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Laura Dimond
Maddox Associates

Sent by email

Dear Laura,

1. Background

1.1 This is the Council's second letter following our earlier pre-application response dated 22 January 2019. For the sake of the completeness, I have repeated my advice where it is still relevant.

2. The site

- 2.1 The site fronts on to Kentish Town Road. There is also a narrow rear frontage on to Grafton Yard.
- 2.2 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).
- 2.3 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.
- 2.4 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.
- 2.5 The site is within the Kentish Town Neighbourhood Plan area.

3. Proposals

3.1 The proposals are for significant external alterations including a two-storey roof extension (including mansard) and erection of five storeys at the rear. The proposals are also for the change of use of existing Class A2 premises into flexible Class A1/A2 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.

4. Introduction

4.1 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

5. Principle of development

5.1 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 still consider that in this instance, the full demolition of the building would be preferable.

6. Land use

Housing

6.1 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.

6.2 332.3sqm of residential use is proposed. Residential is the Council's priority land use and is welcomed in principle.

6.3 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 ($332\text{sqm}/100 = 3.32$ 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

6.4 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.

6.5 136.6sqm of flexible Class A1/Class A2 use is proposed. The retention of Class A2 use at ground floor is considered acceptable, as would the provision of a Class A1 use.

6.6 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).

7. Quality of proposed residential accommodation

Policy

7.1 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.

Unit mix

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

7.2 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.

Unit sizes

7.3 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.

7.4 Flats 1-4 would meet the space standards outlined above. Flats 5 and 6 appear cramped with convoluted layouts. The floor areas should be usable space, not including areas with spiral staircases.

Amenity of the proposed flats

7.5 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.

External space

7.6 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.

7.7 Flats 2, 3, 5 and 6 would have access to external space. It is acknowledged that it is more difficult to provide external space when a comprehensive redevelopment is not proposed. However, officers consider a demolition and rebuild would be preferable and that the failure to provide meaningful external space for all flats is a symptom of overdevelopment.

Access and circulation

7.8 The 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. The entrance way must feel safe and secure, and currently is considered to present a poor quality entrance into the residential units.

7.9 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.

7.10 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.

Residential layouts

7.11 The number of residential units proposed results in compromised accommodation.

7.12 Flat 1 is single aspect and has no other windows beyond the high level windows on Kentish Town Road. This flat's single aspect would be on to Kentish Town Road. Given the shallow floorplate, all of the flat would be very close to

Kentish Town Road, a busy road with much pollution. Officers consider that this flat would not provide a satisfactory level of amenity.

- 7.13 Flats 2/3 also suffers from high level windows on Kentish Town Road. Their only other aspect is into a deep lightwell, which presents additional concerns about the amenity, outlook and daylight for the rear bedrooms. As a result all three units would provide poor quality accommodation.
- 7.14 Flat 6 is a single-bed, single-aspect flat, with a deep and narrow floorplan measuring 39.3sqm over two floors, with additional space lost due to the staircase. Outlook is further compromised due to the fact it is set back from the buildings on either side by 6.1m and 5.2m respectively, leaving a channel 3.4m wide between buildings as its only outlook.
- 7.15 The first floor programme should be rationalised to provide either commercial or residential use only across the floor, which would help to resolve the convoluted layout.

Daylight and sunlight

- 7.16 A daylight/sunlight report should be submitted with any future applications demonstrating that the proposed flats would receive sufficient daylight. We have concerns that some of the rooms at rear first floor and second floor would not receive sufficient light.

Noise

- 7.17 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).

Part M

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

Access and circulation

- 7.19 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.
- 7.20 The internal layout shows three separate stairways staircase within a flat, 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.

8. Design

Policy review

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

Architectural approach

- 8.2 This is a prominent site in one of Camden's primary town centres and as such design is expected to be of the highest quality. The Council has significant aspirations for future development in Kentish Town, and improvements to the

high street will play a part in this. Careful consideration of the characteristics of the site and the wider context is needed in order to achieve high quality development that responds to its surroundings. The information provided lacks sufficient contextual analysis, and consequently the proposal lacks a coherent design approach.

- 8.3 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 generous ground floor and high quality shopfront. As shopfronts are seen at close quarters, the detailing, type and quality of materials, execution and finishes are very important. More detail of the material proposed here should be provided.
- 8.4 The elevation seems to seek to relate to its neighbours, which is a welcome starting point. However, there is no strong design narrative underpinning the design which results in a confused response. For example, the façade does not relate to the internal floor plates within the proposed building due to the retention of the existing structure, and thus results in unusual proportions internally and externally.
- 8.5 The palette of materials proposed for the primary façade indicates a mix of render and zinc/metal cladding. The Council requires high quality design and materials, and there is concern that the materials proposed fail to meet the Council's design standards (Policy D1e, Local Plan).
- 8.6 The proposals suggest that the materials will be applied to the existing brick façade. Any projection beyond the existing building line will disrupt the consistent and established building line of the street, and appear 'stuck on' and will not be acceptable.
- 8.7 Zinc infill panels are not contextual, or considered to be a robust material common to the area, and should be removed.
- 8.8 The Kentish Town Road elevation shows an awkward relationship between the windows on this façade and the floor plates, with the floors bisecting the windows at all levels. A false window sitting in front of the existing brickwork would not be acceptable. This would have a significant effect on the façade and as such more information about how this would work and be viewed must be provided.
- 8.9 This results in internal window cill heights at between 1.3m and 1.4m above floor level, which is unnaturally high, and presents poor outlook and visibility from within the residential units (flats 1-3).

9. Amenity of neighbouring properties

- 9.1 Policy A1 and CPG6 (Amenity) of the Camden Local Plan are relevant with regards to the amenity impact on neighbouring properties.
- 9.2 The VSC is calculated at the centre point of each affected window on the outside face of the wall in question. A window looking into an empty field will achieve a maximum value of 40%. BRE (Building Research Establishment) guidelines suggest that 27% VSC is a good level of daylight. If a window does not achieve 27% VSC as a result of the development, then it is assessed whether the reduction in value would be greater than 20% of the existing VSC – which is when the reduction in light would become noticeable to occupants. However, officers consider that VSCs lower than 27% are normal for urban areas, with 20% still considered acceptable.

9.3 A daylight/sunlight assessment has been submitted, which tests the impact on neighbouring properties on Kentish Town Road and Grafton Yard. Most of the windows tested passed BRE guidelines for VSC. The following windows failed:

205 Kentish Town Road

- 1st floor R4 W4
- 2nd floor R3 W3

1-27 Grafton Yard

- 2nd floor R1 W1
- 2nd floor R1 W2
- 2nd floor R2 W4
- 2nd floor R3 W7
- 3rd floor R2 W4

9.4 We note that a number of these transgressions occur because of the very low levels of light that these rooms receive now and that any reduction would appear large when measuring VSC. We also note that some of these windows receive poor levels of light due to the design of the building, which houses them. Furthermore, most of these windows serve rooms with more than one aspect. However, there is one window - 2nd floor R3 W3, where we consider further justification is required, given the transgression. It would be useful to know the use of this room and to have further investigation.

9.5 With regards the impact on external amenity spaces (page 27), your submitted study shows the flat with the terrace that is affected the most has another terrace serving it. The impact is therefore considered acceptable.

9.6 Given the location, orientation and the position of the proposed windows, there would be no overlooking issues.

9.7 Full details of all plant and ventilation are required and a noise report should be submitted as part of any future application.

9.8 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.

10. Transport

Car parking

10.1 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

10.2 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. A contribution towards CMP monitoring would be secured.

Cycle parking

10.3 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.

11. Sustainability

- 11.1 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.

12. Conclusion

- 12.1 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.
- 12.2 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.
- 12.3 The proposed flats would be acceptable in terms of unit mix and size. 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.
- 12.4 At present the proposal does not demonstrate a clear narrative, and does not meet the requirements of policy D1, which requires development to be of the highest architectural and urban design quality. 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.
- 12.5 Whilst this site could accommodate a mix of commercial and residential uses at upper floors, the design is not of sufficient quality to overcome some significant issues and is unsupportable in its current iteration.

13. Community Infrastructure Levy

- 13.1 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.
- 13.2 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.

14. Section 106 Obligations

- 14.1 CPG8 (Planning obligations) is relevant with regards to planning obligations.
- 14.2 The section 106 obligations below are likely to be included in an agreement. Please note that this list is not exhaustive.

15. 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 compliant payment for affordable housing
- Daylight/Sunlight Assessment
- Transport Statement
- Air Quality Report
- Energy Statement
- Sustainability Statement
- Details of refuse and recycling storage
- Noise Report and details of necessary attenuation measures
- Draft Construction Management Plan

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