

London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London WC1H 9JE

Date 27/09/2016

Ref 2016/5010/NEW

Dear Camden Planning

We have taken planning advice from Treanor Consulting who has provided the following assessment of Flat 4, 6 St Augustines Road, London NW1 9RN. Planning application ref 2016/5010/NEW

We have been asked by Bradley Van Der Straeten Architects to supplement the planning application submitted on 13 September for a residential extension at the lower ground floor flat in 6 St Augustine's Road. This letter draws together justification for the proposed development in the context of planning policy, building upon what is already set out in the submitted DAS. Accordingly, this letter should be considered part of the supporting application documentation.

The site, its context and the development proposals are described in the DAS. The recent history of the site is relevant. In particular, the 2006 planning permission which established the principle of a side and rear extension to the flat, albeit not implemented. The approved development provided 29sqm additional floor space. The current application proposes 31sqm, on the same part of the site.

Since this permission was approved, there has been change adjacent to the site with construction of a five storey building, approximately 2m from the boundary wall of No 6. The neighbouring development has windows in the elevation facing towards the garden of No 6. Flat 4 has sole use of the garden. Proposing an extension along the boundary wall will help mediate this change in scale and provide a sense of enclosure/ containment, creating a greater sense of privacy and intimacy for residents of flat 4. For clarity the existing garden shed would be demolished to make way for the extension.

Planning policy has moved on since 2006 but has not altered the key considerations. If anything, there is even more pressure (at all levels of policy) to deliver good quality, adaptable housing that makes efficient use of land whilst ensuring a sensitive response to local townscape and amenity.

The planning policy context comprises the National Planning Policy Framework 2012 (NPPF), London Plan with minor alterations 2016, Camden Core Strategy 2010 and Development Policies 2010. Supplementary planning guidance issued by the Mayor and the borough council assists in applying these policies. The scale and scope of the proposals do not raise matters of strategic importance. Nevertheless, the following points from the national and strategic policy framework are pertinent.

NPPF

1. The NPPF promotes a positive approach to growth and a presumption in favour of sustainable development, advocating three dimensions to sustainable development – an economic role, a social role and an environmental role and advises that these roles should not be taken in isolation. Development that accords with an up to date local plan should be approved, without delay and planning should operate to encourage and not impede sustainable growth (paras 14, 19).

2. The Framework identifies core principles that are expected to underpin decision-making (para 17). The following principles are relevant to the application proposals, planning should:
 - proactively drive and support sustainable development to deliver homes meeting the needs of an area and respond positively to growth;
 - always seek to secure high quality design and a good standard of amenity;
 - take account of the different character and roles of an area;
 - encourage effective use of land, reusing previously developed land;
 - conserve heritage assets in a manner appropriate to their significance, so they can be enjoyed and contribute to quality of life.
3. The Framework seeks to boost significantly the supply of housing and deliver a wide choice of high quality homes (paras 47, 50).
4. Great importance is attached to the design of the built environment. It is a key aspect of sustainable development, indivisible from good planning and should contribute positively to making better places (para 56). High quality and inclusive design is important (para 57). Decisions should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain form or style. Reinforcing local distinctiveness can be supported (para 60).
5. Permission should not be refused for schemes promoting high levels of sustainability because of concerns about incompatibility with an existing townscape where concerns have been mitigated by good design (para 65).
6. The Framework advises that heritage assets are an irreplaceable resource and should be conserved in a manner that is appropriate to their significance (para 126). Account should be taken of the desirability of new development to make a positive contribution to local character and distinctiveness (para 131). Proposals that enhance or better reveal the significance of an asset should be supported (para 137).

London Plan

7. The vision in the Plan is for London to excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.
8. The overall vision is supported by six detailed objectives embodying the concept of sustainable development, which include ensuring – the challenges of economic and population growth are met; diverse, strong, secure and accessible neighbourhoods; a city that delights the senses. Policy 1.1 states that growth will be supported and managed in order to realise these objectives.
9. Housing is a key priority in the Plan, both new development to increase supply and improving existing accommodation. The Plan promotes efficient use of existing stock (Policy 3.14). It seeks minimum space standards and convenient layouts to improve quality (Policy 3.5).
10. The Plan expects development to make the fullest contribution to minimising climate change, in accordance with a strategy to be lean, be clean, be green. Proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
11. The Plan seeks high quality development through design (Policy 7.4). Buildings are expected to make a positive contribution to streetscape – be of highest architectural quality; be of appropriate proportion, scale; of complementary details and materials (not necessarily replicating local architecture); not cause unacceptable harm to surrounding

amenity; incorporate best practice for resource management and adapting to climate change; provide high quality space (indoor and outdoor); meet principles of inclusive design; optimise use of sites (Policy 7.6).

12. Policy 7.8 relates to heritage assets, which includes conservation areas and advises that development should conserve significance of heritage assets and their settings by being sympathetic to form, scale, materials and architectural detail.
13. Guidance on residential design is expanded in the Mayor's 2016 Housing SPG. The intent for quality is already embraced in Camden's supplementary planning guidance.

At the local level, the following points are especially relevant in considering the current planning application.

1. The site benefits from good access to public transport, within easy walking distance of Camden Road Overground station, Camden Town Underground station and bus routes serving a wide catchment. It is close to the town centres at Camden and Kentish Town. Whilst acknowledging there are constraints being a residential neighbourhood in the conservation area, the principle of further development is consistent with policy CS1 - promoting growth in accessible locations, making best use of Camden's limited land and seeking full use of a site, having regard to its context.
2. The impacts of the development have been managed through the proposed design (policy CS5). The proposal will improve the existing flat without impacting on amenity for neighbours, or local townscape. As a single storey extension, there will be no loss of light for other residents and no loss of privacy (satisfying policy DP26). The extension will not be visible from the street. This is demonstrated through compliance with CPG2 (see below).
3. The development makes full use of Camden's capacity for housing (policy CS6). Whilst there is no change in unit numbers, the development provides another habitable room. Use of the space is not a planning consideration but the flexibility it offers is relevant, potentially converting the dwelling in to a two bedroom flat. A very high priority is placed on two bedroom market flats under policy DP5.
4. The development responds positively to policy promoting high quality places and heritage conservation (policies CS14, DP25). The rear extension will not be seen from public vantage points and the new entrance and enclosed side extension will improve views from the conservation area. Existing glimpses through the gap do not have townscape value.
5. The proposal will secure high quality design in accordance with policy DP24 and addresses the Key Messages in CPG1 Design.
 - The development respects its context.
 - The proposed massing is comparable to the extension approved in 2006 and subordinate to the main building. The footprint is virtually identical. The development retains 30sqm of garden space, exceeding recommendations in the Mayor's Housing SPG.
 - The side extension is set back from the main building line and sits well below the height of the raised porch, reinforcing its subservient scale, whilst providing a clear and legible entrance for the flat. The new entrance will be closer to on street car parking.
 - High quality and durable materials will be used. The palette reflects materials used elsewhere in the locality. Using timber cladding suits the 'garden room' context. It will provide harmonious contrast with the existing building and will blend well with vegetation. Policy welcomes high quality contemporary design.
 - The development will not impact on existing trees.
 - The building is designed to control rainwater collection and water run-off.
6. The development meets the principles for good residential design in CPG2 Housing (section 4).
 - It provides an entrance hallway for the existing flat.
 - The rear extension provides a habitable room directly off the hallway.

- As well as providing additional accommodation, the enlarged flat offers more flexibility and scope to adapt to changing living requirements.
- The internal headroom exceeds standards in the Mayor's Housing SPG.
- Good levels of natural daylight will be provided across the extension. Glazed doors onto the garden will receive morning sun and provide an attractive outlook. Existing external windows will become internal, allowing security bars to be removed and improving light penetration.
- Glazing in the rear extension is at least 1/10 of the floor area. The roof lights are openable allowing natural ventilation.
- Enclosing the side passage enhances security for the flat.
- The layout avoids noise intrusion or added disturbance for the occupants of the flat or those in the building above and materials will be specified to achieve requisite levels of soundproofing.
- The new build will be specified to meet required standards for thermal insulation.
- The extension provides level access to the rear part of the garden.

The application proposes a carefully and well-designed modest extension to the existing flat, improving the quality and flexibility of living space. It will contribute positively to the building when seen from the street – preserving and enhancing the character and appearance of the conservation area. There will be no harm to local amenity. The principle of development has previously been approved. Allowing the proposed extension is consistent with the aims of sustainable development. There are no reasons why planning permission should not be granted.

We trust these points will be taken in to account in determining the application. Should you have any queries, please contact the scheme architect and agent, George Bradley.

Yours faithfully

Treanor Consulting