



Planning Statement

24A Mornington Crescent,

On behalf of Mr Marc Cohen

March 2016



Document Control

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"Conversion of existing 3 bedroomed flat to create two 1 bedroomed flats together with other associated works".

Project:

24A Mornington Crescent

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1.0 INTRODUCTION

1.1 This *Planning Statement* has been prepared on behalf of our client in support of Planning and Listed Building Consent applications for the conversion of the existing duplex flat at 24A Mornington Crescent.

1.2 Full Planning Permission and Listed Building Consent is sought for:

"Conversion of existing 3 bedroomed flat to create two 1 bedroomed flats together with other associated works".

1.3 The application comprises the following documents:

- Completed and signed application forms including Ownership Certificate;
- *CIL Additional Information Requirement form*;
- Site Location Plan showing red line ownership (1:1250);
- *Planning Statement* (March 2016)- prepared by WYG Planning;
- *Design and Access Statement*- prepared by ehk architects;
- Full planning application drawings – prepared by ehk architects;
- *Sunlight and Daylight Report* (March 2016) – prepared by Schroeder's Begg

2.0 SITE LOCATION AND DESCRIPTION

Application Site

2.1 Number 24A Mornington Crescent comprises a duplex flat at basement and ground floor level within Grade II listed five storey Georgian town house. The premises which form part of the wider Mornington Crescent are located at the corner of Mornington Crescent and Mornington Place. The existing flat is arranged over two floors, with open plan kitchen and living space at ground floor, and 3 bedrooms and bathroom at lower ground. The flat has access to the rear garden via the basement bedroom and by a separate communal access at ground floor.

2.2 The internal layout of the flat has undergone significant alteration over time. The original plan form has been substantively altered with the original partitions removed to create the current open plan space at ground floor. Following the re-modelling of the space over the years there is limited historic fabric remaining. The existing staircase and the partitions at lower ground are non-original.

2.3 The remainder of the property outside the application is in residential use with a residential flat at first, second and third floor respectively. The owner shares the freehold of the property and



owns the freehold of the rear lightwell and two small sections of the rear garden. The remainder of the courtyard area is outside the control of the applicant. All of the flats in the property have access to the rear garden and this situation would remain unchanged with both the lower ground and ground floor having access to the shared garden space.

- 2.4 Shared waste and recycling storage for the existing flats is located next to the entrance on the Mornington Place elevation. This area is not part of the property and is outside the control of the applicant.

Surrounding Area and Properties

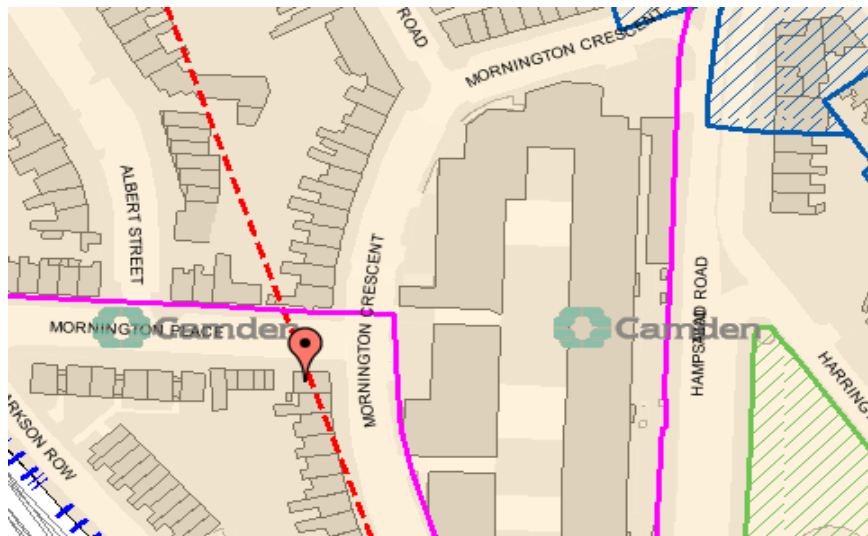
- 2.5 Mornington Crescent faces the rear of the former Carreras Cigarette factory now an office building, but the Crescent itself and the surrounding streets are residential in character. On reviewing the use of the wider buildings, the original townhouses are no longer occupied as single family dwellings. The Council tax records show that the terrace from No.13 to 24 and from 25 to 36 are in use as either residential flats or maisonettes. The majority of the original terraces now comprise either 4 or 5 residential units. It is common along the Crescent for the terraces to have a separate flat at each level including separate basement and ground floor flats.

Planning History

- 2.6 The application premises have limited planning history. The Council's online planning register shows the following applications:
- 2.7 On 26th May 1983 planning permission was granted for the erection of a single storey shed for bicycles and dustbins along part of the return frontage to Mornington Crescent.
- 2.8 On 13 July 1983 Listed Building Consent was granted for the restoration of the front and side elevation including works to windows, railings and entrance.

Development Plan Allocations and other designations

- 2.9 Mornington Crescent is Grade II listed terrace. The property is also situated within the Camden Town Conservation Area. The property falls within the Parliament Hill oak tree to Palace of Westminster - Viewing Corridor. The site is within Flood Zone 1 with a low risk of flooding. The site is a short walking distance from Mornington Crescent tube station and from Camden Town Centre. It is also within close proximity to Harrington Square Designated Open Space. It has a high public transport accessibility with a PTAL of 6a.



*Extract from adopted Proposals Map

3.0 THE PROPOSED DEVELOPMENT

3.1 This section describes the proposed development and sets out the principle components of the alterations to the existing 3 bedroom duplex flat. The application is accompanied by a *Design and Access Statement*.

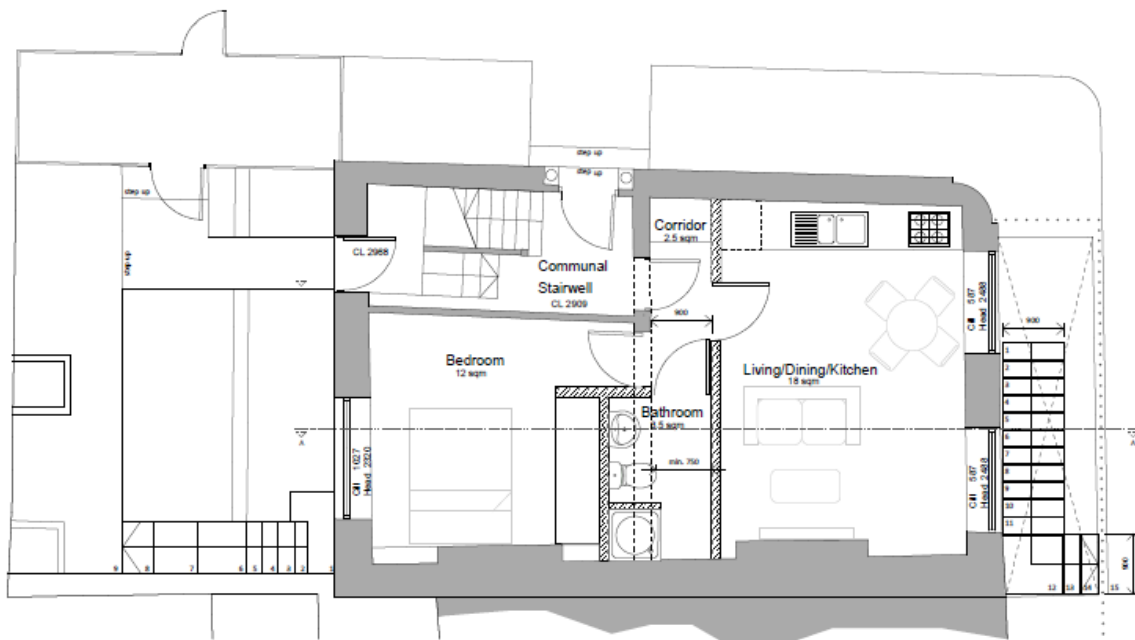
3.2 The scheme proposes the following:

"Conversion of existing 3 bedroomed flat to create two 1 bedroomed flats together with other associated works".

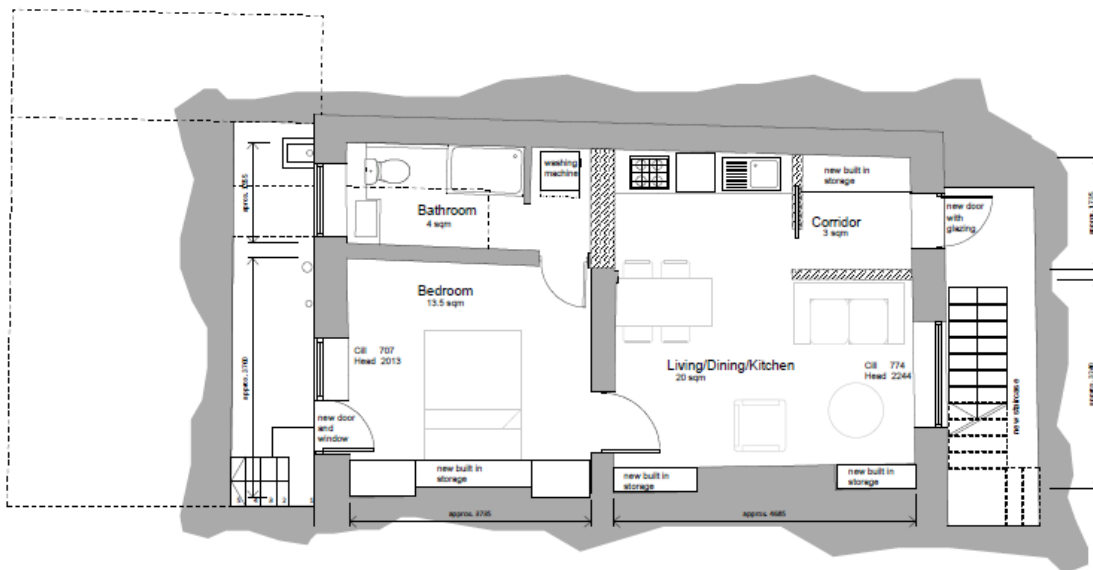
3.3 The existing duplex flat provides living space and open plan kitchen at ground floor with 3 bedrooms and bathroom at basement level.

3.4 The proposal is to have a 1 bedroomed flat at basement and ground floor respectively.

3.5 Both proposed flats are dual aspect with living space and open plan kitchen to the front of the property with the bedroom and bathroom to the rear looking out onto the garden area. In terms of privacy this is an improved situation where the existing bedrooms front Mornington Crescent. Both flats have openable windows to the front and rear allowing cross ventilation.



1. Ground Floor Plan



2. Lower Ground Floor Plan

- 3.6 The two proposed flats are both 1 bedroomed 1 person flats with a GIA of 39 sqm and 46 sqm respectively in accordance with both the London Plan Housing Design Standards SPG and the *National Technical Standards* (Adopted October 2015). A Sunlight/ Daylight report produced by Schroeder's Begg provides an assessment of daylight to new habitable rooms for Average Daylight Factor (ADFs) and sunlight to living rooms in accordance with BRE Guide 'Site layout planning for daylight and sunlight – a guide to good practice' (2nd edition 2011).



- 3.7 The internal layout of the existing flat has undergone significant alteration over time. At ground floor the stairs would be removed. The original plan form has already been altered and the current stairs are non-original. At lower ground the non-original partition between the existing rear bedrooms would be removed.

External Alterations

- 3.8 The ground floor flat would be accessed via the existing entrance off Mornington Place. Access to the lower ground flat would be via steps introduced to the front of the premises. The existing front railings would be reworked to create a new gate with steps down to a new entrance door at lower ground level. Proposed Elevation Plan P003 shows how the steps have been lowered to reduce impact on the existing window.
- 3.9 The railings would be modified to create a gate allowing access to the new external stair to lower ground level. The detail will remain consistent with the existing. Several other properties along the terrace have similar modifications.
- 3.10 The existing door at lower ground front and rear door and windows at lower ground and windows at ground floor be replaced. The windows at ground floor will remain unaltered. A new flue is proposed to the secondary side elevation, in line with the apartments above. Other making good works including the relocation of front light into the lightwell, painting and removal unsympathetic alarm boxes.
- 3.18 Space for cycle storage is provided for each flat as shown on the application plans.

4.0 PLANNING POLICY

- 4.1 This section sets out the planning policies and legislative framework, which together, provides the context against which the Application for the proposed development will be considered. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 4.2 The Development Plan comprises the London Plan Further Alterations (March 2015); The Camden Core Strategy (Adopted 2010); and the Camden Development Policies (Adopted 2010).

National Planning Policy

- 4.3 National planning policy is set out in the National Planning Policy Framework (NPPF). At the heart of the NPPF is the presumption in favour of sustainable development. "For decision taking this means: approving development proposals that accord with the development plan without delay" (para 14).



- 4.4 There are three dimensions to sustainable development; economic, social and environmental. It is recognized that these dimensions give rise to the need for the planning system to perform a number of roles; the social role being “supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the communities’ needs and support its health, social and cultural well-being” (para 7).
- 4.5 At paragraph 9 the NPPF seeks positive improvements in the quality of the built environment and a wider choice of high quality homes.
- 4.6 At paragraph 10, it states that decisions should take local circumstances into account to respond to different opportunities for achieving sustainable development.
- 4.7 Apart from the general principles that support sustainable development in the NPPF, there are a number of other important considerations that are raised that relate directly to the current application. The relevant sections and paragraphs are referred to below:
- 4.8 Section 6, relates to the “Delivery of a wide choice of high quality homes”.
- 4.9 Section 7 considers design and emphasises that good design is key to sustainable development.
- 4.10 Paragraph 47 sets out the Government’s objectives to significantly boost the supply of housing. In accordance with the objectives of the NPPF these proposals seek to provide new homes to meet an identified need.
- 4.11 Chapter 12 specifically discusses ‘Conserving and enhancing the historic environment’ and advises that local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and
 - opportunities to draw on the contribution made by the historic environment to the character of a place. (Paragraph 126).

Regional Policy -London Plan

- 4.12 The Further Alterations to the London Plan (FALP) (Adopted 2015) provides city wide context within which individual boroughs must set their local planning policies.



- 4.13 The FALP identifies Camden as having capacity to introduce 889 new homes per year in the Borough. A key policy applicable to this submission which seeks to optimize the supply of homes within London is Policy 3.3 – Increasing London’s Supply of Housing. This proposal complies with this policy as it seeks to increase supply and contribute to the local planning authority’s housing targets.
- 4.14 Stipulated in the London Plan (Table 3.3) are minimum internal space standards which the two flats in this proposal meet.
- 4.15 The London Plan recognises the importance of residential provision within the Central Activities Zone (CAZ). Policy 2.12 Central Activities Zones promotes residential development in the CAZ. It is recognised that the CAZ is a place where many people live “the availability of a range of homes in the CAZ helps support its strategic function, as well as allowing for sustainable lifestyle and reducing the need to travel. (par 2.56).
- 4.16 With regard to securing improvements for existing buildings **Policy 5.4 – Retrofitting** supports improvements to existing buildings that bring existing buildings up to the Mayor’s Standards on sustainable design and construction.
- 4.17 **Policy 7.4 – Local Character:** Buildings, streets and open spaces should provide a high quality design response that (i) has regard to pattern and grain of existing spaces, (ii) contributes to positive relationships between urban and natural landscapes, (iii) is human in scale, (iv) allows positively contributing buildings to influence the future character, (v) is informed by surrounding historic environment.
- 4.18 **Policy 7.8 – Heritage Assets and Archaeology:** This policy seeks to safeguard heritage assets. The policy encourages development that (i) identifies, values, conserves, restores, re-uses and incorporates heritage assets, where appropriate, and (ii) that conserves heritage assets and their setting.

Local Policy

Creating New Homes

- 4.19 **Policy CS1 – *Distribution of growth*** promotes Camden’s growth in the most suitable location, firstly the growth areas and then appropriate development at other highly accessible locations, in particular Central London. Policy promotes the best use of Camden’s limited land by inter alia “seeking development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site”; and “expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible”.



- 4.20 **Policy CS5 - *Policy CS5 Managing the Impact of Growth and Development*** *inter alia* seeks the provision of uses that meet the needs of Camden's population, providing sustainable buildings and spaces of the highest quality which protect and enhancing our environment and heritage and the amenity and quality of life of the local community.
- 4.21 **Policy CS6 - Providing Quality Homes.** Under criteria e) of Policy CS6 specifically recognises housing as a priority land use of Camden's Local Development Framework. The Council will aim to minimise social polarisation and create mixed and inclusive communities across Camden. Criteria J seeks a diverse range of housing products in the market and affordable sectors to provide a range of homes accessible across the spectrum of household incomes.
- 4.22 **Policy DP2: Making full use of Camden's capacity for housing** seeks to maximise the supply of additional homes in the borough, by *inter alia*: expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site.
- 4.23 Supporting text at para 2.24 recognises a mix of large and small units in an area can help to create more balanced communities (as different size dwellings meet the housing needs of different parts of the community) and increase housing choice. To achieve a more varied mix of housing, *"the Council will favourably consider proposals that create large homes out of smaller homes in parts of the borough where there is a relatively low proportion of large dwellings (that is, the wards of Bloomsbury, Holborn and Covent Garden, King's Cross, Kilburn, Regent's Park and St Pancras and Somers Town)"*.
- 4.24 With the objective of creating mixed and inclusive communities **Policy DP5 – Homes of different sizes** supports a range of self –contained homes of different sizes. Policy allows flexibility and in having regard to the different dwelling size priorities will take into account *inter alia* the character of the development, the site and the areas, site size and any constraints on including homes of different sizes.
- 4.25 The table at paragraph 5.4 sets out the Council's different dwelling size priorities. For market units it identifies a lower priority for 1 bedroom, with a very high demand for 2 bedrooms and medium demand for 3 and above bedrooms. It is however acknowledged at paragraph 5.5 that there is a need for and/ or demand for dwellings of every size and at paragraph 5.7 that the Council will be flexible when assessing development against **Policy DP5**.
- 4.26 **Policy CS9 – Achieving a successful London** supports and promotes the Central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit. Policy *inter alia* supports Central London as a focus for Camden's future growth in homes, offices, and other uses seek to secure additional housing and affordable homes, including as part of appropriate mixed use developments.



Design, Conservation and Heritage

- 4.27 **CS14 – Promoting high quality places and conserving our heritage** seeks to ensure that Camden’s places and buildings are attractive, safe and easy to use by *inter alia* preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens.
- 4.28 Supporting text at para 14.4 requires development schemes to improve the quality of buildings, landscaping and the street environment and, through this, improve the experience of the borough for residents and visitors.
- 4.29 **Policy DP24 – Securing High Quality Design** require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:
- a) character, setting, context and the form and scale of neighbouring buildings;
 - b) the character and proportions of the existing building, where alterations and extensions are proposed;
 - c) the quality of materials to be used;
 - d) the provision of visually interesting frontages at street level;
 - e) the appropriate location for building services equipment;
 - f) existing natural features, such as topography and trees;
 - g) the provision of appropriate hard and soft landscaping including boundary treatments;
 - h) the provision of appropriate amenity space; and
 - i) accessibility.
- 4.30 **Policy DP25 - Conserving Camden’s heritage** permits development within conservation areas that preserves and enhances the character and appearance of the area. Policy resists the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention; not permit development outside of a conservation area.
- 4.31 With regard to listed buildings **Policy DP25** criteria f) supports the grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause



harm to the special interest of the building; and g) permits development where it is considered not to cause harm to the setting of a listed building.

- 4.32 The supporting text at 25.2 recognises that the Council will only grant planning permission for development in Camden's conservation areas that preserves and enhances the special character or appearance of the area. The character of conservation areas derive from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing, and uses. These elements should be identified and responded to in the design of new development.
- 4.33 The supporting text at paragraph at 25.3 recognises that the character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the existing.

Amenity

- 4.34 **Policy DP26** specifically relates to protecting the quality of life of occupiers and neighbours. Policy DP26 states that planning permission will only be granted where it does not cause harm to amenity. The factors considered include:
- a. Visual privacy and overlooking;
 - b. Overshadowing and outlook;
 - c. Sunlight, daylight and artificial light levels;
 - d. Noise and vibration levels;
 - e. Odour, fumes and dust;
 - f. Microclimate; and
 - g. The inclusion of appropriate attenuation measures

Other Material Planning Considerations

Camden Town Conservation Area Appraisal and Management Plan

- 4.35 The Camden Town Conservation Area is seen as being divided into two sub areas of distinctly different character, a busy commercial and retail area, and, a quieter more formal residential area. Mornington Crescent is located in the Residential-sub area. The Conservation Area Statement specifically acknowledges the Crescent.

"The sizeable townhouses of Mornington Crescent consist of four storeys raised on basements with mansard roofs and dormers. Constructed from brick, with restrained



stucco ornament and with natural slate roofs, they boast finely detailed cast-iron balconies and doorcases with inset fluted columns. Although these characteristics remain in most part, the street has suffered quite extensively, becoming sandwiched between the railway lines at the rear and the enormous bulk of Greater London House (originally the Carreras Tobacco Factory), erected on the site of the gardens in the 1920s. The terraces have experienced an adverse change in appearance arising from the subsequently high number of houses in multiple-occupation”.

- 4.36 Mornington Crescent 1-35 (cons) & attached railings, animal drinking trough at Hampstead Road junction, bollard outside No 25 are all Grade II listed.

Supplementary Planning Guidance

- 4.37 The Housing SPG requires the following residential space and design standards; inter alia
- A partition between eating and sleeping areas;
 - Kitchens and living rooms that are permanently separated are preferable but combined kitchen and living areas are considered acceptable as long as the floor area is sufficient to allow for the greater range of activities that will take place in them (para 4.7).
 - All rooms should be able to function for the purpose for which they are intended. They should have an adequate size, shape, door arrangement, height, insulation for noise and vibration and natural lighting and ventilation.
 - Regarding Sunlight and Daylight all habitable rooms should have access to natural daylight. Windows in rooms should be designed to take advantage of natural sunlight, safety and security, visual interest and ventilation. Developments should meet site layout requirements set out in the Building Research Establishment (BRE) Site Layout for Daylight and Sunlight – A Guide to Good Practice (1991) (para 4.21).
- 4.38 Para 4.30 recognises that in some instances, it is accepted that existing buildings may not be able to provide balconies or roof terraces, however, external amenity space i.e. access to communal gardens should still be provided where possible (our emphasis).

5.0 PLANNING CONSIDERATIONS

- 5.1 This section assesses the scheme against relevant Development Plan Policies as set out in local and regional plans and policies.



Principle of Conversion

- 5.2 Housing provision and the aim to make full use of Camden's capacity for housing by inter alia maximising the supply of additional houses is addressed in **Strategic Policy CS6 *Providing Quality Homes***. Under criteria e) of **Policy CS6** specifically recognises housing as a priority land use of Camden's Local Development Framework. **Policy DP2** further seeks to maximise the additional supply of homes. The conversion of the existing flat resulting in the creation of an additional dwelling supports the objectives of **Policy CS6 and DP2** to maximise housing and support a mixed-use and inclusive communities which provides for a spectrum of household incomes.
- 5.3 With regard to unit sizes, **Policy DP5** supports a range of self – contained homes of different sizes. The proposal will result in the replacement of a 3 bedroomed unit with 2 x 1 bedroomed units. We acknowledge the Council's borough wide housing priorities (table at paragraph 5.4) which recognise 1 bedroom units as having a lower priority and units of 3 and above bedrooms as having a medium priority. However, it is still acknowledged that over the wider borough there is a need for and/ or demand for dwellings of every size. The premises are not in the areas of the borough identified as having a shortage of family units. Accordingly, the conversion of the premises to 2 x 1 bedroomed units continues to support the objectives of **Policy DP5**.
- 5.4 It is clear from reviewing both the planning history and the Council tax records for the wider Crescent that a substantive number of the terraces have 5 units per terrace and it is therefore common along the terrace for there to be flats at basement level with separate access. The nature of the dwellings across the terraces shows that the market is for smaller accommodation rather than family housing in this location. This application simply seeks to optimise the use of the building, through improved layout while still complying with all the necessary amenity standards.
- 5.5 The overall floorspace of each residential unit has been designed to comply with floorspace standards set out in the *London Housing Design Guide SPG* and the *National Technical Standards* for a 1 person unit. The existing situation at lower ground floor results in a poor layout for the bedrooms with a particular poor quality accommodation of the 7 sqm room. Overall it is felt that the space functions better as two 1 bedroomed flats.

Residential Amenity

- 5.6 The proposals continue to maintain the quality of life of occupiers and neighbors as required by **Policy DP26**. There are no impacts to surrounding neighbours. As per the existing situation, the set back from the pavement secures visual privacy and overlooking. Having bedrooms to the rear is more appropriate. Both flats are dual aspect and have an outlook from the front and rear. Both flats will share the garden area together with the existing units in the building.



Design and Conservation

- 5.7 The proposal continues to maintain the original residential use to the premises. The Conservation Area Management recognises that the majority of the buildings in the conservation area were built as town houses for residential purposes. The continued residential use supports the objectives of **Policy DP25** to preserve the character of the conservation area and not to cause harm to the special interest of the listed building.
- 5.8 The existing premises have already undergone substantive alterations. The original layout which would have formed part of the original house has been fundamentally altered with the current open plan space at ground floor originally being two rooms. The existing non-original stairs replaced a spiral staircase which previously provided access to the lower ground. In this regard it is considered that in accordance with **Policy DP25** the conversion would not cause harm to the special interest of the building.
- 5.9 With regard to the external works, there would be no loss of original windows or doors, the non-original lower ground front door and window and ground floor would be replaced with new timber frames. The making good works including the removal of unsightly burglar alarms and painting to the front elevation with result in a much improved appearance of the building. The front wall mounted light would be relocated into the lightwell well away from the main façade. Overall the external works preserve the character of the Conservation Area and the special interest of the building.
- 5.10 It is recognised that the Conservation Area Statement places importance on the Urn shaped railings that form the boundary of the terrace. There would be no loss of the original architectural detail or fabric and it will be possible to modify the existing railing in order to create a gated entrance to the proposed external stairs. This has been similar modifications carried out along the terrace. When the gates are closed the visible appearance of the railings remains unchanged.

6.0 SUMMARY

- 6.1 All of the properties across the terrace have now been converted into flats or duplex apartments. A significant number of the properties have been converted into provide a flat on each floor. The creation of an additional unit supports the objectives of **Policy CS6** which prioritises housing in Camden and **Policy CS6** which seeks to maximize the supply of additional homes.
- 6.2 As indicted by the use of the wider terrace the premises are best suited to smaller units. The premises are not located in an area recognized as having a shortage of family units. It is recognized that there is a need for all sizes of units across the borough.



- 6.3 With regard to amenity there is no impact on surrounding neighbours. Both flats meet the necessary size standards, with dual aspect and appropriate privacy and outlook. The existing situation results in a cramped layout with a particularly poor quality of the third bedroom (7 Sqm). The proposed reconfiguration moves bedrooms to the rear and is overall felt to function better as two 1 bedroomed flats.
- 6.7 The existing premises have already undergone substantive alterations. The original layout has been fundamentally altered. The existing non-original stairs replaced a spiral staircase which previously provided access to the lower ground. In this regard it is considered that in accordance with **Policy DP25** the conversion would not cause harm to the special interest of the building.
- 6.8 External stairs have been introduced to a number of the terraced properties with the railings modified to create access. In the same way there would be no loss of the original architectural detail or fabric and it will be possible to modify the existing railing in order to create a gated entrance to the proposed external stairs. In this regard it is considered that in accordance with **Policy DP25** the conversion would not cause harm to the special interest of the building.
- 6.9 The making good works result in a much improved appearance of the building. Overall the external works preserve the character of the Conservation Area and the special interest of the building.
- 6.10 For these reasons, it is respectfully suggested that the application proposals should be supported and should be permitted. We trust the detail included above and in the enclosed supporting information provide you with sufficient information but should you require anything further, please do not hesitate to ask.