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Our ref: 2018/5624/PRE
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Mr Matt Richards
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By email

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Dear Mr Richards

Re: 112-124 Camden High Street, London, NW1 0LU

Thank you for submitting a pre-planning application enquiry for the above property, which was received on 15th November 2018 together with the required fee of £3,708.81

1. Drawings and documents

2. Proposal

Change of use of first and second floor from ancillary retail (Use A1) to office (Use B1(a)) and erection of two storey roof extension to provide additional office space (Use B1(a)) to building

3. Site description

The application site consists of three retail units as part of a group of six units within a three-storey terraced building. It is located on the eastern side of Camden High Street between Greenland Street to the north and Pratt Street to the south. At ground floor level, the current occupiers are the Post Office and Vision Express. At the upper floors, the use is ancillary retail.

The building was constructed during the early 1990s. The site is located within the Camden Town Conservation Area. The building is not listed and is not described as a building that makes a positive or negative contribution to the conservation area.

4. Relevant planning history

2017/3460/PRE- Change of use of upper floors with rear extension at second floor level plus a roof extension at third floor level to provide 14 residential units. The pre-app concluded that the roof extension would be unacceptable and that the rear elevation would need to be redesigned.

5. Relevant policies and guidance

[National Planning Policy Framework 2018](#)

[The London Plan March 2016](#)

[Camden Local Plan 2017](#)

Meeting Housing Needs

H2- Maximising the supply of self-contained housing from mixed-use schemes

Economy and Jobs

E1- Economic development

E2- Employment sites and premises

Protecting amenity

A1- Managing the impact of development

Design and heritage

D1- Design

D2- Heritage

D3- Shopfronts

Sustainability and climate change

CC1- Climate change mitigation

CC2- Adapting to climate change

CC3- Water and flooding

CC4- Air quality

CC5- Waste

Town Centres and Shops

TC2- Camden's centres and other shopping areas

Transport

T1- Prioritising walking, cycling and public transport

T2- Parking and car-free development

T4- Sustainable movement of goods and materials

[Camden Planning Guidance 2018](#)

CPG1 (Design) (Updated March 2018)

CPG3 (Sustainability) (Updated March 2018)

CPG Amenity (March 2018)

CPG7 (Transport) (Updated March 2018)

CPG8 (Planning Obligations) (Updated March 2018)

[Camden Town Conservation Area Appraisal and Management Strategy 2007](#)**6. Introduction**

This written response is based on the drawing submitted in the "Drawings and Documents", and a pre-application meeting conducted on site on Wednesday 12 December 2018. Should the pre-application scheme be altered, some of the advice given may become redundant as a result of this. The advice may not be considered relevant if adopted planning policies at national, regional or local level are changed or amended. Other factors such as case-law and subsequent planning permission may affect this advice.

The main issues to consider in this case are as follows:

- Design and conservation
- Land use
- Impact on neighbouring amenity

- Transport and access
- Energy/sustainability
- Planning obligations
- Consultation

7. Design and Conservation

Policy D1 seeks high quality design in all developments. The Council will require that development respects the local context and character and is of high quality that complements the local character. Furthermore, policy D2 will preserve, and where appropriate, enhance Camden's diverse heritage assets and their settings including conservation areas.

Two Storey Rear Extension

CPG1 specifies that extensions should be designed to:

- Be secondary to the building being extended in terms of location, form, scale, proportions and detailing;
- Respect and preserve the original proportions of the building, including its architectural period and style;
- Respect and preserve the historic pattern and established townscape of the surrounding area;
- Not cause loss of amenity to adjacent properties.

In review of the guidance above, submitted plans, aerial photography and site visit there are concerns regarding the proposed two-storey extension.

The proposed scale of the rear extension is considered excessive and dominant in relation to the host building. It is acknowledged that the building has been designed so that when the building is viewed from the front (along Camden High Street) the extension would not be visible from above the existing roofline. At the rear, the development would not be seen in many public views (due to the service yard and buildings of Bayham Street immediately behind the application building); however, the proposed extension would be viewed as overwhelming. Furthermore, there would be a resulting awkward relationship with the existing pitched roof of the building. This is as the terminating heights of the rear extension and the existing pitch roof would appear to compete with each other.

It is advised to reduce the height of the rear extension to one storey in order for it to be considered as a subordinate addition to the application building. Furthermore, at roof level, it would not be seen as competing within the roofscape (whether or not it is visible from traversing along Camden High Street). CPG1 advises that rear extensions should terminate at least one full storey beneath the original eaves of the host building. Although a single storey extension would terminate by the eaves of the building, it is considered in this instance to be acceptable. This is due to the built up character of the rear vicinity, the extension would not be seen in longer or public views and the extension of this scale would be considered to not overwhelm the building.

It is also strongly advised for the rear extension to be set further back from the rear elevation of the existing building, which is demonstrated within the scheme. This in turn would set a precedent to terminating depths should there be proposed neighbouring extensions in the future.

The proposed materials used in the construction of the rear extension is considered contemporary while sympathetic to the host building. The materials used are matching brickwork, aluminium framed glazing, and steel balustrading.

Rear Window Enlargements

The window enlargements at the rear of the building are considered acceptable. This part of the scheme would only be visible from within the rear service yard and neighbouring commercial views within the rear.

First Floor Front Terrace and Associated Alterations

Along Camden High Street, the ground floor levels protrude forward from the building core, resulting in a flat roof along the first floor level to the front. Along the entirety of the eastern side of Camden High Street, there is no evident apparatus constructed in association with the formation of amenity terraces. To introduce this to the host building would set a precedent along the streetscene as well as to introduce an alien and cluttered feature to the building at first floor level.

In association, the alteration to the existing windows to create door openings to allow access onto the terrace is considered as an inappropriate alteration that would imbalance the consistency of the fenestration across the terrace of units. It is advised to omit this element from the scheme in any subsequent planning application.

New Entrance and Shopfront Alterations

The proposed new shopfronts and new entrance to provide access to the proposed office space above is considered acceptable. These alterations are considered to provide a uniformity to the shopfronts along this terrace of buildings.

8. Land Use

Loss of Existing Ancillary A1 Space (Retail)

The principle of the loss of ancillary retail space is considered acceptable on principle providing that it can be demonstrated within the planning application that the loss of such would not impact upon the long-term viability/future of the ground floor units. This is of particular importance as the site is located within the Camden Town Town Centre.

Reduction and Layout of Ground Floor Retail Floorspace

The creation of the new entrance and access between the retail units would result in a small loss of floorspace to Retail Unit 1. However, the resulting GIA would be 290sqm, which is considered as a viable amount of floorspace for the continuation of the unit and the wider frontage. The floorspace of Retail Unit 2 would not be affected.

Provision of Office Space

The proposal would result in 1065sqm of office space. This would be a combination of 598sqm of converted ancillary retail space and 467sqm of new construction. The provision of office space is supported by the Council in line with policy E1, in particular criterion f) which directs new office development to the growth area, Central London and the town centres in order to meet the local forecast demand. It is considered that the provision of office in this location would not cause harm to the amenity of existing adjacent residential occupiers, nor would it prejudice any future residential development. Whilst the loss of A1 floorspace is typically discouraged within the Borough, and particularly in Town Centre locations, given the ancillary and under-utilised nature of the above ground floor commercial floorspace, and that the ground floor would remain a sufficient size to remain functional, it is considered in this rare instance to be acceptable.

Mixed Use Schemes and Provision of Residential Accommodation

The Council 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 the Camden Town Town Centre, where development provides more than 200sqm (gross) additional floorspace, it is required that 50% of all additional floorspace is to be housing. The Council will require this residential accommodation to be provided on site. Where the inclusion of housing is not appropriate for the area and cannot be practically achieved on site, the Council may accept a contribution to the mix of uses elsewhere in the area, or in exceptional circumstances, a payment in lieu.

There is a number of criteria listed in policy H2, which the Council considers whether a mix of uses should be sought. They are as follows:

- a) The character of the development, the site and the area;
- b) Site size, and any constraints on developing the site for a mix of uses;
- c) The priority the Local Plan gives to the jewellery sector in the Hatton Garden area (not applicable in this proposal)
- d) Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e) Whether the development is publicly funded or serves a public purpose.

In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account the above criteria and the following criteria:

- f) The need to add to community safety by providing an active street frontage and natural surveillance;
- g) The extent of any additional floorspace needed for an existing user;
- h) The impact of a mix of uses on the efficiency and overall quantum of development
- i) The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j) Whether an alternative approach could better meet the objectives of policy H2 and the Local Plan.

The proposed rooftop extension results in the uplift of 467sqm GIA of additional commercial floorspace. As such, a contribution to the Borough's housing supply would be required as part of the proposal. This is as the character of the immediate area contains a mixture of residential, retail, eating and drinking, leisure and tourism and educational uses. The mix of further residential accommodation within the area is not considered to cause any strain on the area or the operational requirements of the existing building and other nearby uses. The proposed development is not publicly funded nor does it serve a purpose for the public as a whole.

Using the criteria, the Council considers that the provision of housing within a mix of uses should be sought and provided on site. Without any evidence to justify that a secondary residential use cannot practically be achieved on site as part of a mixed-use development, it is unlikely that officers would be able to support the proposal.

The policy on this is clear that on any proposals for commercial floorspace over 200sqm, the Council will seek to negotiate 50% of the additional floorspace for housing. For this proposal, the Council would seek 233.50sqm of the additional floorspace for housing. However, as it has been discussed previously that the Council would not support a two-storey rear extension, this would be lower. Should on the second floor extension be constructed (and using the GIA of 256sqm), the Council would seek 128sqm of housing on the site.

This acts as a starting point and whilst the Council would take into account any justification/viability argument, the onus is on the applicant(s), through the submission of a detailed financial approach (which should include the existing value of the site, set against the residual value of the developed scheme), to address the necessary policy requirements of policy H2.

Should the justification/viability information demonstrate that housing can't be provided on site, the Council may discuss the opportunity to provide this required housing off-site or in the form of a payment in lieu.

9. Adjacent Residential Amenity

Policy A1 of the Camden Local Plan seeks to ensure that the amenity of neighbouring properties is protected. It states that planning permission will not be granted for development that causes harm to the amenity of occupiers and neighbours in terms of loss of daylight, sunlight, outlook and privacy.

The nearest residential occupiers are identified as the upper floors of No. 108 Camden High Street and the upper floors of No. 128 Camden High Street. No residential uses are identified to the rear of the site.

Daylight/Sunlight

It is generally considered that the proposed third-floor level extension would not have an adverse impact upon the levels of sunlight and daylight currently experienced by adjoining residential occupiers. This is due to the separation distance between the proposal and the adjoining residential properties. These levels would be even less should the recommendation to reduce the extension to a single storey be pursued.

Overlooking and Privacy

It is considered that the proposal would not lead to adverse levels of privacy and overlooking as there are no residential units to the rear of the site within the service yard.

Outlook

The proposed fourth-floor extension is considered to not impact upon the outlook of neighbouring residential occupiers.

The other works within the scheme are not considered to impact upon the amenity of adjoining residential occupiers due to its internal location within the building or its minimal physical scale upon the exterior.

10. Transport and Servicing

Cycle Parking

As a result of the proposal, 1065sqm of office space would be developed. Therefore, as part of the scheme, the Council would expect the provision of 12x long stay cycle spaces and 3x short-stay cycle spaces in accordance with policy T1. This would need to be addressed should a subsequent application be submitted. However, the proposed floorspace would be reduced as a result of the advice to reduce the scale of the rear extension, thereby affecting the minimum provision of cycle spaces required.

Car-Free Development

The site falls within the Camden Town controlled parking zone (CPZ). As per, the requirements of policy T2 of the Camden Local Plan, a S106 agreement would be required for the proposal to be car free to ensure that future occupants (office staff) of the development are aware that they are not entitled to on-street parking permits. Policy T2 seeks to ensure car-free development across the borough.

Construction Management Plan (CMP)

Construction works and construction movement vehicles have the potential to disrupt the day to day functioning of the surrounding highway network for an extended period of time and will need to be carefully managed to ensure disruption is kept to a minimum. In accordance with policies A1 and T4 of the Local Plan, a construction management plan would be required via a S106 agreement with an associated financial contribution of £3,136 to cover the costs of reviewing, monitoring and enforcing the CMP.

Highways Contribution

Paragraph 6.11 (policy A1) of the Local Plan states that the Council will repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links, road and footway surfaces at the developer's expense. The Council may need to secure a financial contribution for highway works as a S106 planning obligation.

11. Sustainable Design and Construction

The Council requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially available during construction and occupation.

All developments involving 5X or more residential dwellings and/or 500sqm of (gross) any floorspace will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest CO2 reduction. Also any development involving 5x or more residential dwellings or 500sqm of any additional floorspace is required to demonstrate climate change mitigation measures in a sustainability statement.

Energy Statement

As the development involves 500sqm of gross internal floorspace (by way of conversion and/or physical uplift), the applicant will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction.

The energy statement would need to demonstrate how the development meets the following policy requirements:

- Camden's Local Plan encourages developments to be Zero Carbon;
- A minimum 19% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013;
- Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies as set out in the London Plan (2016) Chapter 5 (particularly Policy 5.2) GLA guidance on preparing energy assessments and CPG3 should be followed;
- Camden's Local Plan requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement;
- Where the carbon reduction target cannot be met on-site, we may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £60/tonne CO2/yr over a 30 year period), which will be used to secure the delivery of carbon reduction measures elsewhere in the borough. Further information on this can be found [here](#).

These targets and policy requirement would also be required to be further met by entering into a S106 legal agreement to ensure that these targets are carried out during construction and occupation.

12. Community Infrastructure Levy (CIL)

This scheme will be liable for both the Mayoral and Camden CIL as the proposed results in a development of new dwellings. The Camden CIL will apply to all applications that are

granted planning permission after April 1st 2015. For further information please visit the website below:

<https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/community-infrastructure-levy.en>

13. Conclusion

In conclusion, it is strongly advised to reduce the rear extension to single storey in order for the proposal to appear subordinate to the host building. Additionally, the alterations at the front would not be supported. The loss of ancillary A1 space may be supported subject to the application demonstrating that it would not impact upon the viability of the ground floor retail units. As the proposal involves an additional uplift of more than 200sqm of commercial floorspace, the Council would seek 50% of that additional floorspace to be residential. An energy statement would be required due to the amount of converted and additional floorspace required. Planning obligations required by way of S106 legal agreement would be car-free development, construction management plan (CMP), and energy targets.

14. Planning application information

8.1 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 Permission
- 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
- Sample photographs/manufacturer details of proposed brick cladding
- Energy statement
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

8.2 We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up notices 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.

8.3 It is likely that that a proposal of this size would be determined under the development control committee. 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 please do not hesitate to contact Samir Benmbarek on 0207 974 2534

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

Yours sincerely,

Samir Benbarek

Planning Officer
Planning Solutions Team