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Date: 21/12/2016
Our ref: 2016/6067/PRE
Contact: Laura Hazelton
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Alan Gunne-Jones
120 Pall Mall,
London,
SW1Y 5EA

By email

Dear Mr Gunne-Jones,

Re: 124 St Pancras Way, London, NW1 9NB

Thank you for submitting a pre-planning application enquiry for the above property which was received on 07/11/2016 together with the required fee of £3,600.00.

1. Drawings and documents

Pre-application submission document dated November 2016, and revised drawings received 13/12/2016.

2. Proposal

Conversion of single dwelling house into 1 x 3 bed unit and 1 x 2 bed unit, erection of infill extension and other internal and external alterations.

3. Site description

The application site comprises a 3 storey plus basement mid-terrace building, located on the north eastern side of St Pancras Way. The property is Grade II listed, along with the rest of the terrace within which it sits (nos. 108 – 132). The surrounding buildings are predominantly residential, with some retail and office use.

The application site is located within the Jeffrey's Street Conservation Area.

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.

Similarly, the building features a 1970s 3 storey brick extension to the rear which steps up and back towards to the roof – each level with flat roofs and plastic windows facing in towards the garden. The extension was constructed prior to the building being listed.

4. Relevant planning history

There are no planning or enforcement records for the application site.

History of wider terrace

No.108

2013/1570/P - Erection of two storey rear extension and excavation to create a rear basement level extension, and associated external alterations to shopfront and fenestration of dwelling house (Class C3) granted 03/09/2013

2010/0203/P - Change of use of ground floor from retail (Class A1) to residential (Class C3), erection of a two-storey rear extension and external alterations including a replacement side boundary wall, all in connection with the use of the whole building as a single family dwellinghouse granted 17/02/2010

No.110

PE9800756R2 - Demolition of shopfront, pavement over area, rear shed and reinstatement of area railings and ground store of front elevation and shopfront and internal alterations granted 18/03/1999

No.112

H12/9/5/33190/R - The erection of a roof extension together with alterations to the front elevation including the formation of a new basement access granted 25/01/1982

No.114

PE9900144 & LE9900145 - Demolition of existing lean-to rear extension and erection of single storey timber framed conservatory to rear granted 01/07/1999.

No.116

2013/1280/P & 2013/1831/L - Erection of a single storey rear extension at basement floor level to existing dwellinghouse (Class C3) granted 23/05/2013.

No.126

H12/9/4/18329 - Erection of a third floor extension to provide a studio/bedroom granted 06/05/1974.

No.130

2005/5555/P & 2005/5556/L - Erection of a rear extension at basement and ground floor levels of dwellinghouse (Class C3) granted 03/04/2006.

5. Relevant policies and guidance

[National Planning Policy Framework 2012](#)

[The London Plan March 2016](#)

[LDF Core Strategy](#)

CS5 (Managing the impact of growth and development)

CS6 (Providing quality homes)

CS11 (Promoting sustainable and efficient travel)

CS14 (Promoting high quality places and conserving our heritage)
 CS19 (Delivery and monitoring)

LDF Development Policies

DP2 (Making full use of Camden's capacity for housing)
 DP5 (Homes of different sizes)
 DP16 (Promoting sustainable and efficient travel)
 DP17 (Walking, cycling and public transport)
 DP18 (Parking standards and limiting the availability of car parking)
 DP19 (Managing the impact of parking)
 DP24 (Securing high quality design)
 DP25 (Conserving Camden's heritage)
 DP26 (Managing the impact of development on occupiers and neighbours)

Camden Planning Guidance 2011/2015

CPG1 (Design) 2015
 CPG2 (Housing) 2016
 CPG6 (Amenity) 2011
 CPG7 (Transport) 2011
 CPG8 (Planning Obligations) 2015

Jeffrey's Street Conservation Area Statement 2002

Emerging policy:

It should be noted that the Camden Local Plan will replace the Core Strategy and Development Policies in early 2017. The submission draft has now been approved by Cabinet and Full Council after a period of public consultation. The Local Plan and associated documents were formally submitted to the Secretary of State for public examination along with copies of all representations received on 24 June 2016. In accordance with Section 20 of the Planning & Compulsory Purchase Act 2004, Inspector Katie Child was appointed to conduct an examination to determine whether the Plan is sound. The public hearings for the Examination were held at the Camden Town Hall during October 2016.

The submission draft is a material consideration in planning decisions. At this stage the Plan has weight in decision making and is a statement of the Council's emerging thinking. Emerging policy is therefore a relevant consideration to this pre-app advice. A copy of the draft Local Plan can be found on our website [here](#).

The following policies would be relevant in the determination of a future application:

Policy G1 (Delivery and location of growth)
 Policy H1 (Maximising housing supply)
 Policy H3 (Protecting existing homes)
 Policy H7 (Large and small homes)
 Policy A1 (Managing the impact of development)
 Policy A5 (Basements and lightwells)
 Policy D1 (Design)
 Policy D2 (Heritage)

6. Assessment

The proposals include the conversion of the existing single dwelling house to 2 flats (1 x 3 bed and 1 x 2 bed), erection of lower ground floor extension and associated alterations.

Alterations include:

Basement

- Reconfigure kitchen and bathroom
- Removal of dividing room between front and rear rooms to create double doors
- Block up doorway from hall to front room and entrance door from front lightwell
- Remove door opening from front room in to existing entrance from lightwell
- Removal of rear external wall bar a small section near to stairs
- Extension to incorporate two existing extensions and infill in between and beyond in to garden; rear glazed walls; including glazing in existing extension raising to upper basement level and part section of roof; infill extension to have large glazed rooflight
- Dig back garden to create new area accessible from rear extension
- Provide a WC adjacent stairs

Ground:

- Provide two doors in widened hall (incorporating stairs in to upper unit) and additional hall between front and rear rooms
- Insertion of WC between front and rear rooms, wall abutting chimney breast

First:

- Retention of rear extension but convert to cloak and WC and provision of a rooflight (removal of door from landing); alteration to location and size of window opening (no elevation provided)
- Removal of double opening doors between front and rear rooms
- Blocking up doorway off hallway in to rear room

Second:

- Removal of rear extension; insertion of thin sash window
- Introduction of ensuite between front and rear room – between and abutting chimney breasts
- Small infill extension with window to the existing stairwell at the rear of the lower ground floor.

The key planning issues are as follows:

- Principle of conversion of single dwellinghouse into two self-contained flats;
- Design (impact on special character of host listed building and wider Jeffrey's Street Conservation Area);
- Basement development;
- Standard of residential accommodation;
- Impact on neighbouring Amenity;
- Transport;

- S106 and CIL matters

7. Principle of conversion of single dwellinghouse into two self-contained flats;

Although the property has been converted into two residential flats already, this appears to have been completed relatively recently without planning permission or Listed Building Consent. The fact that the building has already been converted into two flats therefore would not be a consideration in the determination of a future application, and the principle of the conversion would need to be considered.

Housing is regarded as the priority land-use of the Local Development Framework, and the Council will make housing its top priority when considering the future of unused and underused land and buildings. As such the creation of a new residential unit is compliant with policies CS6 and DP2 as long as it meets the Council's residential development standards and does not harm local amenity.

Policy DP5 seeks to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table. The table identifies 2-bedroom market homes as being very high priority and 3-bedroom units as medium priority. The policy also aims for 40% of market homes to contain two bedrooms. 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.

8. Design (impact on special character of host listed building and wider Jeffrey's St Conservation Area)

The Camden Core Strategy 2010-2025 sets out the key elements of the Council's planning vision and strategy for the borough and Camden Development Policies contribute to implementing the Core Strategy by setting out detailed planning policies that the Council will use when determining planning applications. The Camden Planning Guidance (CPG) Supplementary Planning Documents support the policies in the LDF by giving detailed guidance on the implementation of the policies. Policies CS14 and DP24 seek to ensure that all development is of the highest quality and design and exhibits consideration of the character, setting, context and form of neighbouring buildings. Furthermore, Policy DP25 seeks to preserve and enhance the character and appearance of Conservation Areas.

Lower ground floor infill extension

The proposal includes the demolition of the existing lean to extension at lower ground floor level measuring 2.6m deep and 1.7m wide and the erection of a new full width infill extension extending to the same depth as the existing closet wing extension. This would involve the demolition of the rear wall at lower ground floor level.

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).

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.

Removal of top storey of closet wing extension

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.

Internal works

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.)

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.

9. Basement development

Aside from the concerns regarding impact to the listed building highlighted above, 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.

You are therefore advised to submit a comprehensive and accurate Basement Impact Assessment demonstrating no significant harm to the application site, neighbouring sites or those surrounding.

The BIA will include the following stages:

- Stage 1 - Screening;
- Stage 2 - Scoping;
- Stage 3 - Site investigation and study;
- Stage 4 - Impact assessment; and
- Stage 5 - Review and decision making.

Further detail on BIAs can be found in Camden Planning Guidance 2013 (CPG4 - Basements). At each stage in the process the person(s) undertaking the BIA process should hold qualifications relevant to the matters being considered. The Council will only accept the qualifications set out in paragraph 2.11 of CPG4.

Independent verification of Basement Impact Assessments, funded by the applicant, is now also required (since CPG4 was updated in September 2013) in the following situations:

- Where a scheme requires applicants to proceed beyond the Screening stage of the Basement Impact Assessment (i.e. where a matter of concern has been identified which requires the preparation of a full Basement Impact Assessment);
- Where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow; or
- For any other basement applications where the Council feels that independent verification would be appropriate (e.g. where conflicting evidence is provided in response to a proposal).

A full scoping study is required as part of any application, identifying the potential impacts for each of the matters of concern.

Please note that the Council's preferred provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charge a fixed fee dependant on the category of basement audit, outlined in appendix A of Camden's BIA audit service terms of reference.

10. Standard of residential accommodation

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.

Flat 1 would provide a 3 bedroom, 4 person unit spread over ground/lower ground floor level. It would include 1 x double bedroom and 2 x single bedrooms with 1 x ensuite, 1 x bathroom, 2 x WCs, and outside amenity space.

Flat 2 would be a 2 bedroom, 3 person unit on first and second floor with 1 x double bedroom and 1 x single bedroom.

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.

11. Impact on neighbouring Amenity

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.

12. Transport

Cycle storage

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).

Car-free housing

The site has a Public Transport Accessibility Level (PTAL) of 6a (excellent). The nearest stations are Camden Road overground station located to the south east of the site, and Camden Town to the south west. 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.

13. CIL

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. This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

14. Conclusion

As discussed above, we have serious concerns with the scheme at present and the cumulative impacts which would result in harm to the listed building. Any proposal should bring significant benefits to such a building and the creation of two units is not a sound justification. It is not seen here that the benefits of removing the top section of the existing rear extension is a sufficient benefit to outweigh the harm from the other proposals.

It was requested at the site visit that drawings were prepared to highlight the loss or impact upon the historic fabric; this has not been completed. Nor is there an elevation drawing showing the side of the extension to appreciate changes to the fenestration. Potential landscaping or balustrading to the rear lightwell would also require submission of additional details for assessment. It is therefore recommended that a follow up pre-application enquiry is submitted prior to the submission of a full planning and listed building consent application.

15. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – full planning and listed building consent
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Demolition drawings detailing loss of historic fabric
- Landscaping details
- Design and access statement
- Heritage statement
- Sample photographs/manufacturer details of proposed materials
- Basement impact assessment and management plan
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

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

It is likely that that a proposal of this size 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 should it be recommended for approval by officers. 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 Laura Hazelton on the number above.

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

Yours sincerely,

Laura Hazelton

Planning Officer
Planning Solutions Team