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Mr Michael Hickey

Re: Bedford House, 17 New North Street, London, WC1N 3PJ

Change of use of lower ground floor and ground floor levels from restaurant (Class A3) to residential use (Class C3) to provide 1 x 2 bed and 1 x 3 bed residential flats, and associated external works including the opening up of front lightwells with railings, alterations to the shopfronts and alterations to rear lower ground floor extension and rear windows.

This letter sets out the Council's formal response to the pre-application scheme at the above site submitted on the 19/06/2017 and revised on the 26/10/2017.

Submitted Plans and Documents:

- Design & Access Statement - *superseded*
- P-Si-D-006 Location Plan
- P-00-D-003 Existing Basement and Ground Floor Plan
- E-S-D-004 Existing Front Elevation
- E-N-D-005 Existing Rear Elevation
- P-Si-D-007 Proposed Site Plan - *superseded*
- P-B1-00-D-008 Proposed Basement and Ground Floor Plan - *superseded*
- E-S-D-009 Proposed Front Elevation - *superseded*
- E-N-D-010 Proposed Rear Elevation
- X-AA-D-011 Proposed Section AA - *superseded*
- X-BB-D-012 Proposed Section BB
- X-CC-D-013 Proposed Section CC - *superseded*
- X-DD-D-014 Proposed Section DD - *superseded*

Revised Plans:

- P-Si-D-007 Proposed Site Plan Rev A
- P-B1-00-D-008 Proposed Basement and Ground Floor Plan Rev A
- E-S-D-009 Proposed Front Elevation Rev A – *superseded*
- E-S-D-009 Proposed Front Elevation Rev B
- Front View CGI lightwell railings

- X-AA-D-011 Proposed Section AA Rev A
- X-CC-D-013 Proposed Section CC Rev A
- X-DD-D-014 Proposed Section DD Rev A

1. Proposal

- 1.1 The pre-application scheme proposes the change of use of the lower ground floor and ground floor levels of the building from a restaurant (Class A3) to residential use (Class C3) to provide 1 x 2 bed and 1 x 3 bed residential flats. The scheme also proposes external works including the opening up of the front lightwells with metal railings and alterations to the shopfronts. At the rear, the scheme proposes some minor alterations to the lower ground floor extension and rear windows and the removal of a redundant extract duct.
- 1.2 The pre-application scheme was amended in accordance with advice from the Council's Conservation & Design Officer, which included revisions to the design of the shopfront and front lightwells.

2. Site description

- 2.1 The pre-application site is located at the northern end of New North Street at the junction with the pedestrianised Boswell Court. New North Street is located off Theobald's Road within the Central London Area. Theobald's Road is a main road linking Clerkenwell with Bloomsbury and is characterised by a mixture of office uses, small-scale retail and cafes at ground floor level and some residential use. However, New North Street is a quieter cul-de-sac mainly characterised by large blocks of residential flats. The site is located within the Bloomsbury Conservation Area.
- 2.2 The site contains a 4-storey building plus basement level which has a vacant double fronted restaurant unit at ground floor and basement levels. The basement level includes access to the area below the existing covered lightwell and pavement vaults. The upper floor levels are in use as residential flats known as Bedford House and are accessed from a front door at ground floor level. The adjacent unit at no. 16 New North Street, has been converted from a restaurant to a residential flat at ground floor and basement levels with external alterations including the opening up of the front lightwell, installation of railings and steps and a replacement part obscure glazed frontage (ref: 2009/3694/P dated 18/02/2010).

3. Relevant Planning history

- 2009/3694/P - Change of use of lower ground and ground floor level from restaurant (Class A3) to two bedroom flat (Class C3) and associated external works including the opening of the front lightwell with staircase and railings and alterations to the fenestration at the rear - Granted Subject to a Section 106 Legal Agreement - 18/02/2010 (16 New North Street).

4. Relevant policies and guidance

National Planning Framework (2012)

The London Plan (2016)
The London Plan Housing SPG (2016)

Camden Local Plan (2017)

C6 Access for all
H1 Maximising housing supply
H6 Housing choice and mix
A1 Managing the impact of development
A4 Noise and vibration
A5 Basements
D1 Design
D2 Heritage
D3 Shopfronts
CC1 Climate change mitigation
CC2 Adapting to climate change
CC3 Water and flooding
CC5 Waste
TC2 Camden's centres and other shopping areas
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development
T3 Transport infrastructure
T4 Sustainable movement of goods and materials

Camden Planning Guidance

CPG1 Design (2015)
CPG2 Housing (2016)
CPG4 Basements and Lightwells (2015)
CPG6 Amenity (2011)
CPG7 Transport (2011)
CPG8 Planning obligations (2015)

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

5 Assessment

Principle of Development

- 5.1 The site is not located within a designated shopping frontage and is not in an area where you would generally find food drink or entertainment uses. This small frontage originally only contained three units. The application site contains two of these three units, which have been merged into one larger unit. The other unit on the frontage at no. 16 has already been converted to residential use following permission granted in 2010. The application site is located within the Central London Area; however, the character of the immediate area is predominantly residential. The site is located in a cul de sac at the end of New North Street and it is unlikely that the commercial units gain much passing trade in this location.

- 5.2 The Council has no policy that specifically seeks to protect A3 restaurant uses outside designated frontages or town/neighbourhood centres. Policy TC2 (Camden's centres and other shopping areas) is designed to protect town centres uses in designated frontages/centres and policy TC3 (Shops outside of centres) seeks to protect A1 retail units outside designated centres. The application site is not located in a designated frontage and does not contain a retail unit and therefore the scheme would not conflict with these policies. The site contains a vacant restaurant, which is the last remaining commercial unit on this small non-designated frontage. The other commercial unit on this small parade at no. 16 was converted to residential following permission granted in 2010. The site is also not considered to be the most suitable location for a restaurant given the proximity of the adjoining residential accommodation and at its location on the no-through road. In addition a range of A3 cafés and restaurants are available on the busier main roads within walking distance of the application site.
- 5.3 It is therefore considered that the principle of the change of use of the existing vacant restaurant to residential use would be supported
- 5.4 Policy H1 (Maximising housing supply) welcomes the creation of additional residential accommodation within the borough, provided that it meets acceptable standards. As there is existing residential on the upper floors and most of the surrounding buildings are in residential use, the location is considered to be suitable for such development.

Design Issues

- 5.5 Camden Local Plan Policy D1 (Design) states that the Council will seek high quality design which respects local context and character. Policy D2 (Heritage) states the Council will require that development within conservation areas preserves or, where possible, enhances the character and appearance of the area.
- 5.6 The Bloomsbury Conservation Area Appraisal and Management Plan states that inappropriate and poorly designed shopfronts can detract from the character and appearance of the Conservation Area. The Council expects the quality and design of new shopfronts to respond sensitively to their historic setting and, importantly, the building frontage as a whole. The Conservation Area Appraisal states that railings and basements along the majority of frontages are an important facet of the character of the area. Where the introduction of shops has resulted in the infilling of basements and the streetscape is characterised by the pavement extending to the building, the excavation of the basement would not normally be acceptable.
- 5.7 The pre-application scheme originally proposed two full width lightwells with stairs and a new contemporary shopfront which was proposed to be set-back at ground floor and basement levels. It was considered that these alterations would have failed to harmonise with the subject building and would have harmed the character and appearance of the parade and conservation area. Following advice from the Council's Conservation and Design Officer, revised plans were submitted which proposed two part-width lightwells and a new traditional shopfront with access doors and the removal of the previously proposed set-back. The originally

submitted design was not supported by the Council, therefore the following design comments are based on the revised plans.

- 5.8 The pre-application development proposes the installation of two part width lightwells at the front. This would involve the removal of the existing pavement lights to open up the existing basement level below and would not involve the excavation of a new basement level at the front of the site. The Bloomsbury Conservation Area Appraisal normally seeks to retain the pavement in front of shops where the lightwell has been previously infilled. The principle behind this is that basement lightwells and railings are a traditional feature in front of residential buildings, but not typically at commercial buildings. However, it is acknowledged that the proposed opening up of the lightwells would be associated with the change of use of the building to residential flats. In addition, the revised design proposes two modest part-width lightwells and sections of the pavement lights would be retained to provide access doors into each unit. The revised design is considered to propose the addition of two sensitively designed lightwells which would harmonise with the character and appearance of the frontage and conservation area. The proposed railings would need to be painted metal railings and all external doors would need to open inwards to avoid impacting on pedestrians. Overall, the proposed lightwell alterations would be supported.
- 5.9 The pre-application development proposes the installation of a replacement shopfront. The revised plans show that this would have a traditional design including a timber stall riser, timber mullions and transom bar. The existing pilasters, console brackets, fascia would also all be retained. The proposed windows between the stall riser and transom bar would be obscure glazed and fixed shut to provide privacy and the windows above the transom bar would be clear glazed to provide daylight. The revised plans also show the removal of the previously proposed set-back shopfront at ground and basement levels. The shopfronts would also contain new timber doors at either end of the replacement frontage to provide access to the proposed residential flats.
- 5.10 Retail to residential conversion schemes need to retain any important historic features of the frontage and the general character of the shopping parade, whilst providing privacy for future residents. The proposed alterations to the shopfront shown on the amended plans are considered to successfully balance these requirements. The replacement shopfront would have a high quality traditional design and the historic character of this small shopping parade would be maintained in accordance with the Council's CPG1 Shopfront Design Guidance. It is noted that the proposals would not exactly match the design of the adjacent shop conversion scheme at 16 New North Street. However, this would not compromise the character of the parade and it is considered that some variation in the design of the parade would add to the character of the streetscene. Overall, the proposed shopfront alterations would be supported. Full details of the proposed shopfront design including elevation and section plans, details of materials and a basement elevation would be required with the planning application.
- 5.11 The proposed alterations to the rear include the reduction in the width of the basement level rear extension, the installation of a new rear windows and doors at basement and ground floor levels, the provision of terraces on the roof of the

basement extensions and the removal of the existing redundant extract duct. All of these alterations are considered to be relatively minor and would be screened by the high rear boundary wall. These alterations would all be supported. The design and materials to be used should match the existing building.

Residential Standards

- 5.12 The required residential standards for new housing are set out in Local Plan Policy H6 (Housing choice and mix), Camden Planning Guidance (CPG) 2 (Housing) and the London Housing SPG.
- 5.13 The proposal is to create 1 x 2 bed and 1 x 3 bed residential duplex flats at ground and basement levels. The main living space and accessible toilets would be located at ground floor level with bedrooms and bathrooms located at basement level.
- 5.14 The proposed 2 bed 4 person flat would have an internal floor area of approximately 80 sq. m, which would meet the National Minimum Space Standard of 79 sq. m. The proposed 3 bed 6 person flat would have an internal floor area of 102 sq. m, which would meet the National Minimum Space Standard of 102 sq. m. The internal layout would be adequate in other respects including bedroom sizes and circulation space.
- 5.15 In accordance with CPG 2, all windows to habitable rooms including basements, must have an area equivalent to at least 1/10 of the floor area of the room and openable sections equivalent to 1/20 of the floor area of the room to provide light and natural ventilation. The proposed development would comply with these requirements.
- 5.16 In order to provide adequate daylight to basement rooms, CPG 2 also advises that at least 10% of the area of the basement windows should have a 30° outlook angle over any obstructions (see CPG 2 figure 9). The proposed development would appear to comply with this requirement. However, if this can not be achieved a daylight and sunlight assessment would be required with the application which demonstrates that the basement rooms would have adequate daylight (calculated as Average Daylight Factor (ADF) levels in accordance with the Building Research Establishment (BRE) Daylight and Sunlight Guidance 2011).
- 5.17 CPG 2 also requires the internal layouts of residential flats to be designed to reduce the problem of noise disturbance between adjoining properties by using 'vertical stacking' (i.e. placing living room above living room and bedrooms above bedrooms etc.). The existing room layout of the first floor residential accommodation above is not known. However, if this can not be achieved, details of floor/ceiling insulation would need to be submitted, which demonstrates that adequate noise mitigation would be provided between the proposed ground floor and existing flats above.
- 5.18 In accordance with CPG2 and the London Housing SPG, all new flats should provide access to some form of private outdoor amenity space. The London Plan Housing SPG requires a minimum of 5 sq. m of private outdoor space to be

provided for 1-2 person dwellings and an extra 1 sq. m to be provided for each additional occupant. The 3 bed flat would be provided with an external amenity area measuring approximately 17 sq. m and the 2 bed flat would be provided with an external amenity area measuring approximately 12 sq .m in compliance with this requirement.

- 5.19 The Local Plan Policy H6 requires new dwellings to be accessible and adaptable. The development would provide level access and an accessible toilet at basement level in accordance with CPG2 requirements.
- 5.20 The Local Plan Policy CC5 (Waste) requires new development to include facilities for the storage and collection of waste and recycling. The Council's detailed requirements are set out in Camden Planning Guidance 1 (Design) Section 10 - Recycling and Waste Storage. It is acknowledged that the proposed ground floor layout indicates adequate space at the rear to provide refuse storage. Therefore details of refuse storage and management arrangements in compliance with CPG 1 requirements should be submitted with the planning application. This will need to include details of how waste vehicles/staff will access the site.

Amenity Impact

- 5.21 Local Plan Policy A1 and Camden CPG1 Design seeks to ensure that the amenity of neighbours is protected including visual privacy, outlook, sunlight, daylight and overshadowing.
- 5.22 The proposed change of use/conversion to residential flats, new lightwells and replacement shopfronts and minor alterations to the rear would not result in an amenity impact on neighbouring properties. However, the application should include measures to prevent any overlooking of neighbouring properties from the rear amenity terrace areas, such as terrace screening where required.

Transport/ Construction Issues

- 5.23 Camden Local Plan Policy T1 (Prioritising walking, cycling and public transport) states that in order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within Camden Planning Guidance 7 (Transport). The development would require 2 secured and covered cycle parking spaces per flat in compliance with the design requirements in CPG7.
- 5.24 Camden Local Plan Policy T2 (Parking and car-free development) states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The Council will not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits. The proposed residential flats which would therefore need to be secured as car free units by s.106 legal agreement.

- 5.25 Local Plan Policy A1 (Managing the impact of development) states that the Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. The factors we will consider include the impacts of the construction phase, including the use of Construction Management Plans (CMPs). The sub-text to Policy A1 notes that disturbance from development can occur during the construction phase and measures to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan (CMP). The reasons why a CMP may be required to be provided include developments with poor or limited access; developments that are accessed via narrow residential streets; developments in areas with a high number of existing active construction sites; and, developments that could cause significant disturbance due to their location.
- 5.26 The Council considers that the site is located in a constrained location in the pedestrianised northern end of New North Street close to the junction with Boswell Court. This pedestrianised route should not be blocked off during construction. The construction vehicles accessing the site would also need to do so via Theobald's Road, which is a busy main road linking Clerkenwell with Bloomsbury. The Council therefore needs to secure a construction management plan on this application as a section 106 planning obligation, to ensure that the impacts of the development, both internal and external to the site are adequately mitigated and managed. The construction management plan would have to be completed using the Council's pro-forma document. The following page on the Council's website contains the pro-forma document and details of the associated implementation support financial contribution to cover the cost of reviewing the CMP:
<https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/construction-management-plans.en>.
- 5.27 The policy basis for seeking to secure a highways contribution is detailed in Local Plan Policy A1 (Managing the impact of development) and Camden Planning Guidance document CPG8 (Planning Obligations). Local Plan Policy A1 states that development-requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. The proposed development, particularly the opening up of the lightwells and the replacement shopfronts, would be likely to result in some damage to the public highway directly adjacent to the site. A highways contribution therefore needs to be secured to allow the Council to repair any such damage following completion of the development (this contribution would be calculated at the application stage). A request refund can be made if it can be demonstrated that highway works are not actually required.

Sustainability

- 5.28 Local Plan Policy CC1 (Climate change mitigation) states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. We will promote zero carbon development and require all development to reduce carbon dioxide emissions

through following the steps in the energy hierarchy; support and encourage sensitive energy efficiency improvements to existing buildings and expect all developments to optimise resource efficiency. The Council will also expect all developments, whether for refurbishment or redevelopment, to optimise resource efficiency by: reducing waste; reducing energy and water use during construction; minimising materials required; using materials with low embodied carbon content; and enabling low energy and water demands once the building is in use.

- 5.29 Local Plan Policy CC2 (Adapting to climate change) states Council will require development to be resilient to climate change. All development should adopt appropriate climate change adaptation measures such as: the protection of existing green spaces and promoting new appropriate green infrastructure; not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems; incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and measures to reduce the impact of urban overheating.
- 5.30 The proposed extension would be below 500 sq. m and therefore the requirement to demonstrate a 19% CO₂ reduction below Part L 2013 Building Regulations and a 20% CO₂ reduction from on-site renewable energy generation does not apply to this development (This applies to development of 5 dwellings or more). However, the planning application would need to ensure that adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation as set out above. Camden Planning Guidance 3 (Sustainability) states that as a guide, at least 10% of the project cost should be spent on environmental improvements.

6 Conclusion

- 6.1 Overall, the principle of the change of use of the existing vacant restaurant to residential use would be supported.
- 6.2 The proposed replacement traditional shopfront and lightwells would harmonise with the character and appearance of the streetscene and conservation area and would be supported. The alterations to the rear would be minor in nature and would also be supported.
- 6.3 The proposed residential flats would provide good quality accommodation with adequate internal living space, circulation space, external amenity space, accessibility and outlook/daylight. The development would also not result in an amenity impact on neighbouring properties.
- 6.4 The development would be secured as a car free development by s.106 legal agreement. A construction management plan and highways contribution would also be secured by s.106 agreement to manage the highway and amenity impacts of the construction process and repair any damage to the highway. The development should also provide two secured and covered cycle parking spaces for each residential unit.

7 Planning application information

7.1 The following information would be required for a valid planning application:

- Completed application form.
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.
- Existing and proposed plan drawings at a scale of 1:50/1:100.
- Existing and proposed elevation drawings at a scale of 1:50/1:100.
Existing and proposed section drawings at a scale of 1:50/1:100.
- The application fee (£770).
- A design and access statement.
- A daylight and sunlight assessment (if required see paragraph 5.16).
- A construction management plan (using the Council's pro-forma).
- Please see [supporting information for planning applications](#) for more information.

7.2 We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by site notice on or near the site and would advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

7.3 It is likely that this type of application would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel. For more details click [here](#).

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.

If you have any queries about the above letter or the attached document please do not hesitate to contact Robert Lester on 020 7974 2188 and Robert.Lester@Camden.gov.uk

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

Yours sincerely,

Robert Lester
Planning Officer
Planning Solutions Team