

Ref: NS/95AveBsto1

Date: 1 July 2024

**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

**Town & Country Planning act 1990 (as amended)**

**Creation of lightwells, formation of windows, doors, insertion of rooflight and related works in connection with use of part of the Lower Ground Floor as two self-contained residential units (C3) at 95 Avenue Road, London NW8 6HY**

On behalf of our client, 95 Avenue Road (Freehold) Limited we are pleased to enclose an application for planning permission for the creation of lightwells, formation of windows, doors, extension and insertion of rooflight and related works in connection with use of part of the Lower Ground Floor as two self-contained residential units (C3).

The lower ground floor of the building currently contains one self-contained residential flat, and an area of ancillary storage space currently utilised by the applicant. This space is currently below ground and does not have access to daylight. The proposal consists of introducing new lightwells, similar to those serving the existing lower ground floor flat, in order to allow the insertion of windows and doors into the exterior walls, to serve the two new two bedroomed residential units. Within one of the newly formed lightwells it is also proposed to create a new entrance to one of the flats, with a flat roof allowing access from the light well. This would generate a total additional area of approximately 3.3 sq. m. The two new flats would be accessed via the main entrance to the block.

The proposals seek to optimise the use of this currently under-utilised ancillary space to provide new residential accommodation, in a highly accessible location and consequently constitute 'sustainable development' which we trust will be welcomed.

## **The Site**

The site is a single free-standing 'point block' purpose-built block of flats situated between Avenue Road to the east and St John's Wood Park to the west, with access/egress points from both. The block stands at eight storeys in height and is cross shaped in plan.

The site is close to South Hampstead train station, Swiss Cottage underground station and numerous bus routes; consequently, the site benefits from a PTAL Level of 6a, the second highest possible.

There is no planning history on the council's website, but the block was built in the 1960's.

This development would make best use of a currently under-utilised brownfield site and in a highly accessible location. Additional residential accommodation is a priority use at a national and regional and local level and consequently this proposal constitutes 'sustainable development'.

To assist in your consideration of these proposals, we include with this application:

- Design & Access statement - HUB Architects
- Plans & Drawings - HUB Architects
- Acoustic Report
- Arboricultural Impact assessment
- BRE Daylight/Sunlight report
- Fire statement.
- Flood risk & SUDS assessment.
- Sustainability, energy, overheating & water use report.
- Structural Report
- Transport Report

The Design and Access Statement provides a comprehensive explanation of the proposals and the design approach. Nevertheless, below I set out some further commentary in relation to various planning matters which I hope will be of assistance to you.

### **Land-use principles.**

The site is currently in C3 residential use, as ancillary storage space at basement level. This space is used by the applicant to store surplus furniture from some of the flats in the building. There is already one existing flat on this level, accessed from the same staircase as the storage area.

The proposals involve the conversion and fitting-out of the existing space, and the formation of new light wells, with the insertion of new windows into the outside walls thus exposed. In addition, one small area of new space within the lightwell is proposed, giving access to the lightwell via a new door.

From a land use perspective, clearly making best use of under-utilised space within an existing residential building is in line with policy at all levels – NPPF, London Plan and Local Plan - and raises no matters of land-use principle. The applicants are prepared to enter into a car-free agreement in respect of the two new dwellings in accordance with policy.

### **Design & sustainability considerations.**

The design and access statement explains in more detail the rationale for the design approach chosen and explains how this takes careful account of both site context, the need to provide amenity and privacy for both neighbours and the occupiers of the new houses, and the approach taken to sustainability – which is explored in greater detail in the Energy and sustainability report and related material.

The options for reducing the energy demands and CO<sub>2</sub> emissions for the proposed new flats have been carefully explored. A set of deliverable energy strategy proposals have been identified that when adopted would ensure the development complies with relevant national planning policy, the London Plan and the London Borough of Camden policies relating to energy and climate change.

Energy strategy options were assessed according to the Mayor's Energy Hierarchy and the resulting savings calculated against a Building Regulations target assessment following the GLA guidelines. The strategy meets CO<sub>2</sub> emission savings targets and other related policies applicable to the site and enable each step of the Mayor of London's energy hierarchy to be addressed. The energy statement shows how the proposals can be fully compliant with the Camden Local Plan Policy CC1 and the London Plan Chapter 9 Policy SI 2.

The energy hierarchy has been followed, improving upon the Baseline requirements at the Be Lean stage through high levels of insulation and energy efficient services and fixings. It has been demonstrated that the site has achieved a 14% reduction in CO<sub>2</sub> emissions.

At the Be Clean stage, utilising the communal heating system results in a further reduction in CO<sub>2</sub> emissions through the improved efficiency of the installed system.

For the third stage, Be Green, a feasibility study evaluating the suitability of various renewable technologies was undertaken. In this instance no renewable technologies were suited to this proposal due to the nature of the project and its location.

A site wide reduction in CO<sub>2</sub> emissions of 19% has been achieved against the Baseline/Target Emission Rate, in compliance with policy CC1.

Overall, the proposals meet the requirements of Part L 2021 of the Building Regulations, the relevant parts of the London Plan and Policy CC1. We have also included the council's 'small sites' proforma.

## **Servicing Traffic and Transport**

Caneparo's report deals with this issue in more detail, but in summary, the site enjoys good access to public transport, appropriate bike storage facilities are provided, along with refuse and recycling storage. As noted above, the applicants are prepared to enter into a car free agreement in relation to the new flats. The amount of additional service traffic from two more flats within this existing block would be minimal. Consequently, the proposals raise no significant issues in these regards.

## **S106 Obligations**

In addition to the car-free agreement, our clients are also prepared to enter into obligations with regard to CTMP/CEMP requirements as necessary/appropriate.

## **Overall conclusions**

This is a 'brownfield' site, with good access to public transport. The existing basement space is under-utilised. However, there is the opportunity to introduce two new dwellings which have been carefully designed to respect the scale and nature of the site, have a minimal impact on the amenity of neighbours, and deliver high-quality energy efficient new residential accommodation.

This proposal would make a valuable contribution to meeting the borough's significant housing need.

We trust on this basis that with information provided, you will be able to positively determine this application.

# Callidus

Yours sincerely,

Nick Sharpe

**Director**

## Callidus

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