

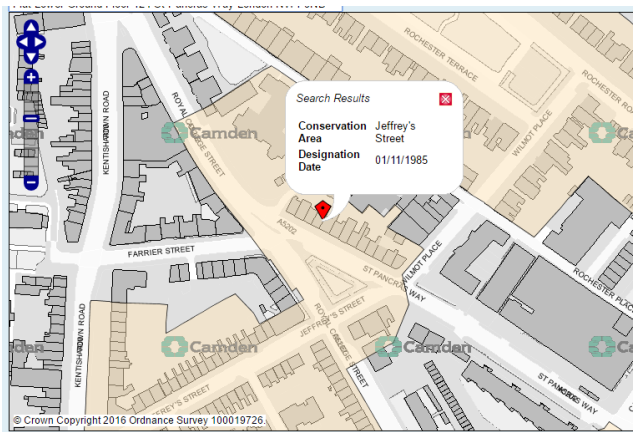
Planning and Design & Access Statement

124, St Pancras Way, London, NW1 9NB

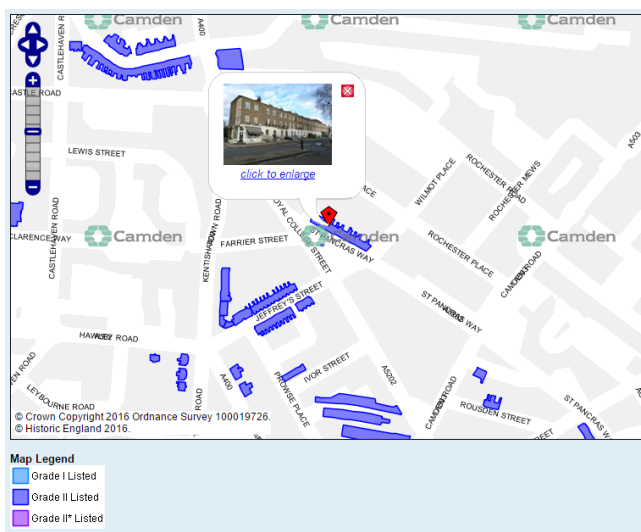
PP-05905791

A. INTRODUCTION

1. This Statement comprises the Planning and Design & Access Statement prepared in support of a planning and listed building application for the 'Conversion of building to two self-contained flats and minor internal alterations' (the 'proposed development') at 124 St Pancras Way, London, NW1 9NB (the 'property').
2. The property is located within the Jeffrey's Street Conservation Area as the following map extract confirms.



3. The property is Grade II Listed as the following map extract confirms.



4. A Heritage Impact Assessment has been prepared and supports the planning and listed building applications and this provides further information on the listing description.
5. There is no planning history recorded against the property. It is located within Flood Risk Zone 1 and therefore at low risk from flooding. The property has a PTAL of 6a confirming an excellent level of public transport accessibility.
6. The existing use of the property is residential and it has been used and rated as 2 flats, although there are no planning records to confirm the change of use.

B. PRE-APPLICATION CONSULTATION

7. Proposals for the conversion of the property and external changes in the form of: a small infill extension with window to the existing stairwell at the rear of the lower ground floor; the incorporation of a roof terrace over this room accessed from ground floor level; the removal of the metal basement stairwell and blocking up of the entry door to the lower ground level at the front of the property were submitted for pre-application consultation in November 2016.
8. Following a site meeting, a pre-application feedback letter was issued on the 21 December 2016 under reference 2016/6067/PRE. The pre-application response confirmed the following:
 - a. The single dwellinghouse was previously converted into two separate flats; however, these works were completed without the benefit of planning permission or listed building consent. Council Tax records show that they were first registered as two separate flats in 2013 and are therefore unlawful.
 - b. There are no planning or enforcement records for the application site.
 - c. The principle of the subdivision of the property and the creation of a new 2 bedroom flat would therefore be policy compliant and would be welcomed by the Council in terms of land use.
 - d. As the proposals involve the creation of a new residential unit, it is likely that the development would be required to be car-free. This would be secured via Section 106 legal agreement.
 - e. There are concerns with the massing created by inserting an infill extension, along with the existing two extensions at basement level. There is little definition to and reference of the existing built form and character, this should be clearly evident in any future proposals. If an infill extension is to be created here; this would constitute basement development and would therefore have impact upon the historic structure, fabric and foundations of this building. Surveys and detail would be needed to ensure that there is no impact or loss of fabric for this element of the proposal. A management plan will need to be submitted in accordance with CPG4 (paragraph 2.11).
 - f. There are major concerns with the removal of such a large proportion of the rear external wall and this cannot be supported due to the loss of fabric and plan form and the impact on the proportions and character at this floor level. There are also

concerns with the large expanse of glazing to the rear elevations and especially to the existing closet wing extension where it wraps around up onto the roof. The infill extension may sit more sensitively if the existing rear closet wing was retained in brick with a more traditional window appropriate to the building.

- g. The proposal also includes the removal of the top section of the existing three storey closet wing extension which would be a welcome enhancement. However, further detail will need to be provided to appreciate any damage to historic fabric and therefore the character and appearance of the rear elevation. The proposed window to be reinstated should be in keeping with the character and proportions of the rear elevation; replicating the detail seen on the prevailing window type to other properties.
- h. There are major concerns with the amount of existing internal walls to be removed across all floor levels and creation of new partition walls, and thus the impact upon the historic plan form. There has been no historical analysis or assessment to provide justification for these alterations; other than creating two units which is not seen as sufficient justification. At first floor level the double doors are to be removed which would not be encouraged. Any future application should look to reinstate historic plan form, detail and proportions (the existing opening size etc.)
- i. Any future application should include the replacement of the existing unsympathetic uPVC windows along with details of the proposed windows and how the works will be undertaken. Likewise, proposed rooflights should be in keeping with the character of the host building and have traditional appearance – not creating large voids adjacent to the listed building.
- j. The proposal to excavate under the existing closet wing extension and an area of the rear garden would constitute basement development. Policy DP27 (Basements and Lightwells) provides guidance on basement proposals and states that in determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity, and does not result in flooding or ground instability. Although the application site does not sit within an area with underground development constraints, a Basement Impact Assessment would still be required as the host building and wider terrace are Grade II listed.
- k. The Council expects development to provide high quality housing that provides secure, well-lit accommodation that has well-designed layouts and rooms in accordance with guidance provided by CPG2 (Housing). The London Plan 2016 sets out new nationally described space standards which all new dwellings, including conversions of existing residential units, must meet.
- l. Both flats would meet national space standards in terms of gross internal floor area and bedroom sizes. They would both be dual aspect with all habitable rooms receiving adequate light and ventilation. Although there is no outside amenity space provided for flat 2 this is considered acceptable given the fact the development involves the conversion of an existing historic building.

- m. Policy CS5 seeks to protect the amenity of Camden’s residents by ensuring the impact of development is fully considered. Policy DP26 supports this, by seeking to ensure that development protects the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of neighbouring residents. This includes privacy, overlooking, outlook and impact on daylight and sunlight. Due to the location of the lower ground extension, it would not have any impact on neighbouring amenity. It would not protrude further than the existing closet wing extension or higher than the very tall boundary wall with no. 126 and therefore would not impact neighbouring daylight, outlook or privacy. The removal of the top storey of the closet wing extension would be likely to improve levels of daylight to neighbouring rear windows.
 - n. Development Policy DP18 (Paragraphs 18.12 and 18.13) requires development to provide cycle parking facilities in accordance with the minimum requirements of our cycle parking standards and in accordance with the minimum requirements of the London Plan. The London Plan cycle parking standards requires 1 cycle parking space for 1 bedroom units and 2 parking spaces for all other units. The development would therefore require 4 parking spaces to be provided. Cycle parking provision should be provided with convenient access to street level and must be secure and easy for everyone to use (see CPG7 which sets out Camden’s cycle parking standards).
 - o. This proposal will be liable for the Mayor of London’s Community Infrastructure Levy (CIL) as the proposal involves the creation of a new unit of residential accommodation.
 - p. Advice provided on the scope of any subsequent planning and listed building applications submitted to cover the proposed works.
9. The proposals have been amended to reflect the pre-application advice and in summary now comprise the formal conversion of the property into two self-contained residential flats and the internal alterations that are required to facilitate this. The full extent of these is described in the following Section and no external works are proposed.

C. PROPOSED DEVELOPMENT

10. The proposed development comprises the conversion of the property into 2 self-contained flats and minor internal alterations. These minor internal alterations comprise:

Top Floor:

- Dry lining and skimming of external walls (internal works only).
- Installation of secondary glazing on all existing windows.
- Installation of Ensuite bathroom and associated plumbing – This requires new studwork (shown in light red on the planning drawings).
- Insulation of the loft.
- Re-skimming of all the ceilings.
- Moving of the door to the bedroom.
- Removal of all floorboards to allow the installation of UFH with insulation between the joists - original floorboards to be re-instated.

First Floor:

- Dry lining and skimming of external walls (internal works only).
- Installation of secondary glazing on all existing windows.
- Installation of new kitchen and associated plumbing.
- Removal of all floorboards to allow the installation of UFH with insulation between the joists - original floorboards to be re-instated.
- Alteration of the doors between the front and back rooms.
- New lighting + electrics.

Ground Floor:

- Construction of new studwork (shown in light red on the planning drawings) to create 1 hour fire separation between the lobby and the lower unit.
- Installation of a fire rated doors at the bottom of the stairs to both the ground level unit and the upper level unit.
- Upgrading of the floor between the ground level and first floor to provide 1 hour fire separation between the 2 units.

Basement:

- No works to basement level.

11. In addition, secondary glazing is proposed only for windows where there are no pre-existing shutters and two pocket doors in room 3.01 - Living room are proposed.

D. PLANNING CONSIDERATIONS

12. The pre-application response confirmed that the development plan context was provided by the London Plan (2016) and the Camden Core Strategy and Development Policies DPD. It was noted that the Camden Local Plan was nearing adoption following examination and therefore may supersede the Core Strategy and Development Policies DPD during the early part of 2017.

13. In assessing the proposed development, the following matters require to be considered:

- a. Principle of conversion
- b. Heritage
- c. Residential Standards
- d. Impact on Residential Amenity.

14. The pre-application consultation established that the principle of the subdivision of the property and the creation of a new 2-bedroom flat was policy compliant and would be welcomed by the Council in terms of land use. This remains part of the development proposal.

15. The heritage considerations have been assessed in the Heritage Impact Assessment (HIA) submitted in support of the planning and listed building applications. In terms of the conservation area the HIA concludes that 'There are no external changes to the front or rear elevations as part of the proposals and so the character and appearance of the Jeffrey Street Conservation Area would remain unaltered'.
16. In terms of the listed building the HIA concludes that:
 - 7.5 There is no coherent surviving early 19th century interior scheme of notable historic interest within the dwelling and the individual fixtures of special note are principally confined to the staircase; cornices, window shutters and the first floor front room fireplace.
 - 7.6 The basement and second floors and the rear extensions are of low or no significance and devoid of historic features of special interest. There are no proposals for the basement other than the removal of the kitchen fittings while on the second floor the works are minor in nature and it is considered that their cumulative impact in this area would cause less than significant harm.
 - 7.7 The proposed internal alterations on the first floor affect areas of medium significance but the works are relatively minor and do not impact to any significant degree on the room layouts or the specific individual fixtures of note. It is therefore considered that the cumulative impact would also cause less than significant harm.
 - 7.8 The proposals for the works to the ground floor also affect areas of medium significance. It is considered that the reinstatement of the wall between the hall and front room would benefit the significance in terms of the building's original room layout but that the works to separate the two flats at the foot of the stair would affect the significance in that specific area but would be capable of being straightforwardly reversed at a later date'.
17. In terms of heritage impacts the proposals are therefore promoted as being policy compliant.
18. The proposed residential flats are each 2-bed and comply with the minimum residential space standards included in the National Described Space Standards, London Plan SPG and the Camden Supplementary Planning Guidance. Individual room sizes are fully compliant with the spaces required for their functions. The lower ground floor flat has access to the rear garden and a front amenity area which is compliant with the London Plan Space Standards.
19. Both flats are dual aspect and cycle parking provision can be provided to meet the policy requirements. The proposed flats therefore meet the requisite residential space standards.
20. Since the proposals do not alter the existing built envelope there will be no impact on adjoining residential amenity.

E. DESIGN & ACCESS STATEMENT

21. This section of the statement comprises the Design & Access Statement (DAS) and has been prepared in accordance with Section 9 (2), Part 3 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 which states that:

'An application for planning permission to which this paragraph applies must, except where paragraph (4) applies, be accompanied by a statement ("a design and access statement") about –

(a) the design principles and concepts that have been applied to the development; and

22. (b) how issues relating to access to the development have been dealt with.

23. Section 9 (3) confirms that a design and access statement must –

(a) explain the design principles and concepts that have been applied to the development;

(b) demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;

(c) explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account;

(d) state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation; and

(e) explain how any specific issues which might affect access to the development have been addressed.'

24. The preparation of the DAS has also been informed by 'Design and Access Statements: How to write, read and use them' which was published in 2006 by the Commission for Architecture and the Built Environment.

25. The design principles that have been pursued in formulating the development proposals are based on the pre-application feedback; regularisation of the existing sub-division of the property and minimising the impacts on the significance of the heritage assets comprising the listed building and conservation area.

26. The development proposals have been formulated based on a thorough understanding of the historical significance of the property and measured survey. The pre-application feedback has been instructive in the adaptation of the development proposals for this submission.

27. Access considerations have been taken into account, but are tailored to meet the heritage objectives of minimal internal interventions. Initial development proposals were subject to a pre-application consultation and the current proposals have been informed by the feedback obtained.

F. SUMMARY & CONCLUSION

28. In summary, the statement has been prepared in support of a development proposal to formally create an additional dwelling and carry out minor internal alterations to facilitate this at the subject property which is a listed building and located in a conservation area.

29. The proposals have been formulated following the commissioning of a heritage impact assessment and a pre-application consultation with the Council. The pre-application development proposals have been amended because of the feedback obtained, but the proposal to create an additional dwelling remains part of the proposed development since this was considered acceptable in principle.
30. The proposals are therefore presented on the basis that they are acceptable in policy terms; they will have no impact on neighbouring residential amenity and are acceptable in heritage terms. They are compliant with residential space standards.
31. In conclusion, the proposals meet the statutory requirement¹ for development plan compliance and the additional statutory tests imposed because of the listed building status and conservation area location which are derived from sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

10 March 2017
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¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.