

28 ALBERT STREET, CAMDEN, NW1 7NU

PLANNING STATEMENT

1. Introduction

This Planning Statement is written in support of minor works to the modern rear extension at 28 Albert Street, a Grade II listed building within the Camden Town Conservation Area. It is accompanied by a separate Heritage Statement.

The proposed works comprise:

- changing the fenestration of a modern rear extension
- replacing the cladding of the modern rear extension
- removing a ceiling (a modern addition) within the top floor original property
- other minor (non-structural) remodelling within the original property

The property is in single residential use and will remain so. An application for planning permission and listed building consent has been submitted for these works.

No. 28 Albert Street forms part of a listed early Victorian terrace of townhouses covering 50-88 Albert Street. Similar listed townhouses lie to the rear of the property. Both terraces are listed for their group value.

No.28 has three above-ground storeys and a lower ground semi-basement level. The rear extension is a 1980s construction with a flat roof, horizontal-proportioned windows and metal panel cladding.

For further details of the site context please refer to the Heritage Statement.



28 Albert Street and its surroundings (Google Maps, 2022)

2. Development Proposals

The proposals should be seen in detail by referring to the submitted plans. In summary they comprise:

Changes to the exterior of the 1980s rear extension:

- Alterations to the existing windows and fenestration pattern. The new windows will be horizontally proportioned and less dominant on the elevation.
- Changing the exterior façade of the rear extensions – replacing the modern metal cladding with white silicone render.
- Adding thermal insulation behind the new silicone render.

Changes to the interior of the rear extension:

- The ground floor bedroom to become a study, with the 1st floor bedroom level to be removed to create a double height space.
- Reconfiguration of the 1st floor bathroom to create a storage area and smaller bathroom
- Reducing the extent of the existing rooftop terrace

Changes within the original property to comprise:

- Removal of the suspended ceiling on the 3rd floor, retaining and revealing the existing roof joists. The roof will be insulated between the existing rafters at roof level, a secondary board of insulation will be applied which will conceal the rafters.
- Internal alteration of the main bathroom on the 2nd floor to add a new dressing room closet area with doors.
- Removal of the existing closet area on the 3rd floor landing.
- Improving the thermal performance of the existing 1980s rear extension by adding thermal insulation on the inside of the external perimeter.

3. Planning Policy Assessment

National Planning Policy

The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At the heart of the Framework is a presumption in favour of sustainable development

Paragraph 215 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay.

The relevant chapters from the Framework are:

- Section 12: Achieving well-designed places
- Section 16: Conserving and enhancing the historic environment

The guidance on the NPPF are reflected in local policy for the site. The development plan is considered to be up-to-date.

The London Plan

The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.

The following policies are of general relevance to these proposals, and the proposals have been designed to respond to their requirements:

- Policy D4 Delivering good design
- Policy D5 Inclusive Design
- Policy D7 Accessible Housing
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety

The following policies (with most relevant parts quoted below) are of particular relevance.

Policy D6 Housing quality and standards

A Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

B Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.

C Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

D The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

E Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.

F Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Internal space standards follow – building is above these standards and this remains the case after the proposals.

The proposals have been designed to respond to these requirements and the proposed changes create rooms that meet these standards. Room sizes are compliant and will be increased from their existing sizes. Light penetration will be increased by a new double-height space and by having more vertical windows.

Policy HC1 Heritage conservation and growth

C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

The Heritage Statement explains how the proposals will impact on heritage assets and their significance, making a negligible impact overall. Change has already occurred to this building, notably with the 1980s extension, but the current proposals do not make any additional changes to the built envelope and they strip out some later additions and create a more sympathetic fenestration. Therefore, they do not represent cumulative impacts.

Local Policy

The Camden Local Plan was adopted by Council on 3 July 2017.

The site has no specific allocations or designations applying to it on the Policies Map, other than the Conservation Area and listed buildings.

The following general policies are of relevance to the current proposals.

Policy C6 Access for all

The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. We will:

- a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;*
- b. expect facilities to be located in the most accessible parts of the borough;*
- c. expect spaces, routes and facilities between buildings to be designed to be fully accessible;*
- d. encourage accessible public transport; and e. secure car parking for disabled people.*

The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.

Policy A1 Managing the impact of development

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;*

- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- d. require mitigation measures where necessary.*

The factors we will consider include:

- e. visual privacy, outlook;*
- f. sunlight, daylight and overshadowing;*
- g. artificial lighting levels;*
- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
- i. impacts of the construction phase, including the use of Construction Management Plans;*
- j. noise and vibration levels;*
- k. odour, fumes and dust;*
- l. microclimate;*
- m. contaminated land; and*
- n. impact upon water and wastewater infrastructure.*

Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

g. is inclusive and accessible for all;

h. promotes health;

i. is secure and designed to minimise crime and antisocial behaviour;

j. responds to natural features and preserves gardens and other open space;

k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,

l. incorporates outdoor amenity space;

m. preserves strategic and local views;

n. for housing, provides a high standard of accommodation; and

o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Local context and character, paragraphs 7.2-7.3:

The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- character, setting, context and the form and scale of neighbouring buildings;*
- the character and proportions of the existing building, where alterations and extensions are proposed;*
- the prevailing pattern, density and scale of surrounding development;*
- the impact on existing rhythms, symmetries and uniformities in the townscape;*
- the composition of elevations;*
- the suitability of the proposed design to its intended use;*
- inclusive design and accessibility;*
- its contribution to public realm and its impact on views and vistas; and*
- the wider historic environment and buildings, spaces and features of local historic value.*

The Council will welcome high quality contemporary design which responds to its context, however there are some places of homogenous architectural style (for example Georgian Squares) where it is important to retain it.

The proposals conform with all of these design policies, which are similar to equivalent policies within the London Plan. Accessibility policies must be balanced with conserving the listed building, however the proposals do not make any negative changes in terms of accessibility compared to the current situation. The property will remain as a single private dwelling.

There are no changes to the built envelope of the property, and its use will remain as a private residential dwelling. Therefore there will be no greater impact on the amenity of neighbours.

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to

maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;

g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and

h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. To preserve or enhance the borough’s listed buildings, the Council will:

i. resist the total or substantial demolition of a listed building;

j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and

k. resist development that would cause harm to significance of a listed building through an effect on its setting.

The submitted Heritage Assessment assesses the impacts of the proposals on the significance of heritage assets. This demonstrates how the proposals comply with the above policies. No historic fabric is being lost and the proposals will generally improve the significance of the listed building.

Policy CC1 Climate change mitigation

The Council will require 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.

We will:

a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;

- b. require all major development to demonstrate how London Plan targets for carbon dioxide have been met;*
- c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;*
- d. support and encourage sensitive energy efficiency improvements to existing buildings;*
- e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and*
- f. expect all developments to optimise resource efficiency.*

Policy CC2 Adapting to climate change

The Council will require development to be resilient to climate change. All development should 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.*

Sustainable design and construction measures

The Council will promote and measure sustainable design and construction by:

- e. ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;*
- f. encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;*
- g. encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and*
- h. expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.*

The proposals only relate to internal and elevational changes to an existing property. As such, many of the above policy requirements do not apply. However, the proposals do represent benefit in terms of sustainability by adding thermal insulation, to both the the roof and the cladding of the extension, which will improve energy efficiency. These changes are all being done without losing any historic fabric.

4. Conclusions

In summary, the proposals represent minor changes that require listed building consent, largely because the modern extension is listed by virtue of being attached to the listed building. The changes to the fenestration require planning permission because they affect the external appearance of a building within a Conservation Area.

This Statement, read alongside the Heritage Assessment, demonstrates that the proposals will result in no negative impacts assessed against national, city-wide and local policies, including their impact on heritage assets. In a number of cases there are a number of positive benefits, such as improving energy efficiency and increasing natural light penetration.

In summary, therefore, there are considered to be no obstacles to the granting of planning permission and listed building consent and the applicant looks forward to a positive and efficient determination of these applications.