

Application ref: 2022/1054/PRE  
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Date: 25/05/2022

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Mandip Singh Sahota  
NTA Planning  
46 James Street  
London  
W1U 1EZ

Dear Sir/Madam

### **Pre-application Medium Development Pre-application Advice Issued**

Address:

**The George IV**  
**89 Holmes Road**  
**London**  
**NW5 3AU**

Proposal: Refurbishment of HMO accommodation and vacant public house and basement cellar/store; alterations to ground floor fenestration; second floor rear extension; and two storey mansard-style roof extension behind retained parapet, comprising 9 HMO room addition, together with kitchen and communal spaces

Drawing Nos: 21046-001, 21046-E-100, 21046-E-200, 21046-E-300, 21046-P-100, 21046-P-200, 21046-P-300, Pre-App Addendum Report (05/05/2022), Design and Access Statement (14/03/2022), Heritage Appraisal (March 2022), Pre-application Planning Statement

#### **Site constraints**

- Article 4 Direction – Basement Development
- Inkerman Conservation Area
- Kentish Town Neighbourhood Forum
- Strategic View Wider Setting
- Underground development constraint - Slope Stability
- Underground development constraint – Subterranean (groundwater) flow

#### **Relevant planning history**

2007/3110/P - Erection of retractable awning at fascia level of public house (Class A4) – Granted (21/08/2007)

## **Relevant policies and guidance**

### **National Planning Policy Framework (NPPF) 2021**

#### **The London Plan 2021**

#### **Camden Local Plan 2017**

Policy A1 Managing the impact of development  
Policy A4 Noise and Vibration  
Policy A5 Basements  
Policy D1 Design  
Policy D2 Heritage  
Policy H10 Housing with shared facilities maximising housing supply  
Policy H3 Protecting existing homes  
Policy H2 Maximising the supply of self-contained housing from mixed use schemes  
Policy C2 Community Facilities  
Policy C4 Public Houses  
Policy C6 Access for All  
Policy E1 Economic Development  
Policy T1 Prioritising walking, cycling and public transport  
Policy T2 Parking and car free development  
Policy T3 Transport Infrastructure

#### **Kentish Town Neighbourhood Plan 2016**

Policy CC3: Protection of Public Houses  
Policy D3: Design Principles

#### **Camden Planning Guidance**

Access for All CPG 2019  
Air Quality CPG 2021  
Amenity CPG 2021  
Basements CPG 2021  
Biodiversity CPG 2021  
Community uses, leisure and pubs CPG 2021  
Developer Contributions CPG 2019  
Design CPG 2021  
Energy efficiency and adaptation CPG 2021  
Employment Sites and Business premises CPG 2021  
Housing CPG 2021  
Transport CPG 2021  
Water and Flooding CPG 2021

#### **Inkerman Conservation Area Statement (2001)**

## Site and surroundings

The Inkerman Conservation Area, where the site is located in, forms a dense, homogenous environment the heart of Kentish Town. The majority of the buildings are residential in character integrated with institutional, educational and light industrial uses. Most of the buildings were built between the 1850s and 1860s. The site is listed as a positive contributor and is adjacent to the former Holmes Road Board School with the main frontage to the school facing Holmes Road which is Grade II listed.

The application site is a typical mid-19<sup>th</sup> century public house situated on the corner of Holmes Road and Willes Road. It is three storeys in height with the public bar at ground floor level and ancillary accommodation on the floors above. Its facades are Italianate in style, constructed of yellow stock brick with stucco embellishment. At ground floor level there is a traditional public house frontage, with large windows and paired entrance doors on the Willes Road façade. According to the Inkerman Conservation Statement the building is described as:

*George IV forms a three storey highly decorative and particularly distinctive building and occupies a prominent corner in the Conservation Area. Built between 1868-1875, it incorporates various forms and styles, including Italian Renaissance and Classical. The classical form is demonstrated with hooded cornices, pediments, architraves and console supports in first floor windows and also through the elaborate use of stucco.*

It is a good example of public house architecture from the period known colloquially as 'the Golden Age of pub building'. The building incorporates a variety of architectural styles including Italian Renaissance and Classical. The classical form is demonstrated with hooded cornices, pediments, architraves and console supports in first floor windows and also through the elaborate use of stucco. Taking inspiration from the Renaissance palazzo, first-and second-floor windows are paired and there is a tall and richly decorated stuccoed parapet, with cornices and brackets.

## ASSESSMENT

The principal planning considerations are the following:

- Design and Heritage
- Basement
- Neighbouring amenity
- Transport
- HMO Accommodation
- Energy and sustainability

### 1. Design and Heritage

#### Mansard Roof Extension

- The mansard roof extension occupies the most of the roof and provides additional floor and mezzanine floor space to accommodate HMO accommodation.

- Whilst the principle of a mansard extension was accepted, the design that was originally proposed was considered far too excessive and bulky in relation to the host building. The height, size of the windows and angle of the mansard meant that the extension failed to have any subordination compared to the floor below. This resulted in a design which is unacceptable.
- Whilst the height does not extend above the building line of the adjacent school, the pub, characteristically so, reads as more of a standalone building. Therefore any additional height needs to be very considerate of the impact it causes. In Appendix A there are a pictures demonstrating the clear and strong roof line in the area and how a large mansard will impact this.
- The following design, which was sent over within the Pre-app addendum report, has attempted to address the issues raised above by reducing the height, size of windows and angle of the mansard slightly. However this still does not overcome the original concerns. The windows still appear dominant as they are set away from the extension and whilst the height has been reduced it isn't enough to maintain an acceptable level of subordination. The result is that the proposed mansard dominates the lower levels and results in harm to the wider conservation area.
- The building itself has a clear hierarchy from the ground to second floor with the fenestration details, including windows reducing in size as you go up the building. It is essential the hierarchy of the building is not compromised as a result of the two storey extension, and the need to reduce the perception of height to a greater degree needs to be focused on. This could be achieved by having a larger pitched section at the top of the roof, slightly reducing the height of the windows and increasing the angle of the mansard.
- The extension has a modern appearance as a result of the windows and materiality, however, the scale and bulk of the proposal are too dominate in their form. The proposed design needs to be reconsidered and further modern architectural approaches explored.
- Whilst the principal of a traditional mansard could be accepted the scale and bulk of the proposal would need to be reduced to ensure that the built form only appears slightly over the existing parapet.
- Therefore, you are advised to resubmit further architectural approaches which include a modern intervention, all of which reduce the overall bulk which is currently shown. Overall whilst there has been some improvements, the design will need to be reduced in scale or be rethought.

### Ground Floor Alterations

- On the ground floor the original submission included multiple alterations and the introduction of two additional entrance doors. The windows are also being altered to extend to the ground level. This was raised as a concern in the meeting citing the distinct British pub character, which would be lost, and issue of light not being a hugely significant due to the large existing windows.
- The design in the addendum has reduced the number of entrances and raise the parapet of the window. At ground floor level it is proposed to alter the proportions of the windows to allow greater visibility into the building from street level. The existing windows and solidity of the ground floor are important elements of public house architecture – visibility into the pub was intentionally limited – as a result the proposed alterations to have larger windows are considered to have a harmful impact on the architectural character of the building and the wider conservation area. A more traditional approach should be explored.

### Fenestration Alterations

- Replacement of window frames if being proposed as part of the overall refurbishment, would need to reflect the original materials of the host property. Timber frames are strongly recommended.

## **2. Basement Use**

The existing cold store/cellar storage space within the basement, which comprises approx.121sqm (GIA) is sought to create additional useable and accessible community space. This lower ground area is sought to comprise a variety of flexible uses. The uses included within the planning statement include:

- Deli
- Potential exhibition space
- Affordable workspace
- Wine cellar
- Florist

Due to the existing community use existing on the ground floor, this can be considered ancillary space to the main sui generis pub use.

Considering the footprint of the basement is not significantly changing, a basement impact assessment would not be required in this instance.

## **3. Neighbouring Amenity**

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include visual privacy, outlook; sunlight, daylight, and overshadowing; artificial lighting levels; noise and vibration; odour, fumes, and dust; and impacts of the construction phase, including the use of Construction Management Plans.

Whilst there are existing HMO's on site there will be additional accommodation as part of the proposal. This means that noise and vibration of the pub use on the ground and basement floors need to be considered and mitigation measures proposed. This should be in the form of a noise impact assessment or acoustic report which should support the application. You are reminded that any plant would need to be accompanied by a noise report

In terms of outlook, increased sense of enclosure, daylight and sunlight, overlooking and privacy there does not appear to be any significant issues with the extension as it is contained to the roof and the neighbouring buildings are either sufficiently set back or do not view the extension. However there should be demonstration within the supporting information that this is the case.

## **4. Transport**

Policy T1 aims to promote sustainable transport by prioritising walking cycling and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities and finally improving links with public transport. All these measure are in place to ensure the Council meets their zero carbon targets.

Policy T2 limits the availability of parking in the borough and requires all new developments in the borough to be car-free. This will be done through not issuing parking permits, resisting development of boundary treatments and using legal agreements to secure these actions.

### *Cycle Parking*

The DAS confirms the development will be car-free which is welcomed. For the public house, it is proposed to incorporate new on-street stands, given the pavement width on the north side of Holmes Road. The pub would also need to accommodate long-stay cycle parking. When designing for the cycle spaces, please check Section 8 of CPG Transport.

For the HMO accommodation the DAS concedes that it does not contain any cycle parking. Considering the proposal is increasing the amount of accommodation on site and additional floors, cycle parking should be provided and the Council strongly encourages the inclusion of onsite cycle spaces for residents.

A lot of developments in Central London have more restricted space and are able to provide cycle parking within the building. On-street bike hangars may be a possibility however clear and substantial evidence will need to be provided that attempts were made to include cycle parking within the building. There is significant concern about having all 22 bike hangar space on-street. We would like to ensure all possible opportunities for on site cycle parking have been considered.

	Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
HMO (as per most relevant other standard - C3-C4 dwellings)	<ul style="list-style-type: none"> <li>• 1 space per studio or 1 person 1 bedroom dwelling</li> <li>• 1.5 spaces per 2 person 1 bedroom dwelling</li> <li>• 2 spaces per all other dwellings</li> </ul>	<ul style="list-style-type: none"> <li>• 5 to 40 dwellings: 2 spaces</li> </ul>
Pub (former A2-A5)	1 space per 175 sqm (GEA)	• 1 space per 20 sqm (GEA)

### *Delivery and Servicing*

The pub is currently vacant but once it is up and running, there would be beer deliveries and other servicing requirements. There is a school directly adjacent to the site. There is a Healthy School Street scheme at the other end of Holmes Road and Ragland Street where motor vehicles are restricted on Mon-Fri between 8-10am and 2-4pm. The Council would expect any application to provide details on delivery and servicing within the full application.

### *Tables and chairs*

Upon submission of a full planning application, you would also need a separate [licence for tables and chairs](#) on the public highway.

### *Green wall*

The Management of plants and green walls should be considered as water should not run onto the public highway. Within any further correspondence, you are advised to submit full detail of the proposed specification including the species, maintenance and fixings to the building.

## *CMP and bond*

A Construction Management Plan would need to accompany a full application as the site is directly adjacent to the school. Construction vehicles would not be able to load and unload on Willes Road due to the Double Yellow Line and double blips. Construction delivery hours would be restricted to 09.30 – 15.00, with possibly recommencement between 15.30 – 16.30 depending on school hours.

Should a full application be made, it is likely that a planning consent would need to be supported by the following S106 planning obligations below:

- Car-free development
- Condition securing the provision of 22 long-stay cycle parking spaces for the residents, for the pub staff
- Condition securing the provision short-stay cycle parking spaces
- Delivery and Servicing Management Plan – to be assessed
- Construction Management Plan and associated implementation support contribution of £3,920
- Construction Impact Bond of £7,500

## **5. HMO Accommodation**

There is a HMO licence for the address listed as 76 Willes Road but is confirmed to be this site.

The property will have to comply with the Council's HMO standards found here on the Council website (please see the link below)

<https://www.camden.gov.uk/documents/20142/2134745/HMO+shared+facilities.pdf/d76a470f-8a76-b5b7-4a1c-c9243e3c4582?t=1603272190273>

Because there are no shared bathroom facilities shown it is presumed that each room has ensuite bathing and WC facilities. The calculation of room size does not include the bathrooms, so we would need to know where and how big the bathrooms are/will be. Kitchen facilities need to be provided at a ratio of 1 full set of facilities for each 5 persons.

The property would have to have adequate fire precautions, in line with the LACORS guidance which we follow in regard to licenced HMO's. The plans would appear to show access to the residential accommodation coming down through the pub which is not acceptable and would need to be amended. The residential accommodation should have a completely separate entrance. If there is to be a shared entrance then there would need to be a fire lobby between the pub and the shared entrance to provide this 60 minute separation and doors to the lobby would have to be self-closing.

## **6. Energy and Sustainability**

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. Policy CC1 requires all development to reduce carbon dioxide emissions by following the steps in the energy hierarchy; supports and encourages sensitive energy efficiency improvements to existing buildings; and expects all developments to optimise resource efficiency.

Policy CC2 requires all development to adopt appropriate climate change adaptation measures such as:

- A. the protection of existing green spaces and promoting new appropriate green infrastructure.
- B. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- C. incorporating bio-diverse roofs, combination green and blue roofs, and green walls where appropriate; and
- D. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

No details of energy or sustainability measures have been provided as part of the pre-application document. Retrofitting the building with more energy efficient measures to minimise energy consumption (draught-proofing, thermally efficient windows and insulation etc) should be considered as part of any refurbishment works.

## CONCLUSION

It is considered that whilst the principle of the HMO accommodation is acceptable for this site, the mansard roof extension and ground floor changes, in their current form, would not be acceptable.

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 application will be acceptable, nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice on or near the site. We would also place an advertisement in the local press. The Council must allow 21 days from the consultation start date for responses to be received. We recommend that you contact the Kentish Town Neighbourhood Forum to discuss your proposals prior to submission. Their contact details can be found [here: Contact Us – Kentish Town Neighbourhood Forum \(ktnf.org\)](http://www.ktnf.org). We also encourage you to speak to your neighbours about the application, prior to submission.

If you have any queries about the above letter or the attached document, please do not hesitate to contact **Ewan Campbell**

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

It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete our online survey at the following website address: [www.camden.gov.uk/dmfeedback](http://www.camden.gov.uk/dmfeedback). We will use the information you give us to help improve our services.



Appendix A:

