



Planning Solutions Team
Planning and Regeneration
 Culture & Environment
 Directorate
 London Borough of Camden
 2nd Floor
 5 Pancras Square
 London
 N1C 4AG

Date: 25/07/2016
Our ref: 2016/3375/PRE
Contact: Kristina Smith
Direct line: 020 7974 4986
Email: Kristina.smith@camden.gov.uk

Akshay Sethi
 London Design Office
By email

www.camden.gov.uk/planning

Dear Akshay,

Re: 15 Glenmore Road, London, NW3 4BY

Thank you for submitting a pre-planning application enquiry for the above property which was received on 07/06/2016. The required fee of £3,600.00 was received on 22/06/2016.

1. Drawings and documents

15 Glenmore Road - Pre-planning application document (draft)

2. Proposal

The proposal is for the conversion of single dwelling house into 4 x 2 bed flats; erection of a replacement rear infill extension; installation of second floor and third floor dormer

3. Site description

The site is a four-storey mid-terrace house on the east side of Glenmore Road comprising a small rear garden. The property is not listed but it lies within the Belsize Conservation Area and is designated as a building that makes a positive contribution to the conservation area.

4. Relevant planning history

None at application site

19 Glenmore Road

2012/6777/P - Erection of dormer (loft level), rooflight and the formation of an external terrace to rear roof of existing flat (C3) **Refused 13/02/2013**

20 Glenmore Road

2012/2712/P - Excavation to create enlarged basement with alterations to front lightwell, erection of single-storey infill extension at rear ground floor level (adjacent to closet wing) and single-storey conservatory all in connection with existing dwellinghouse (Class C3). **Granted 14/09/2012**

21 Glenmore Road

2016/1329/P - Conversion of single family dwellinghouse into 2 x 2 bedroom self-contained flats. **Granted 01/06/2016**

25 Glenmore Road

2013/7994/P - Erection of a single storey rear infill extension following demolition of existing side extension and replacement of existing rear garden doors in connection with dwelling house. **Granted 19/03/2014**

5. Relevant policies and guidance

National Planning Policy Framework 2012

The London Plan 2016

LDF Core Strategy

CS5 (Managing the impact of growth and development)

CS6 (Providing quality homes)

CS11 (Promoting sustainable and efficient travel)

CS14 (Promoting high quality places and conserving our heritage)

CS15 (Protecting and improving our parks and open spaces and encouraging biodiversity)

LDF Development Policies

DP2 (Making full use of Camden's capacity for housing)

DP5 (Homes of different sizes)

DP16 (The transport implications of development)

DP17 (Walking, cycling and public transport)

DP18 (Parking standards and limiting the availability of car parking)

DP19 (Managing the impact of parking)

DP21 (Development connecting to the highway network)

DP22 (Promoting sustainable design and construction)

DP23 (Water)

DP24 (Securing high quality design)

DP25 (Conserving Camden's heritage)

DP26 (Managing the impact of development on occupiers and neighbours)

DP28 (Noise and vibration)

Camden Planning Guidance 2011/2015

CPG1 (Design)

CPG 2 (Housing)

CPG 3 (Sustainability)

CPG 6 (Amenity)

CPG 7 (Transport)

CPG 8 (Planning Obligations)

Belsize Conservation Area statement (2003)

6. Assessment

The planning considerations material to the determination of this application are as follows:

- Residential accommodation
- Design
- Amenity
- Trees
- Transport and Parking

Proposed residential accommodation

The proposal would convert an existing 5 bedroom single dwelling house into 4 x 2 bedroom flats. Flat 1 (81.2 sqm) would be split between ground floor and basement and include rear garden; Flat 2 (82.4 sqm) would be split between ground floor and basement and include front lightwell; Flat 3 (68.8 sqm) would be the first floor; Flat 4 (68.8sqm) would be second floor and loft level.

The London Plan introduced new Nationally Described Space Standards in March 2015, setting out minimum gross internal floor areas (GIA) and accommodation standards for new/converted residential units. The GIA standards for 2 bed flat are as follows:

2 bedroom 3 person flat – 61 sqm
2 bedroom 4 person flat – 70 sqm

Flats 1 and 2 would comfortably satisfy these requirements however flats 3 and 4 would not quite meet the guidelines set out for a 2b4p flat.

2 bedroom flats have been identified in the Camden LDF as being of **very high** priority and would be welcomed by the Council. Policy DP5 (Homes of Different Sizes) seeks to secure at least 40% 2 bed dwellings in developments. In addition DP5 encourages the conversion of market housing to also include large homes i.e. 3+bedrooms. You are therefore encouraged to explore the potential of including a larger unit in any planning application.

All new and converted residential dwellings are required to meet the minimum size standards, and have acceptable outlook, daylight and ventilation. From the submitted floor plans it is expected that the dwellings meet these criteria however a full set of drawings would need to be analysed to ensure that this is the case, particularly with regards to the daylight received by the bedrooms at lower ground floor level.

HMO

There is evidence to suggest that the property has been in use as a HMO. Your initial email referred to the property as such however more recently you have referred to it as a single dwelling house. On site it was noted there were multiple kitchens and bathrooms which suggests it could have been a HMO at some point. Although the property is not registered as a HMO if it has been used in this way for 4 or more years then it becomes its lawful use. It is recommended that any future planning application provides evidence for its use as a single dwelling house otherwise the above advice may not apply. DP29 resists development that involves the net loss of housing with shared facilities unless it can be demonstrated that the accommodation is incapable of meeting the relevant standards for housing in multiple occupation or adequate replacement housing with shared facilities will be provided

Design

Policy DP25 of the LDF states that the Council will only permit development within conservation areas that preserves and enhances the character and appearance of the area.

- **Erection of replacement infill extension**

Policy DP24 requires extensions to consider the character, setting, context and the form and scale of neighbouring buildings; and the character and proportions of the existing

building. CPG1 (Design) states that rear extensions and alterations should be subordinate to the building being extended and respect the original design and proportions of the building.

It is proposed to erect a replacement infill extension, measuring approximately 2m wide and 6.2m deep. No height information has been provided but it's recommended it is no higher than the existing. The new extension would respect the existing bay window by not projecting beyond it. The existing infill extension is in poor condition and its design and materials do not respect the architectural quality of the host property. Therefore a replacement infill extension would be a welcomed alteration that would enhance the rear elevation. It would appear that all properties along this side of Glenmore Road have carried out infill extensions and therefore it would not harm the pattern of rear development along the terrace.

- **Installation of dormers at second floor and loft level**

The principal requirement of CPG1 (Design) regarding the addition of roof dormers is that they should be sensitive changes which maintain the overall structure of the existing roof form.

The dormer at second floor level would be 2.9m wide and 2.6m deep and is fully compliant with CPG1 guidance on dormers in respect of it being positioned sufficient distances away from the edge of the roof, the eaves and the roof ridge. Dormers at this level are a common feature along this side of Glenmore Road and therefore the proposed dormer would not look out of character.

The dormer at third floor level would measure approx. 1.2m wide by 1.2m deep. Although the size of the dormer would be small, the principle of having a dormer in this location is unacceptable by reason of it causing harm to the roof form and creating a bulky addition at a high level. It is noted there are dormers in this location on three other properties along this side of Glenmore Road. However two of these were granted permission historically and the other case at no.35 Glenmore Road, which I understand this proposal seeks to replicate, was granted only because the adjoining property already had a third floor dormer and granting consent would result in symmetry of the pair.

Materials

The Council favours traditional materials (such as brick and timber) which match the main property. Where non-traditional materials are proposed the applicant should provide material samples, manufacturing details and examples of the material on other products. The success of non-traditional materials depends on the ability to be sympathetic to the main property and how the material would weather.

- **Enlargement of existing basement and installation of front and rear lightwells**

Policy DP27 (Basements and lightwells) states that the Council will consider whether schemes will harm the amenity of neighbours; lead to the loss of open space or trees of amenity value; provide landscaping including adequate soil depth; harm the appearance or setting of the surrounding area and whether the development results in the loss of more than 50% of the front garden or amenity area.

The Council will require a basement impact assessment (BIA) to be submitted so that we can properly assess whether any harmful impact will result from the basement excavation. The BIA will include the following stages:

- Stage 1 - Screening;
- Stage 2 - Scoping;
- Stage 3 - Site investigation and study;
- Stage 4 - Impact assessment; and
- Stage 5 - Review and decision making.

Further detail on BIAs can be found in Camden Planning Guidance 2013 (CPG4 Basements).

At each stage in the process the person(s) undertaking the BIA process on your behalf should hold qualifications relevant to the matters being considered. Paragraph 2.11 of CPG4 outlines the qualifications required for assessments. In order to provide us with greater certainty over the potential impacts of proposed basement development, we will expect independent verification of Basement Impact Assessments, funded by the applicant, when certain criteria are met. One such criteria is where a scheme requires applicants to proceed beyond the Screening stage of the Basement Impact Assessment (i.e. where a matter of concern has been identified which requires the preparation of a full Basement Impact Assessment). When you have submitted your application we will confirm whether independent verification of the BIA is required. Information on the BIA audit process can be found here.

Camden Planning Guidance CPG4 provides specific guidance on basements and lightwells. It should be noted that sufficient margins should be left between the site boundaries and any basement construction to enable natural processes to occur and for vegetation to grow naturally. These margins should be wide enough to sustain the growth and mature development of the characteristic tree species and vegetation of the area.

The basement excavation would be an enlargement to the existing basement, which currently only occupies a small area of the property's footprint. The basement would include front and rear lightwells and provide four bedrooms facing the lightwells with bathrooms in the centre. To ensure habitable rooms in basements receive adequate amount of natural light, CPG2 (Housing) requires walls to be no closer than 3m away. Where this is not possible, a sufficient proportion of the glazing should be above the point on the window(s) from which a line can be drawn at 30° above the horizontal to pass the top of obstruction. The glazed area above the point should total not less than 10% of the floor area of the room. Without a section drawing it is not possible whether to assess this is acceptable in daylight terms.

To ensure the development is not harmful to the character and appearance of the conservation area, the basement should have minimal exterior manifestations. At the front of the property, lightwells should generally be covered by grilles rather than surrounded by railings. To the rear, the lightwell does appear to result in a loss of around 50% of the rear garden however this is more to do with the small rear garden rather than an excessively deep lightwell. Furthermore it is likely to require this depth in order to achieve light to the rear bedrooms. It should be demonstrated in any application that the lightwells at both the front and rear do not harm the character of the building and the wider conservation area.

Construction Management Plan (CMP)

It is important that effective measures are taken during demolition and construction works to ensure that damage is not caused to the host building, neighbouring buildings or the surrounding highways.

The Council will generally require a CMP for basement developments to manage and mitigate the greater construction impacts of these schemes. CMPs will be required for schemes on constrained sites, in conservation areas, on sites adjacent to a listed building, or in other areas depending on the scale of the development and the conditions of the site.

The main highways issue in this case is the potential impact of construction / delivery vehicles associated with the basement excavation on the local highway network. A draft Construction Management Plan (CMP) would be required to be submitted with any application setting out how construction matters would be dealt with, for example deliveries, how material will be stored and construction waste removed from site etc.

A draft (based on the Camden pro-forma found online) should be submitted with the application, with the full CMP to be secured via S106 legal agreement. Chapter 4 of CPG4 (Basements and lightwells) provides more information here.

It should 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:

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

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.

Amenity

CPG6 on Amenity states: "Development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. Spaces that are overlooked lack privacy. Therefore, new buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. The most sensitive areas to overlooking are:

- Living rooms;
- Bedrooms;
- Kitchens; and
- The part of a garden nearest to the house."

The proposed dormer windows could lead to greater overlooking of the neighbouring gardens than the existing windows at levels below provide however given the distance away, the fact that it's a window rather than a terrace, and the existing second floor dormers on adjacent properties, this is considered to be acceptable.

CPG6 aims to minimise the impact of the loss of daylight caused by a development on the amenity of existing occupiers and ensure sufficient daylight to occupiers of new dwellings taking in account overall planning and site considerations.

The proposed rear dormers may lead to some loss of sunlight to neighbouring gardens at certain times of day however given their subordinate size and the shallow roof pitch it is expected that the impact would be minimal and therefore considered acceptable in daylight/sunlight terms.

It is not considered that any other element of the scheme could pose an impact on the amenity of adjoining neighbours.

Trees

Although there are no trees in the rear garden of the application site, the basement and lightwell excavation could affect trees in neighbouring gardens. An arboricultural report should therefore be included in any future planning application in order to demonstrate that no trees would be harmed in the construction process in accordance with CS15 of the LDF. This will need to provide information about:

- species, spread, roots and position of trees,
- which trees you are proposing to fell,
- which trees will be affected in any way by the proposed development, and
- the measures that will be used to protect them during construction.

You will need to provide the information in the form of the documents and plans listed below in line with BS5837:2012 (trees in relation to design, demolition and construction):

- a pre-development tree survey
- a tree constraints plan
- an arboricultural impact assessment
- an arboricultural method statement including a tree protection plan

Transportation and Parking for Residential Use

Policies CS11 and DP17 support cycle provision and Camden's parking standards for cycles states that one cycle parking space is required per residential unit. Changes to the London Plan recently adopted require two cycle spaces to be provided for two bedroom and higher units in a secure and accessible location. No cycle storage has been proposed but due to the site constraints this may not be possible. Justification for any lack of cycle storage should be provided at application stage.

The site has a PTAL rating of 4 (Good) and is easily accessible by public transport. Policies CS11, DP18 and DP19 require developments in such locations to be 'car free'. For 'car free' developments, the Council will:

- not issue on-street parking permits;
- use planning obligations to ensure that future occupants are aware they are not entitled to on-street
- parking permits; and
- not grant planning permission for development that incorporates car parking spaces, other than spaces designated for people with disabilities, and a limited

number of spaces for car capped housing in accordance with Council's Parking Standards.

As required under Development Policy DP18, the additional unit created by the development should be 'car free'. This would be secured by way of a Section 106 legal agreement.

Furthermore, Development Policy DP21 states that 'the Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'. The footway and vehicular crossover directly adjacent to the site could be damaged as a direct result of the proposed works. The Council may therefore need to secure a financial contribution for highway works as part of any Section 106 planning obligation if planning permission is granted.

7. Conclusion

The principle of converting the single dwelling into flats is considered to be acceptable subject to the proposals being in accordance with the Nationally Described Space Standard as set out above, which currently they are. We would ask that you explore the potential to include a 3 bed flat. It will also be necessary to demonstrate how the four bedrooms in the basement flats would receive an adequate amount of natural light. Please note this advice is subject to you demonstrating that the property has not recently been used as a HMO as policy seeks to protect housing with shared facilities.

It is recommended that the dormer at loft level is removed from the proposal as it is uncharacteristic of this side of Glenmore Road and would substantially alter the roof form.

The remaining elements of the proposal are considered to be acceptable, subject to detailed design.

8. Planning application information

Should you choose to 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 Application
- 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
- Arboricultural statement
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

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. You are advised to contact your neighbours and the

[Belsize Conservation Area Advisory Committee](#) prior to submission, to discuss the proposals.

Non-major applications are typically 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 Kristina Smith on **020 7974 4986**

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

Yours sincerely,

Kristina Smith

**Planning Officer
Planning Solutions Team**