

16 September 2019

Camden Planning Department
London Borough of Camden 2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London
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HQ Management Solution LTD
58 Russell Square
London
WC1B 4HS

Dear Camden Planning,

65 AGAR GROVE, LONDON, NW1 9UE
FULL PLANNING APPLICATION SUBMISSION
Planning Portal Reference: PP-08162532

The application seeks full planning permission for the conversion of the above property into three self-contained dwellings (Use Class C3) comprising 1 x 3-bedroom dwelling and 2 x studio dwellings including a modest, single storey, lower ground floor rear extension and other associated works

This application has been prepared following careful examination of the site and surroundings, research into the planning history of the property and a detailed analysis of the acceptability of the proposal under relevant policy documents.

The existing property is currently vacant (and has been for some time) and the building dilapidated and in need of refurbishment and repair. This application presents an opportunity to sensitively extend the lower ground floor of the building at the rear, which is hidden from street view, and greatly improve the internal and external quality and appearance of the building, bringing it back into optimal use by providing three, high quality permanent residential dwellings (Use Class C3), including a family-sized accommodation on the lower levels.

Description of Development

This application seeks full planning permission for the following proposals:

“Refurbishment and conversion of the existing single dwelling house into 3 self-contained dwellings (1 x 3-bedroom dwelling and 2 x studio dwellings) and the erection of a single storey rear extension and other associated works”.

Application Documents

The enclosed submission comprises the following supporting documents, all prepared by HQ Management Solutions LTD:

- **Covering Letter / Planning Statement** (this letter);
- **Design and Access Statement;**
- **Site Location Plan;** and
- **Full Set of Architectural Drawings**

All necessary information in which to validate the planning application are listed above. In addition to the above, a completed **Application Form/Ownership Certificate** and **Community Infrastructure Levy (CIL) Additional Questions Form** has also been supplied. The application fee has also been provided under separate cover.

Relevant Planning History

A search of Camden's online planning application database reveals there is no planning history for the application site.

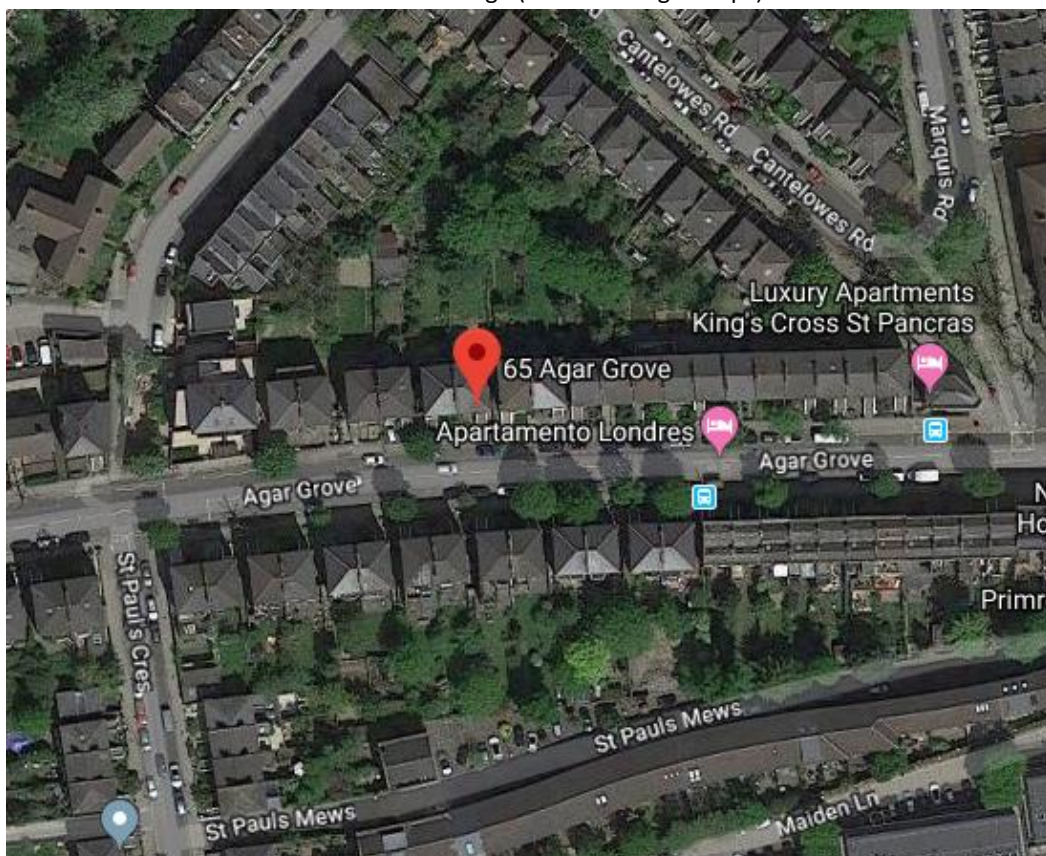
Notwithstanding, there are similar applications that have been granted approval within Agar Grove that are a material consideration; these applications are listed as below and further details of which are provided in the Design and Access Statement:

- 73 Agar Grove – *'Single Storey Rear Extension to Residential Dwelling'* - Ref. 2011/2863/P (Granted 23rd August 2011);
- 75A Agar Grove – *'Erection of a Single Storey Rear Extension to Lower Ground Floor Flat'* - Ref. 2017/0987/P (Granted 4th April 2017); and
- 67 Agar Grove – *'Conversion of house into one self-contained 2-bedroom flat and three self-contained 1-bedroom flats including the erection of a ground floor rear extension'* – Ref. 8501708 (Granted 23rd January 1986).

Site and Surroundings

The application site is located on the northern side of Agar Grove, near the junction of St. Paul's Crescent and approximately 800m east of the Camden Overground and Underground Stations.

Below: Aerial Image (Source: Google Maps)



The application site comprises a four-storey (lower ground, ground, first and second floors) semi-detached single dwelling house with a spacious rear garden area (161.33sqm in area). The character of the surrounding area is very similar to the application site, consisting of semi-detached and terraced residential properties similar in design, scale and appearance.

The application site is not listed (locally or statutorily) though sits within the Camden Square Conservation Area. The application site is not one identified in the Camden Square Conservation Area appraisal as a positive contributor to the conservation area and in its current dilapidated state, is in need of refurbishment and repair to improve its appearance.

The application site has a Public Transport Accessibility Level (PTAL) of 3 though is serviced by the bus route 274 along Agar Grove and the site is only a short, 10-15 minute walk from the Camden Town Centre, Camden Town Underground Station, Camden Road Overground Station and Caledonian Road Underground Station. Refer to the Design and Access Statement for more detailed analysis on public transport links in close proximity to the site.

The Proposals

The proposals seek planning permission for the refurbishment and conversion of a dilapidated single dwelling house into three self-contained dwellings, including family sized accommodation, and a single storey modest rear extension, further detailed as follows:

- A single storey, rear extension at lower ground level, projecting 3.0m in depth from the existing rear elevation, with a rear eave height of only 3.1m, providing an additional 13.63sqm in floor area;
- Conversion of the Lower Ground (including the extension) and Ground Floor levels to accommodate a 12.8sqm 3-bedroom (family-sized) self-contained dwelling with direct access to a private garden/amenity in the rear garden
- Conversion of the First Floor to accommodate a 49.0sqm self-contained studio dwelling with access to the extensive communal rear garden;
- Conversion of the Second Floor to accommodate a 46.6sqm self-contained studio dwelling with access to the extensive rear garden;
- Provision of a secure storage facility accommodating four cycle spaces for the residents of the property located toward the rear of the property and a discreet timber bin store at the front of the property that is further screened by landscaping.
- Table 1 below, summarises the proposed units' types and sizes:

Table 1 – Proposed Housing Type and Size:

| Flat No. | Floors | Type | Size (GIA) |
|----------|----------------------|------------------------------|---------------------|
| 1 | Lower Ground, Ground | 3-bedroom, 6 person (Duplex) | 112.8m ² |
| 2 | First | Studio, 1 person | 49.0m ² |
| 3 | Second | Studio, 1 person | 46.6m ² |

- With respect to the 'Access to and Use of Buildings' section of the Building Regulations 2015 (Part M) all the dwellings will be designed to comply with M4(2) standards 'Accessible and adaptable dwellings' which cater for a wide range of occupants with differing needs including some older people and disabled people, and allowing for adaptation to meet the changing needs of occupants over time.

External refurbishment, improvement and repair works include the following:

- General refurbishment and repair of external treatments of the existing property (windows, fencing, gates, paint, paving etc.); and
- Significant improvements to the landscaping at the front and rear of the site.

Planning Considerations

National Planning Policy Framework (2019)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and is a material consideration in determining planning applications.

Paragraph 50 of the NPPF states: *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

Paragraph 123 (a) of the NPPF states: *"Local Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible"*.

Regarding decision-taking, the NPPF advises that Local Planning Authorities should approach this in a positive way to foster the delivery of sustainable development and should look for solutions rather than problems. Decision-takers at every level should seek to approve applications for sustainable development where possible

Local and Regional Policies

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that any planning application must be determined in accordance with the development plan for the area unless any material considerations indicate otherwise.

In this case, the development plan comprises the following:

- The London Plan (as amended 2016);
- The Camden Local Plan (adopted July 2017; and
- Camden Square Conservation Area Character Appraisal (adopted 2011).

Emerging Policy:

- Draft London Plan (expected adoption 2020);

Camden also have a number of supporting Supplementary Planning Documents which have also been considered as part of this application. These documents include:

- CPG 2: Housing (Amended March 2019);

- CPG: Altering and Extending Your Home (March 2019); and
- CPG: Interim Housing (March 2019)

The five main planning considerations in determining this application are listed as follows and addressed in the following sections of this letter:

- The principle of the Land Use and Conversion;
- Affordable Housing;
- Quality of the Residential Accommodation;
- Design and Heritage Considerations;
- Impact upon Neighbouring Residential Amenity; and
- Transport considerations.

The Principle of Land Use and Conversion

The proposal seeks to refurbish the vacant single dwelling house and convert it into three self-contained permanent residential dwellings (Use Class C3) including a large/family sized home (with 3 bedrooms).

Policy H1 of the Camden Local Plan states that ‘the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.’

The need for more homes in the borough and wider capital is evident in the Local Plan and also in both the Draft New London Plan and the London Housing Strategy. The Draft London Plan identifies small sites specifically as needing to make a greater contribution to the delivery of housing. These small sites policy is particularly important in the context of this proposal as the London Plan has never included a small sites policy before and it is being introduced in recognition of the important role such sites will need to play in providing new homes for the future in this time of huge housing shortage and increased housing targets across the Capital.

Table 4.1 of Policy H1 of the draft London Plan sets Camden’s annualised average housing target at 2,310 homes, which is a 22% increase on their previous target. The supporting text of the policy states that to achieve these increased targets *“delivery on both large and small sites will need to approximately double compared to current average completion rates”* and that there will need to be *“not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered”*.

The Draft London Plan states that ‘to deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes’. To deliver these targets, part D of the policy states that there should be a presumption in favour of development which would provide one to 25 homes through on sites which propose to increase the density of existing residential homes in higher PTAL area through development such as residential conversions. The application site has a PTAL of 3 though the site is well within a 10 minute walk of a range of train stations, bus routes and the Camden Town Centre and as such, increase in density should be supported on the site.

Policy H2 of the draft London Plan follows on from this and states that small sites should play a much greater role in housing delivery and boroughs should proactively support well designed new homes on small sites, in order to significantly increase the contribution of small sites to meeting London’s housing needs and diversifying the sources, locations, type and mix of housing supplies.

The Camden Local Plan states that “we will seek to exceed the target for additional homes, particularly self-contained homes by:

- a) regarding self-contained housing as the priority land-use of the Local Plan;
- b) working to return vacant homes to use and ensure that new homes are occupied”.

Policy H7 of the Camden Local Plan and The Camden Strategic Housing Market Assessment (SHMA) indicates that the greatest requirement in the market sector is likely to be for two and three-bedroom (larger) homes, followed by one-bedroom homes/ studios. Policy H7 also states that “where a development is for the conversion of existing homes (including the creation of self-contained homes from residential accommodation that is ancillary to another use), the Council will seek to minimise the loss of market homes with 3 bedrooms, particularly where the 3-bedroom homes have access to outside space.

The proposals will not only return a currently vacant property to optimal use, but contribute a net increase in the number of permanent residential dwellings toward Camden’s housing targets and include the provision of a larger family sized accommodation (3-bedroom, 6 person) with direct access to an outside amenity space which is a priority for the Borough as stated in Policy H7 of the Camden Local Plan. On this basis, the principle of the land use, the net increase in dwelling number and type of dwellings, are fully encouraged and supported under policies H1, H2 and H7 of the Camden Local Plan and relevant policies and objectives of the London Plan.

Affordable Housing

Paragraph 63 of the NPPF (2019) states “provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount”.

Policy H4 of the Camden Local Plan states that the borough will expect a contribution to affordable housing from all developments that provide one or more additional homes AND involve a total addition to residential floorspace of 100sqm GIA or more.

While the proposals create a net increase of two additional homes, there would only be an increase in floor space of 13.6sqm within the minor extension and as such, an affordable housing contribution is not applicable in this application and the proposal complies with policy H4 of the Camden Local Plan.

Quality and Standard of Housing

Policy H6 of the Camden Local Plan, the Camden Housing CPG and Mayor’s Housing SPG provide that all new self-contained dwellings, including those created through conversions, must comply with the Nationally Described Space Standards (NDSS- 2015). The table below, evaluates each of the proposed dwelling under the space standards:

Table 2 – Residential Space Standards

| Flat No. (type) | GLA Dwelling Size Standard (GIA) | Proposed Floor Area (GIA) | GLA Bedroom Size Standard (GIA) | Proposed Bedroom Sizes (GIA) | NDSS Storage Area Standard | Proposed Internal Storage Areas |
|-----------------|----------------------------------|---------------------------|---------------------------------|------------------------------|----------------------------|---------------------------------|
| 1 (3b,6p) | 102 | 112.8 | 11.5 11.5 11.5 | 12.2 | 2.5 | 4.5 |
| 2 (Studio) | 39 | 49.0 | 11.5 | >11.5 | 1.0 | 1 |
| 3 (Studio) | 39 | 46.6 | 11.5 | >11.5 | 1.0 | 1 |

As demonstrated in the table above, all of the proposed dwellings meet (and in some cases exceed) the internal space standards prescribed by the NDSS. Furthermore, each of the dwellings are provided dual aspect accommodation to provide good levels of natural light, outlook and natural ventilation as well as exceed the minimum ceiling height standard (2.3m) across all levels.

Amenity Space

Camden's Interim Housing CPG states that *"all new homes should have access to some form of private outdoor amenity space, e.g. balconies, roof terraces or communal gardens"*. This amenity space should meet the minimum standards of the Mayor's Housing SPG which states that *"a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant."*

The application site contains an extensive rear garden, 161.33sqm in area, that all proposed dwellings will have access to. The lower ground floor family sized flat will have direct access to a private rear garden area over 60sqm in area via the door on the side of the lower ground floor and the other flats will be able to access the communal section of the rear garden (also over 60sqm in area) via the gate at the front of the property. Given the constraints of the site and the low number of residents in the studio apartments, it is considered appropriate that both of these units have access to the communal garden area of the property with shared access whereas, more appropriate for the 3-bedroom family dwelling to have access to a private garden area for greater privacy and safety for any potential children. Refer to the Design and Access Statement and accompanying drawings for details of these amenity areas and access arrangements.

On this basis, the proposed dwellings comply with Policy H6 of Camden's Local Plan, the Mayor's Housing SPG, the NDSS (2015) and other guidance and dwelling standards provided within Camden's CPGs.

Design and Heritage Considerations

Policy D1 (Design) of the Camden Local Plan seeks to secure high quality design in development that respects local context and character and preserves the historic environment and heritage assets in accordance with policy D2 (Heritage). The Council will expect developments to consider the character, setting, context and the form and scale of both the host building and neighbouring buildings, as well as the prevailing pattern, density and scale of surrounding development. Development should consider the impact on existing rhythms, symmetries and uniformities in the townscape.

Policy D2 (Heritage) of the Camden Local Plan states that *'the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, and locally listed heritage assets. Policy D2 states that the Council will:*

- e. requires that development within conservation areas preserves or, where possible enhances the character or appearance of the area'.*

Camden Planning Guidance: *Altering and Extending Your Home* provides that a single storey ground floor rear extension is generally preferable to those at higher levels/floors. In order for a new extension to be subordinate to the original building, its height and depth should respect the existing common pattern of rear extensions at neighbouring sites, where they exist, and ensure that the extension is subordinate to the host building. With respect to the width of the rear extensions, they should be designed so that they are not visible from the street and respect the rhythm of rear extension in neighbouring sites.

The Camden Square Conservation Area does not identify single storey rear extensions as one of the works **not** permitted in a conservation area for enlargement, improvement or other alteration to a dwelling house (includes flats). Development in rear gardens is acceptable if it does not cause harm to the contribution of these space to the character and appearance of the conservation area, particularly in prominent positions where the visual impact of a proposal may be greater (where visible from the public realm).

The proposed rear extension is modest in depth, projecting only 3.0m from the existing rear elevation of the property (and 1.69m from the rear bay window) with a rear eave height of only 3.1m, ensuring the extension would remain subordinate to the host property. Being at the rear of the property, the extension would not be visible from the public realm (public street) and would retain a significant portion of the existing, extensive rear garden. As such, the extension would not result in harm to the character and appearance of the host dwelling and Camden Square Conservation Area. Furthermore, the extension would be similar in height, depth and scale with the existing rear extension at the adjoining property (67 Agar Grove – ref. 8501708 - Granted 23rd January 1986) hereby respecting the predominant pattern and principle of extensions of neighbouring sites, including 73 and 75A Agar Grove (see Design and Access Statement for further details of these applications).

Further to the above, the existing property is currently vacant, damaged and deteriorated/dilapidated in appearance with overgrown front and rear gardens. This proposal represents an opportunity to sensitively extend the lower ground floor of the building at the rear, which is hidden from public view, and refurbish, repair and greatly enhance the internal and external quality and appearance of the building to the visual benefit of the street scene and wider conservation area.

On the basis of the above, the proposal complies with the provisions and considerations of Policies D1 and D2 of the Camden Local Plan as well as guidance in the CPGs and Camden Square Conservation Area Appraisal.

Impact on Neighbouring Amenity

Policy A1 seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Factors to consider, and which are particularly relevant in this case, include sunlight, daylight, outlook, visual privacy and overlooking. Camden Planning Guidance on *Amenity* states that development should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers.

The proposed modest rear extension will project only 3.0m from the rear elevation of the dwelling with a rear eave height of only 2.7m and as such, would have a negligible impact upon the residential amenity of adjoining paired dwelling (63 Agar Grove). The other neighbouring dwelling, 67 Agar Grove, is detached from the application site and separated from the extension (by 3.06m and a boundary wall) and as such, will not be impacted in any way by the proposal.

On the basis of the above, the proposed extension would not cause harm to the residential amenity of either adjoining dwelling, preserving the levels of sunlight/daylight and outlook currently experienced from these dwellings and as such, the proposal complies with policy A1 of the Camden Local Plan.

Transport Considerations

Policy T1 of the Camden Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. 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, and parking will only be considered for

new non-residential developments where it can be demonstrated that the parking provided is essential to the use or operation of the development.

No on-site parking exists, nor is proposed as part of this proposal and as such, the proposal would comply with policy T2 of the Camden Local Plan. Furthermore, the application site is within walking distance of the Camden Market and Town Centre, Camden Town Underground Station, Camden Road Overground Station, Caledonian Road Underground Station as well as many bus services including from Agar Grove, which would promote and provide ease of access to alternative and public transport options in the borough (see Design and Access Statement for further details and analysis of transport links available and in close proximity to the site).

Policy T1 of the Camden Local Plan also requires that cycle parking is provided for development in accordance with the London Plan (Table 6.3) and outlined within Camden Supplementary Guidance. Furthermore, the emerging draft London Plan requires 1 space per studio flat and 2 spaces for a 3-bedroom flat. Accordingly, the application provides 4 cycle parking spaces for the future residents of the property. A secure storage facility accommodating four cycle spaces is to be provided at the rear of the property for the future residents (refer accompanying plans and Design and Access Statement). The provision of adequate cycle parking, further promotes sustainable travel to and from the property for the residents.

On the basis of the above, the proposal would fully comply with policies T1 and T2 of the Camden Local Plan.

Waste

Camden's *Environment Service Technical Guidance for Recycling and Waste* document provides guidance on necessary waste provision and storage areas/facilities for planning proposals.

The waste storage area/facility is shown on the plans and provides adequate provisions for the future residents in accordance with Camden's Technical waste guidance based on the number of dwelling and bedrooms (min. 360L general waste; 420L dry recycling; 69L food waste). The waste storage facility will be in the form of a discreet timber bin store located at the front of the property and will be further screened from view by soft landscaping proposed at the front property boundary so as not to detract from the character and appearance of the streetscape.

Conclusion

This planning application is to provide a number of important elements that will bring planning and public benefit in line with the objectives of the London Borough of Camden. The proposal will bring back a vacant site into optimum use and contribute a net increase in the number of permanent residential dwellings toward Camden's ambitious housing targets including the provision of a larger family sized accommodation (3-bedroom, 6 person) with direct access to an outside amenity space which is a priority for the Borough

The existing property is currently vacant, damaged and deteriorated/dilapidated in appearance with overgrown front and rear gardens. This proposal represents an opportunity to sensitively extend the lower ground floor of the building at the rear, which is hidden from public view, and refurbish, repair and greatly enhance the internal and external quality and appearance of the building to the visual benefit of the street scene and wider conservation area.

The proposal will also promote walking and sustainable transportation by being a car-free development and include policy compliant provisions for cycle parking spaces.

As outlined in this letter, the application accords with the prevailing national, regional and local planning guidance covering the site and we therefore respectfully request that the application is recommended for approval.

Yours Sincerely,

Hamza Qasim

A handwritten signature in black ink, appearing to read 'Hamza Qasim', written in a cursive style.