



T: 07900 413080
DDI: 0207 692 0643

E: info@smplanning.com
W: www.smplanning.com

80-83 Long Lane
London, EC1A 9ET

Via Planning Portal Only

27th October 2023

Dear Sir/Madam

FULL PLANNING APPLICATION – THE TOWN AND COUNTRY PLANNING ACT 1990

AMALGAMATION OF SEVEN FLATS TO FOUR AND LOWER GROUND REAR EXTENSIONS WITH TERRACE ABOVE AND ASSOCIATED WORKS AT 5-7 ADAMSON ROAD.

Please accept this covering letter as an accompaniment to this full planning application for the proposed amalgamation of seven flats to four flats, lower ground floor rear extension with terrace above and associated works at 5-7 Adamson Road.

Description of Proposed Development

Amalgamation of seven flats to four and lower ground floor rear extension with terrace above and associated works.

The Site

The site is located on the north side of Adamson Road, to the east of the junction with Winchester Road. The site comprises of a pair of semi-detached, properties which have been subdivided into a total of 19 flats. No.5 currently comprises 9 flats across 5 floors and no.7 comprises of 10 flats across 5 floors. The proposal relates to the lower ground and upper ground floors.

The site is on a street comprised of similar residential properties. The site lies within the Belsize Park Conservation Area.

Planning History

On the 5th of August 2021, a lawful development certificate (reference 2021/2543/P) was granted for the continued use of no.5 and no.7 Adamson Road as 19 self-contained residential flats (C3).

On the 7th of January 2022, lawful development certificates were issued (references 2021/5301/P and 2021/5276/P) for the amalgamation of two lower ground floor flats into a single flat at no.5 and no.7 Adamson Road.

On the 27th of July 2023, planning permission was granted (reference 22/0706/P) for extensions and alterations at lower ground, first floor and roof level including replacement mansard roof, installation of balconies/ terraces and alterations to fenestration to enable the reconfiguration of the residential units and create a shared access core resulting in a reduction from 19 units to 16 units with associated refuse and cycle storage and the erection of a front boundary treatment.

The Proposal

The proposal is to amalgamate seven flats to four, the erection of a lower ground floor rear extension with terrace above and associated works including fenestration alterations and waste and cycle storage provision.

Planning Policy:

National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social. The following sections are relevant to the consideration of this application; Section 11 (making effective use of land), Section 12 (achieving well designed places) and Section 16 (Conserving and enhancing the historic environment).

Local Planning Policy

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017), Kentish Town Neighbourhood Plan (2016) and associated Supplementary Planning Guidance. The following policies are considered relevant to this proposal:

London Plan (2021) (LLP)

- Policy D3 – Optimising Site Capacity Through a Design Led Approach
- Policy D4 – Delivering Good Design
- Policy D6 – Housing Quality and Standards

- Policy D12 – Fire Safety
- Policy HC1 – Heritage Conservation and Growth
- Policy T5 – Cycling
- Policy T6.1 – Residential Parking

Camden Local Plan (2017) (CLP)

- Policy H3 – Protecting Existing Homes
- Policy H6 – Housing Choice and Mix
- Policy H7 – Large and Small Homes
- Policy G1 – Delivery and Location of Growth
- Policy A1 – Managing the Impact of Development
- Policy A5 – Basements
- Policy D1 – Design
- Policy D2 – Heritage
- Policy CC1 – Climate change mitigation
- Policy CC2 – Adapting to climate change
- Policy CC3 – Water and flooding
- Policy CC5 – Waste
- Policy T1 – Prioritising walking, cycling and car-free development
- Policy T2 – Parking and car-free development

Kentish Town Neighbourhood Plan (2016) (KTNP)

- Policy D3 – Design Principles

Supplementary Planning Guidance Documents (SPDs)

- Basements (2021)
- Design (2021)
- Housing (2021)
- Amenity (2021)
- Transport (2021)

Planning Analysis:

Principle of development

Camden Local Plan Policy H3 states that the Council will resist development that would involve the net loss of two or more homes (from individual or cumulative proposals) unless they create large homes in part of the borough with a relatively low proportion of large dwellings, enable existing affordable homes to be adapted to provide affordable sized dwellings that are most in need or enable sub-standard units to be enlarged to meet residential space standards.

Policy H7 seeks to ensure that new residential development provides a range of homes of different sizes to create mixed, inclusive and sustainable communities and reduce mismatches between housing needs and supply. The dwelling size priority table referenced in the policy sets out a high demand for 2/3 bedroomed market dwellings.

The buildings currently comprise 19 flats as confirmed by lawful development certificate reference 2021/2543/P. A lawful development certificate has been issued confirming that amalgamating two lower ground floor flats in each building to a single flat (a net loss of two dwellings) is lawful and does not require planning permission. Planning permission has been granted (reference 22/0706/P) for a further amalgamation at ground floor level, resulting in a net loss of 3 dwellings. These certificates and planning permission is a realistic fallback position and a material consideration in the determination of this application.

The existing front ground floor flat at no.7 is substandard in respect to its internal floorspace fails to meet the nationally described minimum space standard for a 1 bed, 1 person, single storey dwelling. Similarly, the rear ground floor flat is substandard insofar as it also falls below the minimum space standard for a 2 bed, single storey dwelling. They are also awkwardly laid out with poor or no separation between eating and sleeping areas, single aspect and do not meet current building regulation requirements. They are considered to offer a poor quality living environment for the occupants.

The proposed layout seeks to create 4 high quality, family sized dwellings, with private amenity space. All of which are multi aspect and exceed the national minimum space standards. The family sized dwellings diversify the mix that is currently offered in the building, including 3 bed dwellings which are identified as a priority housing type in Local Plan Policy H7.

The proposal seeks to amalgamate two additional substandard units above that of the fall-back position established by lawful development certificates (references 2021/5301/P and 2021/5276/P) and as per the previously approved planning permission 22/0706/P. As such, the proposal accords with Local Plan Policies H3 and H7 and is acceptable in principle.

Design, visual and heritage impacts

Case law dictates that decision makers are required to give great weight to any harm to the significance of a heritage asset. Section 16 of the NPPF reflects the statutory duty insofar as it requires a consideration as to whether the proposal preserves and enhances the significance of the heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset.

Paragraph 130 of the NPPF outlines that decisions should ensure that developments are visually attractive and are sympathetic to local character.

LP Policy D3 sets out that all development must make the best use of land by following a design-led approach. The policy also states that developments should enhance local context, respect local character and be of high-quality architecture. Policy HC1 requires development proposals that affect heritage assets and their settings to conserve their significance and appreciation within their surroundings.

CLP Policy D1 requires development to be of the highest architectural and urban design quality, have regard to design and visual impact and to the context within which it is placed, and the contribution it makes to the landscape qualities of the area.

CLP Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.

The aims of Policy D1 are further reinforced by guidance contained within the Camden Planning Guidance (CPG) on Home Improvements. In relation to rear extensions, it is advised that extensions are subordinate to the host building and respect the original design, proportions, architectural detailing and materials of the host building whilst ensuring a reasonable sized garden is retained. The guidance continues that extensions should respect and preserve the historic pattern and established townscape of the surrounding area and ensure that extensions have a height, depth and width that respects the existing common pattern and rhythm of rear extensions at nearby sites, where they exist.

Whilst the application buildings are not listed, they are located within Belsize Park Conservation Area.

The Belsize Park Conservation Area is characterised by mid C19 villas of consistent scale, materials finish and detailing that address the street with modest front and reasonably deep rear gardens. The Conservation Area appraisal identifies inappropriate materials, extensions and alterations to be a threat to the character of the area. The buildings are not identified, in the conservation area appraisal, as making a positive contribution to the character and appearance of the conservation area. Threats to the character of the conservation area include, infilling gaps between buildings, unsympathetic extensions and alterations involving inappropriate materials, scale, bulk, massing, inappropriate railings to roof terraces/balconies and loss of original detailing.

The application site comprises a pair of semi-detached C19 villas constructed of stock brick with stucco projecting bays, quoin detailing, window surrounds and porches. Both properties have stepped access to the main entrances. The properties have overhanging eaves supported by decorative brackets. The properties also have a slate tiled dormer roof extensions and chimney stacks. The existing fenestration comprises of recessed sashes which reduce in size from the ground floor up. The rear elevation is less ornate in its detailing and comprises a ground floor projecting bay. Many of the aforementioned features are characteristic features of buildings within the conservation area. The properties are located on a street of similar properties, many of which have been extended and altered, particularly to the rear at lower ground and first floor level and at roof level.

The proposal includes a full width lower ground floor rear extension, projecting approximately 4 metres from the rear elevation of the host building, with terrace above, new timber windows and timber doors to match existing and fenestration improvements.

The proposed extensions and alterations primarily relate to the side and rear elevations of the property which are not readily visible from public vantage points. The proposed rear extensions are modest in their scale and proportions are subservient to the host building and retain the legibility of the characteristic rear bay, at upper ground floor level and regularity of fenestration, which comprises timber sashes set in reveals. The fenestration alterations provide regularity throughout the facades and re-instate the hierarchy of window

proportions decreasing as you move up through the building. The traditional features of the building, as highlighted in the Belsize Conservation Area appraisal are retained.

Planning permission 22/0706/P granted permission for a pair of 6 metre deep lower ground floor rear extensions. This is a realistic fall back position and a material consideration in the determination of this application. The proposed extension projects 2 metres less into the rear garden than the previously consented scheme and is clearly subservient to the host building.

If deemed necessary, appropriate materials finishes can be secured by way of suitably worded planning conditions. The proposal retains a good sized, landscaped rear garden and re-introduces a low level boundary treatment to the front, both of which are characteristic features of the wider area. The proposed cycle and waste storage is discretely located and would not be unduly prominent in the street scape.

The proposal preserves the contribution the building makes to the character and significance of the conservation area.

The proposal is in line with the aspirations of LP Policies D3 and HC1, CLP Policy D1 and D2, KTNP Policy D3 and the Camden's Supplementary Design Guidance Documents.

Neighbour amenity

Paragraph 130 of the NPPF sets out that decisions should create places which are safe, inclusive and accessible which promote health and well-being, with a high standard of amenity for existing and future users.

Policy D3 of the LP states that proposals should deliver appropriate outlook, privacy and amenity. Policy D6 sets out that 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.

CLP policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and ensuring that development protects the quality of life of occupiers and neighbours by not granting permission that would give rise to amenity harm to neighbouring residents.

The proposed lower ground rear extensions would not project above the existing boundary treatments. The proposed upper ground floor terraces are set back from the shared boundaries with the neighbouring buildings and are enclosed by privacy screening to prevent any overlooking opportunity to neighbours. The proposed fenestration would not directly face any existing neighbouring windows, in close proximity. The proposal would not harm neighbour amenity with respect to loss of daylight, sunlight, privacy, outlook, overbearing impacts or other noise or disturbance.

The development meets the amenity aspirations of LP Policy D3, CLP Policy A1 and the Council's adopted Amenity CPG (2021).

Living conditions for future occupants

Paragraph 130 (f) of the NPPF states that planning decisions should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Policy D6 of the London Plan states that housing development should provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners.

CLP Policy H6 states that in all developments the Council will encourage design of all housing to provide functional, adaptable and accessible spaces, and expect all self-contained homes to meet the nationally described space standards. The CLP advises that private amenity space is also important in adding to residents' quality of life and CLP Policy D1 requires development to incorporate outdoor amenity space.

The proposed 4 bedroom flats at lower ground level have a floor area of approximately 157 square metres (in exceedance of the national minimum space standard guidance for 4 bedroomed, 6- 8 person dwellings). Similarly, the two 3 bedroomed upper ground floor level dwellings have a floor area of 110 sqm metres (in exceedance of the national minimum space standard guidance for 3 bedroomed, 4- 5 person dwellings). All habitable rooms are served by a window and all dwellings direct access is to private rear amenity space.

The site is in an accessible location with respect to existing services and facilities, including public open space and transport infrastructure. The proposal provides a high quality living environment for the future occupants in line with the aspirations of LP Policy D6, CLP Policy H6 and the Council's Amenity CPG.

Highway and parking impacts

CLP Policy T1 sets out that the Council seek to encourage sustainable transport by requiring developments to provide cycle parking that meets or exceeds the requirements set out in the London Plan. Policy T2 advises that the Council will limit parking availability by requiring all developments to be car free. Policy T5 of the London Plan requires developments to provide 1 cycle parking space per 1 bedroomed dwelling and 2 spaces per 2 bedroomed dwelling.

The site is within walking distance of Swiss Cottage Underground Station (Northern Line) and well served bus routes along Finchley Road and College Crescent, with a Public Transport Accessibility Level (PTAL) of 4. The street and surrounding area is subject to Controlled Parking Zone (CA-B).

The existing lower ground and ground floor comprises 7 flats. The proposal reduces the number of flats within the properties to 4, reducing the parking demand for the properties. As per approved scheme 22/0706/P, it is proposed that the lower ground and ground floor family units retain access to car parking permits. The proposal includes 22 cycle parking spaces and waste storage for the existing and proposed flats. The proposal would have no adverse impact on highway safety. The proposal accords with LP Policy T5 and CLP Policies T1 and T2.

Waste storage and collection

Policy CC5 sets out that the Council will make sure that developments include facilities for the storage and collection of waste and recycling.

The proposal results in a less intensive residential use of the site and subsequently reduces the waste storage demands for the property. Waste storage is proposed in existing stores at lower ground level and to the front of the building. The proposal is in line with CLP Policy CC5.

Basement Development

Policy A5 of the Local Plan sets out a number of requirements relating to neighbouring impacts, local structural, geological and hydrological conditions and extent parameters that need to be met to enable basement (or other underground development) to be supported.

The proposal involves earthworks to extend the lower ground floor approximately 4 metres further into the rear garden. The proposal does not constitute basement development and policy A5 and associated Basement CPG is not considered to apply and the submission of Basement Impact Assessment Screening, Scoping or full BIA is not required. This is wholly consistent with the approach taken for substantially similar extensions at Ames House, 26 Netherhall Gardens, London NW3 5TL (application reference 2023/0207/P) and 5 Rochester Road (application 21/4311/P).

Notwithstanding this, the proposal is a single storey extension which is not below an existing basement, it does not exceed 50% of the rear garden and is far less than 1.5 times the footprint of the host building, the extension is set back from the shared boundaries with the neighbours. Previously approved application reference 22/0706/P was accompanied by a Basement Impact Assessment. The assessment concluded that the proposal would have no hydrogeological impacts, the increase in impermeable surfacing proposed could be mitigated by a sustainable urban drainage scheme which could be secured by condition. It was also concluded that the proposal would not have any adverse stability impacts.

The proposal would not give rise to any adverse land stability or drainage impacts. If deemed necessary, a SuDs scheme could be secured by condition.

Energy and water efficiency

Policy CC12 of the CLP requires all development to minimise the effects of climate change by encouraging sensitive energy efficient improvements to existing buildings. Policy CC2 sets out that all development shall adopted appropriate climate change adaption measures such as the provision and protection of green infrastructure, not increasing surface water runoff, incorporating green and blue roofs and walls and measures to reduce impacts of overheating. London Plan Policy SI2 states that new residential development should achieve a minimum of a 10% reduction in carbon emissions above that the current building regulations requirement.

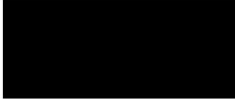
The proposal is for extensions and alterations to existing flats within an existing residential building. It is envisaged that the refurbishment will include the installation of energy and water efficient fixtures and fittings which will benefit the energy and water efficiency of the building.

Summary & Conclusion

As demonstrated in this letter and the plans and documents that support this planning application, the development constitutes sustainable development which will provide high quality family accommodation and significantly improved living conditions for the future occupants of the building whilst preserving the contribution the building makes to the character and appearance of the Conservation Area. The proposal reduces the parking demand of the site and ensures appropriate cycle parking and waste storage arrangements for the existing and future occupants. The proposal preserves neighbour amenity and will seek to improve the energy and water efficiency of the building. The development is in accordance with the relevant Development Plan Policies and therefore it is respectfully requested that planning permission is granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the application but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully



Stuart Minty
Director
SM Planning