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Our ref: 2022/1686/PRE
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Constantine Koritsas

By email

www.camden.gov.uk/planning

Dear Constantine,

Re: 22 Holmes Road, NW5

Thank you for submitting a pre-planning application enquiry for the above property which was received on 20/04/2022 together with the required fee of £1,425.00. This advice is provided following our meeting of on 7 July 2022 and the submission of revised drawings to address comments raised during that meeting. The advice provided in this letter is in response to the revised proposals.

1. Drawings and documents

Design and Access Statement sent by email dated 20/04/2022 and revised drawings sent by email dated 01/12/2022.

2. Proposal

Changes to the previously approved scheme (reference 2019/2823/P) for the 'demolition of the former studio building and existing side and rear extensions to 22 Holmes Road. Erection of 2 storey (with basement), 2 bedroom dwelling between no.22 and no.24, and 2 x 2 storey (with basement) 2 bedroom dwellings to rear of site with associated private amenity space and refuse/cycle storage'. The proposed amendments include changes to the design and materials of the new dwellings and changes to the footprint of the new basement.

3. Site description

22 Holmes Road is a semi-detached property in use as a single dwellinghouse (C3 use). No.22 and attached neighbour no.20 are the only remaining period properties in the surrounding area, and both are in residential use. Consequently, both properties are locally listed, and are considered to make a positive contribution to the character of the area. They are described in the Camden Local List (2015) as 'semi-detached mid-19th century villa, semi basement plus two storeys, set behind front garden. Attractive remnant of the original development on Holmes Road, and which has provided the cue for some of the later development in terms of building line and height.'

The wider area consists of a mix of architectural styles and land uses; with an office building adjacent to the west, a police station to the east, a school and sheltered

housing to the front. To the rear lies Regis Road and an industrial estate. The buildings closest to the site are three storeys in height, with some apartment blocks further along the road increasing to six storeys.

The site is not a listed building and is not located in a conservation area; however, it is within the Kentish Town Neighbourhood Plan Area.

4. Relevant planning history

2019/2823/P – Demolition of former studio building and existing side and rear extensions to 22 Holmes Road. Erection of 2 storey (with basement), 2 bedroom dwelling between no.22 and no.24, and 2 x 2 storey (with basement) 2 bedroom dwellings to rear of site with associated private amenity space and refuse/cycle storage. Erection of new 2 storey extension to rear of no.22. Granted subject to S106 agreement on 07/12/2020.

5. Relevant policies and guidance

[National Planning Policy Framework 2021](#)

[The London Plan March 2021](#)

[Camden Local Plan 2017](#)

Growth and spatial delivery

Policy G1 Delivery and location of growth

Meeting housing needs

Policy H1 Maximising housing supply

Policy H3 Protecting existing homes

Policy H4 Maximising the supply of affordable housing

Policy H6 Housing choice and mix

Policy H7 Large and small homes

Community, health and wellbeing

Policy C5 Safety and security

Policy C6 Access for all

Economy and jobs

Policy E2 Employment premises and sites

Protecting amenity

Policy A1 Managing the impact of development

Policy A2 Open space

Policy A3 Biodiversity

Policy A4 Noise and vibration

Policy A5 Basements

Design and Heritage

Policy D1 Design

Policy D2 Heritage

Sustainability and climate change

Policy CC1 Climate change mitigation

Policy CC2 Adapting to climate change

Policy CC3 Water and flooding

Policy CC4 Air quality

Policy CC5 Waste

Transport

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Parking and car-free development

Policy T4 Sustainable movement of goods and materials

Delivery and monitoring

Policy DM1 Delivery and monitoring

Kentish Town Neighbourhood Plan 2016

Policy D3 - Design principles

Policy D4 - Non-Designated Heritage Assets

Policy SSP7 – Small sites and infill development

Camden Planning Guidance

Access for All CPG - March 2019

Air Quality - January 2021

Amenity - January 2021

Basements - January 2021

Biodiversity CPG - March 2018

Design - January 2021

Developer Contribution CPG - March 2019

Employment sites and business premises - January 2021

Energy efficiency and adaptation - January 2021

Home improvements - January 2021

Housing - January 2021

Transport - January 2021

Trees CPG - March 2019

Water and flooding CPG - March 2019

6. Assessment

Pre-application advice is sought for the following amendments to the approved scheme (ref. 2019/2823/P):

- Changes to the design of the front elevation of the front infill building. Three design options have been presented.

- Changes to the approved basement. The amendments include a slight reduction in the depth of the basement below the two rear dwellings but an increase in its footprint.
- Introduction of staircase access to the roof of the front infill dwelling and the creation of a terrace at roof level.
- Increase in the height of the two rear infill dwellings.
- Introduction of staircase access to the roof of the two rear infill dwellings and the creation of terraces at roof level.
- Changes to the design of the rear elevation of the two rear buildings fronting Regis Road.

The previous scheme expires on 07/12/2023 and is therefore still extant. This pre-application advice will therefore focus only on the relevant design changes and their impacts rather than all planning considerations which will be as set out in the previous approval report.

7. Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan 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.

Camden's Local Plan is supported by CPG1 (Design) and the Hampstead Conservation Area Statement.

Changes to external design and materials

As mentioned above, three options amending the design of the front infill elevation have been provided. Option 1 shows a symmetrical façade with central circular window, option 2 shows an asymmetrical façade with curved parapet, and option 3 shows an asymmetric façade with pitched roof. Of the three options presented, officers feel option 1 is the most successful, subject to its detailed design.

The drawings do not provide detailed information on the materials, for example, the proposed material is described as 'zinc'. Should this be standing seam zinc?

We would question whether a glazed balustrade is appropriate for the front first floor balcony. A high quality and well detailed metal railing would be preferable.

To the rear elevation fronting Regis Road, the height of the two buildings has been increased. Officers recognise the benefit in raising the level of the windows that face onto Regis Road which would provide more direct overlooking onto Regis Road and better internal lighting. We are generally supportive of the increase in height subject to impacts on the neighbouring building (see amenity section below).

The revised proposed section AA appears to be taken through the same line as the previously approved section CC. The section appears to show the retention of the rear boundary wall onto Regis Road (although it appears to be lower than the existing boundary wall). This wall, in combination with the projecting first floor, would result in very poor outlook and daylight/sunlight to the rear ground floor windows. This section also seems to contradict what is shown in the rear elevation which shows a railing between the buildings and Regis Road. The ground floor window openings to the rear elevation also do not match what is shown on the section. It is therefore not clear whether the rear boundary wall is proposed to be retained or removed. Our preference would be to remove the wall and introduce railings to increase activation onto Regis Road.

The changes to the design of the rear elevations appear to be acceptable, subject to their detailed design and materials. The proposals retain the industrial characteristics of the previously approved scheme which is welcomed. Section EE describes the cladding as Siberian Larch over grey render. Examples of this, along with details of its treatment and how it would weather are required for us to be able to make detailed comments on its acceptability in this context.

It is difficult to comment on the alterations at roof level without more sections showing this element of the proposals. However, there is no objection to the principle of a roof terrace in this location provided there are no harmful impacts on the amenity of future occupants in terms of overlooking. The roof terrace would be set into the centre of the roof space and shielded from views by the raised roof parapets which is welcomed.

No revised rear elevation for the front infill building was provided, and the originally submitted rear elevation shows this would be finished in white render which officers are not supportive of. This material tends to deteriorate quickly and does not respond positively to the local character.

Alterations to floor plans and internal layouts

Within the front garden, the proposed planter to the front boundary has been removed; however, the garden area has been increased in size. Given the overall amount of planting has not been reduced, there is no objection to this change; however, details of the proposed planting within the garden area should be provided to ensure it compensates for the loss of the planter, and you should explore greening of the bin enclosure to ensure an attractive frontage to the site and maximise opportunities for

biodiversity. Given the extent of development and hardscaping at the site, it is recommended that you explore additional opportunities for increasing biodiversity.

A double height space has been introduced to the rear of the front infill building's floorplate to improve light levels into the basement space. This is welcomed, and the dwelling would appear to still meet the minimum floor area of requirement of 70sqm for a two bedroom three person house.

The side passage appears to have been reduced in width so that it would now be below 1200mm wide and therefore not wide enough for wheelchair access to the rear units. Please ensure that all units are capable of meeting Part M4(2) requirements.

The ground floor footprint of the two rear units has been reduced, pulling it away from the rear boundary. The lightwells serving the basement courtyards have also been moved so that the two entrances sit side by side, as well as the small first floor balconies above. Officers have some concerns with this arrangement which could cause issues of overlooking.

8. Basement Excavations

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.

It states that 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:

- a) not comprise of more than one storey;
- b) not be built under an existing basement;
- c) not exceed 50% of each garden within the property;
- d) be less than 1.5 times the footprint of the host building in area;
- e) extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- f) not extend into or underneath the garden further than 50% of the depth of the garden;
- g) be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and

- h) avoid the loss of garden space or trees of townscape or amenity value.

The previously approved basement was the subject of much discussion at pre-application stage prior to the previous approval to ensure that it met the requirements listed above and did not result in overdevelopment of the site.

The basement floor plan submitted does not show a clear site boundary and as such, it is difficult to make a full assessment against the points above. However, when measuring the drawings, the total basement footprint appears to have increased from a total area of 121.8sqm previously approved to approximately 147.4sqm. It has also been extended out to the site boundaries contrary to point (g). It is recommended that you carefully examine the requirements of policy A5 to ensure the proposed basement is in compliance.

The Council will require applicants to demonstrate that proposals for basements:

- a) maintain the structural stability of the building and neighbouring properties;
- b) avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c) do not harm the structural stability of the host building, neighbouring buildings or the water environment in the local area;
- d) avoid cumulative impacts;
- e) do not harm the amenity of neighbours;
- f) provide satisfactory landscaping, including adequate soil depth;
- g) do not harm the appearance or setting of the property or the established character of the surrounding area;
- h) protect important archaeological remains; and
- i) do not prejudice the ability of the garden to support trees where they are part of the character of the area.

The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

Given the proposed changes to the basement, an updated comprehensive and accurate Basement Impact Assessment would be required demonstrating no significant harm to the application site, neighbouring sites or those surrounding.

The BIA will need to include at least the screening and scoping stages, to determine whether a full BIA would be required. This would comprise the following:

- Stage 1 - Screening;
- Stage 2 - Scoping;
- Stage 3 - Site investigation and study;

- Stage 4 - Impact assessment; and
- Stage 5 - Review and decision making.

Please note that the Council's preferred provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charge a fixed fee dependant on the category of basement audit, outlined in appendix A of Camden's BIA audit service terms of reference.

9. Amenity

Impacts on neighbouring residential buildings largely appear to be the same as previously approved, and there are unlikely to be significant impacts on their amenity in terms of privacy, outlook, noise, daylight and sunlight.

However, the proposed increase in height would likely impact on the daylight/sunlight levels to the neighbouring office building's windows and terrace. Although commercial uses are not afforded the same levels of protection as residential buildings, the Council must still consider the impacts on the quality and usability of the office floorspace. You would therefore be required to submit a daylight/sunlight assessment which included an assessment of overshadowing of the neighbouring roof terrace and the impacts on light levels to their windows with any future submission. You should also demonstrate that there would not be any harmful overlooking between users of the neighbouring office terrace and the new homes.

You are also advised the BRE issued a new guidance document this year which made significant changes to how the quality of internal daylighting is assessed for new residential properties. An updated assessment would therefore be required to enable officers to make a full assessment of the quality of the new residential units.

10. Other matters

Please note that the Council has adopted a new rate for payments in lieu of affordable housing, such that the payment in lieu would likely increase from £6,306 to approximately £11,000. Please refer to the Housing CPG for more details.

11. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, 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'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'

- Design and access statement
- Planning statement
- Basement impact assessment
- Construction management plan (pro-forma)
- Daylight and sunlight report
- Energy and Sustainability statement
- Sample photographs/manufacturer details of proposed cladding
- The appropriate fee
- Please see [supporting information for planning applications](#) for full requirements.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

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. For more details click [here](#).

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 Laura Dorbeck on the number above.

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

Yours sincerely,

Laura Dorbeck

Principal Planning Officer
Development Management

