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Via planning portal only

Dear Sir/Madam

**RE: PLANNING APPLICATION - TOWN AND COUNTRY PLANNING ACT 1990
58 ELSWORTHY ROAD, LONDON, NW3 3BU**

Please accept this covering letter as an accompaniment to a planning application for the proposed extensions and alterations to the existing property at No. 58 Elsworthy Road, London, NW3 3BU. This letter assesses the relevant planning considerations associated with the scheme and considers the development in the context of national, regional and local planning policy and guidance. It should be read in conjunction with the plans and drawings submitted as part of the application. In addition to this covering letter, the application is accompanied by the following documents;

- Completed Application Form, submitted via the planning portal;
- Additional CIL Information Form;
- Architectural Drawings and Drawing Schedule, prepared by Wolff Architects;
- Design and Access Statement, prepared by Wolff Architects;
- Heritage Appraisal prepared by The Heritage Practice;
- Arboricultural Report, Tree Constraints Plan, Tree Survey and Tree Retention and Protection Plan prepared by Connick Tree Consultancy;
- Engineering Method Statement, Flood Risk Assessment and Drainage Strategy prepared by Green Structural Engineering;
- Construction Traffic Management Plan prepared by Voldemar Karpevics.

The Site

The site is located on the northern side of Elsworthy Road and comprises of a large three storey detached building that is occupied by four residential apartments. The ground floor comprises two apartments, one apartment on the first floor and one apartment on the second floor, all four apartments utilise the same front entrance to the building and a communal entrance hall, stairs and lift. The rear garden area is utilised exclusively by the two ground floor flats in a communal arrangement, however there is access available to the communal gardens (Wadham Gardens) to the rear, for all flats.

The site is located within the Elsworthy Conservation Area which covers the area from Primrose Hill in the south-east to Avenue Road in the west and forms the boundary between the City of Westminster and the London Borough of Camden. The area was developed between 1840 to 1912 with a large amount of speculative residential development of an affluent nature, this character, as a wealthy residential suburb, has remained to the present day.

The surrounding area comprises similar development, large residential properties set within their own gardens and representing good examples of spacious leafy streets and generously laid out plot sizes. There have been numerous schemes to extend and improve the dwellings in the street, which are outlined in greater detail in the planning history section below and the accompanying Design and Access Statement. The resulting character of the area, and Elsworthy Road in particular, is of a green, verdant environment and a quiet residential street.

The site lies on the border between a public transport access level of 2 and 4, meaning it benefits from good public transport access. The site is within Flood Zone 1, with a low probability of flooding.

Planning History

The site:

In 1995 the site received consent for the conversion of a residential care home into residential flats, including formation of a roof terrace and erection of a side extension at first floor level (Council reference: 9500971).

In 2004 and 2005 planning permission was granted for single storey rear extensions. (Council references: 2004/4519/P & 2005/0842/P).

Surrounding sites:

35 Elsworthy Road (2014/5463/P) – Conversion from 2 flats in single family dwelling house including excavation of basement under footprint of house and rear garden with side and rear lightwells, erection of a two-storey curved bay to rear to replace existing 1 storey angled bay and demolition of side addition. Approved.

42 Elsworthy Road (2019/0149/P) – Erection of a two-storey side extension following demolition of existing structure, basement excavation, alterations to existing eastern side extension and new steps into the rear garden and front side access; alterations to fenestration, front boundary wall, landscaping and provision of cycle storage. Approved.

56 Elsworthy Road (2013/5073/P) - Excavation of basement with side lightwell and rear rooflights, erection of two-storey rear extension (following demolition of single storey extension), removal of existing side extension, alterations to roof and fenestration all in connection with change of use from three flats to two flats. Approved.

55 Elsworthy Road (2015/2039/P) – Erection of first and second storey extension including alterations to the roof and amendments to the front boundary treatment and side entrance at ground floor level to enable installation of lift and stairwell following demolition of a single storey eastern extension. Approved

48 Elsworthy Road (2012/1680/P) – Excavation of basement with rear lightwell and glass balcony over at rear ground floor level. Approved.

31 Elsworthy Road (2021/1527/P) – New basement extension to include pool and rear lightwell, alteration and retention of balconies at second floor rear, alterations to window openings to side elevation, new garage doors and changes to the rear elevation, all to dwelling. Approved.

40 Elsworthy Road (2016/6979/P) – Loft conversion including the erection of a rear dormer and side dormer with rear roof terrace, plus installation of one roof light to the front roof slope. Approved.

70 Elsworthy Road (2015/4684/P) - Erection of a two storey, 7-bedroom dwellinghouse with basement and accommodation in the roof space, following demolition of the main dwellinghouse, extension of new basement under existing mews dwelling, alterations to fenestration and rear elevation of mews dwelling, associated landscaping works. Approved.

Pre-Application Engagement

Paragraphs 39-43 of the NPPF (December 2023) highlights the importance of early engagement with stakeholders to improve the efficiency and effectiveness of planning for all parties. The more engagement and the earlier it occurs, the better the outcomes. Good quality engagement between public and private resources enables better co-ordination and improves outcomes for the community.

In January 2024, pre-application advice was sought with respect to proposed extensions and alterations to the property. Following the pre-application site meeting and the written advice which was received on 28th of March 2024.

In summary, comments were received in relation to the infilling of the original form and slope of the front roof, concern over the alteration and extension at rear first floor and roof level, support for the single storey rear extension, basement and rear lightwell.

The scheme has been amended to address the issues that were raised within the local planning authority's pre-application response. Full details of the changes and alterations are set out in the accompanying Design and Access Statement.

The Proposal

The proposed development seeks to improve and enhance the living accommodation of the existing four flats, through the provision of a new basement which will include private living areas as well as communal space to be used by all four flats, alterations to the front elevation comprising a first floor extension, and alterations and extensions to the rear elevation including replacement single storey rear extensions with terrace, and a new terrace at roof level.

The alterations and extensions are expected to allow for a sympathetic increase in the overall floor area with improved internal layout for the existing flats, and an increase in private and communal amenity areas, commensurate with the size of the flats. The extensions and alterations will preserve and improve the appearance of the building and its historical context. For full details on the proposed development, please refer to the Design and Access Statement that supports the application.

Planning Policy and Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

Planning and Compulsory Purchase Act 2004

Section 38 of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

NATIONAL PLANNING POLICY

National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in formulating local planning policies and taking decisions on planning applications. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three key 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 and beautiful places)
- 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) and the Camden Supplementary Planning Documents and Guidance. As the site is located within the Elsworthy Conservation Area, the Elsworthy Conservation Area Appraisal and Management Strategy (2009) will also be considered throughout the planning assessment of this application.

The following policies will likely be considered relevant to the proposed development:

London Plan 2021

D3 – Optimising site capacity through the design led approach

D4 – Good design

D10 – Basement Development

HC1 – Heritage conservation and growth

Camden Local Plan 2017

Policy A1 – Managing the impact of development

Policy A3 – Biodiversity

Policy A5 - Basements

Policy D1 – Design

Policy D2 – Heritage

Camden Planning Guidance (CPG)

Amenity CPG (2021)

Basements CPG (2021)

Design CPG (2021)

Trees (2019)

Elsworth Conservation Area Appraisal and Management Strategy (2009)

Planning Assessment**Principle of Development**

The lawful residential use of the site has been confirmed and accepted as four residential flats. The proposal involves the extension and improvement of the building, without increasing or decreasing the residential offer, and as such it is considered that the principle of the development is supported.

Design, Visual and Heritage Impacts

Camden Local Plan (CLP) Policy D1 requires development to be of the highest architectural and urban design quality and have particular 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. The aim of this policy is reflected in London Plan Policy D4 (Good Design). Specific guidance in relation to extensions to existing properties and achieving good design is further provided in the 'Home Improvements' and 'Design' Camden Planning Guidance (CPG).

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 and Listed Buildings. These aims are further reflected in London Plan Policy HC1 (Heritage Conservation and Growth).

The building is noted as having both architectural and historical importance (as set out in the accompanying Heritage Statement). The proposals have been designed to ensure these values are maintained and enhanced, and as such includes the removal of existing alterations and extensions that detract from the architectural value of the building, specifically the removal of the front side facing dormer, and the existing ground floor rear extensions. As such the scheme represents an overall improvement to the historical and architectural value of the building and the elements that make a positive contribution to the conservation area.

To the front elevation, the alterations have been limited to the removal of the existing first floor, side facing dormer and associated roof alterations and their replacement with a first-floor extension including two new dormers in the roof space. This section of the building was substantially modified in 1906 when extensions were added, and the proposed extension will maintain the building line of the box dormer, remaining setback from the front catslide roof. The first floor will be raised to match the main eaves level, with a hipped roof added, but below the main ridge line of the building. The asymmetry of the façade will be preserved (as requested in the pre-application response), with a clear step between the plain of the main roof and that of the proposed extension. The proposal will ensure that the current level of articulation and subordination is maintained, by remodelling the current unsympathetic flat roofed dormer, adding further interest, variety and articulation to the roofscape, whilst utilising a traditional and sympathetic form.

To the rear elevation, the proposal comprises the replacement of the existing ground floor rear extensions, which was supported at pre-application stage. The ground floor extensions and lightwell are subordinate to the main dwelling, primarily occupying the same position as the existing extensions, with a detailing and fenestration to match rear façade of the building. At first floor level, the existing terraces will be remodelled, following the same line as the ground floor extensions, allowing for an increase in private amenity space for the first floor flat, but brought in from the side boundary with No. 60 (as suggested in the pre-application response). The terrace at first floor level have always been an essential component in the character of the building, featuring at both ends of the building as part of the 1906 remodel.

At first and second floor on the rear north-east corner of the building, an extension is proposed that will follow the form and hipped roof profile of the adjacent original section of the house, and faced in render to match. Following the pre-application advice, the extension has been pulled back from the historic gable on the rear façade, allowing it to better reflect the character of the rear façade. The previously proposed French doors at first floor level have

been replaced with traditional casements and a single leaf door to the terrace, and the proposed dormer has been reduced in size and the balcony omitted. The extension is considered sympathetic in terms of its form and will maintain the subordinate character of this part of the house in relation to the two gables on the rear façade.

At roof level, it is proposed to create a small, inset roof terrace between the inner slopes of the two gables on the rear of the building. The intention is to provide much needed private amenity space for the 2nd floor flat. To ensure it does not impact on the character and appearance of the dwelling the terrace has been set back from the gable line. The terrace will be a recessive feature, situated at high level and behind prominent gables, where it will not be readily visible.

It is also of note that terraces at first, second and roof level, are all evident within the immediate area and are visible from within Wadham Gardens. Nos 60, 52, 46 Elsworthy Road.

In terms of the basement, this will provide an improved living area and additional bedrooms for the ground floor flats that will be more comparable to the size of the first and second floor flats as well as creating a new shared amenity area for the residents of the building. The basement will have limited visual impact, with only two lightwells required, both on the rear elevation, directly abutting the rear wall of the building, to allow adequate light into the basement. The floor space of the basement is commensurate with the floor space of the ground floor level, with no projection into the rear or front garden spaces, ensuring that the surrounding garden area remains unaffected.

The proposed extensions and alterations by virtue of their design, scale and massing have a sensitive visual impact on the character and appearance of the property and the wider conservation area. The design detailing and materials have been proposed to be in keeping with the architectural detailing of the existing property. The impact of the proposed works when viewed from the street scene will be to re-establish a sense of balance across the front façade and improve the appearance of the building, thereby preserving the character and appearance of the street and the wider Conservation Area. The accompanying Heritage Statement provides detailed consideration of the proposals in relation to the historical and architectural merit of the original building and the wider conservation area.

In terms of the existing garden space, the extensions are modest in terms of their footprint and encroachment into the rear garden, and as result, the existing rear garden will be preserved.

In summary, the proposed extensions and alterations to the property represent a high-quality design which is sympathetic to the character and appearance of the existing building and the Conservation Area. It is considered that the proposed works will enhance the quality of the

host building and the residential flats within. The development therefore complies with CLP Policies D1 and D2, the Design and Home Improvements CPGs.

Basement Development

Camden Local Plan Policy A5 and the Camden Basement CPG (2021) defines what is acceptable in terms of basement development and requires an assessment of the schemes impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment (BIA). It further sets out a set of specific criteria (f-m) which must be met if basement development is to be permitted. The criteria is set out below and the proposal is accompanied by a Basement Impact Assessment, Engineering Method Statement and Flood Risk Assessment/Drainage Strategy.

CLP Policy A5 states that basements should:

f. not comprise of more than one storey

Passes – the basement will not comprise more than one storey.

g. not be built under an existing basement

Passes – the site does not currently benefit from a basement.

h. not exceed 50% of each garden within the property;

Passes – The proposed basement is predominantly located underneath the footprint of the existing property and the basement works do not exceed 50% of the garden.

i. be less than 1.5 times the footprint of the host building in area;

Passes – The proposed basement is located predominantly underneath the footprint of the existing property and the basement works does not exceed 1.5 times the footprint of the building.

j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;

Passes – The proposed basement is located predominantly underneath the footprint of the existing property, and as such the basement works will not exceed 50% of the depth of the host building.

k. not extend into or underneath the garden further than 50% of the depth of the garden;

Passes – The proposed basement is located predominantly underneath the footprint of the existing property and the basement works does not exceed 50% of the garden.

l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building;

Passes – The basement footprint has been set back from the neighbouring boundaries.

m. Avoid the loss of garden space or trees of townscape or amenity value.

Passes - The proposed basement does not lose any garden space, or trees of any townscape or amenity value.

As the proposed basement meets the above criteria, the principle of the proposed basement is therefore considered acceptable and in accordance with Policy A5 of the Local Plan. Therefore, it is considered that the proposed basement is an acceptable addition to the building, is well contained within the plot, and ensures the garden space is retained. Ultimately, the basement extension will not have a detrimental impact on the architectural merit of the scheme, or the wider conservation area.

Residential Amenity

CLP Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. Further guidance is provided in CPG Amenity which sets specific standards of development with regard to amenity.

By virtue of their size, scale and relationship to neighbouring properties, the proposed extensions and alterations will not have an adverse impact on neighbouring amenity through an overbearing impact or loss of daylight and/or sunlight.

The works to the front elevation at first floor level will result in one new opening at roof level, however given the location towards to the front of the site, the orientation of the adjacent dwelling (No. 60) and the lack of openings to No. 60, the new dormer window will not result in any increase in overlooking or loss of privacy.

The proposed first floor terrace at the rear will largely replace the existing terrace and remains stepped in from both side boundaries and as such will not introduce any material change to the existing amenities of the properties to either side. At roof level, the proposed terrace is sited between the two existing gable roofs ensuring that no overlooking of neighbouring properties is possible.

Within the site, the changes to internal layouts and floor spaces have been designed that the four flats will have an appropriate level of privacy, outlook and space. The introduction of a shared amenity space within the basement will further improve the standard of residential amenity offered on site.

By virtue of the size, scale and massing of the proposal, largely contained to the rear elevation of the dwelling, the proposals are not considered to have an adverse impact on neighbours through a sense of overbearingness, enclosure, loss of privacy or loss of sunlight and daylight, and as such the scheme is considered compliant with CLP Policy A1.

Arboricultural Impact

CLP Policy A3 states that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value. It further requires trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development. This is echoed in the guidance contained in the Trees CPG.

The accompanying arboricultural information provides a comprehensive tree survey of the existing trees, detailed assessment of any impact to the trees and a methodology for the protection and retention of the trees. The Arboricultural Impact Assessment confirms that there are no category 'A' trees (high quality and value), which are worthy of retention and that there are no trees that require removal due to reasons of sound arboricultural management.

It is also noted that appropriate arboricultural conditions to secure tree protection can be attached to any permission granted where necessary.

Sustainability and Energy

The Design and Access Statement sets out the sustainability strategy for the proposal, setting out the sustainable development principles of the dwelling.

The application is accompanied by a Drainage and Flood Risk Assessment sets out the risk of flooding and proposed drainage strategy for the scheme, in accordance with policies CC2 and CC3 of the Camden Local Plan and policies SI 12 and SI 13 of the London Plan.

The strategy confirms that the surface water generated on site will be stored within an attenuation tank, before discharging to the Thames Water combined water sewer via an existing assumed connection from the site, subject to s106 approval and CCTV survey. The report demonstrates that the proposed drainage strategy will represent a vast improvement to the existing scenario, reducing the risk of flooding to the site and surrounding area, also providing betterment and relief to the public sewer at which it currently discharges.

Conclusion

The proposed alterations and extensions to the building constitutes high-quality design that reflects the positive components of original building and that which is found in the wider locality. The proposal will enhance the appearance of the site, conform to the established character of Elsworthy Road and preserve the contribution the site makes to the special interest of the Elsworthy Conservation Area.

Careful consideration has been given to the design of the proposals to ensure the proposed development would sit well within the immediate surroundings, and result in no undue harm to the existing amenities of neighbouring occupiers. Accordingly, the development provides a well-designed scheme which responds positively to its surrounding townscape and neighbouring development.

The proposal will result in much improved living accommodation for the four existing flats, allowing for larger homes with high quality shared amenity space provision.

In summary, the proposed development accords with the relevant adopted policies of the London Plan, Camden's Local Plan and the relevant supplementary planning documents, and 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,

Lauren Westley
Principal Planner
SM Planning