

Planning Department
Camden Council
5 Pancras Square
Kings Cross
London
N1C 4AG

VIA EMAIL

32262/A3/SC/JF

17 November 2020

Dear Sir/Madam

172-176 KILBURN HIGH ROAD, KILBURN NW6 4JD
PRE-APPLICATION SUBMISSION

On behalf of the applicant and our client, Altomart Limited, we are pleased to enclose a request for pre-application advice in connection with a development proposal comprising the extension of 172-176 Kilburn High Road (the Site) to provide residential dwellings.

The purpose of this letter is to inform pre-application discussions. It includes:

- a) A description of the Site, its location and its surroundings;
- b) A description of the Proposed Development;
- c) A summary of the relevant planning history;
- d) Relevant planning policy context;
- e) A response to the proposed policy context;
- f) Anticipated application requirements and,
- g) Summary, including requested scope of the feedback.

The following documents have been submitted to support this request for a pre-application meeting:

- Site Location Plan (ref. A-P10-01); and,
- Pre-Application Submission Document (Barton Willmore November 2020).



FS 29637

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a) The Site and its Surroundings

The application Site comprises 172-176 Kilburn High Road, an existing two storey building which is currently occupied by a small supermarket, Costa Coffee and Poundland.

The Site sits between Coopers Arms, a public house, to the south-east and a four-storey mixed use building to the north-east. To the north-east and rear of the building lies Kingsgate Place with residential dwellings behind this. The building has access to Kingsgate Place through a rear entrance.

The surrounding area is characterised by its High Street frontage, which is predominately a mix of 3 and 4 storey brick buildings with retail units below and residential units and offices above.

b) Description of the Proposals

It is intended that the planning application for the proposed development would be submitted in Full, and would comprise:

Extensions and alterations in connection with the conversion of the upper floors into 2no. 1-bedroom flats, 2no. 2-bedroom flats and 4no. 3-bedroom flats including extension to provide additional floor of accommodation

The draft floorplans and elevations are enclosed.

c) Relevant Planning History

Provided below is a summary of the planning history of the Site and nearby properties of relevance to the consideration of the proposals:

- 2010/5708/P – 174 Kilburn High Road – Change of use from retail (Class A1) to financial services (Class A2) – Granted 13/01/2011
- 2007/4650/P – 146-162 Kilburn High Road – Partial demolition, refurbishment and conversion of upper floor office space (Class B1) and construction of additional 4th storey to provide 38 residential units (32 private, 6 shared ownership) within two blocks, plus courtyard, secondary residential entrances (Kilburn High Road), primary residential entrance and new refuse stores/cycle parking (Kingsgate Place).

This application also included a new 4 and 3-storey block with roof terrace & balconies fronting Kingsgate Road comprising 14 social rented residential units; plus new refuse stores/cycle parking on Kingsgate Road frontage; and enclosed mechanical equipment at first, second and third storey levels. Granted 11/01/2008

This application has provided a precedent for extending upwards on buildings along the Primary Frontage of Kilburn High Road, the provision of residential units as well as separation distances between buildings and windows.

d) Relevant Planning Policy Context

The Development Plan for London Borough of Camden ('LBC') comprises:

- Camden Local Plan (July 2017);
- Camden Sites Allocations Plan (2013);

- London Plan (2016); and,
- Emerging North London Waste Plan (2019).

In addition, other material considerations have also been taken into account, including:

- The revised National Planning Policy Framework (the 'NPPF') (2019);
- National Planning Practice Guidance ('PPG') (updated October 2019);
- The Intend to Publish London Plan (published December 2019); and,
- Local LBC and Strategic London Plan Supplementary Planning Documents and Guidance, including those relevant to this submission:
 - Housing CPG;
 - Access for All CPG (March 2019);
 - Amenity CPG (March 2018);
 - Design CPG (March 2019); and,
 - Energy Efficiency and Adaptation (March 2019).

e) Response to Policy Context

The Principle of the Development

The LBC Policies Map identifies that the Site is located with the Kilburn High Road 'Primary Frontage' and is also within the Kilburn High Road Town Centre. Policy H1 of the LBC Local Plan sets out the approach to housing delivery over the plan period, including the need to make provision for at least 16,800 additional homes between 2016/17 - 2030/31. Indeed, this policy makes it clear that LBC seeks to exceed this target, including 11,130 additional self-contained homes.

Moreover, the emerging London Plan sets a new housing target for Camden of 10,380 dwellings per annum (between 2019/20 - 2028/2029). It recognises at draft Policy H2 that small sites (below 0.25 hectares in size) should play a greater role in housing delivery to achieve the housing targets, with Table 4.2 setting a small sites target for Camden of 3,280 dwellings per annum (between 2019/20 - 2028/29).

Policy TC2 of the LBC Local Plan supports the development of housing within centres including above and below shops where this does not prejudice the town centre function and particularly the ability of the ground floor to be used for town centre uses. It also sets out that the Council will permit conversion of retail and other town centre uses to residential use on the protected frontages where it does not harm the role and character of the centre, including maintaining the supply of shop premises in centres across the borough.

The proposal would retain the existing retail uses at ground floor, thus would continue to support the town centre frontage. There would remain appropriate access to the retail units for the existing occupiers, while also providing a safe and secure access for the residential flats at the upper floors. It is considered the proposal will contribute to LBC's vision for promoting the direction of growth towards town centres, as set out by Policy G1 and TC2.

In addition, the emerging London Plan at Policy GG2 advises making the best use of land, enabling the development of brownfield land within town centres and prioritising sites which are well-connected by existing public transport. The Site is highly sustainably located and would provide an opportunity to make the best use of land while retaining retail uses as well as contributing to Camden's housing supply.

It is therefore considered that the principle of enhancing the ground floor retail frontage and providing additional residential accommodation at the Site would accord with the prevailing adopted local LBC planning policy and the emerging London Plan.

Design and Appearance

The proposal has considered and responded to the Site's relationship with the surrounding built development context and character of the area, including in summary:

- The scale of the proposed development has been designed in context of the prevailing character of the area of 4 storey buildings, retaining a retail frontage at ground floor and with residential provision above.
- The design of the proposed development has been carefully considered to preserve the architectural approach to the existing property frontages to Kilburn High Road, including buildings opposite within the London Borough of Brent such as the Earl of Derby public house (a locally listed building).
- The frontage of the extended building has been designed to be set back from Kilburn High Road to ensure the architectural details of the adjacent buildings remain visible within the street scene;
- The access to the proposed development will utilise the existing rear access from Kingsgate Place to create a safe and secure access for the residential flats. This will be similar to the development at 146-162 Kilburn High Road which has accesses onto Kingsgate Place, while retaining retail access from Kilburn High Road.
- Particular attention has been paid to amenity and privacy and on avoiding and reducing any effects on overlooking, with regard to both the proposed windows and outside amenity spaces.

The proposal is therefore considered to accord with Policy D1 of the Camden Local Plan as well as the relevant design provisions of the London Plan and other material considerations including the NPPF and PPG.

Unit Size and Mix

In terms of unit mix, the proposal includes the following:

- 2no. 1-bed 2 person flats, at a minimum 56sqm;
- 2no. 2- bed 3 person flats at a minimum 61sqm; and,
- 4no. 3-bed 5 person flats at a minimum 89sqm.

The above mix provides a variety of housing which we consider will be suitable for existing and future households in accordance with Policy H6 and H7 of the LBC Local Plan. Indeed, we consider the provision of more 3-bed dwellings to accord with the Dwelling Size Priorities Table within the Local Plan which states there is a high demand for 3-bedroom Market housing.

The proposals will contribute to affordable housing as a 'payment-in-lieu' in accordance with Policy H4 of LBC Local Plan and Policy H4 of the emerging London Plan.

Amenity

The proposal would ensure all the flats comply with Nationally Described Space Standards in accordance with the emerging London Plan, with appropriate room layouts providing a dual aspect for all the flats which will provide suitable daylight and outlook for new occupiers.

Outdoor amenity space has been provided for the rear units to ensure suitable outside space and these areas would be located to the rear of the building to reduce impact from Kilburn High Road. The outside amenity spaces will be screened to ensure there would be no harmful overlooking or loss of privacy to existing properties adjacent to the Site.

The distances between the proposal and existing properties would be similar to the distances already in existence and approved by the development at 146-162 Kilburn High Road (ref. 2007/4650/P). The proposal will include the use of angled windows and obscure glazing to reduce any overlooking.

Car / Cycle Parking and Refuse Storage

The proposal will be a car-free development, in accordance with Policy T2 of the LBC Local Plan and will provide accessible and secure cycle parking for residents at ground floor. The cycle store will be accessed to the rear of the building and will provide sufficient space for cycle storage in accordance with the London Plan minimum standards (circa. 14 spaces).

The development will also provide a separate area for storing refuse, accessed at ground floor to the rear of the building. This space will ensure sufficient storage area for refuse and recycling relating to the existing ground floor retail uses and the upper floor residential flats.

Sustainability

The Site lies within a highly accessible location and will be a car-free development. In accordance with Policy CC1 of the LBC Local Plan, the application will be accompanied by an Energy Statement setting out how the proposal will be designed in line with the energy hierarchy.

f) Application Requirements

The following planning application documents are anticipated at this stage:

- 1APP Planning Application Form and Certificates;
- Site Location Plan;
- Full set of existing and proposed detailed Floor Plans, Elevations and Sections;
- Design and Access Statement;
- Details of cycling, refuse and recycling storage;
- Noise Assessment; and
- Energy Statement

We would be grateful if the scope of application documents required could be confirmed as part of the pre-application advice process.

g) Summary and Next Steps

Overall, it is considered that the proposal makes very efficient use of the Site in a way that through careful design delivers a high-quality development that is complementary to the character of the surrounding built environment. Suitable living accommodation for the future and the existing neighbouring residents would also be achieved.

It would be very much appreciated if your pre-application feedback could please take account of the following:

- The principle of the development;
- The concept design information, including the overall arrangement of built development;
- The proposed scope of application documentation; and,
- The extent of likely S106 Agreement requirements.

We trust that the above details serve to provide you with a helpful overview with regards to the future development of the Site. We would welcome the opportunity to discuss this with you as part of a pre-application meeting and would be grateful if you could confirm whether this is possible under this process.

We look forward to hearing from you regarding this and please do not hesitate to let me know should you require any further information.

Yours faithfully,



SARAH COTTINGHAM
Senior Planner

cc. Raj Soni : Altomart Ltd

enc. Site Location Plan (ref. A-P10-01)
Pre-Application Submission Document (Barton Willmore November 2020)