

Date: 22 January 2019
Our Ref: 2018/4116/PRE
Contact: David Fowler
Direct Line: 020 7974 2123
Email: david.fowler@camden.gov.uk

**Development Management
Supporting Communities**
London Borough of Camden
5 Pancras Square
London N1C 4AG

Tel 020 7974 4444
www.camden.gov.uk/planning

Laura Dimond
Maddox Associates

Sent by email

Dear Laura,

1. The site

- 1.1 The site fronts on to Kentish Town Road. There is also a narrow rear frontage on to Grafton Yard.
- 1.2 The existing building consists of a ground, mezzanine and second floor, with the parapet built up to meet the parapets of the neighbouring building (thereby appearing to have an extra storey).
- 1.3 The building is currently vacant. We note that you consider the premises to have a Class A2 use. The latest record we have with regards the use as a 'community law centre and housing aid centre', which we also consider a Class A2 use.
- 1.4 The site is located within the Town Centre of Kentish Town (Primary Frontage). The site is not within a conservation area. The Citizen's Advice Centre to the south-west of the site is locally listed.
- 1.5 The site is within the Kentish Town Neighbourhood Plan area.

2. Proposals

- 2.1 The proposals are for significant external alterations including a two-storey roof extension (including mansard) and erection of a five-storey storey building at the rear. The proposals are also for the change of use of existing Class A2 premises into flexible Class A1/A2/B1 use at part ground and part first floor and for the use of the upper floors as residential, to create 6 residential units (Class C3) at first to fourth floors.

3. Introduction

- 3.1 The following issues are covered in this letter:
 - Principle of development
 - Land use
 - Quality of proposed residential accommodation

- Design
- Amenity of neighbouring properties
- Transport
- Sustainability
- Conclusion

4. Principle of development

4.1 The existing building is considered to be unattractive and to detract from the character of the streetscene. We welcome the possibility of this site being improved. However, we consider that in this instance, the full demolition of the building would be preferable.

5. Land use

Housing

5.1 Camden Local Plan policies H1, H2, H4, H6, H7 and Camden Planning Guidance 2 (Housing) are relevant with regard to the provision of housing, including affordable housing. Residential use is the Council's priority land use and is welcomed in principle.

5.2 333.3sqm of residential use is proposed. Residential is the Council's priority land use and is welcomed in principle.

5.3 Policy H4 is relevant with regards the provision of affordable housing. We will expect a contribution to affordable housing from all developments that provide 1 or more additional homes. A sliding scale applies to developments that provide between 1 and 25 additional homes. An assessment of capacity is based on the gross floorspace and capacity is calculated as 1 home per additional 100sqm, with the capacity rounded to the nearest whole number. The capacity is therefore 4 homes in this instance ($333\text{sqm}/100 = 3.33$ homes). Using the sliding scale (2% per unit), 8% would be required of the GEA. The GEA figure has not been provided so I have calculated this by multiplying by 1.25 (in accordance with the Council's CPG on Housing). Therefore the GEA calculates at 416.25sqm ($333 \times 1.25 = 416.25\text{sqm}$) and 8% of this calculates at 33.8sqm. The affordable housing payment-in-lieu is £88,245 ($33.3\text{sqm} \times £2,650$).

Proposed commercial use

5.4 The site is within a Primary Frontage in the Town Centre of Kentish Town. Policy TC4 seeks to maintain the vitality and viability of Town Centres. Policy SW1 of the Kentish Town Neighbourhood Plan seeks to support small businesses.

5.5 146.3sqm of Class A2 use is proposed, although we discussed other potential commercial uses. The retention of Class A2 use at ground floor is considered acceptable, as would the provision of a Class A1 use. The provision of a Class B1 use at ground floor level would detract from the viability and vitality of the Town Centre and would not be supported.

5.6 We have no objections with regards the provision of a part first floor in commercial use on land use grounds, however, this is considered to jeopardise the quality of the residential accommodation (see below).

6. Quality of proposed residential accommodation

6.1 Policy H7 requires homes of different sizes to meet the priorities set out in the Dwelling Size Priorities Table (see below). The proposed unit mix should broadly accord with this table, although the Council will be flexible when assessing development.

Table 1: Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

6.2 Under the proposals there would be 6 flats, made up of the following mix:

- 3 x one-bedroom
- 3 x two-bedroom

The unit mix is considered to broadly comply with the above table, although the provision of more two-bedroom and three-bedroom units is encouraged.

6.3 The proposed residential accommodation should meet the National Space Standards which are outlined below. Floorspace figures of all the flats should be provided as part of any future application, which demonstrates that they all meet the National Space Standards. Any discrepancies should be strongly justified.

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Notes to Table 3 3

- * Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.
- The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls¹ that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²).
- The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

6.4 All 6 flats would meet the space standards outlined above.

Amenity of the proposed flats

6.5 All residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, in both new build and change of use:

- is self-contained and has its own secure private entrance;
- has good ceiling heights and room sizes;
- is dual aspect except in exceptional circumstances;
- has good natural light and ventilation;
- has good insulation from noise and vibration;
- has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities);
- 3+ bed units should separate kitchen and living areas;
- incorporates adequate storage space;
- incorporates outdoor amenity space including balconies or terraces; and
- is accessible and adaptable for a range of occupiers.

6.6 The London Plan Housing SPG (March 2016) requires all flats to have private amenity space as follows:

Standard 26

- 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.

Standard 27

- The minimum depth and width for all balconies and other private external spaces should be 1500mm.

6.7 All of the flats would have access to external space, either in the centre of the site, or at the rear, on to Grafton Yard, in accordance with the London Plan Housing SPG.

6.8 A daylight/sunlight report should be submitted with any future applications demonstrating that the proposed flats would receive sufficient daylight. A noise report should be submitted as part of any future application and should include the impact on proposed residential accommodation as well as existing residential accommodation (see 'Amenity of neighbouring properties' below). We have concerns that some of the rooms at rear first floor and second floor would not receive sufficient light.

6.9 All housing should meet Part M building regulations. We require 10% of units to be wheelchair homes or easily adaptable.

6.10 We note that you intend to minimise the number of single-aspect units in the scheme, which is encouraged. Single-aspect north-facing units will be unlikely to be acceptable. The choice of slab blocks as the form of buildings on the site could result in numerous single-aspect units and you are advised to address this issue.

Access and circulation

6.11 Proposals show primary residential access through a yard space enclosed by a 2.5m brick wall dominated by access to the bin store. All other surrounding buildings turn their back on Grafton Yard, resulting in a poorly overlooked space. As such a primary residential entrance would be more appropriate on Kentish Town Road. This would be a more contextual approach - residential and commercial entrances side by side are commonly seen along the high street.

6.12 The internal layout shows three separate stairways, resulting in an inefficient use of space, and suggests convoluted programming of the building. Consideration should be made as to whether internal layout could be rationalised to provide better use of space.

7. Design

Policy review

7.1 Policies D1, D2 and CPG1 (Design) of the Camden Local Plan are relevant to conservation and design.

Architectural approach

7.2 Careful consideration of the characteristics of the site and the wider context is needed in order to achieve high quality development that integrates into its surroundings. The information provided lacks contextual analysis, and consequently the proposal lacks a coherent design approach.

7.3 As a high street building, this needs to present a strong ground floor appropriate for its use. As a commercial unit in a town centre, this should typically have a more generous storey height than that of the upper floors. (Further information on the design of retail spaces is in Policy TC2 Camden's centres and other shopping areas). As proposed, the height of the ground floor is considered too low for commercial unit (2.5m). The upper floors are taller, which undermines the hierarchy of the building and brings skewed proportions to the facade.

7.4 The elevation seems to seek to relate to its neighbours, which is a welcome starting point. However, borrowing from 2 quite different buildings of different periods and styles by virtue of their adjacency is not considered a strong enough design approach and results in a confused response. For example, the proposal draws through the horizontal banding of the building to the south. This does not relate to the floor plates within the proposed building due to the retention of the existing structure, and thus results in unusual proportions and fenestration pattern. The composition of the façade should be considered in the round.

7.5 The palette of materials proposed for the primary façade indicates a mix of stone and zinc/metal cladding. Without site analysis or design development it is unclear as to how these materials have been chosen and how they are intended to work together. The Council is open to high quality contemporary design and materials, where it improves the character and quality of an area, but the combination here is jarring and confused. For example, the proposal states 'windows to match 195 and 199-203 Kentish Town Road'. Is the intention that these would be timber sashes? How would this work with the stone and metal cladding? A more developed narrative around the design response should be demonstrated in order to adequately assess proposals.

Residential layouts

7.6 The number of residential units proposed results in compromised accommodation. This is clearly apparent in flat 1 where the living/kitchen area is accessed via the bedroom. Residential accommodation is thus unlikely to be supported at first floor level, and completely unacceptable in its current guise. The first floor programme should be rationalised which would help to resolve the convoluted layout.

7.7 Flats 2, 3, 4 have more coherent and workable layouts, though have concerns about the amenity, outlook and daylight for the rear bedrooms via the proposed light well.

7.8 Likewise, flat 6 is a single aspect unit with deep and narrow rooms, with the only outlook enclosed by and set back from the building line of the blocks on either side. This could result in particularly compromised light levels.

8. Amenity of neighbouring properties

8.1 Policy A1 and CPG6 (Amenity) of the Camden Local Plan are relevant with regards to the amenity impact on neighbouring properties.

- 8.2 A daylight/sunlight assessment should be submitted as part of any future application to demonstrate that there would be no material impact on neighbouring properties.
- 8.3 Given the location, orientation and the position of the proposed windows, there would be no overlooking issues.
- 8.4 Full details of all plant and ventilation are required and a noise report should be submitted as part of any future application.
- 8.5 You will be required to include mitigation and offsetting measures to deal with any negative air quality impacts associated with your development proposals. At the same time your development should be designed to minimise exposure of occupants to existing poor air quality. An Air Quality Assessment would be required as part of any future application.

9. Transport

Car parking

- 9.1 The proposed residential units would be secured as car free under a Section 106 Agreement. We welcome the removal of parking areas.

Servicing and construction

- 9.2 Full details of servicing would required in any future applications in the form of a Servicing Management Plan. A draft Construction management Plan should also be submitted, and should follow the Council's pro-forma. We encourage you to remove the forecourt and follow the predominant building line of this part of Haverstock Hill/Chalk Farm Road. Given the scale of development, including just 2 commercial units, we consider that the site could be serviced from the road, although this is a point that would need to be agreed with TfL, given the bus lane. A contribution towards CMP monitoring would be secured. A Servicing Management Plan would be required as part of any future application. This should include details such as hours of servicing, which should be out of rush hour times.

Cycle parking

- 9.3 Cycle parking should be provided in line with the standards laid out in the London Plan 2016 for both the residential and non-residential elements.

10. Sustainability

- 10.1 A Sustainability Plan and Energy Plan should be submitted as part of any future application, detailing how the proposals accord with policies CC1, CC2, and CC3.

11. Conclusion

- 11.1 We welcome the improvement of this site, however, we consider that full demolition and rebuild would be preferable in this instance. At present the proposal does not demonstrate a clear narrative. More work should be done to understand the context of the high street, and how this site can contribute to one of Camden's major town centres. The proposals are not considered acceptable in design terms at present.

11.2 Residential use is welcomed in principle. A payment towards affordable housing would be required. The proposed Class A1 or A2 uses would also be welcomed.

11.3 The proposed flats would be acceptable in terms of unit mix, size and outlook. However, officers have concerns regarding the light to some rooms at lower levels. Residential access from the rear (Grafton Yard) is undesirable and results in a compromised primary entrance to the accommodation at upper levels. Access to the residential units from Kentish Town Road should be considered. Internal layouts and programming should be rationalised as results in substandard accommodation for both residential and commercial units.

12. Community Infrastructure Levy

12.1 At the present time development would be subject to the Mayor of London's Crossrail CIL given that more than 100sqm increase in floorspace is proposed. The rate depends on the type of floorspace with (for example) £50 per sqm levied for residential use in Camden. Please be aware that the Mayor is reviewing his CIL schedule and has indicated that a new schedule may be in place in 2019.

12.2 The proposal by its size and land use type will be liable for the London Borough of Camden's Community Infrastructure Levy (CIL) introduced on the 1st April 2015 to help pay for local infrastructure. You will need to refer to the prevailing charge at the time that any planning permission is granted. At present the Council levies a charge of £250 per sqm for residential development.

13. Section 106 Obligations

13.1 CPG8 (Planning obligations) is relevant with regards to planning obligations.

13.2 The section 106 obligations below are likely to be included in an agreement. Please note that this list is not exhaustive.

14. Potential section 106 terms

- Car free
- Sustainability/energy
- Construction Management Plan + monitoring fee
- Highways contribution
- Pedestrian, Cycling and Environmental contribution
- Public Open Space
- Affordable housing contribution
- Employment and training

You are encouraged to undertake public consultation, including with local groups, before the submission of any planning applications. The details of any should be provided within a Statement of Community Involvement.

You are strongly advised to make early contact with local organisations/groups and ward councillors.

As part of your submission you should set out what public consultation you have carried out, what comments have been received and how your proposal has been amended in response to such comments.

Information to be submitted with any planning application (not exhaustive)

- Planning Statement
- Design and Access Statement(s)
- Viability Report if not providing policy complaint payment for affordable housing
- Daylight/Sunlight Assessment
- Transport Statement
- Lifetime homes and wheelchair housing statement
- Air Quality Report
- Statement of Community Involvement
- Energy Statement
- Sustainability Statement
- Details of refuse and recycling storage
- Noise (and Vibration) Report and details of necessary attenuation measures
- Draft Construction Management Plan
- Statement of Community Involvement
- Flood Risk Assessment.

Please note that failure to provide all of the above information with any planning application is likely to lead to delays in the application being validated. Please note, this list is not exhaustive, and other documents may be required to validate the application if they are considered necessary at a later date.

Disclaimer:

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries about the above letter or the attached document please contact **David Fowler** on **020 7974 2123**.

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

Yours sincerely,

David Fowler
Principal Planning Officer