Development Management

London Borough of Camden

Town Hall

Judd Street

London

WC1H 9JE

12th September 2023

Dear Sir/Madam,

**Planning Application**

**9 Woodchurch Road, NW6 3PL**

**PP-12335606**

On behalf of my client, Lanesra Group, I have today submitted a planning application for the following:

*Excavation of basement extension with front and rear lightwells, erection of single storey plus basement side extension and single storey rear extension, new side and rear dormers, and internal reconfiguration to provide 1 x 1 bed flat, 1 x 2 bed flat, 1 x 3 bed flat, 1 x 2 bed house and 4 bedsits.*

The application is supported by the following:

* Site Location Plan
* Existing and Proposed Drawings
* CIL Form
* Design and Access Statement
* Daylight and Sunlight Report
* Heritage Statement
* FRA/SuDS Strategy
* Transport Statement
* Construction Method Statement
* Basement Impact Assessment

**Proposal**

The proposal subject to this application comprises the creation of 8 dwellings: 1 x 2 bedroom house and 1 x 3 bedroom duplex both spanning a new basement and ground floor, retention of the 1 x 1 bed flat on the ground floor, 4 new exceptionally well designed bedsits on the first floor and the retention and extension of a 2 bedroom flat in the loft.

**Existing Accommodation**

The property currently accommodates 8 dwellings: 1 x 1 bedroom flat and 2 bedsits on the ground floor, 3 more bedsits and a communal bathroom on the first floor along with an undersized studio (31m2) and an undersized 2 bedroom flat in the left (60m2).

**Pre-Application Advice**

On the 9th of January 2023, a pre-application meeting took place to discuss proposals for:

*Excavation of basement extension with front and rear lightwells, erection of two storey plus basement side extension and single storey rear extension, new side dormer and enlarged rear dormer, and internal reconfiguration to provide 3 x 1 bed flats, 1 x 2 bed flat, 1 x 3 bed house and 6 bedsits.*

Specifically, the proposal comprised the creation of a new 2 storey 3 bedroom house with basement accommodation, 2 x 1 bedroom flats in a new basement, retention of existing 1 bedroom flat on the ground floor along with 2 bedsits, 4 bedsits on the first floor and retention and extension of a 2 bedroom flat in the loft.

It should be noted that the proposal would result in the existing loft flat being extended so it meets the space standards and the removal of a studio on the first floor which also failed to meet the space standards.

Pre-Application advice was received on the 25th of May 2023. Whilst the principle was acceptable the following detailed issues were raised:

1. *Proposals to upgrade the living accommodation at the site are welcomed and the proposed bedsits would meet Camden’s required minimum internal space standards.*
2. *The excavation of a new basement must comply with all indicators within policy A5 and a BIA needs to be submitted and independently audited by Campbell Reith at application stage to demonstrate that it would not harm neighbouring properties and the structural, ground or water conditions of the area.*
3. *The proposed lightwells within the front garden should be secured with a flush metal grille rather than balustrades, to avoid a cluttered appearance to the front of the property.*
4. *The standard of accommodation of the proposed basement flats is a concern. The proposed rear lightwells would suffer a loss of privacy through overlooking from the existing ground floor 1 bed unit G.01, the rear bridge of the proposed side extension dwellinghouse, and the ground floor rear bedsit 02. The natural light to the units would need to be assessed by a Daylight and Sunlight Assessment. The installation of metal grilles above the proposed front lightwells as recommended above would further reduce the light and outlook to the basement units. The creation of self-contained flats at basement level within a previously flooded street is contrary to policies A5 and CC3 and further work is required to demonstrate the acceptability of the proposals in terms of flood risk. This is discussed further below.*
5. *The proposed two storey plus basement side extension to create a separate dwellinghouse would block the current views into the verdant rear garden above the existing garage and would interrupt the rhythm and pattern of development of the street. The existing side extensions cited as precedents are not recent approvals and are considered to be harmful to the character and appearance of the conservation area. The revised single storey extension would not be read as a separate residential unit within the streetscene and would still allow for views into the rear garden and is considered to be a more sympathetic option.*
6. *The proposed rear dormer does not comply with Camden Planning Guidance in terms of its positioning on the roofslope and detailed design and is not acceptable in design terms. The drawings need to be updated so that location of the rear dormer on the proposed roof plan corresponds with its location on the proposed rear elevation.*
7. *Transport: 12 cycle spaces are required and all units would need to be secured as car-free via a s106 legal agreement. A Construction Management Plan (CMP) and associated implementation support contribution and impact bond would also be required to be secured via s106.*

In addition, comments were received in relation to flooding with the advice recommending that self-contained dwellings in the basement should not be pursued.

In response to the above, we comment as follows:

1. Noted
2. A detailed BIA supports the application.
3. Flush grilles have been introduced although some form of fenestration is required for safety reasons. In this respect, railings are proposed which will be hidden behind planting.
4. The proposal no longer includes self-contained dwellings in the basement. What was previously proposed is replaced with 1 duplex flat and one house. As such, the overlooking issue has been removed. A daylight and sunlight assessment is submitted in support of this application which concludes:

***7.2 Daylight within the proposed new dwellings***

*7.2.1 The assessment of daylight has been undertaken using the Illuminance and Daylight Factor tests as set out in the guidance. The results have shown that all proposed habitable rooms achieve daylight factor levels that exceed the recommended targets for their specific room use and are therefore in accordance with the BRE guidelines.*

***7.3 Sunlight within the proposed new dwellings***

*7.3.1 The results of the internal sunlight assessments demonstrate that the majority of the proposed units (75%) will achieve at least 1.5 hours of sunlight on the 21st of March thus meet the BRE targets. In isolated instances where 2 units fall short of the recommendations, this is inevitable given they are orientated outside of 90o of due south.*

*7.3.2 The BRE recognises that it may not be possible to ensure all units have a southerly aspect and that in such instances internal sunlight levels will be limited. Nevertheless, the sunlight exposure results show a good level of compliance with the BRE recommendations and is considered wholly acceptable for a flatted scheme - particularly where all units demonstrate full compliance for internal daylight amenity.*

*7.3.3 Overall, the proposal will provide a high-quality accommodation for the future occupiers. As such, the proposals are considered to be in line with the BRE guidelines and relevant planning policy in respect of daylight and sunlight.*

1. The 2 storey side extension has been reduced to a single storey.
2. The dormer has been redesigned.
3. Noted.

**Principle**

As the officers have alluded to in their pre-application advice, the principle is acceptable. This view accords with Policies H1, H3, H6 and H7 of the adopted Local Plan (2017) which seek to maximise housing and at the same time protect it whilst accommodating an appropriate mix of dwellings.

There is no net gain or loss of dwellings. However, the opportunity has been taken to replace existing under sized dwellings and poor bedsits. In addition, the mix of units is better including the introduction of a house and a family duplex with easy access to the communal garden at the rear. The proposed bedsits on the first floor are exceptionally well designed replacing tired and worn out bedsits.

In conclusion, the proposal seeks to significantly improve the quality of the existing accommodation which introducing a well-designed extension accommodating a separate house.

I trust you have sufficient information to validate the pre-application advice request and look forward to meeting you to discuss the proposals.

Yours sincerely



**Mark Pender**

**PPM Planning Limited**