

Date: 05/04/2024

Our ref: 2023/5231/PRE

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Planning Solutions Team
Planning and Regeneration
 Culture & Environment
 Directorate

London Borough of Camden

2nd Floor

5 Pancras Square

Dear Ms Fong

Re: Pre-app enquiry 2023/5231/PRE – 51 Elsworthy Road, NW3 3BS

I refer to your pre-planning application enquiry (2023/5231/PRE) for householder development at the above site, comprising a basement extension (including front and rear lightwells), removal of conservatory and erection of single storey rear extension, alteration to windows at first floor level (rear), formation of three gables at roof level (rear) and removal of garage at front and erection of a new bay window and removal of guttering pipes and a store at the front.

I confirm receipt of your pre-application pack and the pre-application fee (£1,772).

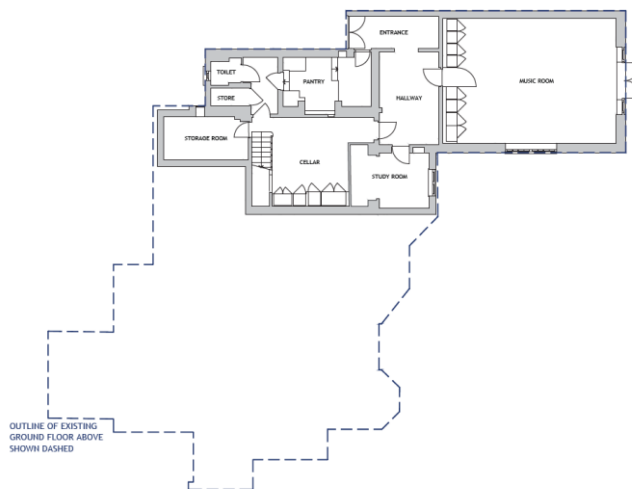
I write following our meeting onsite on 20/03/2024 to provide our formal comments in response to your enquiry.

1. Proposal

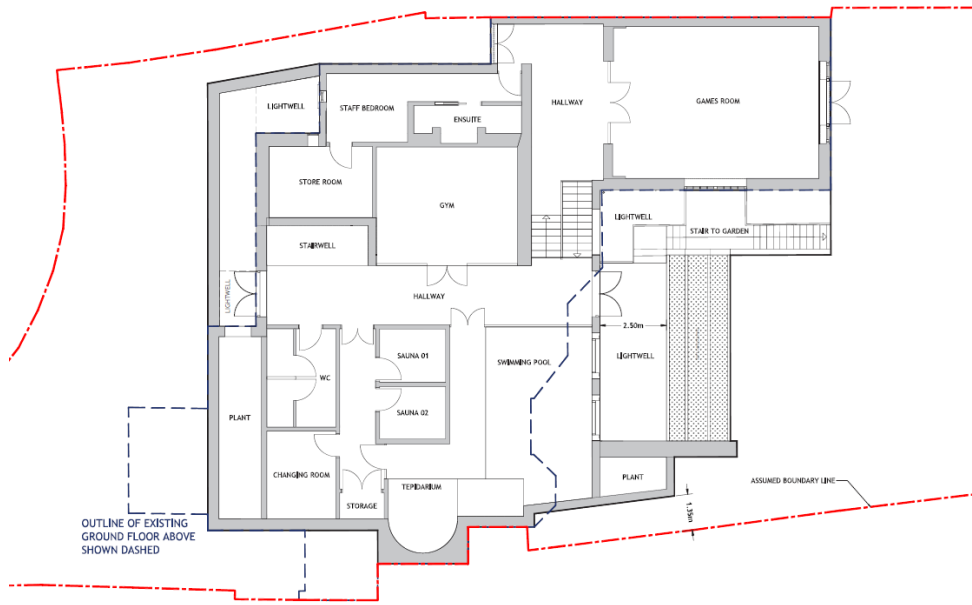
The proposal essentially comprises the following elements:

Basement:

A basement extension under the main house and extension, with front and rear lightwells. The basement proposals provide a games room, a spa, swimming pool and gym and associated changing rooms, a garden room, a utility room, a staff room, a plant room and a garden store.

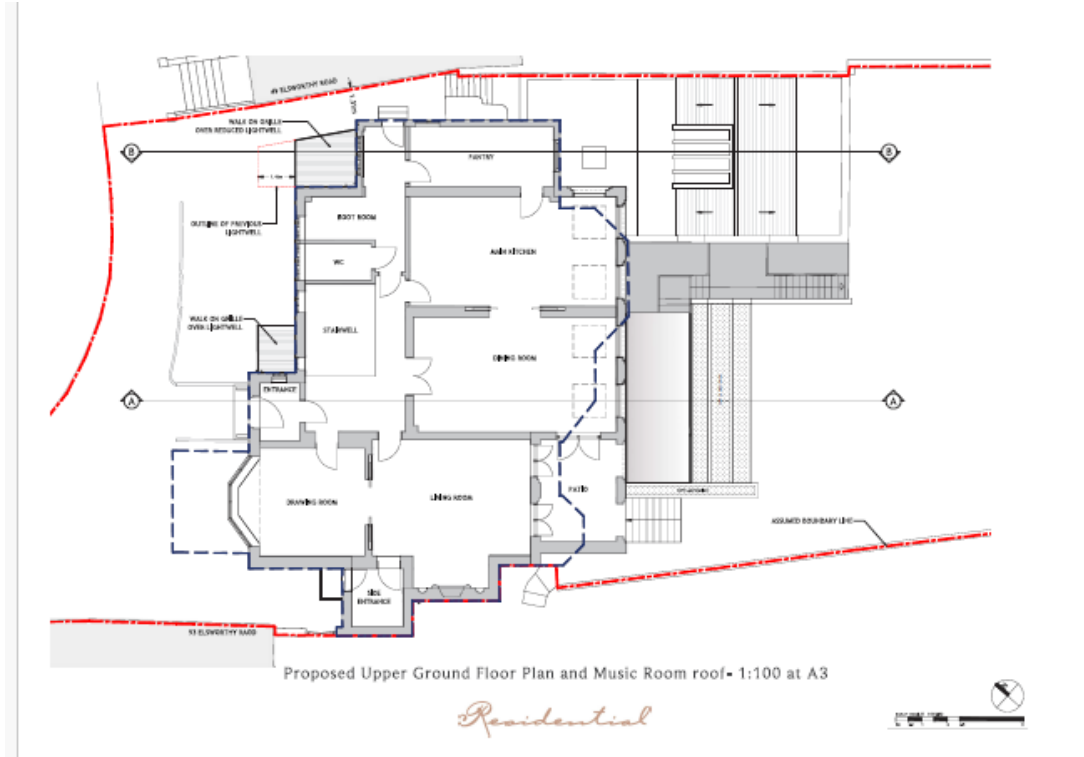
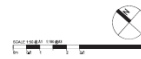


Existing Lower Ground Floor Plan - 1:100 at A3



Proposed Basement and Lower Ground Floor Plan - 1:100 at A3

Residential



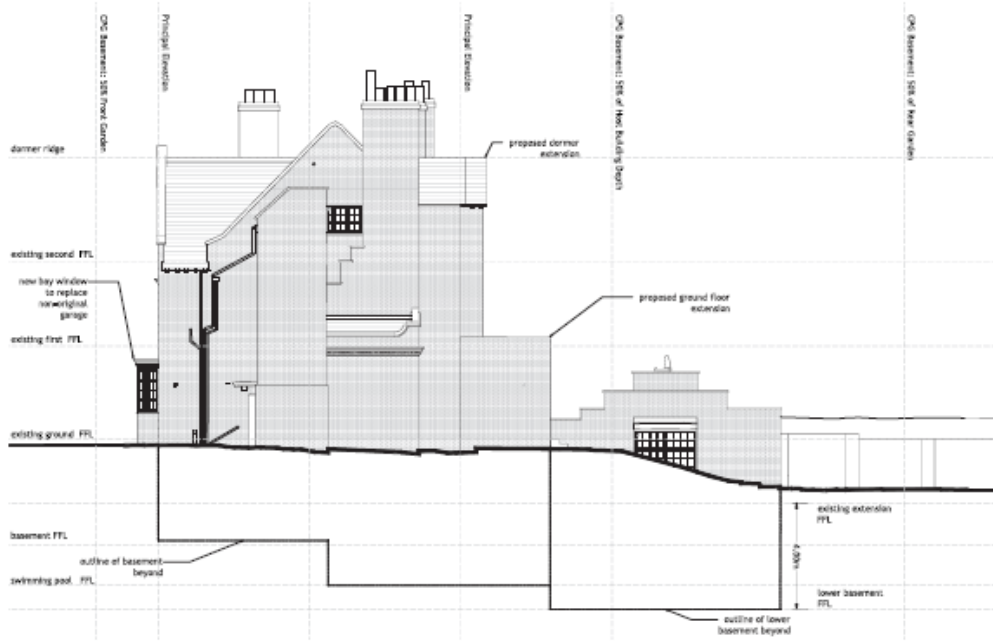
Proposed Upper Ground Floor Plan and Music Room roof- 1:100 at A3

Residential





Existing Side Elevation - 1:100 at A3



Proposed Side Elevation - 1:100 at A3

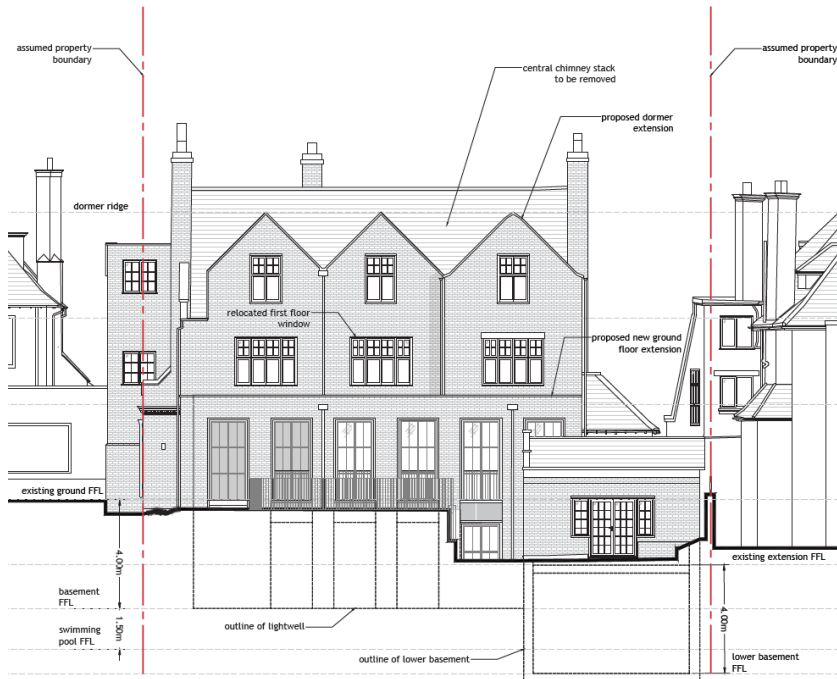
Residential



Removal of existing conservatory and erection of single storey ground floor rear extension



Existing Rear Elevation - 1:100 at A3



Proposed Rear Elevation - 1:100 at A3

At first floor level, the middle sash windows will be relocated to the centre of the building. At second floor level, three new gable ends, and three smaller sash windows are proposed in line with the windows at first floor level.



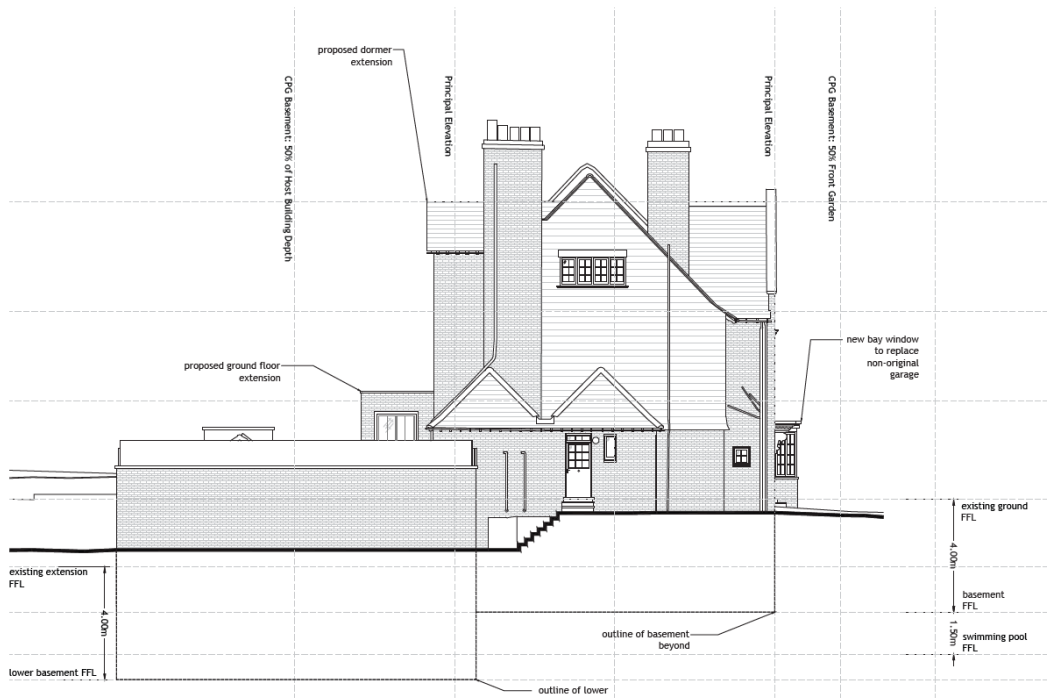
Existing Model Rear Elevation



Proposed Model Rear Elevation



Existing Side Elevation - 1:100 at A3

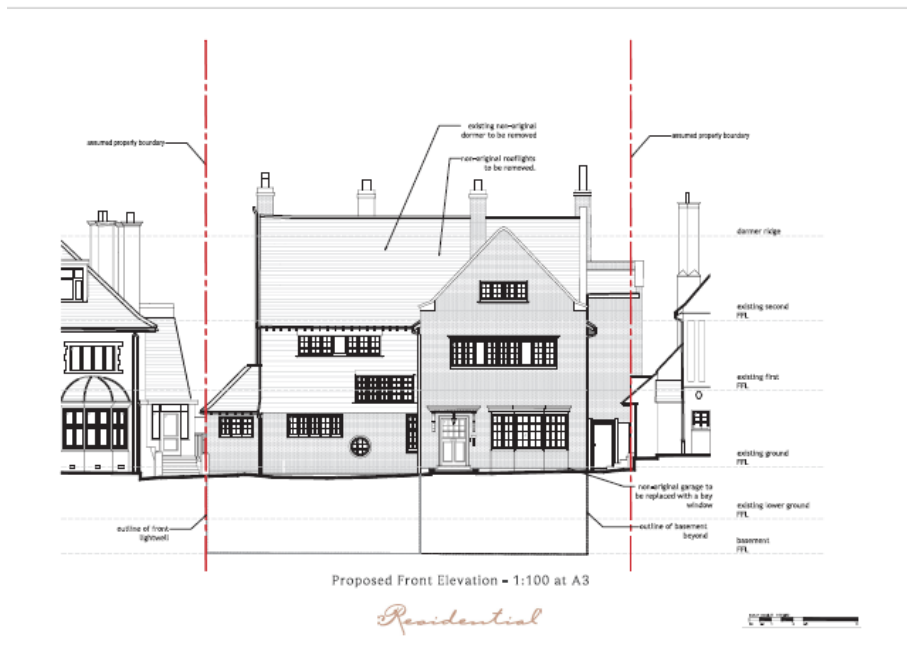


Proposed Side Elevation - 1:100 at A3

At the front of the building, the garage extension, the vertical guttering pipes and the storage box to the left of the property will be removed. In addition, the windows on the roof will be removed. The garage will be replaced with a bay window which will be in keeping with the existing windows.



Existing Front Elevation - 1:100 at A3



Proposed Front Elevation - 1:100 at A3

Residential

2. Site description



51 Elsworthy Road is a positive contributor within the Elsworthy Conservation Area. The property is not listed and there are no listed buildings which adjoin the site.

The character and appearance of the conservation area, especially in Wadham Gardens, is that of an Edwardian villa suburb. The houses in Wadham Gardens are unusually close in proximity given their size and architectural pretention but are generally angled in such a manner as to give the impression of a spacious garden suburb. A common building line at the front, fairly well set back from the pavement, helps to contribute to the impression of garden space. The mixture of ornament and materials in a variety of historic and vernacular idioms creates a rich architectural vocabulary and a picturesque street scene.

The site is in a 'low risk zone' on the Environment Agency flood map. It is also in areas of subterranean groundwater flow and slope stability.

3. Relevant planning history

There is no recent planning history of relevance at the site on Camden's planning application search. However, it is understood that in 1936, permission was granted to rebuild the rear flat roofed extension (a studio) on the south east side of the property under application ref. 23499. Following this, in 1947, permission was granted for an additional extension (a garage) to the front façade under application ref. TP/009470. Both these permissions were implemented.

In 1963 under application ref. 2137, a further extension to the side of the property was granted to allow for a separate access to the loft, a new conservatory to the rear of the property, and lower ground remodelling to the rear of the property. This permission was built out with the exception of the lower ground works. In 1964, further details of a stairwell serving the loft were submitted under application ref. 13986. These works were implemented.

In 1977, planning permission for the erection of an extension to the garage was permitted under application ref. J8/4/19/24091. This permission was implemented.

4. Relevant policies and guidance

National Planning Policy Framework 2021 (updated 2023)

The London Plan March 2021

Camden Local Plan 2017

A1 Managing the impact of development

A5 Basements

D1 Design

D2 Heritage

CC1 Climate Change Mitigation

CC2 Adapting to climate change

CC3 Water and flooding

T3 Transport Infrastructure

Camden Planning Guidance 2021

CPG Design

CPG Amenity

CPG Home Improvements

CPG Basements

CPG Transport

CPG Water and flooding (2019)

Elsworthy Road Conservation Area Appraisal and Management Strategy 2009

5. Assessment

Design/Heritage

Local Plan Policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and 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 and listed buildings.

Considering each of the proposals in turn:

Basement:

The lightwells have been amended to now form two smaller lightwells. The slight extension of the existing lightwell is acceptable as it enlarges an existing feature in a discreet location. The lightwell beside the entrance is more difficult to support because it introduces a new lightwell on a frontage, which the Conservation Area Guidelines are not in support of.

There is no concern regarding the proposed basement works providing they continue to be achievable without demolition of existing facades and result in no manifestation of any kind to the front elevation and forecourt (other than modest extension of the existing lightwell).

Please see 'Basement Impacts' below for advice on the relevant basement considerations.

Removal of existing rear conservatory and erection of single storey ground floor rear extension

The proposed re-provision of a single storey rear extension is accepted. The replacement of the existing rear extension with an extension and lightwell of the form proposed would not be resisted in conservation terms given the concealed nature of this part of the site.

First floor level, the middle sash windows will be relocated to the centre of the building

The proposed alteration of the location of the first floor windows is somewhat concerning as it does alter an historic elevation at a higher level than ground floor.

Para 13.23 of the Conservation Area Appraisal states: *'In all cases the Council will expect original architectural features and detailing to be retained, protected, refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair'*

However, if the alteration to the locations of the windows can be demonstrated to be achievable without significant rebuilding of the first floor façade then it would be possible to support amendment to the positions of the window openings providing they are not of a greatly different quantity or design to the existing.

At second floor level, three new gable ends, and three smaller sash windows are proposed in line with the windows at first floor level.

The extension of the roof to the rear, by means of gables, alters the historic form of the rear roof.

Para 13.19 of the Conservation Area Appraisal requires the retention of the many diverse historic rooflines which it is important to preserve. Fundamental changes to the roofline, insensitive alterations, poor materials, intrusive dormers, or inappropriate windows can harm the historic character of the roofscape and will not be acceptable. Of particular interest are original tiles, dormer windows, parapets, finials, chimney stacks and pots and expressed party walls.

Permission has been granted for alteration of rear roof slopes on some other properties in the vicinity. However, generally the presumption is that rear roof slopes in conservation areas should not be altered, even if they are not visible from the street. The rear roof slope of the host building is part of the historic form and design of the building and it gives integrity to the property as a piece of Edwardian architectural design. Adding three gables to serve as dormers changes the original design intent considerably and it is likely to be visible from neighbouring gardens, even if it is not visible from public land. There is no objection in principle to the loss of the existing rear dormer nor to the creation of additional dormers on the existing rear roof slope. Entirely altering the rear roof slope is more difficult to support because, even if permitted elsewhere, it harms the original character and composition of the building and runs contrary to the guidance contained in the Conservation Area Appraisal and Management Strategy

Replacement of garage at front with a bay window and removal of guttering pipes and storage box

The proposed replacement of the garage with a single storey bay or bow window is considered to be an enhancement and would be supported. Other enhancements involving the “tidying up” of redundant services to the main elevations are also welcomed.

Amenity

Policy A1 (Managing the impact of development) of the Camden Local Plan seeks to ensure that the amenity of neighbouring properties are protected, particularly with regard to visual privacy, outlook, sunlight, daylight and overshadowing, noise and vibration levels.

The basement proposals themselves would be unlikely to result in any effects on the residential amenity of any rooms or gardens for the occupiers of any neighbouring properties (However, please note all the requirements of policy A5 (Basements) below, which addresses all the structural, geological, hydrological, heritage and landscaping issues associated with any basement proposals).

The excavation and construction of the basement would be likely to result in potential disturbance and nuisance in the form of emissions of noise, soil, material and other activities on the highway to the harm of the amenity of surrounding occupiers. As such, it would be necessary to submit and implement a draft Construction Management Plan (by way of a legal agreement attached to any planning permission).

The proposed single storey rear extension, due to its height and separation from the principal habitable room windows and patios at the neighbouring sites would not result in any undue loss of privacy, light, outlook or security.

The rooftop alterations (new gable ends) and relocated windows would also not result in any undue overshadowing or overbearing/loss of outlook or loss of privacy effects at any neighbouring properties.

Basement Impacts

Basement Policy A5 of the Local Plan states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) neighbouring properties;
- b) the structural, ground, or water conditions of the area;
- c) the character and amenity of the area;
- d) the architectural character of the building; and
- e) the significance of heritage assets.

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property.

Basement development should:

- f) not comprise of more than one storey;
- g) not be built under an existing basement;
- h) not exceed 50% of each garden within the property;
- i) be less than 1.5 times the footprint of the host building in area;
- j) extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- k) not extend into or underneath the garden further than 50% of the depth of the garden;
- l) be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- m) avoid the loss of garden space or trees of townscape or amenity value.

From examining the proposed plans, it seems the development could comply with the substantive strands (a – e) of policy A5 and also the prescriptive strands, f – m. Should an application be submitted, it is requested that a diagram be prepared to show compliance with these criteria.

However, with regard to the substantive strands (a – e) it will be necessary to undertake a Basement Impact Assessment to demonstrate no adverse effects on structural, ground or water conditions in the area (see below).

In terms of strands f – m, the quantitative criteria set out in f – l appear to be satisfied. It will be necessary to submit an Arboricultural Impact Assessment to demonstrate that there would be significant harm to any significant trees/plants at the front or rear.

There should be no net loss of landscaping value at the site, in accordance with Camden Local Plan policies for urban design (D1), heritage (D2), biodiversity (A3) and water and flooding (CC3).

Basement Impact Assessment:

Given the extent of excavation involved, a Basement Impact Assessment (BIA) would be required in accordance with Policy A5 and the CPG on Basements.

This would have to consist of the following studies:

Surface flow and flooding by a Hydrologist or a Civil Engineer specialising in flood risk management and surface water drainage

Subterranean (groundwater) flow by a Hydrogeologist

Land stability by a Civil Engineer

Please note that the Council's approved provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charges a fixed fee dependent on the category of basement audit. The fee of this audit would be confirmed at application stage and covered by the applicant. Please refer to the Council's 'Basements' CPG for further information: CPG Basements.

In the event of a future planning application, please include Camden BIA Pro-forma, with Parts B and D completed, which you can find attached.

Biodiversity

The proposal should be mindful of the existing trees at neighbouring properties which might be affected by the proposed excavation. An Arboricultural Implications Assessment would be required to demonstrate the adjoining trees would not be affected.

In the event of a future planning application, you are encouraged to provide details of the soft and hard landscaping proposed and consider if greenery could be enhanced in the front and rear gardens as part of your proposal. When the application is submitted there may be a need to demonstrate Biodiversity Net Gain.

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 emissions 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.

Under Local Plan 8.41 All new developments will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design. Any development that is likely to be at risk of overheating (for example due to large expanses of south or south west facing glazing) will be required to complete dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated.

Furthermore the Council will resist the siting of any electrical ventilation (i.e. air conditioning units) under 8.42 of the London Plan which states that 'Active cooling (air conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy'.

Conclusion

Officers consider that the removal of the front garage and formation of a front bay, 'tidying up' of the front elevation and proposed ground floor rear extension would not result in significant harm to the character and appearance of the Conservation Area or the amenity of neighbouring occupiers. Subject to appropriate design details the replacement windows at first floor level should similarly be acceptable. There is concern with the proposal to alter the roof form by way of the formation of three gables, and also to create a new lightwell next to the front entrance, both in conservation and design terms.

It will be necessary for you to submit a comprehensive Basement Impact Assessment for the proposal. This should address surface water flow and flooding, subterranean groundwater and land stability and it will be audited by the Council's Basement Impact Assessment Consultants at the applicant's cost.

If you submit a planning application, I would advise you to submit the following for a valid planning application:

- Completed form (Full planning permission)
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and Access Statement Heritage Statement
- Flood Risk/Drainage Assessment
- Basement Impact Assessment
- Draft Construction Management Plan
- The appropriate fee

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 Elsworthy CAAC to discuss your proposals. Their contact details are: bcaac@belsizeconservation.org.uk. We also encourage you to speak to your neighbours about the application, prior to submission.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Adam Greenhalgh on Adam.Greenhalgh@camden.gov.uk.

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

Yours sincerely,

Adam Greenhalgh

Senior Planning Officer
Planning Solutions Team