



**Date: 18/08/2016**  
**Our ref: 2016/3804/PRE**  
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Dear Mr McGuinness

**Re: 51 Gloucester Crescent, London, NW1 7EG**

Thank you for submitting a pre-planning application enquiry for the above property which was received on the 07 July 2016 together with the required fee of £420.00

**1. Drawings and documents**

1.1. The following documentation was submitted in support of the pre-application request:

- 'Stage C Report for renovation and extension to 51 Gloucester Crescent, London NW1 7EG' dated July 2016

**2. Proposal**

2.1. Advice is requested in relation to the excavation of a basement behind the existing dwelling including front and rear lightwells as well as new access stair to lower ground floor level. The proposed works would enlarge the existing dwellinghouse and would not include any sub-division or changes to the use of the property.

**3. Site description**

3.1. The application site relates to a two storey dwellinghouse situated on the Western side of Gloucester Crescent, NW1. The property is situated within a short row of terrace dwellings (nos.50-51a) which are read as a group within the streetscene. These properties are of contrasting scale, design and character in comparison to the larger villas along the street.

3.2. The application site is located within the Primrose Hill Conservation Area. The Primrose Hill Conservation Area Statement (2000) classifies the application property as making a positive contribution to the Conservation Area. There are two lime trees protected by tree preservation orders immediately adjacent to the application site (to the front of no.59a – TPO ref S2). There are also a number of mature trees located in the rear gardens of properties in close proximity to the dwelling.

## 4. Relevant planning history

4.1. The following planning history is relevant to this site:

PE9900701 – Permission was granted for ‘*The erection of part first-floor and part ground-floor and first-floor extension to the side and rear; alterations to the doors and windows at the front and rear; the provision of a wooden gate, the formation of a new pedestrian entrance, and the blocking up of an existing entrance*’ on the 22/05/2000.

PEX0000063 – Permission was refused for ‘*The erection of a new mansard roof to create accommodation at second-floor level and the erection of a two-storey side extension on the north western flank of the building*’ on the 21/03/2000.

*Reason for refusal:*

*The proposed mansard and side extensions do not relate well to the scale, form, design and character of the individual building or the group of which it forms part. Furthermore, they are not subordinate to the original building and would detract from the small-scale character of this group within the conservation area...*

8903235 – Permission was granted for the ‘*Erection of a side extension at first floor level for use for residential purposes and alterations to the exterior of the building*’ on the 20/09/1989.

TP72560/621 – Permission was granted for the ‘*Conversion of ground floor garage at No. 51, Gloucester Crescent, St. Pancras, into extra living accommodation*’ on the 18/05/1954

Note – there is a considerable amount of planning history for the adjacent 51a Gloucester Crescent, an infill dwelling which was approved and constructed around 1955. This is not relevant to the hereby proposed development and has therefore not been included in the above list.

## 5. Relevant policies and guidance

5.1. The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8th November 2010, The London Plan 2015 Consolidated with Alterations and the NPPF (2012). The following policies will be taken into consideration:

- **National Planning Policy Framework (2012)**
- **London Plan (2016)**
  - Policy 7.4 – Local Character
  - Policy 7.6 – Architecture
- **Local Development Framework**
- **Core Strategy (2011)**
  - CS5 – Managing the impact of growth and development
  - CS6 – Providing quality homes
  - CS14 – Promoting high quality places and conserving our heritage
- **Development Policies (2011)**
  - DP16 – The transport implications of development
  - DP24 – Securing high quality design
  - DP25 – Conserving Camden's heritage

- DP26 – Managing the impact of development on occupiers and neighbours
- DP27 – Basements and lightwells
- **Supplementary Guidance**
  - CPG 1 – Design
  - CPG 4 – Basements and lightwells
  - CPG 6 – Amenity
  - CPG 7 – Transport
  - CPG 8 – Planning Obligations
- **Primrose Hill Conservation Area Statement (2000)**

## 6. Assessment

6.1. The main issues to consider in this case are as follows:

- Principle of basement development;
- Design and heritage;
- Impact on the amenity of adjoining occupiers;
- Transport & Planning Obligations.

### **Principle of basement development;**

- 6.2. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability.
- 6.3. Policy DP27 (Basements and lightwells) states that *“in determining proposals for basement and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability, where appropriate”*. Guidance regarding the processes and recommendations for this Basement Impact Assessment (BIA) is set out within CPG4 (Basements and Lightwells) and the associated Camden geological, hydrogeological and hydrological study 2010 (referred to below as the ‘Arup report’).
- 6.4. As such, any planning application for a basement development on this site would need to include a Basement Impact Assessment (BIA) which has been prepared in accordance with the processes and procedures as set out within CPG4.
- 6.5. This site is subject to an underground development constraint (slope stability). As a result, the submitted BIA will be independently assessed by a third party, at the applicant’s expense, to satisfy the Council that the development would not lead to any unacceptable impacts on the land stability, groundwater flows and surface flows of the area should the development be granted.
- 6.6. For completeness please ensure that the report details the author’s own professional qualifications. Note that CGP4 requires the following qualifications for the different elements of a BIA study or review:

#### Surface flow and flooding

A Hydrologist or a Civil Engineer specialising in flood risk management and surface water drainage, with either:

- The “CEng” (Chartered Engineer) qualification from the Engineering Council; or a Member of the Institution of Civil Engineers (“MICE”); or
- The “C.WEM” (Chartered Water and Environmental Manager) qualification from the Chartered Institution of Water and Environmental Management.

#### Subterranean (groundwater) flow

A Hydrogeologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.

#### Land stability

A Civil Engineer with the “CEng” (Chartered Engineer) qualification from the Engineering Council and specialising in ground engineering; or

- A Member of the Institution of Civil Engineers (“MICE”) and a Geotechnical Specialist as defined by the Site Investigation Steering Group with demonstrable evidence that the assessments have been made by them in conjunction with an Engineering Geologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.

- 6.1 As the BIA will require a third party audit, it will be expected that your report is in line with the Council’s Pro Forma. A Basement Impact Assessment AUDIT: Instruction form will be sent across with these notes, please see Section B for a full list of items to be included in your Basement Impact Assessment (BIA). You will need to fill out this section of the form and return to us alongside any formal submission.
- 6.2 Please also 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. These categories and the relevant fixed fees are set out below:

#### Category A - £997.50

Residential or commercial development with single storey basement where the Screening Stage of the Basement Impact Assessment indicates no matters of concern which need further investigation.

Submitted BIA anticipates no significant impact relating to:

- land stability or impacts, buildings or infrastructure;
- groundwater flow or surface water flooding and underground tunnels

#### Category B - £3045

Residential single basement or commercial development with single or double basement where the Screening Stage of the Basement Impact Assessment identifies matters of concern which need further investigation

Submitted BIA anticipates potential impact:

- on land stability;
- on groundwater flow;
- on potential for surface water flooding ;
- on underground tunnels or infrastructure; and
- cumulative impact on ground stability and the water environment

### Category C

Exceptional development (in terms of geometry, area, depth or complexity) which may be a single or double basement with potential complications. This category would be charged at an agreed rate on a case by case basis taking consideration of the complexity.

Submitted BIA anticipates potential for significant impact:

- to a listed building;
- on other buildings and or with land stability issues;
- to groundwater flow and potential for surface water flooding ;
- underground tunnels or infrastructure; cumulative basement impacts;
- relating to significant technical issues raised by third parties

### **Design and heritage**

- 6.7. The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy DP24 are relevant to the application: development should consider the character, setting, context and the form and scale of neighbouring buildings, and the quality of materials to be used. Policy DP25 'Conserving Camden's Heritage' states that within conservation areas, the Council will only grant permission for development that 'preserves and enhances' its established character and appearance.
- 6.8. CPG4 (Basements) states that the Council will only permit basement development where it does not cause harm to the recognised architectural character of buildings and surrounding areas, including gardens and nearby trees. With regard to proposed lightwells/windows, the CPG states that any exposed area of basement should remain subordinate to the building being extended; respect the original design and proportions of the building, including its architectural period and style; and retain a reasonable sized garden. Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the building, or the character and appearance of the surrounding area, or the relationship between the building and the street.
- 6.9. The unlike others in the local vicinity, the application property does not benefit from a substantial setback from the street or a large front garden. The area to the front of the property has been hard surfaced for parking and boundary treatment including sliding gates have been added for additional privacy. Notwithstanding this the property is very prominent within the streetscene due to its siting on a bend and its lack of set back from the street. Although the installed gate blocks views when closed, when a car is parked on the driveway this gate cannot be closed due to the shallow depth of the plot, affording unobstructed views of the front of the property for passers-by.
- 6.10. The hereby proposed scheme would include a sizeable front and rear light well including the installation of a new access stair to the front. Whilst the rear lightwell is not objectionable (subject to the submission of the outlined reports) it is considered that the design of the front lightwell would fail to appear visually sympathetic to the front elevation of the property. The size of this front lightwell would not be considered subordinate in terms of scale and does not relate well to the proportioning or fenestrations of the façade above. The access stair would additionally introduce visual clutter due to the requirement for railings/balustrading. Due to its prominent location, these front alterations would appear incongruous within the streetscene and would devalue the overall appearance of the host property, failing to maintain to character of the conservation area. As such it is considered that the scheme would not be supported in its current form.

- 6.11. It is therefore recommended that the front lightwell is reassessed, removing the access stair so as to minimise its area and that it is designed in a manner which better responds to the front façade of the property. Due to its aforementioned prominence, it is considered likely that only a modest lightwell, with a subtle choice of cover (perhaps utilising a grille rather than glazing) would be found acceptable in this location.
- 6.12. As previously described, the site is adjacent to two TPOs at no.51a as well as several mature trees located in the rear gardens behind the property. Mature trees are a characteristic feature of the street, including views through to trees in rear gardens. It should therefore also be noted that it would also be necessary to demonstrate that the proposed works would not disrupt the root systems or otherwise cause harm to these trees in order for the development to be supported by the Council. Consequently, it is advised that a full Tree survey/arboricultural statement and landscaping schemes are included with any formal submission.

### **Residential Amenities**

- 6.13. Policy DP26 seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Factors to consider, and which is particularly relevant to this case, include sunlight, daylight, artificial light levels, outlook and visual privacy and overlooking. As the entirety of the development would be subterranean, it is not considered that the basement extension would give rise to any concerns relating to residential amenities.
- 6.14. Notwithstanding this, the construction of any approved basement would likely give rise to significant disruption to neighbouring residents unless carefully planned. The resulting requirement to submit a Construction Management Plan will therefore be outlined in the subsequent section.

### **Transport / Planning Obligations**

- 6.15. As previously outlined, as result of the proposed basement excavation, a Construction Management Plan, will be required as part of a Section 106 Legal Agreement in order to ensure that the works do not cause undue harm to nearby residents or impact upon nearby trees or local traffic conditions. Furthermore, in order to ensure that the adjacent footpath and highway is protected, a highways and streetworks contribution will also be required as part of a Section 106 Legal Agreement. The highways contribution can be refunded provided that, as a result of the works, the adjacent highway is left in a good state of repair. For further detail on Construction Management Plans (CMPs), please refer to Camden Planning Guidance 6 (Amenity), Section 8 (pages 39 – 44).
- 6.16. It should also be noted that in February 2016 Camden's Cabinet agreed to the introduction of a £60/hour formal charge to support the review and approval of submitted draft Construction Management Plans (CMPs) and verification of the operation of approved CMPs, to be secured as part of Section 106 agreements. The £60 hourly rate will allow the Council to set charges that address the specific impacts and issues of each development scheme. However, indicative standard charges per development type are set out below to provide an indication of the levels of charges that can be expected:

<b>Construction/ Demolition Management Plans: Implementation Support Contribution: indicative charging rates</b>	
Small/ less complex (0-10 homes/ 0-1999sqm other uses)	<b>£1,140</b>
Medium size and complexity (10-50 homes, 2000-4999sqm other uses)	<b>£3,240</b>
Major and complex applications (50-499 homes/ 5,000-9,999sqm other uses)**	<b>£7,620</b>

6.17. The CMP Implementation Support Contribution will be used to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and ensure that the planning objectives we are seeking to secure are actually achieved.

## **7. Conclusion**

7.1. Subject to the submission of an adequately prepared BIA report, Arboricultural Report and draft CMP; the principle of the proposed basement is not likely to be considered objectionable by the Council.

7.2. It is however advised that the front lightwell should be reduced in scale and redesigned to appear as a modest addition which relates better to the front façade of the property. You should also be advised that the Council would be unlikely to support a scheme including a basement excavation unless it can be demonstrated that none of the mature trees surrounding the site would be significantly impacted upon by the proposed works/basement.

## **8. Planning application information**

8.1. 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
- 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
- Basement Impact Assessment
- Draft Construction Management Plan
- Tree survey/arboricultural report including landscaping schemes
- Sample photographs/manufacture details of proposed lightwell covers
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

8.2. We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by letter, put up a 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.

8.3. 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 me direct.

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

Yours sincerely,

**John Diver**

Planning Officer

Regeneration and Planning

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