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Dear Ms Vallee,

Re: Erection of single storey rear extension & further excavation to existing basement along with other associated alterations – 9 St Martins Almshouses, Bayham Street, London, NW1 0BD

Thank you for submitting a pre-planning application enquiry which was received on 3 June 2016 together with the required fee of £1200.

The applicant wishes to receive the Council's view on the proposed erection of single storey rear extension & further excavation to the existing basement along with other associated alterations at 9 St Martins Almshouses, Bayham Street, London, NW1 0BD.

1. Drawings and documents

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

- Design statement prepared by Moxon Architects;
- 599-100; 599-110; 599-220; 599-221; 599-222; 599-223; 599-230; 599-231; 599-232; 599-240.
- Revised drawings – 599-220 Rev B; 599-221 Rev B; 599-222 Rev B; 599-223 Rev B; 599-231 Rev B; 599-232 Rev B; 599-240 Rev B; 599-250 Rev A.

2. Proposal

2.1 Erection of single storey rear extension & further excavation to the existing basement along with other associated alterations.

3. Site description

3.1 The application site forms part of a terrace of 9 Grade II Listed former Almshouses, built 1817-18 to a design by Henry Hake Seward for the Parish of St Martin-in-the-Fields. The buildings were listed in 1974. The site also sits within the Camden Town Conservation Area.

3.2 The almshouses are set back behind a high planted wall onto Bayham Street and accessed via a shared gated entrance which leads to a hard landscaped strip between the houses and the street wall.

- 3.3 The property is finished in yellow stock brick with a pitched slate roof. It is 3 bays wide and contains a private rear garden.

4. Relevant planning history

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

Relevant applications at St Martins Almshouse

No.8 St Martin Almshouses

2009/2837/P & 2009/2838/L – Erection of single-storey rear ground floor level extension to existing single-family dwellinghouse. **Refused 30/11/2009 – Appeal allowed 18/08/2010.**

No.4 St Martin Almshouses

2014/0796/P & 2014/0837/L – Erection of full width, ground floor rear extension including 2 rooflights and first floor rear extension following the demolition of existing ground and first floor rear extensions, installation of 1 rooflight on the rear roofslope of the host building and associated works to the existing boundary treatment to the rear, in connection with the existing use as a house (Class C3). – **Granted 16/05/2014.**

No.2 St Martin Almshouses

2015/5180/P & 2015/5503/L – Erection of single storey rear extension with rooflight (following demolition of existing extension), installation of slate roof at rear first floor level and replacement of window with internal door at rear ground floor. **Granted 13/11/2015.**

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 2016 and the NPPF (2012). The following policies will be taken into consideration:

National Planning Policy Framework 2012 London Plan 2016

LDF Core Strategy and Development Policies

CS5 – Managing the impact of growth and development

CS14 – Promoting high quality places and conserving our heritage

DP24 – Securing high quality design

DP25 – Conserving Camden's heritage

DP26 – Managing the impact of development on occupiers and neighbours

DP27 – Basements and lightwells

Camden Planning Guidance 2015: CPG1 Design

Camden Planning Guidance 2011: CPG6 Amenity, CPG7: Transport

6. Assessment

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

- Design and heritage;
- Basement;
- Impact on the amenity of adjoining occupiers;
- Transport.

Design and heritage

Initial Proposals

6.2 Informal comments were provided via email on the initial proposals. Following this the scheme was revised to take on board the feedback provided. Below are comments on the revised plans submitted via email on the 9 September.

6.3 The historical information submitted within the 9 September email, supplied by an architect neighbour - Russell Graham - who has researched the history of the buildings, is useful commentary. However in order for this information to be used as justification for the proposed alterations, evidence should be included to support Russell Graham's understanding of the historical development of the site.

Proposed Extension

6.4 The principle of demolition and reconstruction of the rear extension is acceptable, there is a clear precedent set by recent permissions along the terrace. The demolition of the outbuilding will require an assessment, in the form of a heritage assessment, of the contribution that it makes to the overall significance of the listed building, as well as justification provided for its demolition.

6.5 The siting of the proposed extension is considered to be appropriate, in that it follows the line of the former link to what was once the wash-house building, but sets the rest of the extension to the side in order to open up part of the rear elevation of the original building.

6.6 The proposed new opening within the rear building wall should be limited to the width of the existing window opening due to the unacceptable resultant loss of historic masonry wall. It is noted that this was not amended with the revised proposals, however it is important to emphasise that this element which would cause harm to the significance of the building cannot be supported by officers.

6.7 The revisions to the glazed atrium, introducing a timber frame supporting structure to the large areas of glazing, are welcomed. It is accepted that this element of the proposal is differentiated from the main area of the proposed extension, which has a more solid appearance with areas of brickwork surrounding the proposed sliding doors.

First Floor Rear Window

- 6.8 It is acknowledged that the revisions retain the proposed rooflight, but also propose to increase the height of the existing central opening at first floor level.
- 6.9 It is clear that the first floor rear central opening has been subject to reconfiguration, as can be seen in the modern brickwork above the lintel, with a former high level window blocked up presumably when the doors were installed to provide access to the small terrace.
- 6.10 When read in conjunction with the proposed rear extension, the modern interventions to the historic building appear overly dominant and are considered to have a harmful impact on the character of rear elevation. It is recommended that either the high level high window is re-instated, with the existing opening below infilled with bricks to match the existing walls. This restoration would be considered as a heritage benefit that could help balance the impact of the loss of historic fabric elsewhere within the building. An alternative option would be to retain the existing window opening, replacing the existing double doors with a window of a more traditional and solid appearance.

Staircase

- 6.11 Officers still have reservations regarding the proposed demolition of the staircase. As indicated above, the historical commentary provided within the email of 9 September is welcomed. However evidence would need to be provided to support the indication that the existing staircase is not an original feature.
- 6.12 Please note that if this is included within the full application this will trigger consultation with Historic England and with national amenity societies due to the demolition. This would not normally be required for more minor alterations to a Grade II listed building.

Other internal alterations

- 6.13 The reduction in the overall extent of the removal of internal walls is welcomed. The proposed new openings (subject to the retention of downstands) and infilling of existing doorways at first floor level are acceptable, as is the proposed enlargement of the opening between the front and rear room to match the other side - subject to the overall planning balance of the level of historic fabric to be removed elsewhere within the building and consideration of other heritage benefits that might be achieved through the proposals.
- 6.14 It is important to consider the structural implications / interventions that might be required associated with the creation of any new doorways / openings. The impact on timber A frames or similar structural elements within the internal walls should be carefully considered.

Rooflight

- 6.15 The proposed rooflight should be a heritage-style rooflight, set flush with the roofslope.

Basement

- 6.16 The proposed lowering of the basement floor level is considered to be acceptable in design and conservation terms. However consideration should be given to how the bottom of the staircase and the chimney stacks are treated with the proposed lowering of the floor level.

Basement

- 6.17 The proposals for the basement, as illustrated, are considered acceptable. This includes the lowering of the floor level and extension to the rear. It is however noted that one of the rooms to the front of the basement could be used as a habitable room. It is important that this room is not used as a habitable room as it has no access to natural light. The proposed basement extension could therefore be considered acceptable provided that it is found to be acceptable following the Council's audit process as set out below.
- 6.18 Policy DP27 (Basements and lightwells) states that *"in determining the 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"*. Further guidance on the processes and recommendations for Basement Impact Assessments is set out within CPG4 (Basements and Lightwells, September 2013) and the associated Camden geological, hydrogeological and hydrological study 2010 (referred to below as the 'Arup report').
- 6.19 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.
- 6.20 The submitted BIA will be independently audited by the Council's preferred engineers, with the costs passed to the applicant. The audit will advise the Council (and neighbouring groups) that the development would not lead to any unacceptable impacts on the groundwater flows, land stability and surface flows of the area should the development be granted.
- 6.21 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.

- 6.22 Attached with this pre-application letter is Section A of the Basement Impact Assessment Audit. To speed up the process of commencing the BIA audit you are strongly encouraged to submit a completed Section B with your application. This will allow the BIA to be audited at the earliest opportunity of the application process.

Amenity

- 6.23 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 the amenity of neighbours and provides satisfactory amenity for future occupiers. Factors to consider, and which is particularly relevant to this case, include the impact of the rear extension on sunlight, daylight, artificial light levels, outlook and visual privacy and overlooking, as experienced by neighbours
- 6.24 It is not considered that the proposed replacement rear extension will create any significant impact on the amenity of adjacent occupiers with regard to any of the above factors. It is not therefore considered that that the proposal will lead to any increased impact on the amenity of any adjacent occupiers.

Transport

- 6.25 CPG6 (Amenity) and CPG7 (Transport) require that a construction management plan (CMP) be submitted for development that is likely to give rise to significant noise and other disturbance during construction. Despite the opportunity for on-site access, it is considered necessary to require the applicant to enter into a S106 legal agreement to secure the provision of a Construction Management Plan (CMP).
- 6.26 A CMP outlines how construction work will be carried out and how this work will be serviced (e.g. delivery of materials, set down and collection of skips etc.), with the objective of minimising traffic disruption and avoiding dangerous situations for pedestrians and other road users. The CMP would also need to fully consider the current approvals and construction projects in the mews, taking account of, amongst other things, the proposed construction vehicle arrival/departure arrangements, road closures and impacts on pedestrian and other traffic.

- 6.27 The summary page of 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 directly adjacent to the site could be damaged as a direct result of the proposed works. It is highly likely that a financial contribution towards repairing the public highway will be required in this instance. The applicant should be mindful of this when an application is submitted.
- 6.28 In summary, a fully complete CMP, and a financial contribution for highway works would all be secured via Section 106 agreement.

7. Conclusions

- 7.1 Officers are concerned with a number of the elements currently proposed. Some revisions together with full justification of the proposal with regards to the impact on the listed building will be required in support of any application.
- 7.2 A Basement Impact Assessment will be required as a supporting document for this application. It is not considered that that the proposal will lead to any increased impact on the amenity of any adjacent occupiers. Please note that it is likely that a CMP and highways contributions will be required as part of a Section 106 agreement in order to address the mitigating circumstances of the proposal.

8. Planning application information

- 8.1 In order to ensure your application is valid, the following information will be required to support the planning application which should be submitted in electronic form via the Planning Portal
- Completed and signed planning application forms for 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;
 - Heritage Statement;
 - Basement Impact Assessment;
 - The appropriate fee – £172;
 - 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 putting up a site notice outside of the site. The Council must allow 21 days from the consultation start date for responses to be received.

- 8.3 This application will be decided under delegated powers. However, if 3 or more objections are received, and/or a local amenity group object, then the application will be referred to Member's Briefing which is held every Monday. Details of the Member's Briefing process can be found here: <https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/after-an-application-is-made/deciding-the-outcome-of-an-application/>.

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 Ian Gracie (0207 974 2507)

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

Yours sincerely,

Ian Gracie

Planning Officer
Planning Solutions Team