

Date: 12/12/19
Your ref:
Our ref: 2019/2906/PRE
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Dear Samir Lariko,

Town and Country Planning Act 1990 (as amended)
Re: 25a Mornington Crescent, London, NW1 7RE

Thank you for your enquiry regarding:
Change of use of unit 25a (facing Mornington Place) from Class A2 office to a 1-bedroom maisonette (Class C3) plus erection of ground floor front and rear extensions, 1st floor side extension and roof terrace at front, plus internal alterations.

Supporting Information

PA001, PA020, PA200, PA400, PA201, PA011, PA101, PA202, SK001, SK010, SK020.

Site Description

25 Mornington Crescent constitutes the end terrace building of a crescent of 11 buildings built by I Bryant between 1821-32, which are Grade II listed. The site is located within the Camden Town Conservation Area within the Residential Sub Area 2. Unit 25A is accessed from Mornington Place and forms the ground and first floor of the four storey closet wing/side and rear return of No 25 Mornington Crescent and also includes a recently added one storey infill structure to the west.

The unit is currently vacant and the last use of the site is unclear.

Relevant Planning History

25/25A Mornington Crescent

LEX0300002 – Demolition of existing timber and tin constructed rear/side extension and the erection of a single storey rear extension. - **Listed building consent refused 16/04/2003** due to insufficient information. Unit 25A shown on plan as “shop/office”.

25 Mornington Crescent

2013/0735/P & 2013/0738/L - Change of use from 9 x residential units (2 x 1-bedroom and 7 x studios) to 4 x 1-bedroom self-contained residential flats (Class C3), including installation of 1 x roof light to main roof and infill of 3 x windows to side elevation and works of

refurbishment. – **Granted PP subject to S106 legal agreement 23/09/2013 and Granted LBC 03/07/2013**

Policies

The most relevant policies are listed below:

Camden Local Plan 2017

Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy D1 Design
Policy D2 Heritage
Policy D3 Shopfronts
Policy E2 Employment premises and sites
Policy H1 Maximising housing supply
Policy H4 Maximising the supply of affordable housing
Policy H6 Housing choice and mix

Camden Planning Guidance

Design (March 2019)
Amenity (March 2018)
Employment sites and business premises CPG (March 2018)
Transport (March 2019)

London Plan 2016

National Planning Policy Framework 2019

Camden Town Conservation Area Statement (October 2007)

Proposal

The pre-application includes the following development:

- Change of use of unit 25a at ground and first floor levels from Financial Services (Class A2) to x a 1-bed maisonette (Class C3)
- Associated ground floor front and rear extensions, 1st floor side extension and roof terrace at front, and internal alterations.

Assessment

The key considerations in the assessment of this proposal are:

- Principle of the change of use;
- Impact on the special interest of the Grade II listed building, the character and appearance of the host building, terrace, and the wider Camden Town Conservation Area;
- Impact on the residential amenity of neighbours;
- Impact on the highway network.

Principle of change of use

As noted above, there is limited planning history for the premises and the current lawful use of the unit is unclear. The 2003 application shows the unit as a shop/office and VOA business rates for 2017 list the ground floor unit as "Office and premises." The pre-application, however, gives the use of the unit as A2 (financial and professional services). The applicant is advised that evidence should be submitted as part of any future planning application to demonstrate the last use of the site (for a continuous period of 10 years) and any periods of vacancy.

Conversion of the site from A2 (financial and professional services) to C3 (dwelling)

Offices (B1a) and Financial and professional services (A2) are both defined within the Local Plan as town centre uses, but the site does not fall within the Town Centre. There is no specific policy protecting A2 uses in this location, and thus in principle the loss of an A2 use would be acceptable.

Conversion of the site from B1a (office) to C3 (dwelling)

CPG 'Employment sites and business premises' para. 8 states that the Council will take into account various factors when considering proposals involving the loss of a business use. These include: the condition of the premises, the unit sizes it provides and its suitability for small businesses, and the suitability of the location for a business use and how it relates to nearby land uses.

Policy E2 (Employment premises and sites) states that the Council will protect premises that are suitable for continued business use, in particular premises for small businesses and employment sites for local residents. The CPG's Employment Density Guide states that B1a offices should provide a minimum of 8sqm per worker (for Call Centres only). All other office uses require 10sqm or more per worker. The existing premises at the ground floor is subdivided into two small rooms measuring 7.5 sqm and 6sqm. The first floor room/mezzanine level provides a further 6 sqm but as it is accessed by a hatch, it is only practical for storage. The addition of a staircase would further restrict the functional area of the premises. As such, the existing premises would only be suitable for 1 worker at any time for any B1a office use, with no flexibility to expand, and is considered to have limited value as a commercial office space.

It was observed on the site visit that the premises is in a poor condition and cannot be occupied without substantial refurbishment. The split-level nature of the unit, internal subdivision and lack of stairs severely limits its functionality. Although the site is near to offices in the former Carreras Cigarette Factory on Mornington Crescent, the character of the immediate area is residential, although it is considered that the location is not incompatible with either B1a or A2 uses. On balance, the unit is sub-optimal as an employment premises and the loss of a B1a use would not be contrary to the criteria of Policy E2.

Housing provision

Policy H1 (Maximising housing supply) of the Camden Local Plan states that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future

households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 – 2030/31, including 11,130 additional self-contained homes. Point d) of Policy H1 states that where sites are underused or vacant, the Council will seek to achieve this by expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site. Policy G1 states that the Council will resist development which makes inefficient use of the Borough's limited land, and take into account a site's transport accessibility (among other factors). The principle of providing a residential use on this site is therefore welcomed and acceptable.

Paragraph 3.39 of Policy H1 states that in negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the Council will have regard to the characteristics and constraints of the site and the area; progress towards meeting Camden's overall housing target; the financial viability of the development; the contribution the development makes to the creation of mixed communities; and the Council's other Local Plan objectives.

Policy H7 states that the Council will seek to ensure that all housing development contributes to meeting the priorities set out in the Dwelling Size Priorities table. There is lower demand for market and social-affordable rented 1-bed dwellings, while demand is high for intermediate affordable 1-bed dwellings.

Policy H6 states that the Council will expect all self-contained homes to meet the nationally described space standard of the London Plan, and encourage design of all housing to provide functional, adaptable and accessible spaces. The minimum gross internal floor area for a 1 bedroom 2 person dwelling over 2 storeys is 58sqm. The proposed 1-bedroom unit would measure approximately 50sqm over two floors, and does not meet the minimum area required. It should be noted that the national minimum standard for a one storey 2 person dwelling is 50sqm. The unit would also fall slightly short of the minimum of 1.5 sqm of built-in storage required. The Council would therefore refuse an application for the proposed development on these grounds. The applicant should seek advice from Building Control regarding the use of a space-saving stair in a new dwelling.

Amenity

The main property No. 25 is divided into flats, with habitable rooms facing the rear yard at basement and ground floor levels. The pre-application proposal includes an extension at ground floor level that would infill part of the rear yard, with double doors opening onto a rear terrace. A further extension is proposed at the first floor level. The ground floor extension would be located 3.5m away from the sole rear window of the ground floor room, and would allow direct overlooking from the new flat's dining room and rear terrace. No planning history could be found to show the layout of the basement flat, but on the site visit it appeared that the rear window serves a bedroom. The impact on the existing basement level window is expected to be worse.

Due to its scale, relationship to existing habitable rooms, and enclosed nature of the site, the proposed extension and rear terrace would lead to an unacceptable sense of enclosure, loss of outlook, loss of privacy and potentially loss of light to existing neighbouring dwellings. The first floor extension would have a further adverse effect, and due to its impact on the basement flat window, any first floor extension is unlikely to be acceptable in amenity terms.

Heritage and design

The Council's design policies are aimed at achieving the highest standard of design in all developments improve the function, appearance and character of the area. Policy D2 states that developments must preserve or enhance the Conservation Area and must not cause harm to the significance of a listed building.

The closet return of No. 25 is unusually tall being 4 storeys whereas other closet wings of similar building blocks are one or two storeys. The overall height of this rear/side extension infringes upon the gap behind the listed buildings and restricts views towards the rear.

Unit 25A, albeit different in occupancy and in ownership, still forms part of the listed building of 25. It has a stand-alone entrance canopy, fascia board, bay window and door, which is uncharacteristic of such buildings within this conservation area and is considered to detract from the building's character and special interest.

- By extending beyond the established front building line, the proposed element fronting Mornington Place is not acceptable in principle. Any proposals should be within the existing building line, in this case of 25 Mornington Crescent, and in effect direct principal changes to this elevation of the building will not be accepted.
- Any proposals are required to be considered in the overall context of the listed building as a whole. The drawings presented appear to be designed only with the context of the rear closet building of No 25 MC.
- A Heritage Assessment is required to justify any proposal which should include an assessment of the significance of any interior features and a justification of the proposals according to Conservation Principles, the NPPF and relevant Camden heritage and design policies.
- The Camden Town Conservation Area Appraisal recommends that the design of any rear/side extensions should not compromise the special character of the building or conservation area and places emphasis on high quality design and execution. Successful modern design can be of the 21st century and enhance the conservation area, by carefully assessing and responding to the form and qualities of surrounding buildings and spaces.
- Materiality needs to have regard to the existing listed building and the Camden Town Conservation Area and it is advised that any new proposals must be sensitive to the existing context.
- The entrance porch and bay window at 25A are atypical of this type of building and it is questionable in the first instance if they contribute positively to the significance of the listed building. Proposals are welcome to design this element sensitively and appropriate to the listed building, preferably something very simple. It is recommended to do an analysis of similar buildings around the area to understand this context. Historic research and references should be sought to justify what could be appropriate. The materiality should definitely be in keeping with the existing listed building which is rendered. An entrance door may possibly be kept within the confines of the single storey infill element.
- Camden CPG Altering and Extending your home considers the importance of significant views or gaps between buildings. In this case the gap has been infilled in the recent past by a one storey element; however, glimpsed views to the rear of the

Mornington Crescent listed buildings are still visible through this. Increasing the height of the infill element will create a lesser appreciation of the gap and obstruction of the existing views and this will not be supported. As discussed at the pre-application site meeting, a marginal increase could be acceptable, but at a height which is set down well below the adjacent neighbouring property of 1A & 1B, in order to address the issue relating to the gap mentioned earlier and to maintain the subordination of the current proposals at the infill element.

Changes to the Rear

- It is recommended to repair the rear window and not replace it completely. A single panel casement window is not considered to be appropriate to the context. Similarly the style of the rear door proposed needs to be reconsidered and should be reflective of the building's historic status.
- Improvements are welcome to the façade of the one storey infill. This possibly used to be the garden wall of No 25 historically and should be reflected in material appropriately. Some other similar buildings have this part of the building wall treated in timber or other, but the existing modern plaster is not considered to be appropriate.
- The applicant intends to use a contrasting material cladding to the proposed new rear garden block. A modern intervention at this point can be welcome provided that it is designed sensitively and is of high quality, which can be justified to be appropriate to this sensitive setting.

Interior Features

- Interior features identified of significance including historic joinery should be retained and any repairs suggested are to be like for like.
- It is apparent that the proposal aims to cut out the floor above to move the staircase. Are the floorboards on the first floor of historic significance? A significance assessment is required to inform this and other interior proposals. It will need to be justified that proposals do not harm the historic significance of the existing context.
- The same applies to features on the first floor, windows, doors, etc. Any non-usable doors can be closed off in a state where the change can be reversible, not bricked up or plastered.
- Lime Plaster repairs should be like for like.
- Railings/Bike Store: New railings should match the existing original design along the street boundary.

Transport

The new dwelling is expected to be secured as car-free in accordance with policy T2. This would be secured through a S106 legal agreement. A financial contribution to public highway repairs following any damage by construction will be required, also to be secured by S106. Cycle parking for the new dwelling as shown appears to be acceptable and will be secured by condition- its location, size and access should be in accordance with CPG standards.

Conclusion

The loss of the existing commercial unit is likely to be acceptable in policy terms; however, the proposed two storey residential unit is not considered to be acceptable for the reasons

given above. Due to the constraints of the site, there is unlikely to be scope to provide a residential unit that complies with the minimum space standards and does not impinge upon the amenity of existing occupiers within No. 25 or extend towards Mornington Place and which does not harm the townscape and heritage assets here.

Planning application information

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

- Completed form – Full planning application and listed building consent form
 - An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
 - Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
 - Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
 - Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed' showing context with adjoining buildings
 - Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
 - Design and access statement
 - Heritage Assessment assessing the significance of any affected elements and justifying the proposals according to relevant policy including the NPPF, Camden Local Policy and Guidance.
- Relevant views to demonstrate that the proposal will have minimal impact on the 'gap' or rear views of Mornington Crescent buildings.
- The appropriate fee - £462
 - 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 would put up notices on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Control section or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me on the details above.

Yours sincerely,

Emily Whittredge MSc, PgDip
Junior Planner

Regeneration and Planning
Supporting Communities
London Borough of Camden