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Planning and Regeneration
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Date: 24/12/2019
Our ref: 2019/5803/PRE
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Piotr Adamczyk
 45 St Mary's Road
 London
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www.camden.gov.uk/planning

By email

Dear Piotr,

Re: 313A Royal College Street, NW1

Thank you for submitting a pre-planning application enquiry for the above property which was received on 19/11/2019 together with the required fee of £989.02.

1. Drawings and documents

Existing and proposed drawings and pre-application draft design statement received 15/11/2019.

2. Proposal

Remodelling and conversion of existing storage space located at ground and lower ground floor levels into a 1 bedroom maisonette. The proposals include internal remodelling, enlargement of the existing rear lightwell and alterations to the ground floor level to increase the lower ground floor to ceiling height.

3. Site description

The application site comprises a storage unit located at ground and lower ground floor level of the former Black Horse Public House. Planning permission was previously granted (and implemented) for the conversion of the remainder of the ground floor into three self-contained flats, and for the use of the first, second and third floors as a house in multiple occupations (HMO) – see history section below. The building is four storeys in height and located on the west side of Royal College Street. There is a narrow rear yard with a high brick boundary wall between the internal courtyard of the residential buildings located to the southern, western and northern sides.

The site is located east of the designated Kentish Town District Shopping and Service Centre.

The building is not located within a conservation area, and is not a listed building.

4. Relevant planning history

2006/2468/P - Conversion of public house (Class A4) to three self-contained flats (Class C3) at ground floor level including new front entrance door and single-storey rear extension. Granted subject to S106 Legal Agreement 25/07/2006.

PEX0000737 - Use of the first, second and third floors as a house in multiple occupation. Granted 10/10/2000.

5. Relevant policies and guidance

[National Planning Policy Framework 2019](#)

[The London Plan March 2016](#)

[The Draft London Plan](#)

[Camden Local Plan 2017](#)

Growth and spatial delivery

Policy G1 Delivery and location of growth

Meeting housing needs

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

Community, health and wellbeing

Policy C5 Safety and security

Policy C6 Access for all

Protecting amenity

Policy A1 Managing the impact of development

Policy A5 Basements

Design and Heritage

Policy D1 Design

Policy D2 Heritage

Sustainability and climate change

Policy CC1 Climate change mitigation

Policy CC2 Adapting to climate change

Transport

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Parking and car-free development

Policy T4 Sustainable movement of goods and materials

[Camden Planning Guidance](#)

CPG Basements 2018

CPG Interim Housing 2019

CPG Housing 2019

CPG Design 2019

CPG Altering and extending your home 2019

CPG Amenity 2018

CPG Transport 2019

CPG8 (Planning obligations (July 2015, updated March 2018)).

6. Assessment

The principle planning considerations are the following:

- Land use
- Standard of residential accommodation
- Design
- Excavations
- Neighbouring amenity
- Transport

7. Land use

Loss of storage space

The design statement describes the application site as being used as storage and during my site visit the applicant described the space as originally being ancillary space for the previous public house. However, since the conversion of the site to residential use, it has been used on an ad hoc basis for storage. The unit is not registered with the VOA as paying business rates, and as such, does not appear to be used for formal storage or distribution purposes (B8 use class). Consequently, the Council would not seek to protect the use of the site for storage purposes as required by the Council's Employment Policies.

Creation of residential dwelling

The proposals involve the creation of one new residential flat. Housing is regarded as the priority land use of the Local Plan, and given the new residential unit would be in addition to the existing flats in the building, the proposed development would be appropriate in this location. As such, the development would be compliant with Policy H1 provided the flat meets the Council's and national residential development standards and did not harm local amenity.

Dwelling mix

The Council requires development to contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes. Where possible, a mix of large and small homes should be provided for all tenures. Two and three bedroom homes are the highest priority for market housing in Camden.

The development would provide 1 x 1 bedroom flat. Although this is a lower priority dwelling size, given the size and location of the site and the fact that the majority of the flat would be at lower ground level, a one bedroom dwelling is considered appropriate in this instance, and in compliance with the aims of Policy H7.

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 additional residential floorspace proposed.

As the proposals do not involve any additions to floorspace, the development does not trigger the requirement to provide affordable housing.

8. Standard of residential accommodation

The new dwelling would measure 64sqm (GIA) excluding the internal void which would meet the nationally described space standard of 58sqm for a two storey, one bedroom, two person dwelling.

The dwelling would be dual aspect which would help to ensure adequate ventilation, although it is noted that the front window is partially obscured at ground level and there is no window at lower ground level. To the rear, there would be views from the rear ground floor window, although the outlook at lower ground would be very limited, even after the existing lightwell is enlarged and lowered given the height of the retaining wall and the narrow width of the lightwell. Given the inadequate outlook, it is recommended that the internal layout is amended so that the bedroom would be located at the lower level, and the living areas and kitchen are located at ground level where there is improved outlook and daylight. Please note however, that the Council does not support the creation of new habitable rooms in areas prone to flooding. Please ensure this is assessed and included as part of any future planning application.

An internal void is proposed to provide daylight to the lower level, although there is still concern that internal light levels would be inadequate. As such, it is recommended that a daylight and sunlight report is provided with any future application to allow a full assessment of the internal daylight and quality of the proposed accommodation.

At present, the lower ground floor has a floor to ceiling height of 1.87m which does meet the recommended standard of 2.3m. It is proposed to raise the ceiling level, which would provide a floor to ceiling height of 2.7m at lower ground and 2.9m at ground level, which would be acceptable.

9. 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.

There would be no external alterations to the front of the building, with all proposed works confined to the rear. The existing lightwell would be lowered and enlarged, but the visual impact of this would be limited, and as such, would be considered acceptable. The existing and proposed sections suggest that the rear fenestration would be altered, although there are no proposed elevation drawings provided, and as such, advice cannot be provided on this element of the works. It is recommended that any new fenestration is timber framed, and the design is in keeping with the existing windows across the rest of the building.

10. Excavations

The proposals involve the lowering and enlargement of the existing rear lightwell to bring it to the same floor level as the existing lower ground floor level. The section drawings seem to suggest the rear wall of the lightwell is a retaining wall, with the ground level to the other side of the wall sitting at a higher level than the site's lower ground floor.

Although the extent of excavation is limited, given the application site is located within an area with a number of underground development constraints, (subterranean (groundwater) flow, surface water flow and flooding, and slope stability), it is recommended that the screening stage of a basement impact assessment (BIA) is completed in order to determine whether a full BIA is necessary, or a letter from a structural engineer is provided. Please refer to policy A5 of the Local Plan and the Basements CPG for more information.

The Council's records also indicate that the site is located within an area which is potentially contaminated. Development on contaminated land can expose people to a wide range of potential health risks. As the proposals involve an element of excavation, you would be required to submit relevant assessments and take appropriate remedial action to the Council's satisfaction. Please refer to our Contaminated Land team and our supplementary planning document Camden Planning Guidance on amenity for further information.

11. Neighbouring amenity

Policy A1 seeks 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.

Given the fact that the proposals involve limited external alterations, and the rest of the building is in residential use, the proposed conversion to provide one new residential unit is not considered to harm the amenity of nearby residential occupants by way of loss of outlook, daylight or privacy.

12. Transport considerations

Car Parking

Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. This includes limiting the availability of both off-street and on-street parking. The proposals do not include the provision of residential car-parking, in accordance with Policy T2.

The council will not issue on-street parking permits in connection with new development and will use S106 legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits.

Cycle Parking

Policy T1 of the Camden Local Plan requires development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements outlined in the Transport CPG. The Draft London Plan requires a minimum of 1 long stay space per 1 bedroom/studio unit.

The plans do not show any cycle parking. It is recommended that the possibility of providing cycle parking within the building is explored, however, it is acknowledged that this may not be possible.

13. Conclusion

Although the principle of a new residential dwelling in this location is considered acceptable, there are concerns regarding the quality of the accommodation provided. It is recommended that you explore changes to the internal layout, and provide sufficient evidence and analyses with any future application to demonstrate to the Council's satisfaction that the quality of accommodation would be acceptable.

14. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full planning application.
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.
- Existing and proposed floor plans, elevations and sections.
- Design and access statement.
- Daylight and sunlight assessment.
- Contaminated land assessment.
- The appropriate fee
- 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 a site notice on or near the site and 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](#).

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 or the attached document please do not hesitate to contact Laura Hazelton on the number above.

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

Yours sincerely,

Laura Hazelton

Planning Officer
Planning Solutions Team