

**Date:** 10th December 2018  
**Our Ref:** 2018/4661/PRE  
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Simon Itkin  
Leafgreen Estates Ltd.

Dear Sir,

### **Planning Pre-application Advice:**

#### **151-153 Camden High Street London NW1 7JY**

Thank you for submitting a pre-planning application enquiry for the above properties. 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 proposal will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

### **Proposal**

Conversion of 1st and 2nd floors to residential flats plus erection of 2<sup>nd</sup> floor rear extension and mansard roof extension and other alterations.

This advice follows on from a site visit on 25.10.18 and a meeting on 1.11.18. It is based on existing survey plans 22918PR-1,2,3,5 and revised plans 18.15.SK.OPS-SHT1 and SHT2.

### **Site and Surroundings**

The site in question comprises a 19<sup>th</sup> century 3 storey terraced commercial property on the west side of the High Street with a retail shop on ground floor, plus ancillary staff facilities and some storage on the 1<sup>st</sup> and 2<sup>nd</sup> floors. There is no independent access from the street or rear alley to these upper floors, although it was evident on site that their rooms were most probably once in residential use. The rear elevation has a projecting 1<sup>st</sup> floor rear extension and a 2<sup>nd</sup> floor mansard rear roofslope, 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 which has 4 storeys.

The site is within the commercial subarea 1 of Camden Town conservation area designated in 1986. The property, along with its neighbours, is identified as a

positive contributor to its character. It is also within the primary shopping frontage of Camden Town Centre.

### **Planning History**

None relevant- only a series of permissions relating to new shopfronts and adverts.

### **Relevant policies**

National Planning Policy Framework 2018  
London Plan 2016

#### Camden Local Plan 2017-

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 E2 Employment premises and sites  
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

### **Other Planning Policies / Guidance**

#### Camden Planning Guidance-

CPG1 Design  
CPG2 Housing  
CPG3 Sustainability  
CPG Town Centres  
CPG7 Transport

Camden Town Conservation Area Appraisal and Management Strategy (CAAMS)  
2007

### **Assessment**

The main issues of consideration are

- Landuse, residential standards and affordable housing
- Design and impact on heritage assets
- Impact on amenity
- Transport

## **Landuse**

### *Loss of commercial space*

The lawful planning use of the upper floors is unknown and needs to be resolved. The ground floor shop was used by H Samuel jewellers from 1950s and by Vodafone (the current tenants) since the last 14 years and apparently the upper floors may have been used in conjunction with H Samuel. It is not clear whether there was ever separate access to the upper floors or if they were just ancillary to the shop below, either in commercial or residential use. From an inspection on site, it appeared that the upper floor rooms were probably originally laid out and occupied as residential rooms with a bathroom and kitchen and 4 habitable rooms. At a later postwar date, it seems that a purpose-built toilet block with separate male and female facilities was created at the rear 1st floor, which would indicate that the upper floors were at least partially used in connection with the ground floor shop, such as jewellery workshop/storage space and/or ancillary residential use. Vodafone only partially use the kitchen for storage purposes but they have their own staff facilities on the ground floor. It was clear from a site visit that the upper floors are not really used or needed by the current shop tenants, nor have been for some time, and that any residential use here has now been abandoned. The upper floors appear to be 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.

It is therefore considered that no objection is raised to the loss of ancillary commercial space on these upper floors. However as part of any submission of a planning application, it would be useful to have more evidence on the history of usage of these upper floors, to establish the lawful use over the last 10 years, and whether they have ever been needed by Vodafone and in what way.

### *New housing*

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.

Various options for conversion to residential use of the upper floors have been presented involving permutations of mix and number of units. The applicant's preferred option 5 now involves erection of a 1<sup>st</sup> floor rear extension and a mansarded roof extension to accommodate 2 new dwellings, a 1bedroom 2person flat (65.5sqm) on 1<sup>st</sup> floor and a 3bedroom 6person maisonette (105sqm) above. 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. The flat layout and stacking is acceptable and 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 should be 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 1<sup>st</sup> floor flat will have direct access to the rear flat roof where a roof terrace is proposed- this amenity space provision is welcomed. The new units in this conversion will need to comply with Part M4 (1) on accessible homes.

### *Affordable housing*

The new housing would be approx 170.5sqm GIA floorspace. Thus the new residential floorspace uplift would exceed 100sqm 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 100sqm 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 200sqm, thus the requirement for housing is 4% (2% x capacity for 2 units at 100sqm 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. 7sqm, hence the formula for a payment-in-lieu (7sqm x £2,650) results in a financial contribution required of approx. £18,550 payment-in-lieu. The final agreed amount would be secured by a S106 legal agreement. More advice on calculations can be found in CPG2 Housing.

### **Design**

The CAAMS says, in relation to subarea 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'.

### *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 2<sup>nd</sup> floor rear extension would sit above the existing 1<sup>st</sup> 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 2 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 affect 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; however it should comply with CPG guidance on detailed design with the lower slope having a maximum angle of 70 degrees. More details of the roofslope, dormers, fenestration and materials should be provided as part of the application submission.

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

The extensions and alterations would preserve the character and appearance of the Camden Town conservation area. Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

#### **Amenity**

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.

#### **Transport**

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. The site is in area of excellent public transport accessibility and thus the Council will not issue on-street parking permits to the new units. Car-free housing will be secured by a S106 legal agreement.

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 ground floor plan needs to show adequate space adjoining the new entrance for 3 cycles in accordance with standards. More advice on design and dimensions can be found in CPG7 Transport.

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. A Construction Management Plan (CMP) would therefore be required, 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. It would be helpful to have a draft CMP submitted with any planning application so that the principles of the construction process can be assessed early on by transport officers, in conjunction with Transport for London (TfL) as the road is a Red Route. A CMP Implementation Support Contribution of £3,136 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.

### **Other issues**

The new units will require adequate refuse and recycling storage located in the communal entrance to meet standards. A waste storage and collection plan should be submitted with any planning application. More advice can be found in chapter 10 of CPG1 Design.

Although no formal energy and sustainability reports are required for developments of less than 5 new units, all developments should demonstrate how sustainable design principles have been considered and incorporated. In particular for minor residential schemes of 1-4 units, they should achieve the greatest possible overall reduction in carbon dioxide emissions, meeting Part L1B for retained thermal elements, and target a 20% reduction through on-site renewable energy technologies. More advice can be found in CPG3 Sustainability and the latest new draft CPG on Energy efficiency and adaptation, which will supersede this (both available to view online).

No Public Open Space contributions will be required as the development for 2 units is below the threshold for such payments.

The proposal will be liable for both the Mayoral and the Camden CIL as the proposal is for 2 new residential units and the uplift is more than 100sqm. The likely charge would be based on an uplift of 171sqm equating to £8550 (Mayor of London @ £50 p/sqm) and £85,500 (Camden @ £500 p/sqm).

### **Conclusion**

The scheme is considered overall to be acceptable in principle in terms of landuse, design, transport and amenity issues. Any permission would be subject to a S106 legal agreement covering the following heads of terms- affordable housing payment, car-free housing, CMP, CMP monitoring fee, highway repairs payment.

### **Planning application information**

If you submit a planning application, I would advise you to submit the following for a valid application:

- Completed form – Full planning application
- The appropriate fee
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans, sections and elevations of existing and proposed
- Photomontages
- Planning statement, to cover issues of heritage and energy
- Draft CMP
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We no longer notify neighbours by post, but we still display a notice on or near the site and, for sites in conservation areas, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter please do not hesitate to contact me on 020 7974 5867.

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

Yours faithfully,

Charles Thuaire

Senior Planning Officer  
Planning Solutions Team

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our [pre application enquiry survey](#). We will use the information you give us to monitor and improve our services.