



Callidus Planning Ltd

Ref: NS/95Aveo1

Date: 14 November 2022

Regeneration and Planning Development Management Team

London Borough of Camden 2nd Floor, 5 Pancras Square
C/O Town Hall
Judd Street
London
WC1H 9JE

Via the Planning Portal

Dear Sir/Madam

Schedule 2 Part 20 Class A Town & Country Planning (General Permitted Development) Order 2015 (as amended)

Notification of Proposed Single-Storey Roof Extensions of Searle House and Benjamin House, Cecil Grove, London NW8 7EB & NW8 7EF

On behalf of our client, Cooper Group Developments (St. Edmunds) Limited, we are pleased to enclose a notification for Prior Approval of single-storey roof extensions on two separate residential blocks to provide a total of six additional residential (c3) units.

The proposed development is permitted by the amended Class A Part 20 (Construction of New Dwellinghouses) of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 1995 (GPDO) (as amended August 2020).

A 'prior approval' application differs from a planning application in terms of the decision-making process. The scheme is not judged by assessing the proposal against planning policy. A prior approval application is a technical assessment against the various specified criteria. If it meets all of these criteria, then prior approval should be granted to confirm the permitted development rights.

As set out in this letter the development meets the relevant conditions for permitted development under Class A of the GPDO and does not give rise to any significant detrimental impacts in relation to the narrow range of assessment criteria in the regulations. The purpose of this letter is to explain this in more detail, and highlight the other supporting information included to confirm this.

Accordingly, we are pleased to enclose the following:

- Plans, elevations and sections – HUB Architects
- Design and Access Statement (including information on 'amenity') – HUB Architects
- BRE assessment – sunlight & daylight
- Fire statement
- Structural report
- Flood risk assessment
- Land contamination report
- Transport statement

The Site

The site comprises two multi-storey detached residential (C3) apartment blocks, Searle House is 6 storeys and Benjamin House is 4 storeys. The apartment blocks are situated within the eastern edge of St John's Wood, with the primary site access off St Edmund's Terrace and the main visible frontage of Searle House fronting Broxwood Way. The two blocks are separated by a linear inner courtyard space that forms the forecourt / communal amenity areas to the residential accommodation, with Benjamin House inset from the main roadways situated at the rear / inner western portion of the site. The scheme was constructed in 2015.

The site is not listed and does not form part of any conservation areas. There are no Listed Buildings within the immediate vicinity of the site.

The site is a large plot that occurs at the intersection of St Edmund's Terrace and Broxwood Way.

The main site access is off St Edmund's Terrace for both pedestrian, cycle and vehicular access.

The site is located within Flood Zone 1, indicating the lowest possible risk of flooding.

In terms of public transport accessibility, the site is approximately 0.4 miles to St. John's Wood Tube Station (London Underground) which provides good connectivity to central London and 0.7 miles to South Hampstead Train Station (London Overground). There are numerous local bus connections nearby within 0.1 miles all offering frequent services in and around the city.

The building has a concrete frame and is largely brick clad, with the upper stories largely metal clad. As noted above a structural report and fire report have been included with the submission.

The Proposals

Additional Residential Units

The proposal is for the creation of 6 additional dwellings at the application site which currently comprises of multiple units. The new dwellings will occupy the new 4th (Seale House – Block A) and 6th (Benjamin House – Block B) floors which will be situated on top of each of the existing buildings.

The proposed flats will provide self-contained accommodation which is in-keeping with the other units in the existing buildings. The proposed development will provide apartments that are dual aspect and which provide good quality accommodation that surpasses minimum space standard guidelines. They will be well lit and have private terrace space.

Refuse and Recycling Facilities

The new proposed dwellings on each block will utilise the existing waste/recycling storage and disposal facilities that exist on the site.

No changes are proposed to the existing waste storage arrangements. The development includes existing internal / external waste and recycling storage areas that serve each block. Refer to the existing block & site plan for the location and extent

Car Parking & Cycle Parking

The proposal is that the new added dwellings will be car free in-line with Camden's car-free policy for all new developments. No changes are proposed to the existing parking arrangements.

The existing buildings include dedicated cycle storage areas for the existing flats, these are both internal and external. The existing internal cycle storage areas are situated in the ground floor level of Block A and there is external cycle storage to the rear western portion of Block B. The original scheme included an over provision of cycle parking spaces.

In accordance with the cycle parking standards set out within the London Plan 2021 for C3 residential development our proposal will provide a total of 12 long term cycle storage spaces, and 2 short term spaces.

Assessment against GPDO requirements

This prior approval application for the proposed development is submitted in relation to Class A Part 20 (Construction of New Dwellinghouses) of the GPDO (as amended). Under these regulations, it is confirmed that the site meets the following criteria as set out under **paragraph A.1:**

Criterion	Compliant?
a) the permission to use any building as a dwellinghouse has not been granted only by virtue of Class M, MA, N, O, P, PA or Q of Part3 of this Schedule.	Yes – purpose-built as dwellings prior to these use-classes coming into existence.
b) above ground level, the building is greater than 3-storeys in height.	Yes – Searle House (Block A) is 4-storeys in height, and Benjamin House (Block B) is 6-storeys in height.
c) the building was constructed between 1st July 1948 and 5th March 2018.	Yes – the block was constructed in 2015.
d) the additional storeys are not constructed other than on the principal part of the building;	Yes – the additional storey will be on the principal part of the building.
e) the floor to ceiling height of any additional storey is — i. not more than 3 metres in height; or ii. not more than the floor to ceiling height of any of the existing storeys	Yes – see submitted proposed 'section' drawings.
f) the new dwellinghouses are flats	Yes – see submitted drawings.
g) the overall height of the roof of the extended building is not greater than 7 metres higher than the highest part of the existing roof	Yes – see submitted drawings.
h) the extended building (not including plant) is not greater than 30 metres in	Yes – see submitted drawings.

height	
i) development under Class A.(a) would not include the provision of visible support structures on or attached to the exterior of the building upon completion of the development	Yes – no external support structures proposed; see submitted drawings.
j) development under Class A.(a) would not consist of engineering operations other than works within the existing curtilage of the building to— i. strengthen existing walls; ii. strengthen existing foundations; iii. install or replace water, drainage, electricity, gas or other services; or	Yes – no works beyond those permitted are proposed.
k) in the case of Class A.(b) development there is no existing plant on the building	N/A
l) in the case of Class A.(b) development the height of any replaced or additional plant as measured from the lowest surface of the new roof on the principal part of the extended building would exceed the height of any existing plant as measured from the lowest surface of the existing roof on the principal part of the existing building;	No – the new plant is no higher than the existing plant on the building.
m) development under Class A.(c) would extend beyond the curtilage of the existing building	No – the development is within the curtilage.
n) development under Class A.(d) would— (i) extend beyond the curtilage of the existing building; (ii) be situated on land forward of a wall forming the principal elevation of the existing building; or (iii) be situated on land forward of a wall fronting a highway and forming a side elevation of the existing building;	No – the proposals do not align with any of these points.
o) The land or site on which the building is on is not located on and does not form part of— i. Article 2(3) land; ii. A site of special scientific interest; iii. A listed building or land within its curtilage; iv. A scheduled monument or land within its curtilage; v. A safety hazard area; vi. A military explosives storage area; or vii. Land within 3 kilometres of the perimeter of an aerodrome.	Yes – the site has none of these designations.

Paragraph A.2 outlines the various aspects of the development which the local planning authority may consider, as follows:

A.2 1) Where any development under Class A is proposed, development is permitted subject to the condition that before beginning the development, developer must apply to the local planning authority for prior approval of the authority as to—

- a) *transport and highways impacts of the development;*
- b) *air traffic and defence asset impacts of the development;*
- c) *contamination risks in relation to the building;*
- d) *flooding risks in relation to the building;*
- e) *the external appearance of the building;*
- f) *the provision of adequate natural light in all habitable rooms of the new dwellinghouses;*
- g) *impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light; and*
- h) *impact on a protected view.*

Assessment against Relevant Criteria

The table below sets out each of the criteria set out under paragraph A.2 of the GPDO and how the proposed development has addressed them, supported the relevant technical evidence.

Consideration	Comment
A. Transport and highways impacts of the development	<ul style="list-style-type: none"> No additional parking spaces are proposed. Fourteen additional cycle spaces are proposed to be accommodated alongside the Details of this provision are included in the Design and Access Statement. <p>These matters are explored further in the submitted Transport Statement.</p> <p>The site's characteristics and the limited nature of the works proposed necessarily mean that any impact in highways terms will be extremely limited.</p>
B. Air traffic and defence asset impacts of the development	<p>The site is not located within an Air Traffic and Defence Asset Zone. Consequently, there will be no air traffic and defence asset impacts associated with the rooftop extension.</p>
C. Contamination risks in relation to the building	<p>The site currently comprises a residential block and the proposal would not involve any excavation works that could give rise to any contamination risks. It is therefore considered unlikely that there would be any contamination risk associated with the proposed additional accommodation. A contamination report has been submitted with the application.</p>
D. Flooding risks in relation to the building	<p>The site is located within Flood Zone 1 – land with the lowest probability of flooding – and it is not considered that the proposal would give rise to any flooding impacts. See flood risk report for more detail.</p>
E. The external appearance of	<p>The new elements have been carefully designed to respond to the existing building and its context. Further detail is set out in the Design & Access</p>

the building	Statement.
F. the provision of adequate natural light in all habitable rooms of the new dwellinghouses;	The new accommodation will enjoy excellent amenity, with high levels of daylight and sunlight, and good outlook.
G. impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light	By virtue of the existing building's separation from surrounding development, neighbours' amenity will not be significantly affected. More detail on this topic can be found in the submitted design and access statement, and in the BRE sunlight and daylight assessment
H. impact on a protected view.	The site is not within any identified protected view. There will be no such impact.
I. Fire safety and the construction of the existing building; and	In accordance with the requirements of the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 We enclose a Fire Statement, setting out relevant information in this regard. We also enclose a structural engineer's report.
J. where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building	We enclose a fire safety report to address the fire safety impacts on the intended occupants of the building.

Conclusions

For the reasons set out above and the supporting documentation, we consider that the scheme meets all of the qualifying conditions set out in Class A of the GPDO to be considered permitted development. Furthermore, the scheme does not give rise to any significant issues related to transport, air traffic, contamination, flood risk, external appearance, natural light, amenity or impact on a protected view

We therefore conclude that prior approval should be granted.

We trust that the documentation submitted is sufficient for you to make this determination, however should you require any further information or should you have any queries or wish to visit the site, please do not hesitate to contact me.

Callidus

Yours sincerely,

[Redacted Signature]

Director

Callidus

Callidus Planning Ltd

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