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Contact: Kristina Smith
Direct line: 020 7974 4986
Email: Kristina.smith@camden.gov.uk

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

Boyer Planning
24 Southwark Bridge Road
London
SE1 9HF

www.camden.gov.uk/planning

Dear Rachel White,

Re: 149-151 King Henry's Road, NW3 3RD

Thank you for submitting a pre-planning application enquiry for the above property which was received on 10/01/2019. The required fee of £ £989.02 was received on 14/01/2019

1. Proposal

The proposal is for:

- Conversion of 2 flats (1 x 2-bed; 1 x 3-bed) into 3 units (C3) (1 x 4-bed; 1 x 1-bed; 1 x studio)
- Excavation of basement with front and rear lightwells under no.151
- Erection of single storey rear extension at no.151

2. Site description

The application site comprises a four-storey semi-detached pair of Victorian villas on the south side of King Henry's Road. The properties are part of a wider building group (no's 115 – 157) of buildings of the same architectural style. The properties have very long rear gardens which meet Wadham Gardens to the rear. Both buildings have been converted into flats and this pre-application relates to the lower ground floor flat at no.149 and a maisonette at lower ground and ground floor levels at no.151.

The properties are situated in the Elsworth Conservation Area and are considered to make a positive contribution to the area.

3. Relevant planning history

2009/5006/P - Erection of single-storey rear and side conservatory-style extension to the lower ground floor flat, enlargement of the existing side window at upper ground floor level and alterations to the access to the lower ground floor flat. **Granted 10/12/2009**

4. Relevant policies and guidance

National Planning Policy Framework 2019

[The London Plan 2016](#)

[Camden Local Plan 2017](#)

H1 Maximising housing supply
 H6 Housing choice and mix
 H7 Large and small homes
 A1 Managing the impact of development
 A4 Noise and Vibration
 A5 Basements and lightwells
 D1 Design
 D2 Heritage
 CC1 Climate change mitigation
 CC3 Water and flooding
 CC5 Waste
 T1 Prioritising walking, cycling and public transport
 T2 Car-free development and limiting the availability of parking
 DM1 Delivery and Monitoring

[Camden Planning Guidance](#)

CPG1 Design (2015 updated March 2018)
 CPG Amenity (2018)
 CPG 7 Transport (2011)
 CPG 8 Planning Obligations (2015, updated March 2018)
 CPG Housing (interim, 2018)
 CPG Basements (2018)

The Council is reviewing and updating its Camden Planning Guidance documents to support the delivery of the Camden Local Plan following its adoption in summer 2017. The update is being carried out in two phases to manage the amount of material to be consulted on at any one time and ensure that relevant revised CPG documents take into account the emerging London Plan and changes to national planning policy due in early 2018. Please refer to the Council's website for further [details](#).

5. Assessment

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

- Land Use
- Design and impact on Conservation Area
- Proposed residential accommodation
- Amenity
- Basement considerations
- Transport
- Sustainability
- Planning obligations/CIL

6. Proposed residential accommodation

The proposal would involve converting two units (1 x 2-bed; 1 -3-bed) into 3 self-contained units, resulting in an uplift of one unit. The priority land use of the Council's Local Plan is self-contained housing and therefore the subdivision is acceptable in principle subject to the quality of residential accommodation.

The flats would be laid out as follows:

- Flat 1 - studio (38 sqm) – lower ground floor at no.151
- Flat 2 – 1-bed (67 sqm) – upper ground floor at no.151
- Flat 3 - 4-bed (288 sqm) – lower ground floor and basement

The Council expects development to provide high quality housing that provides secure, well-lit accommodation with well-designed layouts and rooms in accordance with guidance provided by Policy H6 (housing choice and mix) and CPG Housing. The London Plan 2016 sets out Nationally Described Space Standards which all new dwellings must meet. Table 1 of the space standards sets out the minimum gross internal floor areas (GIA) expected for various dwelling sizes. The size of the proposed units have been assessed against these standards and all units comply. The studio proposes a shower room rather than bathroom and therefore the floorspace of 38 sqm is acceptable.

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Quality of proposed accommodation

Flats 2 and 3 would be dual aspect and would receive good levels of outlook, daylight and ventilation. Flat 3 would benefit from a very large garden; however the other two units would have no private amenity space. You are encouraged to explore how the provision of some private amenity space for these units could be incorporated into the scheme.

The standard of residential accommodation for the studio would be slightly limited given it would have two windows, one at high level and the other facing onto a lightwell / boundary wall. ADF values have been provided for the basement bedroom which demonstrates compliance with the minimum 1% required. Given that the studio is at raised ground floor level it would receive more light than the basement flat; however studios should achieve 2% ADF (value for kitchen/living/dining). An ADF value for the studio should therefore be

provided with a future planning application. If compliance can be demonstrated then on balance the standard of accommodation is considered acceptable.

Dwelling mix

The Council will aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities. The Council will ensure that housing development (including the conversion of existing homes) contributes to the twin aims of policy H6 to a.) meet the priorities set out in the Dwelling Size Priorities Table and b.) include a mix of large and small homes.

The Council's priority dwelling size is for 2 and 3-bed units which are noted as being very high priority, compared to 1-bed and 4-bed units which are lower priority. Whilst not being in strict accordance with the size priorities, the proposed mix (1x studio; 1x1-bed and 1x4-bed) would provide large and small properties. Nonetheless, given the comments regarding the quality of residential accommodation of the studio, you are encouraged to investigate whether a 2-bed duplex rather than a studio and a 1-bed could be provided instead.

7. Design and Conservation

Creation of lightwells

The proposal would involve excavating a basement under no.151 and would include deepening the existing front lightwell and creating a rear lightwell. The front lightwell would result in the lightwell at the property being a storey deeper than any other property on the rest of the street. Although not easily visible from the public realm, this would nevertheless alter the proportions of the property and harm its relationship with the wider building group, none of which have deepened their existing front lightwells to this extent. This element of the proposal is therefore not considered to be acceptable.

The rear lightwell, whilst of a relatively large footprint, would be stepped and soft landscaped. It would therefore appear to be of a subordinate scale and designed in a way as to prevent the new basement level from appearing as a new storey.

Erection of single storey rear extension

It is proposed to erect a single storey rear extension at lower ground floor level that would span across the rear elevation of no.151. It would also wrap round the side elevation slightly replacing an existing poor quality side infill extension. It would remain sufficiently set back for the side extension element to not be legible from the street. Given the height of the host property and the presence of similar rear extensions at other properties in the building group, including examples which include a degree of wrap round along the side elevation, the extension is considered acceptable.

It would be constructed in a combination of London stock brick piers that match the brick of the host building and full length glazing. The design is considered to be simple, refined and high quality. The provision of a green roof on the flat roof of the extension would be a welcomed feature.

8. Basement considerations

The proposed basement would be single storey and located under the footprint no.151 with an enlarged front and new rear lightwell. The principle of a basement excavation in this location is considered to be acceptable (notwithstanding earlier comments with regards to front lightwell) subject to a satisfactory audit outcome as outlined below.

Policy A5 requires basement development to:

- not comprise of more than one storey;
- not be built under an existing basement;
- not exceed 50% of each garden within the property;
- be less than 1.5 times the footprint of the host building in area;
- extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- not extend into or underneath the garden further than 50% of the depth of the garden;
- be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- avoid the loss of garden space or trees of townscape or amenity value.

From the submitted information, the proposed basement appears compliant with the criteria of policy A5.

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 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).

The basement is likely to be a Category B basement, which attracts an audit fee of £3,045. Information on the BIA audit process can be found [here](#).

9. Amenity

The bulk of the rear extension would be situated sufficient distance from the windows of no.151a next door for there to be no material implications for loss of daylight/ sunlight or

outlook. No new window openings would be introduced above ground floor level and so there are no implications for privacy.

10. Transport considerations

Car parking

Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

The Council will require any development to be 100% car-free if the development is to have new occupiers, which is assumed to be the case for all new development. Car-free status will be secured through a Section 106 agreement incorporating the Council's standard planning obligation designating all units on-site as "car-free" housing.

Car-free status is subject to the caveat that where an existing occupier-owner has demonstrated to the Council's satisfaction that he or she has returned to the property as their principal home, the car-free requirement will be temporarily relaxed in respect of that person's home for the period of their future occupation.

A mechanism set out in the Section 106 agreement will require returning owner-occupiers to evidence that they intend to continue to occupy their home as their principal residence before any temporary relaxation of car-free status can take place.

It is understood that Flat 3 will be continue to be lived in by the existing owner and so the car-free obligation can be relaxed for the remainder of their occupancy. Flats 1 and 2; however, are new units and will be subject to car-free agreement on completion.

Cycle parking

Policy T1 of the Camden Local Plan requires development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements outlined in Camden Planning Guidance CPG7 - Transport.

The London Plan 2016 cycle parking standards (Table 6.3) requires one cycle parking space for units with 1 bedroom and two cycle parking spaces for residential units with more than 1 bedroom. Storage for bicycles should be provided and located at an accessible location within the dwelling or within the boundaries of the site.

Four spaces should therefore be proposed as part of the development; however, no cycle storage has been included and therefore it is unacceptable in transport terms. From the submitted plans it would appear there is room to the front of the property.

Managing the impacts of construction on the surrounding highways network

Due to the excavation works, a construction management plan (CMP) and associated CMP Implementation Support Contribution (£3,136) would be required to be secured by S106 Agreement for the site, in accordance with Policy A1 and Policy T4 of the Camden Local Plan.

Our primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air

quality). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

A detailed draft CMP should be submitted (using the Council's pro-forma) at application stage to help inform consultation responses. Please see CPG7 for more details.

Highways and public realm improvements directly adjacent to the site

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 is likely to suffer a degree of damage as a direct result of the proposed works. It would therefore be necessary to secure a financial contribution for highway works as a section 106 planning obligation if planning permission is granted. This would ensure that the proposal would comply with Policy T4.

Some highway licenses may be required to facilitate the proposed works. This might include a temporary parking bay suspension, a skip licence, a hoarding licence, and a scaffolding licence. The applicant would need to obtain such highway licences from the Council prior to commencing work on site.

Local consultation

You are strongly encouraged to engage with the neighbouring occupiers at an early stage in the process, given the likely concerns residents will have with the comings and goings of construction / delivery vehicles. Although the Council advertises the application in the local press and displays site notices, initial consultation may help offset any concerns neighbours have before any application is submitted. You are also advised to contact any local groups.

11. Affordable Housing

We will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. From the submitted information it appears as though the uplift is below 100sqm; however, if this changes then please refer to policy H4 and CPG Housing for more information on how to calculate the Affordable Housing contribution.

12. Sustainability

Water supply and quality

The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures (policy CC3).

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site. Residential developments will be expected to meet the requirement of 110 litres per person per day (including 5 litres for external water use). Refurbishments will be expected to meet BREEAM water efficiency credits.

13. Landscaping and drainage

Policies D1 and CC2 and the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. Please include details of the above in your submission.

14. Refusing and recycling

To make sure that residents can properly store and sort their waste and to make household recycling as easy as possible, the Council will require developments to provide adequate facilities for recycling and the storage and disposal of waste. Please refer to Policy CC5 (Waste) and CPG1 Design (Chapter 10) for more information.

15. Planning obligations/ CIL

The following Section 106 planning obligations would be required if planning permission were granted:

- Car free development.
- Construction Management Plan (CMP) and a one off financial contribution to cover the costs of reviewing the CMP.
- Highway works contribution (amount confirmed at application stage).

CIL

This application would be liable for both the Mayoral and Camden CIL as the proposal results in the creation of a new dwelling or 100sqm of additional floorspace. For further information, please visit the CIL pages of the Camden website.

16. Conclusion

The Council would be supportive of the subdivision of the existing property but you are encouraged to explore how the dwelling mix and quality of residential accommodation (with specific regard to the studio unit) could be improved. The rear extension and basement excavation are acceptable; however, the deepening of the front lightwell would not be supported.

In addition, 4 cycle parking spaces should be provided for the 3 flats in a secure and accessible location and in accordance with the guidance of CPG7. ADF values for the studio flat should also be provided at application stage to give assurance that the unit would receive adequate daylight.

17. Planning application information

Should you choose to submit a planning application which addresses the outstanding issues 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
- ADF study
- Basement Impact Assessment
- CMP pro forma
- 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 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 [Elsworthy 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**