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Planning Solutions Team
Planning and Regeneration
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 London Borough of Camden
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Dear Mr Zarzour

Re: 3 Goodge Place, London, W1T 4SB

www.camden.gov.uk/planning

Thank you for submitting a pre-planning application enquiry for the above property which was received on 14th November 2017 together with payment of £3,654. I write following our meeting on site on 1st February 2018.

Proposed Plans:

- Location Plan (unnumbered)
- G00/2017/01 – Existing floor plans and elevations
- G00/2017/01 – Proposed ground floor plan
- G00/2017/02 – Proposed first to fourth floor plan
- G00/2017/03 – Proposed front elevation
- Pre-application advice statement (iBUILDiT dated 01.11.2017)
- Site photos 1, 2 and 3

1. Proposal

The proposal includes:

- Demolition of existing two storey (plus basement) commercial building (B1/B8 use) with replacement 5 storey (plus basement) mixed use building. The basement and ground floor are proposed for commercial use (no use class specified) with the four floors above for 4 x 1 bed flats.

2. Site description

The site is a two storey (plus basement) building sited on the eastern side of Goodge Place (off Goodge Street). The building is currently vacant and appears to have been so for a significant period of time- the applicant estimates this has been the case for 20-30 years. The surrounding buildings are larger in scale, being typically four storeys, and are largely residential in nature.

The property is within the Charlotte Street Conservation Area, with the street noted as having one of the most consistent Georgian characters in the Conservation Area Appraisal and Management Plan. The street has a number of listed buildings and positive contributors. Whilst the application site is not noted as a 'detractor' within the Conservation Area Appraisal and Management Plan, officers consider it to detract from the character and appearance of the conservation area in its current state.

3. Relevant planning history

None directly applicable to this application.

4. Relevant policies and guidance

National Planning Policy Framework (2012)

The London Plan March 2016

Camden Local Plan (2017)

G1 - Delivery and location of growth

H1 - Maximising housing supply

H4 - Maximising the supply of affordable housing

H6 - Housing choice and mix

A1 - Managing the impact of development

A4 - Noise and vibration

A5 - Basements

D1 - Design

D2 - Heritage

T1 - Prioritising walking, cycling and public transport

T2 - Parking and car-free development

CC1 - Climate change mitigation

CC2 - Adapting to climate change

Camden Planning Guidance 2011/2015

CPG1 - Design

CPG2 - Housing

CPG3 - Sustainability

CPG4 - Basements

CPG6 - Amenity

CPG7 - Transport

CPG8 - Planning obligations

Charlotte Street Conservation Area Appraisal and Management Plan (July 2008)

Technical Housing Standards - Nationally Described Space Standards (2015)

5. Assessment

The planning considerations relevant to the current proposal are:

- Proposed use
- Design and Heritage
- Unit mix
- Quality of accommodation
- Amenity impacts
- Transport
- Sustainability and waste
- CIL
- Affordable housing contribution

Proposed use

Policy E2 promotes the retention of commercial floorspace, particularly B1 floorspace within the Borough. In this instance, given the time the building has been vacant and lack of planning history of the site, it is difficult to determine the use class of the site, which, for the purposes of this enquiry, has been assumed to be Class B1/B8 (Business/Storage and Distribution).

Whilst the loss of the first floor B1/B8 floorspace is not strictly compliant with policy E2, it is noted that the current site has been vacant for a number of years. Archive imagery of the site dates from 2008, with the site appearing to be vacant at this time; the agent has estimated that the site has been unused for some 20-30 years. It is also acknowledged that the result of the application would be the introduction of a commercial unit to the ground floor and basement which is deemed to be a positive contribution to this area, in which there are a number of ground floor commercial units. In order to fully comply with Policy E2, marketing evidence should be submitted with any future application demonstrating that the B1/B8 use at the first floor level (which is proposed to be lost) is justifiable. Further information with regards to marketing evidence can be found at para. 7.18 of CPG5.

Whilst the proposed use of the ground and basement floor has not yet been established, as discussed during the meeting, I would anticipate a range of uses in Classes A1, A2 or B1 would be most appropriate in this location, given the surrounding ground floor uses.

With regards to the upper floors of the building, residential units are proposed which is considered to be appropriate in this area which consists primarily of residential units above ground floor level. Residential use is also encouraged in accordance with the Fitzrovia Area Action Plan. In this instance, subject to policy compliance with respect to design, quality of accommodation and amenity (discussed later within this report), the proposal is considered to be acceptable in principle in land use terms.

Design and heritage

The Council's design policies are aimed at achieving the highest standard of design in all developments. Policy D1 requires alterations to consider the character, setting, context, and the form and scale of neighbouring buildings; the quality of materials to be used; and the character and proportions of the existing area. Policy D2 additionally states that the Council will only permit development within conservation areas that preserves or enhances the character and appearance of the area.

Whilst it is not noted as a detractor within the Conservation Area Appraisal and Management Plan, the application site in its current form fails to make a positive contribution to the character, appearance or historic interest of the Charlotte Street Conservation Area. The redevelopment of the site therefore represents an opportunity to provide a high quality development improving the overall character and appearance of this section of Godge Place.

The proposal in its current form however raises some concerns in terms of its overall design and detailing which require refinement prior to the submission of a planning application.

In forming this response it is noted the plans make it difficult to review the context and do not provide a good level of detail (it is however acknowledged these are initial plans with further detail provided at application stage). We would, as a minimum, require the adjoining properties to be shown on the plans to illustrate the overall height and depth of the building within the context of the streetscape and neighbouring properties, and a section is required

to show adequate floor to ceiling height internally. During the meeting the applicant confirmed the overall building height proposed matches that at no.4 Goodge Place.

The overall height of the building is considered to be acceptable. However four floors of residential units are shown to the front, compared to three on the adjoining block. This would form an unusual appearance when viewed alongside no.4 Goodge Place which has an internal stepped arrangement, so only three floors of residential units are shown at the front of the property, compared to four when viewed from the rear. On this basis it is advised that a similar 'stepped' approach is adopted, with only three floors of residential units shown to the front.

The fenestration detail is unacceptable with UPVC windows shown; a timber sash design would be an appropriate alternative, or alternatively we could consider aluminium framed units. We would not seek a pastiche of the surrounding development, and a different style/material finish may be acceptable; however this would need to be of a high quality to suit the surrounding environment. Similarly, whilst details of materials have not been included, and I note a mix of materials within the area, I advise that a high quality finish, such as a London Stock Brick, is used in this instance.

Limited details have been provided of the ground floor retail unit's frontage, but it appears to be an unacceptable arrangement. Further detail of the shopfront would be required at application stage, and I advise a similar arrangement to the surrounding properties with painted timber fascia board, pilaster and upriser details. Separate advertisement consent would be required for any signage.

Whilst the resultant development includes a basement, as this is existing and would be unchanged as a result of the proposal, no Basement Impact Assessment would be required in this instance.

Unit mix

Policy H6 requires a good mix of residential units, stressing the importance of 2 beds and larger units which are required within the Borough. The proposed 4 x 1 bed units are deemed to be unacceptable in principle. 2 bed units and larger are encouraged within the Borough, and whilst it is noted that the footprint of the building would limit this, if duplexes were proposed, this could comfortably accommodate 2 x 3 bed (5 person) units. It is advised that duplex units are further explored to improve the unit mix.

Quality of accommodation

In relation to housing, part (n) of Policy D1 of the Camden Local Plan requires development to provide a high standard of accommodation. The sub-text to the policy notes that all residential developments are to be designed and built to create high quality homes.

The proposed properties in their current form would fail to accord with the Technical Housing Standards - Nationally Described Space Standard (2015) document, which specifies a minimum GIA (Gross Internal Area) of 50sq.m for a single storey 1 bed (2 bedspace) unit. It is advised that in accordance with the above 'unit mix' advice, duplex style properties are considered to overcome this issue. It should further be noted that 11.5sq.m are required for double occupancy bedrooms, and 7.5sq.m for single occupancy bedrooms, and that 75% of the GIA of the units would have a minimum internal height of 2.3m.

The units would all be dual aspect facing the north-east and south-west which would allow good access to daylight and sunlight. The flats would also allow an acceptable level of

outlook, particularly to the front, and whilst the outlook to the rear would be limited given the proximity of neighbouring properties, it is acknowledged that this is similar to the outlook received at neighbouring properties and on this basis is considered to be acceptable.

Whilst no amenity space would be provided for the units, given the central London location, this is considered to be, on balance, acceptable subject to a good quality of internal living space and accommodation.

Whilst it is anticipated that the proposal would evolve following receipt of this pre-application response, the stacking of the proposal in its current form is considered to be acceptable.

As such, the proposed redevelopment of the site in its current form would not be supported by the Council, as it is contrary to Policies D1, D2 and H6 of the Local Plan, the requirements of CPG's 1 and 2 and the Charlotte Street Conservation Area Appraisal and Management Plan (July 2008), and the Technical Housing Standards - Nationally Described Space Standard (2015) document.

Impact on neighbouring amenity

Policies A1 and A4 seek to protect the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of residents. This includes factors such as privacy, outlook, implications to natural light, artificial light spill, as well as noise and vibration impacts caused from the construction phase of development.

It is anticipated that the proposal is unlikely to result in undue harm to the sunlight, daylight, or outlook of neighbouring properties. It is noted that there are no windows on the adjoining flank walls on both sides to be affected. However care must be taken to ensure the increased height and bulk of the building with new windows on the rear elevation do not result in any harmful loss of amenity to the residential units to the rear in Charlotte Street. Any new windows should be generally 18m away from the neighbouring ones to protect their privacy. A sunlight/daylight report should be submitted with any future planning application to demonstrate compliance with the recommendations of the BRE guide on daylight and sunlight. Furthermore an increased height and bulk of building on this site may lead to an increased sense of enclosure and loss of outlook for neighbouring flats and this impact will need further assessing on site.

Whilst noise from construction would cause some disturbance to neighbouring properties, the hours of operation at the site would be restricted to 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays.

Transport

Policy T1 of the Camden Local Plan requires developments to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements outlined in CPG7. Cycle storage would be required for each unit (1 per studio/1 bed, 2 per 2 bed or larger) to comply with these policies and the London Plan. Given the constraints of the site, it may be that on site cycle storage provision may not be achievable; in this instance, the Transport Team may request a payment in lieu of on-site provision. Fees will be confirmed during the application process.

Policy T2 of the Camden Local Plan 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 parking permits in connection with new development and use legal

agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits. Car-free development would be secured by s106 legal agreement. The legal agreement would also secure a financial contribution towards repaving the footway should there be any damage to the public highway during the construction phase of any future development and to ensure that the footway ties the development into the surrounding urban environment. It is also anticipated that the proposal, being in a central London location and requiring the redevelopment of the site, is likely to require a Construction Management Plan to manage the impacts of construction on the locality, again to be secured by S106. The fees for the above would be confirmed during the application process.

Sustainability and waste

The Council would require development to incorporate sustainable design and construction measures. Schemes must demonstrate how sustainable development principles have been incorporated into the design and proposed implementation. You are advised to refer to Policy CC1 and CC2 of Camden's Local Plan and the accompanying text, as well as CPG3 (Sustainability). Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. It requires all new residential developments to achieve a 19% reduction in CO2 emissions below Part L 2013 Building Regulations. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures

A refuse storage area must be provided on site and shown on plans as part of any future planning application.

Community Infrastructure Levy (CIL)

The proposal will be liable for the Mayoral CIL and Camden CIL as new residential units are being created. This would be collected by Camden after the scheme is implemented and could be subject to surcharges.

For the charging schedule and further information please see:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-andbuiltenvironment/community-infrastructure-levy/>

Affordable housing contribution

As more than 100sq. m of additional residential floorspace is proposed for a scheme involving less than 10 new units, the proposal would be liable to an affordable housing contribution in accordance with Policy H4(g) of the Local Plan (2017). Contributions would be confirmed during the course of the application and would be facilitated via a S106.

6. Planning application information

The following documents should be included with the submission of a full planning application:

- Completed application form
- 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'
- Design and Access statement
- The appropriate fee
- Daylight/Sunlight Assessment
- Please see the following link to supporting information for planning applications

<https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements-/>

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by displaying a notice on or near the site and placing an advert in the local press. The Council must allow 21 days from the consultation start date for responses to be received. The applicant is encouraged to engage with the Charlotte Street CAAC, Charlotte Street Residents Association, and the residents of adjoining properties prior to any formal submission. It is advisable that you liaise with these groups prior to the submission of a full planning application.

Non-major applications are typically 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](#).

7. Conclusion

The Council does not object to the principle of the development of this site, which could serve to positively contribute to the character and appearance of the Charlotte Street Conservation Area. There are however a number of concerns relating to the unit mix, quality of accommodation and design of the proposal, as well as potential impact on neighbours at the rear. I advise the proposal is refined in accordance with the above report, and that further pre-application advice is sought prior to the submission of a full planning application.

This document represents an initial informal officer view of your proposal 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 Ben Farrant on 020 7974 6253.

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

Yours sincerely,

Ben Farrant

Planning Officer
Planning Solutions Team