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PLANNING STATEMENT / DESIGN & ACCESS

24 Camden Road
London, NW1 9DP

By:

Revive Renovations Ltd

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1.0 Introduction

- 1.1 This planning statement is submitted to support the planning and listed building application at the above address, for a development which seeks to extend the property at lower ground, ground and first floor level plus the creation of a mansard roof extension. These extensions are in connection with the change of use of the property from two to three residential units, alongside the general refurbishment of the building.
- 1.2 The statement will focus on the key planning issues such as land use, residential layout and amenity. Please also see the submitted heritage statement, which provides additional commentary on design and conservation.

2.0 Site and Surroundings

- 2.1 The application site relates to a four storey property, comprising lower ground, ground, first and second floor accommodation located in Camden Road. The property is part of a wider grade II listed terrace of 23 houses (Nos 18-62 Camden Road), the majority of which having commercial uses on the ground floor. The site is located within the Camden Town Centre, which has special protection for retail premises at ground floor level.
- 2.2 In terms of uses, the building currently houses a vacant office use at basement, and a two bed maisonette at first and second floor level. There is a retail use at ground floor level; however it should be noted, this is within separate ownership and not part of this application.
- 2.3 On the opposite side of the road, and within the wider setting of the site lies the Grade II* listed Church (Church of St. Michael) and Grade II listed War Memorial attached to the Church. The terrace of 19th century properties to the south of the application site, abutting the rear gardens of the listed Camden Road terrace is also Grade II listed.
- 2.4 The application site is not located within a conservation area or within an archaeological priority area. The site is within an area which has potential for ground contamination.



Plate 1: View of 24-62 Camden Road



Plate 2. View of rear of Nos.24-34 Camden Road

3.0 Proposal

3.1 The proposed development seeks various extensions to the property, in connection with the refurbishment of the building, and the creation of additional residential accommodation. These changes are fully documented in the application form, and illustrated on the application drawings. The proposals are summarised as follows: -

- Change of use of the rear lower ground floor / basement to create a self contained flat.
- The area to the front of this floor is proposed to be changed to ancillary retail space (a further 22sqm) in connection with the ground floor retail unit. A new staircase is proposed to allow access to this area.
- Rear extensions are proposed at basement and first floor level, both providing additional residential accommodation.
- A mansard roof is proposed at third floor level
- Finally, the change of use of the existing first and second floor two bed maisonette, to create a two bedroom flat at first floor level, and a two bed maisonette over second and newly created third floor level is proposed.

4.0 Relevant Planning History

4.1 The planning history has been summarised in the heritage statement, and below provides a summary of relevant considerations.



- 4.2 In 1989 - 1990, a number of applications were refused on this site, on the basis of loss of residential and retail floorspace and subsequent increase in office floorspace. Whilst these decisions were taken in context of the 1987 Local Plan and then London Plan, it is important to note that the current proposals would increase residential and retail accommodation.
- 4.3 The second point to note is that a mansard roof extension and other rear additions were permitted on this site (via appeal) in 1990. Whilst these permissions have expired and not been implemented, this is another important consideration.

5.0 Planning Context and Analysis

- 5.1 The statutory development plan for LB Camden comprises the Further Alterations to the London Plan (2015), Core Strategy (2010) and Development Policies (2010).
- 5.2 In addition to the above, the Camden Local Plan (2016) has been submitted for examination, and therefore policies can be given limited consideration when determining planning applications.
- 5.3 In addition the following documents are deemed a material consideration when determining planning applications:
- National Planning Policy Framework 2012
 - National Planning Practice Guidance 2014
 - Camden Planning Guidance
 - (i) CPG 1 (Design)
 - (ii) CPG2 (Housing)
 - (iii) CPG6 (Amenity)
 - (iv) CPG7 (Transport)
 - (v) CPG8 (Planning Obligations)
- 5.4 The key planning policies and other relevant considerations affecting the proposal are set out below.

Relevant Policies and Analysis

Increase in Retail Floorspace

- 5.5 As noted above, the site is within the Camden Town Centre which has a special protection for retail and other supporting uses. The ground floor unit is outside of the ownership of the applicant, and therefore will remain. The proposal does involve the change of use of part of the lower ground floor to provide additional retail floorspace (22sqm). In reality this is likely to be for retail storage, however its presence will help support the continued function of the retail unit, thus according with both local and national policy, and both sustaining and enhancing the vitality and viability of the town centre network



Loss of Employment Floorspace

- 5.6 The last known use of the lower ground floor is as office space, with access possible internally only and not with independent access. It is understood that the previous owner used this area as a private office, which may explain why there is no independent access. It is unclear from the planning history and drawings if this use ever received planning consent for B1(a) office, and there is evidence that part of this area has also been used for residential purposes. Nevertheless, and for the avoidance of doubt, the statement provides assessment for the loss of the lower ground floor as office space.
- 5.7 Through the NPPF the Government has made a commitment to ensuring that the planning system does everything it can to support sustainable economic growth. It is clear that planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.
- 5.8 The core planning principles set out at Paragraph 17 of the NPPF seeks to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. The core planning principles also encourage the effective use of land by reusing land that has been previously developed and promote mixed-use developments to encourage the multiple benefits deriving from the mixed use of land.
- 5.9 The NPPF also encourages the reuse of former employment sites to deliver alternative uses such as housing, where they provide no real prospect of catering to employment uses and job growth (Paragraph 22).
- 5.10 London Plan Policy 4.4 advises that the Mayor will work with boroughs and other partners to plan, monitor and manage the release of surplus industrial land, so that it can contribute to strategic and local planning objectives, especially those to provide more housing. Further guidance is provided in the Mayor's Housing SPG.
- 5.11 Core Strategy Policy CS1 (Distribution of Growth) encourages the best use of Camden's limited land and expects the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the Borough. Policy CS3 of the Core Strategy provides more detail on the Council's approach in decision taking.
- 5.12 Core Strategy Policy CS8 (Promoting a Successful and Inclusive Camden Economy) safeguards existing employment sites and premises in the borough that meet the needs of modern industry and other employers. This policy also expects new development to provide a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises (SMEs). It also recognises the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.
- 5.13 Development Management Plan Policy DP13 (Employment Sites and Premises) should be read alongside Policy CS8. It ensures that sufficient sites are retained to enable a variety of commercial and industrial businesses to find premises allowing them to continue to operate. In justifying a loss of employment floorspace is must be demonstrated that:



- The site or building is no longer suitable for its existing business use; and
- There is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.

Where a change of use can be justified, the Council will seek to maintain some business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business uses. Further guidance on acceptable marketing activity is provided in CPG5 (Town Centres, Retail and Employment).

- 5.14 Development Management Plan Policy DP1 (Mixed Use Development) will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. In tandem with Policy DP1, Development Management Plan Policy DP2 (Making Full Use of Camden's Capacity for Housing) seeks to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing. This includes underused or vacant sites which are expected to maximise supply of housing, whilst also taking into account any other uses that are needed on the site.
- 5.15 The local market has clearly changed since the building was last occupied as office use. This site is no longer suitable for employment (Class B1) use for the following reasons:
- The building is in a poor state of repair and thermally inefficient;
 - The building does not represent the type of employment (Class B1) space that current B1 users are looking for;
 - The existing employment floorspace on site is poor quality; and does not have independent access from street level.
 - The employment floorspace currently achieved on site is of a poor practical utility; limited light levels and poor quality climate control
 - The building's energy performance also falls below today's standards set by the Building Regulations and as sought by planning policy.
 - It does not meet the needs of the market;
 - It would provide a low density of employment in terms of jobs;
 - The investment required to bring the office building up to a suitable (useable) standard makes this course of action unviable.
- 5.16 The Council seek to protect employment sites and uses. However, the overwhelming sustained market evidence shows that the building and site, are no longer suitable for continued business use, in accordance with Development Management Plan Policy DP13 and CPG3.
- 5.17 While the building and site are no longer suitable for B1 use, Development Management Plan Policy DP13 also asks developers to consider whether there is evidence to support the retention, reuse and redevelopment of the site, or building, for similar or alternative business use and that this has been fully explored over an appropriate period of time. With the lower ground floor use deemed unfit for office occupation for the reasons set out above, and the ground floor outside the ownership of the applicant, it was felt the upper floors



better suited for the Council's principle strategic objective of delivery of more housing. The layout of the upper floors is also seen as a better fit in heritage terms.

Principle of Residential Use

- 5.18 When determining planning applications, the NPPF directs LPAs to apply the presumption in favour of sustainable development; the 'golden thread' which is expected to run through their plan-making and decision making. Policy 14 of the NPPF noted that the presumption in favour of sustainable development for decision-taking means 'approving development proposals that accords with the development plan without delay.' This is reiterated within paragraph 196.
- 5.19 Policy 17 of the NPPF sets out 'core planning principles,' including that planning should 'encourage the effective use of land by reusing land that has been developed previously (Brownfield land) provided that it is not of high environmental value.' These principles also include 'proactively drive and support sustainable economic development to deliver homes...'
- 5.20 Section 6 of the NPPF specifically addresses delivery of a wide choice of high quality homes and paragraph 49 notes that 'Housing applications should be considered in the context of the presumption in favour of sustainable development.' Paragraph 50 goes on to encourage the delivery of a wide choice of quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 5.21 The NPPF also notes that planning law requires that applications for planning permission must be determined in accordance with the development plan.
- 5.22 London Plan Policy 3.3 Increasing Housing Supply notes that the 'Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide real choice for all Londoners in ways that meet their needs at a price they can afford.'
- 5.23 Housing is a priority land use of the LDF and the principle of providing residential units at the site should be considered acceptable. More particularly, Development Policy DP2 confirms that the Council will seek to maximise opportunities to supply new housing; housing is regarded as *the* priority land-use of the Local Development Framework, and the Council makes housing its top priority when considering the future of unused and underused land and buildings (Core Policy CS6). The proposed development seeks to provide 3 self-contained flats and therefore complies with the aspirations of policy DP2 (and CS6).
- 5.24 It is clear there is a significant need for housing in Camden and providing enough housing to meet the demand on a strategic and local level is a concern for Londoners and residents of Camden. Providing more high quality homes in this highly sustainable location is a unique opportunity that will significantly contribute towards this significant housing need. The evidence to support residential accommodation in this location is overwhelming and thus the principle is acceptable.



Quality of Residential Accommodation

5.25 Providing residential accommodation is a top priority for LB Camden, however ensuring these homes are of a high quality is also a crucial element to creating sustainable places. London Plan Policy 3.5 states that housing developments should be of the ‘highest quality internally, externally and in relation to their context and to the wider environment.’ The policy also states that ‘the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people’. The policy further states that LDFs should incorporate minimum space standards which conform to those set out in the London Plan.

5.26 In accordance with Camden Planning Guidance 2 (2015) the overall internal floorspace in new self-contained dwellings should normally meet or exceed the minimum standards set out in the below table: -

Number of Persons	1	2	3	4	5	6
Minimum floorspace (sq m)	32	48	61	75	84	93

5.27 The GLA set out their own space standards, within the Minor Alterations to the London Plan (March 2016). This sets out specific guidance on the size of flats and duplexes. See below: -

Table 3.3 Minimum space standards for new dwellings⁷

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

5.28 The proposals provide the following floor areas: -

- Lower Ground floor (2 bed) = 63 sqm
- First floor flat (2 bed) = 60sqm (plus 2sqm of storage space)
- Second and Third Floor Flat (2 bed) = 74sqm

5.29 All three flats have been designed to comply with the minimum internal space standards contained within both the Camden Planning Guidance and the London Plan. All habitable rooms to ensure that they have appropriate access to natural light.



- 5.30 From 1st October 2015, LPA's cannot longer apply Lifetime Homes. The scheme is below 10 residential units, and therefore there are no requirement for wheelchair housing

Unit Mix

- 5.31 The National Planning Policy Framework (NPPF) recognises that to create sustainable, inclusive and diverse communities, a mix of housing based on demographic and market trends and the needs of different groups should be provided. London Plan Policy 3.8 'Housing Choice' of the London Plan seeks to ensure that development schemes deliver a range of housing choices in terms of a mix of housing and types.
- 5.32 Camden Policy DP5 advises that the Council will seek all residential developments to meet priorities set out in the Dwelling Size Priorities Table, including conversion schemes. The table confirms that the highest priority need is for 2 bed units, with a medium need for 3 and 4+ bed units, and a lesser need for 1 beds. The proposed mix comprises 3 x 2 beds which meets the policy expectations, however this is largely derived from the form of the listed building which lends itself to this layout.

Amenity Space

- 5.33 At a national level, the NPPF sets out 12 core planning principles. One of these principles outlines how planning should seek 'high quality design and a good standard of amenity for all existing and future occupants of land and buildings. In regards to amenity space the Mayor's Housing SPG (2016) and the London Housing Design Guide (2010) recommends that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.
- 5.34 Paragraph 4.29 of Camden Planning Guidance 2 (Housing) 2015 require all new dwellings to be provided with some access to private amenity space. The proposal benefits from a generous rear garden, and all properties will have access to this space exceeding the London Plan targets. Whilst this is not private space, the host building could not practicably provide balconies or roof terraces without causing significant and undue harm to the listed building, and therefore the communal garden is seen as the best approach to providing amenity space.

Impact on Amenity for Future Occupants and Surrounding Residents

- 5.35 London Plan Policy 7.6 requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. The policy makes reference to this being particularly important for residential buildings.
- 5.36 On the whole, the results demonstrate that the daylight effects to neighbouring properties fall within the levels recommended in the BRE guidelines. The daylight within the proposed units is also compliant with national guidelines. All neighbouring windows comply with the BRE guidelines' recommendations for sunlight amenity. Therefore, it is considered that the proposed development will have a negligible impact on the existing or proposed residents in the area.
- 5.37 The first, second and third floors will all be dual aspect with each habitable room possessing generous windows. The lower ground flat is single aspect, although benefits from full aspect



at the rear (no lightwells), and again all habitable rooms have windows providing adequate sunlight/daylight. It is not practicable to provide a dual aspect flat in the lower ground level as this would involve the creation of a front lightwell which is likely to be harmful to the listed building. The proposal provides adequate amenity value, whilst making optimum use of the land.

- 5.38 At a national level, the NPPF sets out 12 core planning principles. One of these principles outlines how planning should seek 'high quality design and a good standard of amenity for all existing and future occupants of land and buildings'. London Plan Policy 7.6 requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors.
- 5.39 The scheme has been carefully designed to consider the impact the development will have on the amenity of both existing and proposed residents. The extensions to the rear are modest, and will not infringe on surrounding office or residential uses.

Transport

- 5.40 Under Policy DP18, the Council will expect development to be car free in areas within Controlled Parking Zones and easily accessible by public transport such as this. The PTAL of the site is 6b, which is the best possible. Accordingly, the applicant proposes that the two additional units should be made car-free (secured via S106)
- 5.41 Due to the constraints of the listed building, it is not possible to accommodate cycle parking at the front of the site or within the units. It may be possible to accommodate storage to the rear, and this could be secured via planning condition if it was felt a structure would not harm the historic setting of the listed building.

CIL

- 5.42 It is acknowledged that the development would be subject to the Mayor of London's CIL and Camden CIL. A completed CIL form is submitted as part of the application which sets out the assumed liability from this development. The applicant would welcome a discussion about any planning obligations alongside the requirement for car-free housing.