

**Our Ref**

R00242/MR/BH/IK

FAO: Rachel English  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

24 September 2019

Dear Ms English,

**RAGLAN HOUSE, 1 RAGLAN STREET, KENTISH TOWN, LONDON, NW5 3DB  
PLANNING APPLICATION SUBMISSION FOR RESIDENTIAL DEVELOPMENT  
RAGLAN HOUSE LIMITED**

I write on behalf of our client, Raglan House Limited, to submit a full planning application for the following residential proposal. Planning consent is sought for:

*Extension and change of use of existing day centre (Use Class D1) to create 6 (3 x 2 bed and 3 x 3-bed) residential dwellings (Use Class C3) comprising the demolition of the existing first floor conservatory and new first floor extension; two storey extension onto Anglers Lane; conversion and extension of the roof space including introduction of new dormer windows in the front and rear elevations; insertion of new doorways at ground floor level and associated minor alterations to the railings.*

The proposals have been subject to pre-application meetings (LPA Ref. 2019/2654/PRE) with Planning Officer, Rachel English and Conservation and Design Officer, Anna Foreshew at the London Borough of Camden, hereafter 'the Council'. This has included a site visit on 12<sup>th</sup> July 2019 and subsequent meetings at the Council's offices on 24<sup>th</sup> June 2019 and 30<sup>th</sup> July 2019. A written pre-application response was received from the Council on 15<sup>th</sup> August 2019 along with the scope of the application, which has been agreed.

This letter details the site context, planning history and assesses the current proposals against the relevant planning policy context. In addition, it provides an explanation of the relevant planning considerations and provides details of Community Infrastructure Levy and Section 106 obligations.

### **Site Context**

The site is located on the immediate edge of Kentish Town Centre on the corner of Raglan Street and Anglers Lane and comprises a two storey institutional 1930s building with a pitched roof. The building was formerly used by the Council as a day centre for dementia sufferers but is now vacant. The building's current lawful use is D1 (non-residential institutions).

Since its original construction, the building has undergone several external modifications, including a new wing on the northern part of the site, a conservatory structure at first floor on the southern wing and the removal of the original main entrance on Anglers Lane and replacement with a window.

The building is not listed, but is however, included on the Council's Local List (2015) under reference 315. It also falls within the Kentish Town Neighbourhood Area. Whilst the building does not fall within a Conservation Area, the Inkerman Conservation Area is located on the opposite side of Raglan Street from the Site.

The site benefits from a PTAL rating of 6a and is located within 350m from Kentish Town Train and Underground Station and 400m from Kentish Town West Rail Station, as well as being located near to various bus links along the Kentish Town Road.

The area immediately surrounding the site consists predominantly of residential and retail properties. Directly to the west of the site on Raglan Street is two storey Victorian terraced housing and to the north, is a 4 storey Council apartment block. The site backs on to various commercial dwellings on Kentish Town Road to the east and a two storey recently converted residential property to the south, on Anglers Lane.

### **Planning History**

Planning permission was granted on 18<sup>th</sup> June 2014 under LPA Ref. 2013/6025/P for the 'change of use of existing day centre (Class D1) to provide 5 (1 x 1 bed and 4 x 2-bed) residential flats (Class C3) and associated external works including the demolition of the existing first floor conservatory to provide private amenity space'. The above permission has now lapsed as it was not implemented.

### **Planning Policy Context**

The relevant development plan comprises Camden's Local Plan (2017), relevant supplementary guidance policies and the Kentish Town Neighbourhood Plan (2016). Alongside Camden's Local Development Framework, the London Plan (2016), draft London Plan (2019) and the NPPF (2019) are material considerations.

### **Proposed Development**

Full details of the proposed works are detailed within the Design and Access Statement prepared by Chassay and Last and comprise:

- Change of use of the existing building from Use Class D1 (non-residential institutions)

to Use Class C3 (dwellinghouses) to provide 6 dwellings, consisting of 3 x 2 bed and 3 x 3 bed houses;

- Demolition of the existing first floor conservatory and the addition of a new first floor extension;
- The addition of a two storey extension onto Anglers Lane; and
- The conversion and extension of the roof space including the introduction of new dormer windows in the front and rear elevations.

The proposed materials are detailed within the Design and Access Statement prepared by Chassay + Last and comprise:

1. Glassed entrance to provide a subtle means of visual difference between the contemporary 1937 host building and the proposed contemporary infill.
2. Vertical hardwood timber slats in a contemporary approach to match 26 Anglers Lane.
3. Brown facing brickwork to match the 1993 first floor extension.
4. Dormers at front and rear elevations. Dormers are a characteristic feature of buildings in the vicinity, including the Victorian terraced properties opposite the site.
5. New window to match ground floor front elevation.
6. Any repairs to brickwork to be in grey brickwork to match host building of 1937.

## **Planning Considerations**

### **1. Principle of development and proposed residential land use**

The site is deemed to be brownfield land and in accordance with paragraph 117 of the NPPF, the effective use of land is encouraged by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value.

Local Plan Policy C2 'Community Facilities' aims to ensure that existing community facilities are retained, recognising their benefit to the community, including protected groups, unless one of the following tests is met:

- a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended users;
- the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area.

The building's current lawful use is Use Class D1 (non-residential institutions). It was originally constructed in 1937 as a mother and baby clinic by St Pancras Borough Council and was then converted to a care services facility in the 1970s. The property was declared surplus to Council requirements in 2012 as part of an agreed strategy under the Council's Community Investment Programme (CIP) to relocate some of Camden's day care and support services to the Greenwood Centre on Highgate Road. Whilst Raglan House remained operational pending completion of the Greenwood Centre, a subsequent review of adult dementia and social care services supported further service reorganisation. In 2017, this culminated in enhanced older people's day services at a refurbished Kingsgate Centre in Kilburn. Since the relocation of the care services, the building has stood vacant.

As the proposals and alternative forms of care provision have been supported through relevant service strategies and agreed through formal decisions by the Council, it is considered

that sufficient evidence exists to meet the policy requirements of Policy C2 and support appropriate alternative use, justifying the loss of D1 use and conversion of the building to housing.

Furthermore, the loss of D1 use at the site has previously been accepted by the Council under the lapsed planning permission from 2014 (ref. 2013/6025/P), which proposed for the site to be converted into five flats. Local Plan H1 'Maximising Housing Supply' regards self-contained housing as the Borough's priority land use. Therefore, the redevelopment of this previously developed site to provide housing accords with the core principle of Camden's Local Plan, the London Plan and the NPPF through effectively using brownfield land to deliver housing.

## **2. Housing mix**

The proposal would provide 3 x 2 bed dwellings and 3 x 3 bed dwellings which accords with Local Plan Policy H7 'Large and Small Homes', meeting the identified need for family sized units, as 2 and 3-bedroom market units are deemed a 'high priority' within Camden.

Therefore, the development would accord and meet this high priority need as dictated by Local Plan Policy H7. The policy also seeks to ensure that new housing development includes a mix of large and small homes. Through the providing a mixture of 2- and 3-bedroom units, this proposal satisfies these requirements and would be an addition to the supply of family housing in the borough.

## **3. Design, scale, bulk and massing**

### *Design*

Local Plan policy D1 'Design' and Kentish Town Neighbourhood Plan Policy D3 'Design Principles' outline that the Council will seek to secure high quality design in all development, respecting local context and character

The design of the proposal is detailed within the accompanying Design and Access Statement prepared by Chassay + Last. The proposals seek to convert the existing vacant building into housing, along with associated external works which comprise:

- Conversion of the roof space of the main building to provide new residential floorspace for the three-bedroom houses and the introduction of new dormer windows in the front and rear elevations. These dormer windows would be in keeping with the context of the local area as they are a characteristic feature of buildings in the vicinity;
- Removal of the existing incongruous first floor side conservatory, fencing and fire escape stairs and replacement with a brick faced extension with pitched hipped clay tile roof that mirrors the form of the extension to the northern bay and façade treatment of the original building;
- Addition of an infill extension to the rear of the building, adjacent to the recently converted residential building at 26 Anglers Lane. The use of materials and contemporary approach to the infill extension reflects that of the adjacent building of 26 Anglers Lane and a proposed glazed entrance provides a subtle means of visually differentiating between the contemporary appearance of the timber clad and red brick residential neighbouring

buildings on Anglers Lane and the more institutional appearance of the grey facing brick and white timber fenestration of Raglan House; and

- Removal of the rear infill conservatory and replacement with rear gardens for the proposed residential units, which will provide external amenity space and new soft landscaping with scope to improve biodiversity.

#### *Scale, bulk and massing*

Whilst an extra level of useable accommodation will be created through the conversion of the existing roof space and the addition of dormers, the overall height, bulk and massing of the existing building will remain largely the same. Both the proposed front and rear dormers are in keeping with the site's local context.

In summary, the design of the proposal is deemed to provide high quality, well designed housing, which respects the context and character of the local area, satisfying the requirements of Local Plan Policy D1 and Neighbourhood Plan Policy D3.

#### *Heritage*

Local Plan Policy D2 'Heritage' sets out that the Council will seek to protect other heritage assets including non-designated heritage assets, with the effects of a proposal on its significance, weighed against the public benefits of the proposal. Raglan House is included on the Council's Local List (2015) as a locally significant building and is a non-designated heritage asset. It is also situated immediately opposite the Inkerman Conservation Area but does not fall within it. Detailed heritage considerations for this site are set out within the accompanying Heritage Statement prepared by Montagu Evans. Overall, in line with Local Plan Policy D2, the proposals can be seen to enhance and complement the existing building through the removal of previously unsympathetic extensions and replacement with high quality additions to the building. Furthermore, the proposals provide the public benefit of much needed family housing to this unused, vacant property.

#### **4. Affordable housing**

Local Plan Policy H4 'Maximising the Supply of Affordable Housing' seeks to maximise the supply of affordable housing in the borough and requires a contribution towards affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA (Gross Internal Area) or more.

The intention is to apply Vacant Building Credit (VBC) for the purposes of this application, given that the building has not been made vacant for the sole purposes of re-development; or is covered by an extant or recently expired planning permission for the same or substantially the same development. The following calculations for the application of VBC were submitted to the Council on 28<sup>th</sup> August 2019: on the following calculation submitted the Council on 28<sup>th</sup> August 2019.

1. **Step 1** (affordable housing contribution): Camden CPG states "works involving a change to residential use will trigger Policy H4 affordable housing requirements where they provide one or more additional homes and involve a total addition to residential floorspace of 100 sq m GIA or more".
  - a.  $522.20 \text{ sq m (GIA) Proposed} = 10\% = 522.20 \text{ sq m} \times 1.053 = 549.9$

b.  $10\% \times 549.9 = 54.98$

c.  $54.98 \times £2,650 = £145,697$

d. **The affordable housing target for the site is 10% in accordance with Local Plan Policy H4 so this is 6 units x 10% = 0.6 = 1 unit**

2. **Step 2** (proportion of existing and proposed floorspace): Existing GIA is 507.20/proposed GIA is 522.20 sqm x 100 = 97%
3. **Step 3** (calculate the number of AH credit: step 1 AH Unit x Step 2 percentage) : 1 x 97% = 1 unit (0.96 rounded up)
4. **Step 4** (deduct the AH credit from the policy compliant affordable housing contribution (step 1 AH number – Step 2 AH number): 1 unit – 1 unit = 0 units.

To summarise, the application of VBC as demonstrated by the above calculation is deemed to negate the obligation to make an affordable housing contribution for this application.

#### 5. Standard of residential accommodation and amenity of adjoining occupiers

##### Standard of residential accommodation

Local Plan Policy H6 'Housing Choice and Mix' seek to ensure high quality accessible homes in all new developments and encourages all housing to be functional, adaptable and accessible. Building Regulation M4 (2) requires 10% of new-build self-contained homes to be suitable for occupation by wheelchair users. In addition, Local Plan Policy D1 'Design' sets criteria for all new housing developments to ensure high quality design in development.

The dwellings all exceed the National Space Standards (2015). Camden's Local Plan and the London Plan also require dwellings to be compliant with these standards. The table below (Table 1) confirms the compliance of the proposals with the National Space Standards. The layout of the dwellings has been planned logically and each of the dwellings are dual aspect. In addition, each of the units has access to private outdoor amenity space which also exceeds the London Plan requirements. The Design and Access Statement accompanying this application confirms that inclusive access has been ensured by complying with 'Access to and Use of Buildings, Approved Document M' of the Building Regulations. The standard of residential accommodation proposed is therefore considered high and exceeds local, regional and national policy standards.

Minimum gross internal floor areas (m2) as required by National Space Standards (2015)				Proposed units		
Number of bedrooms(b)	Number of bed spaces (persons)	2 storey dwellings	3 storey dwellings	Unit number	Unit Type	Gross internal floor area (m2)
2b	3p	70		House 1	2b3p; 2 storeys	75.1
				House 5	2b3p; 2 storeys	70.5
				House 6	2b3p; 2 storeys	84.3
3b	4p		90	House 2	3b4p; 3 storeys	95.1
				House 3	3b4p; 3 storeys	90.3
				House 4	3b4p; 3 storeys	90.2

(Table 1: National Space Standards and Proposed Units Comparison)

#### *Amenity of adjoining occupiers*

Local Plan Policy A1 'Managing the Impact of Development' seeks to protect the quality of life of occupiers and neighbours to ensure harm to amenity is not caused through new developments. The principal outlooks from the new dwellings would be Raglan Street at the front of the building and on to the private amenity space and the backs of the commercial premises on Kentish Town Road to the rear. There is very limited scope for overlooking and the proposed amenity space to the rear of the proposal provides some separation between the housing and existing dwellings.

In terms of impact on daylight and sunlight and overshadowing of adjoining occupiers, the proposal does not increase the existing height of the building, therefore the overshadowing effects to adjoining occupiers will be negligible. The supporting Daylight and Sunlight Assessment prepared by Delva Patman Redler further illustrates 100% compliance in all three daylight assessments undertaken and confirms that the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight.

In summary, the proposed development provides high quality, accessible accommodation, which complies with the National Space Standards and relevant London Plan and Local Plan policies. The dwellings benefit from all being dual aspect and provide future residents with private amenity space. As demonstrated above, the proposals carry a limited scope for impacting the amenity of neighboring occupiers, in accordance Policy A1.

### **6. Transport**

Camden's Local Plan Policy T1 'Prioritising walking, cycling and public transport' aims to promote walking, cycling and public transport use, and requires any new dwelling to provide secure, covered cycle parking. Local Plan Policy T2 'Parking and car free development' aims to mitigate the impact of new development on the transport network and requires any new dwelling to be designated car-free, with a Legal Agreement signed to waive occupiers' rights to on-street and off-street parking. Policy T2 also requires new development to provide secure cycle parking facilities exceeding minimum standards contained in the London Plan (2016) (2 x long stay spaces per dwelling) In accordance with Policies T1 and T2, the residential dwellings created would be car free and cycle storage will be accommodated for each dwelling.

### **7. Environmental considerations**

#### *i. Energy and sustainability;*

Camden's Local Plan Policies CC1, CC2 and CC3 set out the energy and sustainability targets for new developments. A BREEAM Pre-Assessment and an Energy and Sustainability Report have been prepared by JAW Sustainability to support the proposals. These demonstrates that the development can achieve a 'Very Good' BREEAM rating, with a score of 64.22% and that the passive design measures incorporated into the proposal can be used to achieve a 56% improvement over the existing development.

#### *ii. Contamination;*

Local Plan Policy A1 states contaminated land as a factor considered by the Council in managing the impact of development, requiring applicants to submit relevant assessments for sites that are known to be, or have the potential to be contaminated. A Contaminated Land

Assessment has been prepared by Jomas Associates to support the proposals. This recommends an asbestos survey to be undertaken due to the potential presence of asbestos containing materials on site. Ground conditions were found to have predominately high plasticity; therefore, it is advised in the report that consideration should be given to advice published by the National Housebuilding Council (NHBC) and the Building Research Establishment (BRE).

*iii. Archaeology*

Policy D2 'Heritage' of Camden's Local Plan seeks to protect remains of archaeological importance. The site located in a Tier 2 Archaeological Priority Area. To support the application, an Archaeological Desk Based Assessment has been prepared by RPS. This demonstrates that given the generally low archaeological potential of the study site and the minimal below ground impact the proposed development is understood to have it is recommended that no further archaeological mitigation measures will be required in this particular instance.

*iv. Trees*

The Council aims to protect and seek to secure additional trees and vegetation, as stated in Local Plan Policy A3 'Biodiversity'. As there are three street trees directly outside the site, it was advised in the pre-application advice that an Arboricultural Assessment will be required. This has been carried out by chartered arboriculturalist Tim Pursey. The assessment demonstrates that the proposed works will have little impact on the three street trees adjacent to the site. It has been recommended that the canopies of two of the trees be pruned back, protective hoarding should be constructed round the stem of each tree and the mixing and storage of building materials should be carried out at least 10m from each of the trees.

*v. Construction management*

Camden's Local Plan Policy A1 'Managing the Impact of Development' requires a Construction Management Plan will be sought for new developments which are characterised by the following:

- Poor or limited access on site;
- Accessed via narrow residential streets; and
- Areas with a high number of existing active construction sites.

A Construction Management Plan has been prepared by Chassay + Last which demonstrates the site will be constructed safely.

**8. Community infrastructure levy and S106**

Mayoral and Camden's Community Infrastructure Levy (CIL) are applicable to the proposed development. An offset is also deemed to be applicable, where the existing floorspace (507.20 sqm GIA) has been discounted against the proposed floorspace (526.3 sqm GIA), as the building has been vacant since August 2017 and has been in use for 6 months out of the previous 36 months. This brings the total figure including Mayoral and Borough CIL to £8,700 (plus any indexation).

In terms of S106 obligations, a financial contribution towards affordable housing will be secured alongside other obligations including car free development and construction management.



## 9. Conclusion and planning benefits

In conclusion, the key benefits of this proposal can be summarised as follows:

- The proposal would redevelop a brownfield site and provide residential dwellings which is Camden's priority land use and is in accordance with Local Plan Policy H1.
- It would create six high quality dwellings which would provide a high standard of living accommodation for future occupiers, in compliance with Local Plan Policies D1 and H6.
- It would provide much needed family housing to the area, in the form of 3-bedroom properties, in compliance with Local Plan Policy H7.
- The care facilities that were once housed on the site have now been relocated, leaving a vacant building which can now be brought back into beneficial use, in a way which satisfies the requirements of Local Plan C2.
- The changes to Raglan House have been sensitively designed to improve the locally listed building, respect the context and character of the local area and remove the incongruous extensions which have been previously added, demonstrating compliance with Local Plan Policies D1 and D2 and Neighbourhood Plan Policy D3.
- It has been demonstrated that the proposals are unlikely to adversely affect the privacy and amenity of the adjoining occupiers, as per Local Policy A1.
- Overall the proposals are in line with both Camden's Local Plan and relevant guidance, the London Plan and the NPPF.

## 10. Scope of planning application submission and app fee

The scope of the planning application was set out in the formal pre-application response dated 15th August 2019. The planning application documentation comprises:

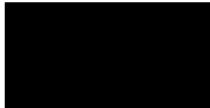
1. Application forms and certificates – ROK Planning September 2019;
2. Cover Letter - ROK Planning September 2019;
3. Site Location Plan (scale 1:1250) – Chassay + Last September 2019;
4. Site Plan (scale 1:500) – Chassay + Last September 2019;
5. Existing Plans and Elevations (scale 1:200)– Chassay + Last September 2019;
6. Proposed Drawings and Elevations (scale 1:100)– Chassay + Last September 2019;
7. CGIs – Existing and Proposed – Chassay + Last September 2019;
8. Area Schedule – Chassay + Last September 2019;
9. Design and Access statement – Chassay + Last September 2019;
10. Heritage Statement – Montague Evans September 2019
11. Archaeological Assessment – RPS September 2019
12. Sustainability Statement – JAW Sustainability September 2019;
13. Daylight and sunlight Report – Delva Patman Redler September 2019
14. Arboricultural Report – Tim Pursey September 2019
15. Construction Management and Logistics Plan – Chassay + Last September 2019
16. Contaminated Land Assessment – Jomas Associates September 2019

The planning application fee of £2,772.00 will be paid online by credit card.

The submitted documents demonstrate the works are considered appropriate as they comply with national and local planning policy and will bring forward significant planning benefits as set out in the conclusions of this cover letter.

I trust that the above and submitted information is self-explanatory and I await validation of the application. If, however you should have any questions in the interim please do not hesitate to contact either myself or Imogen Kupper at this office.

Yours sincerely,



**Matthew Roe**  
**Director**

T:   
E: [matthew.roe@rokplanning.co.uk](mailto:matthew.roe@rokplanning.co.uk)  
For and on behalf of ROK Planning