residential unit and wherever flat roofs are proposed.

Impact on Residential Amenity

The surrounding area is mixed use in character and includes a mix of residential at first and second floor levels and commercial at ground floor level. However particular attention must be given to ensure no detrimental impact with regard to residential amenity as a result of this proposal on the adjacent residential block at no.71 Kentish Town Road with regard to overlooking, loss of light or outlook, privacy and sense of overbearing effect, in particular in this case due to the bulk and massing of the proposed extensions.

Car free- agreement required

Policy DP18 on parking standards and limiting availability of car parking states that the Council will expect development to be car free in the Central London Area and town centres such as Kentish Town.

The site lies within the Kentish Town town-centre and has a Public Transport Accessibility Level (PTAL) of 6b which is the best PTAL level. This means that the site benefits from extremely good levels of public transport accessibility.

Thus any new residential unit created at the application site will need to be car-free. Thus any approval for the proposed development will require a legal agreement to ensure that future occupants of the new units being created are aware they are not entitled to on-street parking permits.

Highways Considerations

Policy DP20 states that Construction Management Plans (CMP) should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Policy DP21 relates to how a development is connected to the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a CMP. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. It is likely that a CMP may need to be secured as a section 106 planning obligation for this development and a draft document would be required on submission. This is due to the site being located on a busy road, Kentish Town Road, in a town centre area.

Please use the link for the Council's pro forma: http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3418568

The summary page of policy DP21 states that 'The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'. The footway directly adjacent to the site could be damaged as a direct result of the proposed works. We would therefore need to secure a financial contribution for highway works as a section 106 planning obligation if planning permission is granted, that is, if the application issues and concerns are satisfactorily overcome.

Cycle Parking

Please see Policy DP17 in the Council's Development Plan Document which sets out the Council's cycle parking standards. We also draw your attention to the London Plan cycle standards, Policy 6.9 and in particular Appendix 6.3.

CPG7 (Transport), which can be downloaded [here](#), provides details on the design and layout that Camden expects for cycle parking. One cycle space per residential unit is usually expected.

Waste management – provision of bin storage

Please note that as required by Policy DP26, 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. Amongst other things the Council require developments to provide facilities for the storage, recycling and disposal of waste.

Please refer to Chapter 10 of CPG1 for detailed guidance on providing appropriate waste recycling and storage space. This can be found at this link:

http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3369897&

Please be aware that developments must accommodate adequate space in a safe and accessible location for the storage of recyclables and waste. This guidance particularly applies to new developments and development that increases the amount of floor space and on-site waste.

Sustainability statement

All applications should demonstrate that they meet sustainable design principles as noted in policy **DP22**. All applications must demonstrate this through the submission of a sustainability statement – the detail of this will need to be commensurate with the scale of the development. A sustainability statement will be secured by legal agreement, or if it is more reasonable/practicable this may be secured by planning condition.

Water efficiency requirement

The sustainability statement should also demonstrate that the development is capable of:

- **achieving a maximum internal water use of 110 litres per person per day** (this includes 5 litres for external water use)

This is to ensure that the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CS13 (Tackling climate change through promoting higher environmental standards), DP22 (Promoting sustainable design and construction) and DP23 (Water).

Planning obligations

CPG8 on planning obligations provides full details of planning obligations which would be likely as a result of development, to mitigate its impact. As stated above, it is likely that a Construction Management Plan and financial contribution towards highways will be required.

CIL (Community Infrastructure Levy)

Please be aware that proposal will be CIL-liable as it proposes the creation of new units.

Please be aware that the application may be CIL liable if the proposed additional floor space exceeds 100sqm. The site lies within Community Infrastructure Levy Zone B for when calculating the CIL liability for this proposal should you submit a Full Planning Application. CIL applies to all applications that add at least 100sqm in additional floor space. For reference to the Camden Council CIL Charging schedule please follow this link the CIL page on the Council website:

website:<http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/community-infrastructure-levy/>

Rights to light

The right to light is a legal right which one property may acquire over the land of another. Planning permission does not override a legal right to light, however where a right to light is claimed, this is a matter of property law, rather than planning law. The Council will have no role or interest in any private dispute arising and it will be for the owner or occupier affected to seek a legal remedy.

How to submit your planning application

When submitting a planning application, the following information will be required:

- An appropriate fee (£385 for full planning permission proposing greater than 40sqm but no more than 75sq m gross floor area) (Above 75sqm the appropriate fee is £385 for each 75sqm or part thereof)
- Site location plan showing full extent of development proposed
- Ground floor and basement plans showing full footprint of development proposed
- All existing elevations (including the front and the side), floor plans, sections and roof plan
- All proposed elevations (including the front and the side), floor plans, sections and roof plan
- Design and Access Statement
- Daylight and Sunlight Assessment is recommended due to the scale and location of extensions being proposed

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 4034.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Fiona Davies
Planning officer
Planning Solutions Team