

Development Control
London Borough of Camden
5 Pancras Square
London
N1C 4AG

31 October 2019

Dear Sir / Madam,

RE: 151-153 CAMDEN HIGH STREET, LONDON, NW1 7JR
FP APPLICATION: CONVERSION OF UPPER FLOORS INTO TWO
RESIDENTIAL WITH ALTERATIONS & EXTENSIONS
SUPPORTING PLANNING STATEMENT

This letter has been prepared by CREATE Planning Ltd ("Agent") in support of a Full Planning Application ("Application") for a residential development submitted on behalf of Place Architecture and Design ("Applicant"), with regard to Nos. 151-153 Camden High Street, London, NW1 7JR ("Site").

This Application seeks permission from the London Borough of Camden ('Council') for the: *"Conversion of the vacant (A1) first and second floors into two residential flats (1 x 2B4P and 1 x 3B6P duplex) including alterations and the erection of second floor rear extension and mansard roof extension with associated refuse and storage."*

The contents of this letter are as follows:

1. Background & Objectives (Page 2)
2. Site Details (Page 3)
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4. Planning Considerations (Page 9)
5. Conclusions (Page 17)

EXECUTIVE SUMMARY

The proposed development would provide additional residential accommodation in general accordance with the Council's housing policy. The proposal would not result in any harm to the character of the area, or result in any amenity issues, it would comply with the intent of the Council's policies and is therefore recommended for approval subject to conditions and S106 Legal Agreement.

This letter should be read in conjunction with the following documents:

- Completed Application Forms prepared by CREATE Planning
 - Transport Technical Report by Kronen
 - Heritage Statement by Heritage Collective
 - Outline Construction Logistics Plan by Kronen
 - Application drawings prepared by Place Architecture and Design:
 - Energy Strategy Report prepared by Syntegra
 - Daylight, Sunlight and Overshadowing Report prepared by Syntegra Consulting
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- 18.15.050 Rev.00 Existing Site Block Plan
 - 22918PR Rev F0_1 Existing Ground Floor Plan
 - 22918PR Rev F0_2 Existing First Floor Plan
 - 22918PR Rev F0_3 Existing Second Floor Plan
 - 22918PR Rev F0_4 Existing Roof Plan
 - 22918PR Rev F0_5 Existing Elevations and Sections
 - 18.15.060 Rev.00 Proposed Site Block Plan
 - 18.15.200 Rev.00 Proposed Ground Floor Plan
 - 18.15.201 Rev.00 Proposed First Floor Plan
 - 18.15.202 Rev.00 Proposed Second Floor Plan
 - 18.15.203 Rev.00 Proposed New Third Floor Plan
 - 18.15.204 Rev.00 Proposed Roof Plan
 - 18.15.260 Rev.00 Proposed Elevations
 - 18.15.300 Rev.00 Proposed Sections AA
 - 18.15.300 Rev.00 Proposed Section s BB and CC
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- LB Camden Planning Pre-Application Advice (Ref. 2018/4661/PRE)

The purpose of this letter is to draw out the key planning issues arising from the development proposals and to assess the proposals in light of the national and local planning policy. This document will demonstrate that the scheme accords with these policies.

An application Fee of £924.00 (inclusive of VAT) will be paid by the Applicant.

1. BACKGROUND & OBJECTIVES

The Applicant is the freeholder of the Site and wishes to redevelop the Site in order to maximise its development potential.

The main objectives of the proposal are:

- The creation of two high-quality and sustainable units designed to meet the needs of future occupiers
- The effective and efficient use of the Site
- To deliver much needed market housing for the London Borough

2. SITE DETAILS

Description

The Site in question comprises a 19th century three-storey terraced commercial property on the west side of the High Street with a retail shop on ground floor, plus ancillary storage on the first and second floors. There is no independent access from the street or rear alley to these upper floors. The rear elevation has a projecting first floor rear extension and a second-floor mansard rear roof slope, plus a temporary covered fire escape corridor across the flat roof. The rear faces a flat roof on the rear extension for the ground floor shop, which is enclosed by high blank walls of adjoining properties on all sides, notably the M&S store of Nos. 143-147 at the rear. The roof is lower than the adjoining properties, notably No. 155 that has four-storeys.

Front Elevation

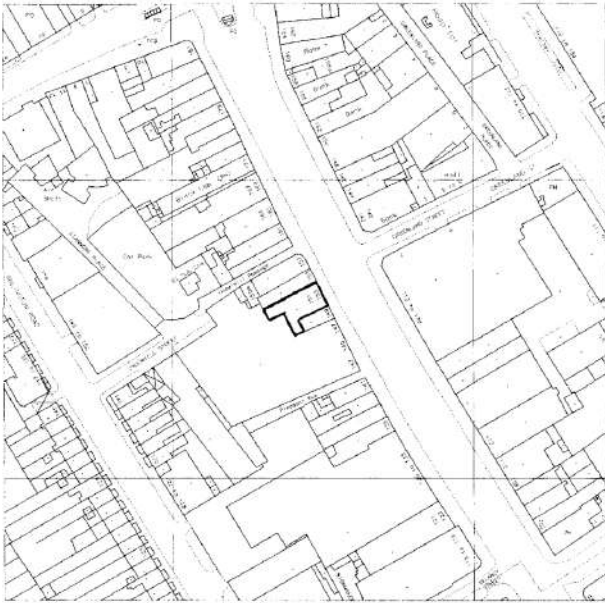


Context

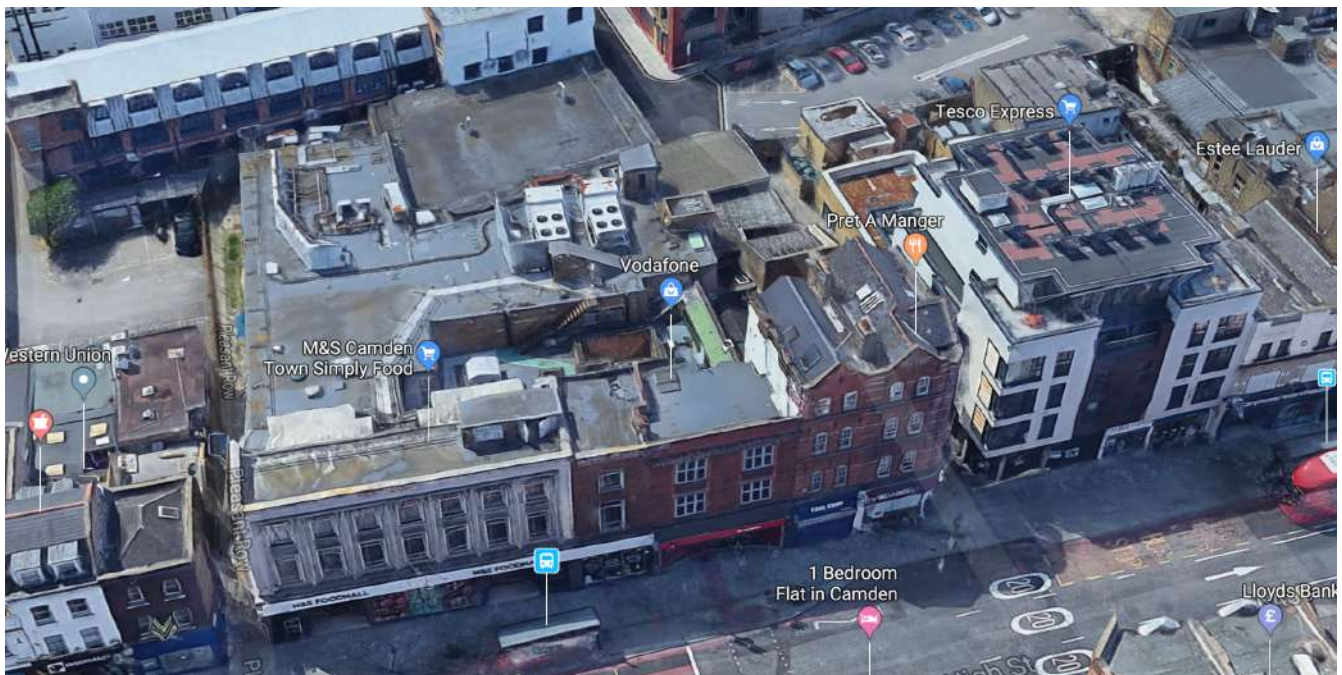
The Site is situated on the west side of Camden High Street with Regent's Park approximately 10 minutes' walk away. The Site has access to local shops and amenities, including Marks and Spencer's, Tesco Express and Lloyds.

The locality is predominantly characterised by commercial developments running along the main high street, leading onto Chalk Farm Road to the north and Parkway (A4201) to the south. The open spaces of Regents Park and Primrose Hill are within close proximity.

Site Location Plan & Aerial Photographs



[Front Elevation]



The property, itself, is designated along primary shopping frontage of Camden Town Centre.

[Rear Elevation]



Transport & Accessibility

The Site has a PTAL rating of 6b, which is regarded as 'excellent'.

WebCAT PTAL Map

Address or co-ordinates

nw1 7jr

Go

Access level (PTAL)

Time mapping (TIM)

PTAL: a measure which rates locations by distance from frequent public transport services.

Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers

PTAL (cell size: 100m)



Tube services run from Camden Town (a two-minute walk away) providing access to the northern line and rail services further afield. The Site also has access to bus services directly outside the premises with 8 routes serving the Site (these include the 29, 134, 214, 253, N20, N29, N253 and N279).

Street Map



Heritage Assets

The Site is within the Commercial Sub-Area 1 of Camden Town Conservation Area designated in 1986. The property, along with its neighbours, is identified as a positive contributor to its character.

Flood Risk

The Site is not located in an area at risk of flooding.

Planning History

There are only a series of permissions relating to new shopfronts and adverts (Refs. 2003/1211/A, 9003166 and 8480197). None are considered relevant to the proposal.

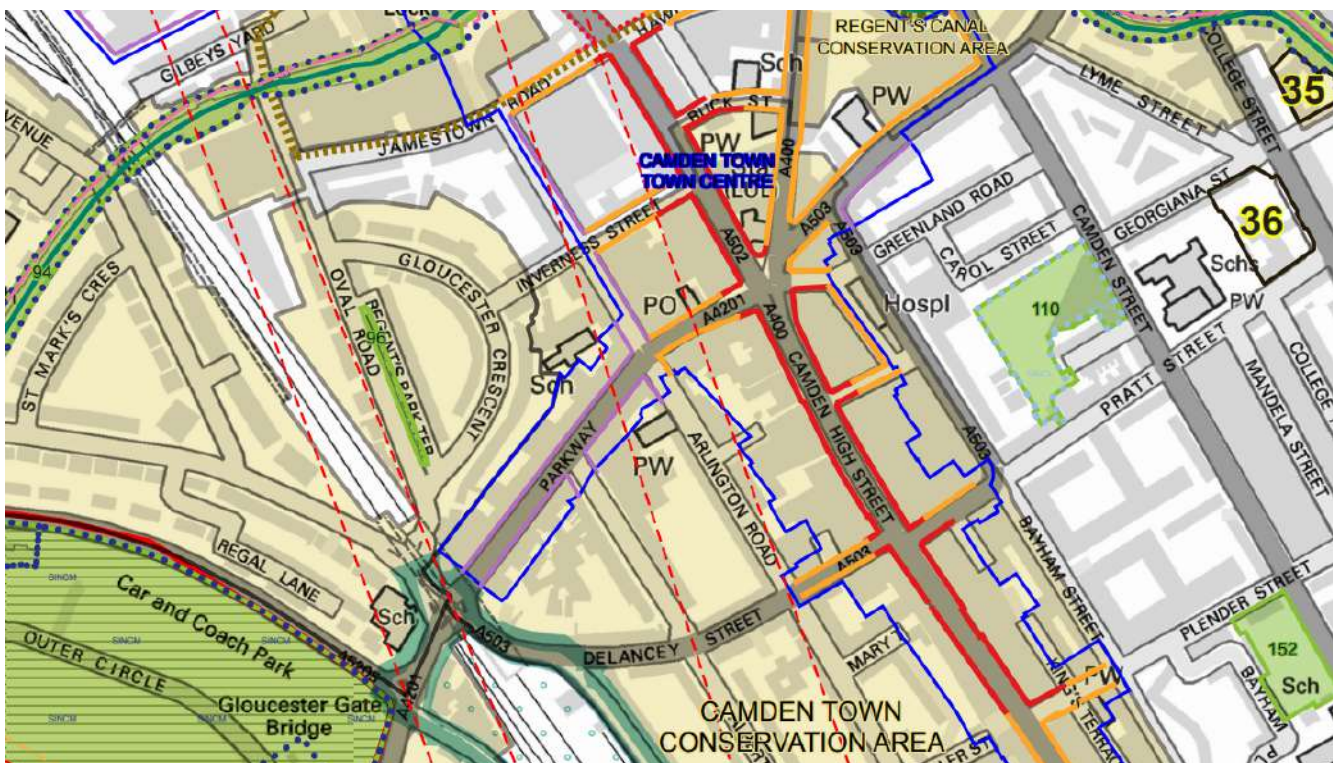
Planning Policies & Guidance

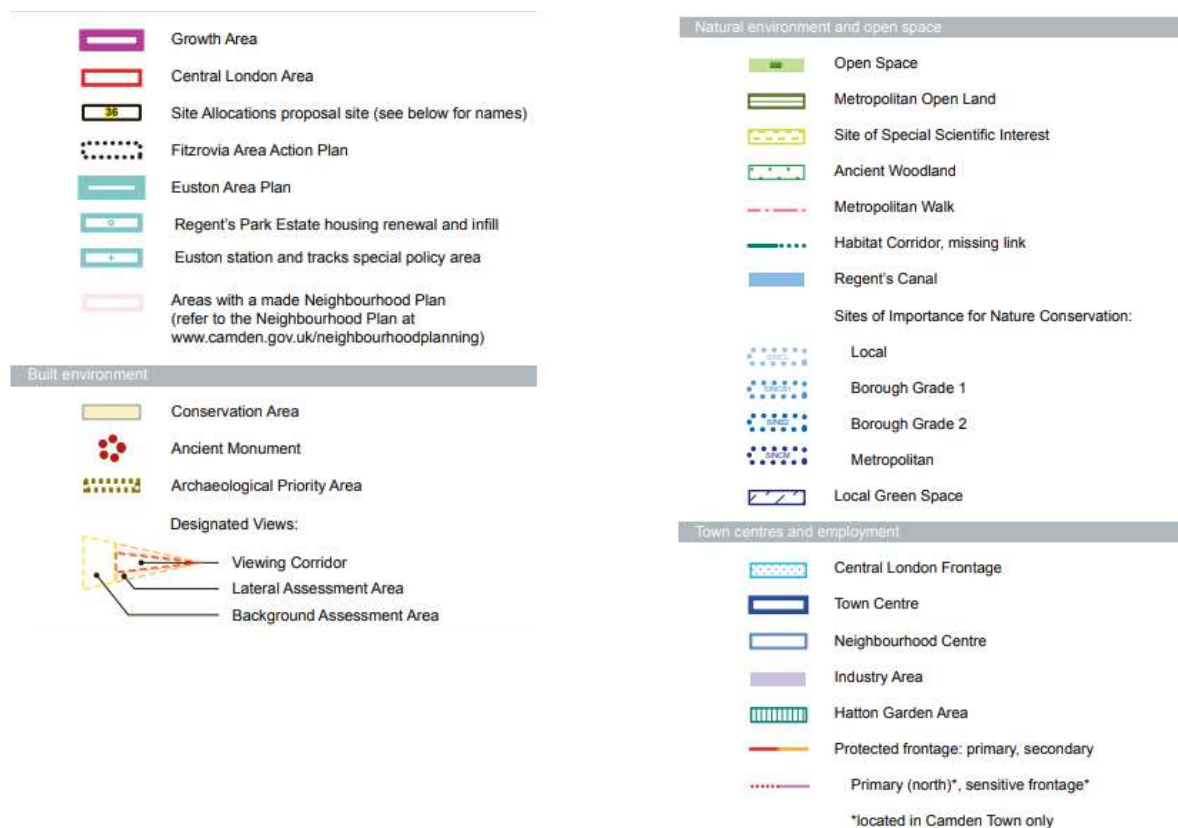
Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, when determining a planning application, regard is to be given to the Development Plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

- National Planning Policy Framework 2019
- The London Plan 2016
- Draft London Plan – Consolidated Suggested Changes Version July 2019
- Camden Local Plan 2017

The relevant policies include (but are not limited to): Policy H1 Maximising housing supply; Policy H4 Maximising the supply of affordable housing; Policy H6 Housing choice and mix; Policy H7 Large and small homes; Policy A1 Managing the impact of development; Policy D1 Design Policy; D2 Heritage; Policy D3 Shopfronts; Policy CC1 Climate change mitigation; Policy TC2 Camden's centres and other shopping areas; Policy T1 Prioritising walking, cycling and public transport; Policy T2 Parking and car-free development; Policy T4 Sustainable movement of goods and materials.

Online Policies Map





Other Planning Policies / Guidance

- CPG1 Design
- CPG2 Housing
- CPG3 Sustainability
- CPG Town Centres
- CPG7 Transport
- Camden Town Conservation Area Appraisal and Management Strategy ("CAAMS")

3. PROPOSED DEVELOPMENT

The Application seeks permission from the Council for the: *"Conversion of the vacant (A1) first and second floors into two residential flats (1 x 2B4P and 1 x 3B6P duplex) including alterations and the erection of second floor rear extension and mansard roof extension with associated refuse and storage."*

The redevelopment of the building will be modern in appearance in keeping with the character of the high street. The rear of the property will be in render finish with the proposed mansard roof and dormers finished with slate roofing.

Currently, there is no independent access from the street or rear alley to the upper floors. The development proposes to produce access from the front of the building.

Both proposed flats benefit from outside amenity space.

No off-street parking exists, and none is provided.



- Land Use Principles
- Affordable Housing
- Housing Mix
- Standard of Accommodation Proposed
- Accessibility
- Design & Conservation
- Amenity
- Transport
- Air Quality
- Energy & Sustainability
- Flooding & Drainage
- Planning obligations

i. Land Use Principles

The CAAMS says, in relation to re-use of premises above shops and other commercial buildings, that: *“many of the retail areas within the Camden Town Conservation Area suffer from empty or under used upper floors. The mix of uses is considered to be a positive characteristic in the commercial part of the Conservation Area. Often the separate street access has been removed to create larger shops and the floors above have become stores or left empty. The Council would like to see the re-use of premises above shops and other under used commercial buildings.”* The reuse of these floors for new housing here would thus accord with these aims.

A new separate street entrance will be created at the side of Vodafone's shopfront.

Self-contained housing is regarded as the priority land-use of the Camden Local Plan and Policy H1 states that the Council will make housing its top priority when considering the future of underused land and buildings. Thus, the creation of new housing here is welcomed.

Retention of A1 Unit (Ground Floor)

The lawful planning use of the upper floors is ancillary to the ground floor (A1). The ground floor shop was used by H Samuel jewellers from 1950s and by Vodafone (the current tenants) since the last 14 years.

The frontages policy (TC2) primarily protects the ground floor, street frontage part of a unit. Although the Council will seek to avoid the reduction of overall retail space, especially in Camden Town Centre, it acknowledges that retail may not always be the most effective use of the upper floors of certain buildings. Providing that the viability of the ground floor unit to act in a retail capacity is not compromised, changes of use away from retail on other floors would not be contrary to the frontage policy.

The upper floors are not really used or needed by the current shop tenants, nor have been for some time. The upper floors are considered surplus to requirements by the retail use and there is sufficient ancillary space within the large ground floorplate to ensure the ground floor shop continues as a viable retail unit.

ii. Affordable Housing

The new housing would be approx. 170.5 sqm GIA floorspace. Thus, the new residential floorspace uplift would exceed 100 sqm and the Council would therefore seek a contribution towards offsite affordable housing.

Policy H4 requires a proportion of the housing provided to be affordable in accordance with the sliding scale. Targets are based on an assessment of development capacity whereby 100 sqm GIA of housing floorspace is generally considered to create capacity for one home. Targets are applied to the additional residential floorspace proposed in GEA. In this instance, based on the GIA figure provided and rounded up to the nearest 100sqm, the additional residential floorspace is 200 sqm, thus the requirement for housing is 4% (2% x capacity for 2 units at 100 sqm each). The payment calculation is based on GEA figures, not GIA, which have not been provided in this case. However, as an indication of the likely contribution required at this stage, the GIA figure is used here to show that the affordable floorspace to be provided on site (4% of 170) is approx. 7 sqm, hence the formula for a payment-in-lieu (7 sqm x £2,650) results in a financial contribution. The final agreed amount would be secured by a S106 Legal Agreement.

iii. Housing Mix

Policy H7 requires a mix of sizes of homes with the main priority for two-bed and three-bed units. It is considered that the proposal's provision of two-family units (1 x 2b4p flat and 1 x 3b6p duplex flat) is suitable.

iv. Standard of Accommodation Proposed

The flat layout and stacking are considered acceptable as there is adequate access to sunlight, daylight and outlook. Headroom of the new mansard floor should be 2.3m as required by CPG2 advice but the section shows that this is possible. The unit sizes meet minimum London Plan standards, and the mix containing a 'high priority' 3-bedroom unit meets the preferences of Local Plan Policy H7 (Table 1). The first floor flat will have direct access to the rear flat roof where a roof terrace is proposed - this amenity space provision should be welcomed.

There is reasonable access to local parks and facilities to complement the on-site amenity areas.

v. Accessibility

The new units in this conversion will comply with Part M4 (1) on accessible homes.

vi. Design & Conservation

Please refer to the Heritage Assessment prepared by Heritage Collective.

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area. Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. Camden's Local Plan is supported by CPG (Design) and the CAAMS.

The CAAMS says, in relation to Sub-Area 1 of the conservation area, that: *"a key element of the distinctive character and appearance of the commercial part of the Camden Town Conservation Area is its variety and eclecticism. Change must be managed so as to retain the distinctive and varied character of this part of the Conservation Area, with new developments contributing positively to that variety and distinctiveness."*

Historic research has established that the ground floor shop front has been changed several times. In images from the 1930's, the original shop front appears largely intact, by 1977 most of these features are absent. The arrangement that exists now is from the 2015 remodelling.

The proposals are considered to enhance the appearance of the frontage of Nos. 151 153 Camden High Street by improving the quality of the entrance way and re-establishing a flat frontage in an arrangement closer to the original. The aim of the proposals has been to preserve the character of the area, changes to the rear in order to improve design, outward appearance and the functionality of the space.

Proposals at roof level are modest and will have low visibility in views down Camden High Street towards the city. It amounts to a minimal change in the existing street scene that does not meaningfully impact character or appearance.

Rear Facade

The rear elevation of this property lies amongst a variety of different rear and roof treatments, heights and projections on neighbouring properties, much of which is very utilitarian. The rear is completely hidden from any public or private views due to the enclosure of the rear roof terrace by the M&S building wrapped around it. The proposed second floor rear extension would sit above the existing first floor one, matching its size and design, and would replace the mansard and toilet block projection. The proposed rear mansard roof would effectively relocate the existing one upwards by a storey and add two more dormers.

Although the extensions together result in totally remodelling the rear elevation, it is considered that this is acceptable in this context of adjoining property rear elevations and lack of visibility from the public realm. The rear extension depth will be similar to the projection of No.157 further north; the mansard will be below the adjoining flank wall height of No.155. The extensions are considered appropriate in size, bulk and design, subject to more details of the fenestration and materials.

Front Facade

The mansard roof extension will be significantly masked from front views in the High Street by the very high parapet and would adjoin a much higher gabled roofscape of Nos.155-157. There is a variety of roof types, styles and heights along this stretch of the road, reflecting the eclectic mix of architectural forms and ages of this shopping parade. It is considered that the proposed roof extension would contribute to this distinctive character in its variety and eclecticism and would accord with the aims of the CAAMS quoted above. It would also meet the aims of CPG1 (Design), as there is unlikely to be: *“an adverse effect on the skyline, the appearance of the building or the surrounding street scene.”* The mansard is considered to be an appropriate form of roof addition here on a flat roof with front parapet; it would comply with CPG guidance on detailed design with the lower slope having a maximum angle of 70 degrees.

The new separate residential side entrance will require alterations to the existing modern shopfront (not shown on the submitted elevations). These are considered acceptable in principle.

Overall, the extensions and alterations would preserve the character and appearance of the Camden Town conservation area.

i. Amenity

Please refer to the Daylight, Sunlight and Overshadowing Report prepared by Syntegra Consulting.

Policies A1 and A4 of the Local Plan seek to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.

This report demonstrates the impact of the proposed development on the surrounding buildings and amenity areas/gardens/open spaces.

The results of the assessment show that in terms of:

- Daylight, this report demonstrates that the levels of daylight for the surrounding buildings located at Nos. 112-157 Camden High Street will not be adversely affected by the proposed development.
- Sunlight, this report demonstrates that the levels of sunlight for the surrounding buildings located at Nos. 112-157 Camden High Street will not be adversely affected by the proposed development.
- Overshadowing, the existing amenity area/garden/open spaces located at Nos. 161 and 149 Camden High Street will not be adversely affected by the proposed development.

On balance, it can be concluded that the surrounding buildings / amenities located at Nos. 112-157, 161 and 149 Camden High Street will not be adversely affected by the proposed development.

The proposed extensions, given their location and setbacks and the lack of any habitable room windows adjoining or opposite, would not have any impact on neighbours in terms of loss of light, privacy and outlook.

ii. Transport

Please refer the Transport Technical Note prepared by Kronen.

Travel Planning & Trip Generation

Local Plan policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. Policy T2 requires each 1-bed unit to have 1 cycle parking space and each 2+ bed to have 2 cycle parking spaces, all to be accessible, covered, secure and fully enclosed within the Site.

The location of the site is very well connected by public transport (PTAL 6B) and within close proximity to Camden underground station and several bus routes. For this reason, and the fact there is no private parking available on-site, this increase in the number of trips is acceptable.

The Site is located in a busy shopping centre outside a pelican pedestrian crossing and near bus stops and bus lanes. Construction access to and from the Site will therefore be difficult at certain times of day and it should not affect operation of the crossing outside. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. An Outline Construction Management Plan (CMP) has been submitted in line with policy A1. The CMP would need to identify the potential impacts of construction and indicate how any potential negative impacts would be mitigated. It will be secured by a S106 Legal Agreement. CMP Implementation Support Contribution would also be required to cover the costs of assessing, reviewing and monitoring the CMP across the duration of construction.

The scheme may result in construction damage to the public highway outside in the High Street and any such damage will need to be repaired at the developer's expense. This will also be secured by a S106. TfL are the highways authority here so you will need to enter into a S.278 agreement with them for any works to the highway.

Provision of Cycle Parking

Given the Site constraints the scheme proposes assessing the Council with public highway cycle parking by agreement / condition. In addition to private cycle ownership, the Site is within walking distance of 2 x Santander Cycle scheme docking station on Parkway and Greenland Road. Accordingly, the proposed arrangements are considered acceptable.

Deliveries & Servicing

Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

As shown on the accompanying drawings, the Site constraints result in an absence of ground floor external area and a constrained entrance / lobby area. Accordingly, we are not proposing a communal refuse / storage but rather 'residential kerbside collection' with sacks.

Within apartments refuse / cycle storage areas are provided in bin cupboards and underneath sinks in kitchens with a storage provision in excess of refuse 60l per apartment / dry recycling 60l per apartment / food waste 7l per apartment. It is proposed that occupants of the proposed apartments will leave Local Authority contactor refuse / recycle sacks on the highway kerbside on collection day mornings only.

We consider this is compliant with Sections .15 to 8.19 Residential Kerbside Collection, of Camden Planning Guidance Design (2019).

Other domestic / loading / unloading could take place on the highway from the Red Route loading maximum 20 minutes bays (Mondays to Saturday, 8am to 4pm, and Sundays 8am to 1pm) outside Pret A Manager (No. 157 Camden High Street and ALDI No. 125 to 133 Camden High Street).

In light of the above, the proposed refuse / servicing provisions are considered acceptable.

iii. Air Quality

Camden Local Plan policy CC4 is relevant with regards to air quality. A condition is recommended providing full details of air quality monitors to be installed on-site to be submitted for approval.

iv. Energy & Sustainability

Please refer to the Energy Strategy Report prepared by Syntegra Consulting.

Camden Local Plan Policies CC1, CC2, and CC3 all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage. Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: Be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition, chapter 5 of the London Plan sets out the need for schemes to: Secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.

The Council requires new developments to incorporate sustainable design and construction measures. The table below summarises the local policy requirements for the proposed development.

Policies	Requirements	Compliance Check
Local Plan Policy CC1	All new residential development will also be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations and 20% carbon reduction via on-site renewable technologies	The development achieved a carbon reduction of 75.43% over Part L 2013 baseline via energy efficient measures. The development achieved an overall carbon reduction of 21.39% via PV.
Local Plan Policy CC2	BREEAM domestic refurbishment 'Excellent' for conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings.	Since the development consists of 2 dwellings of a total of 193.09 sqm, BREEAM 'Excellent' was not targeted.

Table 1 Policy Requirements

The methodology used to determine the CO2 emissions is in accordance with the London Plan's three step Energy Hierarchy (Policy 5.2). The below table shows the Energy Hierarchy and suggested strategies for the proposed development.

Stages	Strategies
BE LEAN Energy efficient design	<ul style="list-style-type: none"> U-values better and air permeability better than Building Regulations Part L; High efficiency electric boiler for heating and hot water. Low energy (LED) type lighting; Natural ventilation
BE CLEAN District heat networks or communal heating systems	As there are no current or proposed district heat networks and the size of the development is not suitable for CHP this stage of the hierarchy is not feasible for this scheme. Details can be found in section 8.1.
BE GREEN On-site renewable technologies	<ul style="list-style-type: none"> PV panels of 4.725 kWp on the roof (approximate 15 panels with 315 w/p are required). Details are in Section Error! Reference source not found.

Table 2 Energy Hierarchy and suggested strategies

After the Application of all strategies based on the Energy Hierarchy, the regulated carbon dioxide emissions have been reduced as follows:

Energy Hierarchy		Regulated Carbon Emissions (Tonnes CO ₂ /yr)
BASELINE	TER set by Building Regulations 2013 Part L	27.90
BE LEAN	After energy demand reduction	8.72
BE CLEAN	After CHP/ Communal Heating	8.72
BE GREEN	After renewable energy	6.85

Table 3 Carbon Emissions after each stage of the proposed strategy

This carbon savings from each stage can be calculated based on the results above. The table below summarises the total cumulative savings:

Energy Hierarchy		Regulated Carbon Savings	
		Tonnes CO ₂ /yr	%
BE LEAN	After energy demand reduction	19.18	68.75 %
BE CLEAN	After heat network/ CHP	0	0
BE GREEN	After renewable energy	1.87	21.39%
Total Cumulative Savings		21.05	75.43%
Total Target Savings		5.30	19 %

Table 4 Carbon dioxide Emissions after each stage of the Energy Hierarchy

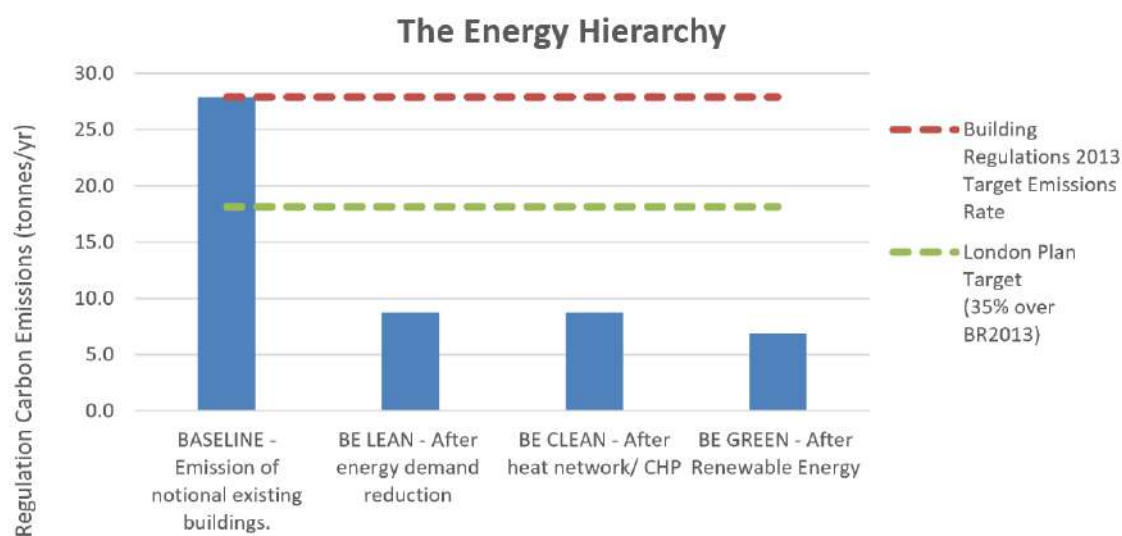


Figure 1 The Energy Hierarchy

v. Flooding & Drainage

Camden Local Plan Policy CC3 is relevant with regards to flood risk and drainage. The area is at very low risk of flooding. It is considered that the surface water runoff generated from the proposed re-development would be no more than the existing situation due to the Site's existing 100% developed and impermeable nature.

vi. Planning Obligations

Employment & Training Opportunities

The proposed scheme has the potential to provide employment and skills opportunities for local residents. The Applicant would be open to agree to a range of training and employment benefits would be secured by s106 agreement to provide opportunities during and after the construction phase for local residents and businesses.

Public Open Space

No public open space contributions will be required as the development for two units is below the threshold for such payments.

Mayor of London CIL2 & Camden CIL contribution

The proposed development is liable to pay the Camden and Mayoral Community Infrastructure Levy (CIL), the funds for which will be applied by the Mayor towards the Crossrail project.

Camden's Community Infrastructure Levy was implemented on 1st April 2015. This will enable the Council to raise, and pool, contributions from developers to help pay for things such as transport, decentralised energy, healthcare, schools, leisure and public open spaces - local infrastructure that is necessary to support new development. Camden's CIL has replaced Section 106 agreements as the principal means by which pooled developer contributions towards providing the necessary infrastructure should be collected.

5. CONCLUSIONS

The proposed development would provide additional residential accommodation in the Central London Activity Zone, in general accordance with the Council's housing policy. The proposal would not result in any harm to the character of the area, or result in any amenity issues, it would comply with the intent of the Council's policies and is therefore recommended for approval subject to conditions.

I trust this letter is satisfactory for registration and validation of the Application and I look forward to receiving an acknowledgement of this letter shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,



Izabela Moorhouse
Planner