



**Date: 14/01/2022**  
**Our ref: 2021/4627/PRE**  
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Dear Dylan Kerai,

**Re: 155 Drummond Street, NW1 2PB**

Thank you for submitting a pre-planning application enquiry for the above property which was received on 16/09/2021 together with payment of £3,936.00 received on 27/09/2021. A site meeting with design officers and applicant's team was undertaken on 04/11/2021.

Initial advice was provided on 12/11/2021 via email. The current advice would focus on the revised drawings received on 26/11/2021.

### **1. Development Description**

Deep refurbishment of the existing building, new cladding, rear extension over three floors, and two-storey extension above, to provide a total of five self-contained flats.

### **2. Planning History**

2019/1653/P - Partial demolition of existing 4no. storey residential building and erection of 8no. storey building to include 5no x2bedroom and 1no x3bedroom self-contained flats, terrace and green roof at roof level, balconies across 5no levels on rear elevation; enclosure and conversion of existing footpath at ground floor level to lobby entrance to flats above. – Withdrawn - Found unacceptable by Officers for several reasons.

### **3. Site description**

The application site is a four storey terraced building, sitting on the southern side of Drummond Street. The building has an under-croft area to allow access for maintenance services to Tolmer's Square Estate to the rear. The under-croft includes pedestrian and vehicular access.

### **4. Assessment**

The main issues for consideration are:

- Principle of development
- Land use and housing mix
- Affordable housing
- Design and Heritage

- Standard of accommodation
- Greenery and landscaping
- Impact on amenity
- Sustainability and air quality
- Transport and recycling
- Security
- Planning obligations

### **Principle of development**

- The scheme is proposed to strip back the existing building to the core and extend it to the rear over three floors and with a roof extension. The existing floor space is of 170.56sqm and the proposed uplift is of 183.96sqm.
- Internal partitions will be removed to create new internal layouts throughout the whole building. In the event of a future planning application, demolition drawings are required for all floors to be assessed.
- The principle of development should be acceptable, subject to the scheme being revised in line with the advice below.

### **Land use and housing mix**

- Currently, the building is occupied by 1 x 2-bedroom flat and 1 x 3-bedroom flat over two floors. The proposal is to refurbish the existing, alter internal layouts and extend with a two-storey extension to create five residential flats, 3 x 2-bedrooms/ 3persons and 2 x 1 bedroom/ 2persons, over the two upper floors. Policy H7 of Camden Local Plan identifies 2-bedroom and 3-bedroom flats as a priority for market provision. As the proposal provides a larger proportion of 2-bedroom flats, this should be acceptable.
- In line with policy H6, we would require 90% of the new self-contained homes to be 90% accessible and adaptable in line with Building Regulation M4(2) and 10% to be suitable for occupation by wheelchair users, in line with Building Regulation M4(3). You are advised to consider this as part of a revised scheme, in the event of a future planning application.

### **Affordable housing**

- As the proposal would provide new residential accommodation and an additional residential floor space of 184sqm (over 100sqm), it would be subject to affordable housing contribution in line with policy H4 of Camden Local Plan, through payment in lieu. In order to calculate the payment, it is necessary to calculate the on-site affordable housing floorspace target in accordance with paragraphs 4.32 to 4.45 of Housing CPG. The affordable housing shortfall will be the affordable housing floorspace target (GIA) minus the floorspace of any new affordable housing proposed as part of the development (GIA). The payment in lieu required will be the affordable housing shortfall (GIA) multiplied by £5000 per sqm (the multiplier outlined in Fig 8 of CPG Housing, set per sqm for market residential schemes).

## **Design and Heritage**

- Initial advice has been provided and this can be found in Appendix 2 below. The revised scheme has addressed some of the points raised, but some will be reiterated for completion.
- The proposed scheme would add three storeys to the existing building but only an additional level above the existing roofline in this location. However, the proposal would not exceed the pediment of the end of terrace row building at no. 60 Drummond Street. The building to no. 60 Drummond Street forms a corner and therefore, should stand proud within the terrace with the other buildings stepping down from this building. If a building of this scale were to be acceptable it would be required to be greatly sustainable and of exceptional architectural quality.
- In terms of the architectural quality, the proposed composite to be created from the existing bricks and the proposed detailed elevation treatment are considered to have a great potential to achieve that. In the event of a future planning application images of samples of such composite should be provided as part of the submission. If permission would be granted a panel of 1x1m of the stone-like cement composite would be required by condition.
- Given the proposed height, and to better appreciate the impact of the new structure on the Tolmer's square, you are required to provide views from the rear entrance into the estate.
- The hierarchy of spaces across the front elevation is now better proportioned as the window openings gradually decreases in size to the mansard level.
- At mansard level, three new openings are created would relate to the ones below in terms of their position, but their dimensions appear disproportionate to the ones below. You are advised to reduce the height and expansion of the proposed openings at this level.
- To the rear the existing building has a staggered elevation, with terraces and sloped roofs which create a dynamic elevation. The proposal would infill these spaces at first, second and third floors, to create a more compact form which is not dissimilar from the more recent developments adjacent to the site.
- Winter gardens are now proposed to the rear, to enclose the balcony. There will be a clear contrast between the heavily glazed winter gardens and the solidity of the rest of the building which maintains the dynamic rear elevation. Details about the winter gardens opening mechanism should be provided and a balustrade clearly indicated on plans.
- Adjacent to the winter gardens, large windows floor to ceiling height would serve bedrooms. Due to their large expansion, the windows appear to serve a commercial building rather than domestic, and therefore you should increase the cill heights for bedroom windows. Also, the space under windows is often use for storage or other associated furniture, which when seen externally, they do not have a positive impact on the appearance of the building.

## **Standard of accommodations**

- The retention of the main access into the building from Drummond Street is welcomed, as well as the retention of the pedestrian access in the undercroft.

- The proposed lift lobby would open with a door into the pedestrian access route. This would impeded on the pedestrian traffic and therefore you should consider revisions to ensure the door could open internally or slide in.
- Most of the flats would have dual aspect and all would benefit from external and covered amenity space, which is supported.
- The proposed 2-bedroom flats would have a GIA of 65.2sqm including storage space and a balcony/winter garden of 6.41sqm. The proposed size would exceed the national minimum standards for a flat of this size which is accepted. The 1-bedroom flats would have a GIA of 58sqm including storage space and a balcony of 6.78sqm. This would meet the national minimum standards which is accepted.
- In terms of internal layouts, the 2-bed flats would have similar internal layouts. Whilst the close proximity of the small bedroom to the kitchen is not ideal, this would allow for more flexibility for occupiers.
- At mezzanine level behind the lift there is an unused space. You are advised to consider whether that space can be used communal for all flats, for storage, laundry room, or others.

### **Greenery and landscaping**

- In existing, the application site does not benefit from a garden or planted terraces. The closest green space is Tolmer's Square behind the site, which has good levels of greenery. In line with policies D1 and A3 you should consider integrating green infrastructure throughout the design of the scheme. Dedicated spaces for planters in winter gardens and terraces at roof level could be an option. Also, there is potential planting at the rear of the building and in the undercroft to define the pedestrian from vehicular space.

### **Amenity**

- In relation to the impact on amenity, given the increase in scale of the property to the rear and height, a Daylight Sunlight assessment is required to demonstrate that no harmful loss of light would be caused to the neighbouring properties to the front and rear of the site, as well as adjacent at no. 141-153.
- In terms of overlooking a cross section through the proposed building and the one adjacent to the rear at Tolmer's Square Estate, should be provided and along with mitigation measures to ensure that no harmful overlooking would be caused from the proposed balconies and terrace above. The section should show what are the rooms potentially affected at Tolmer's Square Estate.

### **Sustainability and air quality**

- Policy D1 states that besides other considerations, development should be sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation and is of sustainable and durable construction and adaptable to different activities and land uses. Furthermore, in line with policy CC1, the Council requires all development to minimise the effects of climate change and encourage all developments to meet the

highest feasible environmental standards that are financially viable during construction and occupation.

- The proposed development would involve to strip back existing fittings to the existing structure to the core and extend by 184sqm, which is an over 100% increase from existing floor area. This would trigger the baseline from Part L1A for hierarchy emissions and reduction.
- Under planning policy, as the proposal would strip back the existing fittings to the existing structure to the core, and provide new five residential flats, the proposal would fall under Medium New built residential building.
- In line with the above then new development would have to comply with the following:
  - Camden's Local Plan encourages developments to be Zero Carbon
  - A minimum 19% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.
  - Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies as set out in the London Plan (2021) Chapter 9 (particularly Policy SI 2). GLA guidance on preparing energy assessments and CPG 'Energy Efficiency and Adaptation' should be followed.
  - Camden's Local Plan (chapter 8) requires these developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement. The reduction is to be calculated against emissions at the previous hierarchy stage and NOT against the baseline emissions.
  - Where the reduction target cannot be met on-site, we may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £95/tonne CO2/ yr over a 30 year period), which will be used to secure the delivery of carbon reduction measures elsewhere in the borough.
- You are expected to submit a sustainability statement - the detail of which to be commensurate with the scale of the development showing how the development will:
  - Be resilient to climate change through the implementation of the sustainable design principles as noted in policy CC2
  - Water use should not exceed 105 litres/per person / day plus 5 litres for external use
- The sustainability statement would be secured under section 106 legal agreement.
- In terms of heating, if the proposal would include Air Source Heat Pumps, these should be clearly annotated on the plans. LETI guides or Retrofit and Climate Emergency are quite helpful in this regard.
- The proposed use of the existing bricks to create a new cladding material is welcomed.
- We encourage provision of water harvesting and recycling measures.
- In order to demonstrate the sustainable design principles have been incorporate you are encouraged to provide Passivhaus or Home Quality Mark assessments.
- Based on previous assessments presented to us, we found that the levels of Air pollution NO2 (Nitrogen Dioxide) and PM10, PM2.5 (Particulate Matter) was very high and therefore mechanical ventilation with air inlet ideally from the roof was required, and windows fixed shut at 1<sup>st</sup> and 2<sup>nd</sup> floor levels, front and rear, and winter gardens not balconies to the rear. You would need to undertake a new Air quality assessment to demonstrate if these assumptions are still valid.

## Transport and recycling

- The proposal would be required to provide access to sustainable modes of transport in the form of cycle parking. For 3 x 2-bedrooms/ 3persons and 2 x 1 bedroom/ 2persons, nine cycle spaces would be required in line with policy T5 of London Plan 2021. The proposal includes 6 cycle spaces at ground level, on vertical racks, accessed from the pedestrian route in the undercroft. CPG Transport highlights that vertical or semi-vertical stands will not generally be supported because not all users are physically able to lift their cycle, and these facilities often do not provide sufficient space or locking capabilities.
- The proposal shows cycles can be stored inside each flat which is welcomed but could not be considered within formal calculations as the space internally is still for a vertical stand and the lift provided does not comply with requirements of minimum 2mx2m, to ensure occupiers can actually take their bike on the lift.
- You are advised to explore the possibility of extending the cycle storage beyond the building line to the rear, making use of the existing planter and/or find a suitable space for a bike hangar at the rear of the site. If the cycle space can be extended with a two tier cycle rack this would likely accommodate the nine spaces required.
- All units within the proposed development would be car-free to be secured through a section 106 legal agreement.
- As the site provides vehicular and pedestrian access to the estate at the rear and as the application site is located within the HS2 – corridor which has a Construction Management Plan (CMP) Priority area, a CMP would be secured via s106 legal agreement in the event of a future planning application and a Draft CMP Pro-forma should be provided at application stage, so transport officers can assess the impact on traffic and parking arrangements near to the site, and mitigate any impact on HS2 works.
- In terms of waste and recycling facilities for the flats, this would generally need to be provided on site. One of the documents submitted shows that the building could benefit from the waste and recycling facilities at Tolmer's Square. You would need to demonstrate that the existing capacity of the estate services bin store could accommodate the additional pressure from the proposed development, by providing. In the event of a future planning application you need to provide evidence that that this can be achieved.
- The following would have to be provided for a residential accommodation of 3-bedrooms or less:
  - 120 litres of bin, box or sack volume for general waste or 'refuse'
  - 140 litres of mixed dry recycling
  - 23 litres of food waste

## Security

- In terms of security, given the existing undercroft, careful consideration is required in relation to the proposed lift doors and cycle facilities storage.
- Crime officers advised that the lift door should be SR2 security rated leading into the lift lobby with destination control with key fob activation. Importantly, the lift should be come active only when the lift lobby door is closed.

- You should consider data login on all access points, which would provide a digital log for the management company and notify when someone came in.
- You need to consider where the mailbox could sit securely within the building or outside to reduce the need for the postman to enter the block every time, as this would reduce the security rate for the building.
- A lighting strategy should be provided for the undercroft area and measures taken to make the space more inviting.
- You are advised to acquire a Secure by Design Accreditation for residential development.

### **Planning obligations**

- In terms of planning obligations, it is likely that the following would have to be secured:
  - Construction Management Plan (CMP):
  - Car-free
  - Affordable housing contribution
  - Sustainability Plan

## **5. Recommendations**

5.1 The revised scheme has addressed most of the advice initially provided. It is advised that the following considerations should be addressed prior to the submission of a future planning application:

- Reduce the size of the openings into the mansard to front elevation
- Provide more information about the winter gardens
- Increase the cill height of the bedroom windows to the rear
- Explore the usability of the mezzanine level for communal spaces
- Consider provision of integrated green infrastructure
- Demonstrate that no harmful loss of light and overlooking would be caused to Tolmer's Square occupiers
- Ensure compliance with relevant hierarchy emissions and reduction as required by London Plan and Camden Local Plan and reach to passivhaus standards
- Demonstrate that cycling facilities are in line with CPG Transport can be provided on site or in close vicinity at the rear
- Demonstrate that the lift door lobby is of appropriate security rating and access into the flats is safe
- Provide a lighting strategy for the undercroft area.

Please see appendix 1 for supplementary information and relevant policies.

If you have any queries about the above letter or the attached document please do not hesitate to contact Nora Constantinescu (0207 974 5758)

Thank you for using Camden's pre-application advice service; I trust this is of assistance in progressing your proposal.

**Please Note: This document represents an initial informal officer view of your proposal 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.**

Yours sincerely,

Nora Constantinescu  
Planning Officer  
Planning Solutions Team



## **Appendix 1:**

### **Relevant Constraints:**

- Pedestrian and vehicular access in the undercroft to be maintained
- Euston Area Plan
- CMP Priority Area – HS2 corridor

### **Relevant policies and guidance:**

## **National Planning Policy Framework The London Plan**

### **Camden Local Plan 2017**

G1 – Delivery and location of growth  
 H1 – Maximising housing supply  
 H2 – Protecting existing homes  
 H4 – Maximising supply of affordable housing  
 H6 – Housing choice and mix  
 H7 – Large and small home  
 C1- Health and wellbeing  
 C5 – Safety and security  
 C6 – Access for all  
 A1 - Managing the impact of development  
 A3 – Biodiversity  
 A4 – Noise and vibration  
 D1 - Design  
 CC1 – Climate change mitigation  
 CC2 – Adapting to climate change  
 CC4 – Air quality  
 CC5 – Waste  
 T1 – Prioritising walking, cycling and public transport  
 T2 – Parking and car-free development  
 T3 – Transport infrastructure  
 T4 – Sustainable movement of goods and materials  
 DM1 – Delivery and monitoring

### **Camden Planning Guidance 2018 - 2019**

CPG Design  
 CPG Amenity  
 CPG Energy efficiency and adaptation  
 CPG Air quality  
 CPG Biodiversity  
 CPG Housing  
 CPG Health and wellbeing  
 CPG Transport  
 CPG Access for all

Planning application information:

The following documents should be included with the submission of a full planning application:

- Completed full planning application form
- The appropriate fee
- Location Plan (scale 1:1250)
- Site Plan (scale 1:200)
- Floor plans (scale 1:100) labelled 'existing' and 'proposed'
- Elevations and sections (scale 1:100) labelled 'existing' and 'proposed'
- Design and Access and Statement
- Air quality assessment
- Sustainability plan
- Waste management plan
- Daylight Sunlight Assessment

Please see the following link to supporting information for planning applications

<https://beta.camden.gov.uk/planning-statements-and-additional-supporting-information?inheritRedirect=true>

We are legally required to consult on applications with individuals who may be affected by the proposals. We notify neighbours by displaying a notice on or near the site and placing an advert in the local press. We must allow 23 days from the consultation start date for responses to be received. We encourage you to engage with the residents of adjoining properties before any formal submission.

Non-major applications are typically determined under delegated powers. However, if we receive three or more objections from neighbours, or an objection from a local amenity group, the application will be referred to the Members Briefing Panel if officers recommend it for approval. For more details click [here](#).

## **Appendix 2: Initial pre-app advice**

**From:** Nora-Andreea Constantinescu

**Sent:** 12 November 2021 16:00

**To:** 'Matt Hill' <matt@maddoxassociates.co.uk>; Dylan Kerai <dylan@maddoxassociates.co.uk>

**Cc:** Ben Anderson <ben@maddoxassociates.co.uk>

**Subject:** RE: 2021/4627/PRE 155 Drummond Street

Hi Matt,

Please see below initial advice for the above.

### **2021/4627/PRE – 155 Drummond Street NW1 2PB**

#### **Demolition:**

- It is not clear from the submitted documents if the existing structure of the building will be retained. We have discussed this on site but please confirm this. It would be useful to see demolition drawings..
- If demolition or partial demolition proposed, you would need to look at the following:
  - o CC1 – requires you to demonstrate that the existing building cannot be retained, improved and reused in a way that resources are optimised efficiently.
  - o You need to undertake a Condition and Feasibility Study to appreciate if the existing building has potential to be reused. Chapter 9 on Reuse and optimising resource efficiency of CPG 'Energy efficiency and adaptation' provides detailed information about the hierarchy of this study and further development options following for refit, refurbish, substantial refurbishment and extension, reclaim and recycle.
  - o If the study shows that the building could only be used to **reclaim and recycle materials**, a Whole Life Carbon assessment (including embodied carbon) would be required in line with the GLA draft SPG, where circular economy principles are applied.
    - it should be demonstrated how **passive design measures** have been adopted into the design of the scheme from the outset. Also, you are advised to consider LETI Climate Emergency Design Guide to ensure the proposal would achieve the lowest possible carbon impact.
  - o The energy strategy for the building should be based on renewable energy and electricity.
  - o Due to the proposed demolition a **detailed Air Quality Assessment** would be required.
- If you retain the structure, and add the additional two floors on top, you would still need to comply with the requirements for new build development (as the extension is over 100sqm) in terms of carbon emissions and energy efficiency measures (Be Lean, Be Clean, Be Green).
- You need to meet 20% reduction of carbon emissions from onsite renewables. If renewables are not achievable on site, you will need to reach Passivhaus standards to help meet the 20% target.
- In terms of heating, are you thinking about Air Source Heat Pumps? Would each flat have one? Where would that sit? LETI guides or Retrofit and Climate Emergency are quite helpful in this regard.

#### **Air quality:**

- Based on previous assessments presented to us, we found that the levels of Air pollution NO2 (Nitrogen Dioxide) and PM10, PM2.5 (Particulate Matter) was very high and therefore mechanical ventilation with air inlet ideally from the roof was required, and windows fixed shut at 1<sup>st</sup> and 2<sup>nd</sup> floor levels, front and rear, and winter gardens not balconies to the rear would be required. You would need to undertake a new Air detailed air quality assessment.
- Given the air quality issues here and the need for closed windows, there is great potential to meet Passivhaus standards.

#### **Design:**

- The research work put into developing this project is appreciated, really informative and useful.

- The height as proposed is challenging given the existing roofline, however, on balance, subject to the delivery of a truly high quality and sustainable building, which responds to our further advice, we could support the additional storey. Would be good to see some views from the Tolmer's square entrance in the estate at the back, if possible.
- Maintaining the main access from the street and the existing pedestrian footpath is welcomed.
- Given the existing context, the proposed openings to the front elevation appear very large and dominating and they overwhelm the building and streetscene. Due to their expansion they do not appear to relate to a domestic use, but rather commercial which is not what we are looking for here. We suggest you follow a simple window hierarchy like the one at neighbouring buildings at nos. 159, 161-163.
- The proposed Juliet balconies to front elevation appear out of context, and create a rather too busy elevation. Also, given the high levels of air pollution we would not support openable windows to the front elevation. We advise you remove the Juliet balconies to front and potentially rear.
- In line with the above on air quality we would expect winter gardens to the rear rather than balconies.
- The opening at mansard level to front roof slope appears very large and not respecting the hierarchy of openings and spaces. You should amend this to better relate to the floors below.
- Please send us a picture of the sample for the cladding if you have it already.

As we discussed, if you could provide revisions in response to the above, we will then issue the formal response.

Any questions, let me know.

Best Regards,  
Nora

Nora-Andreea  
Senior

Planning

Constantinescu  
Officer

Telephone: 02079745758