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Our ref: 2019/0415/PRE
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Ms Elizabeth Woodall
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By email

 **Camden**
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Dear Ms Woodall,

Re: 69 Avenue Road, London, NW8 6HP

Thank you for submitting a pre-planning application enquiry for the above property which was received on 22 January 2019, with the required fee of £432.69 received on 1 February 2019. Further supporting documents were received on 5 April 2019. These notes were informed by a site visit undertaken on 28 February 2019.

1. **Proposal**

Advice is requested for the erection of a two-storey side extension and attached single storey rear and side extension; the erection of a two storey rear extension with alterations to the rear roof pitch including the installation of 3 x replacement rear dormers; and the excavation of a new basement and rear lightwell.

2. **Assessment**

The main points of consideration for this pre-application enquiry are the design of the proposed extensions, the size of the proposed basement, and the impact of the proposals on trees within the site and neighbouring sites. The full range of issues covered are as follows:

- Design;
- Neighbour amenity;
- Basement development;
- Trees;
- Transport and planning obligations;
- CIL.

Design

Overview of site

The site is not listed nor is it situated within a conservation area. The Elsworthy Conservation Area is located on the opposite side of Avenue Road, and the St Johns

Wood Conservation Area runs at the rear of the site from No. 37 Queens Grove. The building is considered to have some historical and architectural merit and to compliment the setting of the two conservation areas and the character of Avenue Road, and as such has been identified as a non-designated heritage asset during the course of previous pre-application discussions at the site in 2017 and 2018.

Avenue Road has a distinctive character. The street was originally laid out in the early to mid-19th century with large semi-detached and detached villas. However, in the early part of the 20th century, many of these building were demolished and replaced with large detached neo-Georgian style domestic houses. Some of the historic plots were amalgamated with single large villas built over two sites.

No. 69 Avenue Road was built over two plots and was designed by architects Wimperis, Simpson and Guthrie in 1937. Avenue Road was substantially redeveloped during this period and Wimperis, Simpson and Guthrie were responsible for designing many of the neo- Georgian style houses that now line the street.

The building is a detached two-storey villa constructed from dark red brick with a large hipped roof of red clay tiles. The windows are 6/6 sliding sashes typical of other neo-Georgian buildings in the surrounding area. The building has a curved form at the entrance, creating a sweeping driveway in order to accommodate motor cars. During the period, motor cars were modern and a symbol of wealth, the introduction of a driveway was therefore symbolic of the character of the street and its inhabitants. The rear of the building has two, two storey curved bays and large doors leading from the study into the garden. Both elevations are largely unaltered, representing the original architecture and displaying some good quality materials and construction. The north-west section of the building has been extended to form a large single storey garage. These extensions are not of a good quality and to a large degree detract from the architectural qualities of the building. The building sits within a large plot and as a result there is a particularly spacious garden to the rear which contains a variety of mature trees. Views of the trees can be seen through the gaps between the houses and over the top of the single storey north-west extensions.

Side extension

The proposals include the rationalisation of the side extensions with the inclusion of an additional storey. Whilst the demolition and replacement of the existing, low quality side extension is not objectionable in principle, in this case concern is raised with regard to the scale and bulk of the proposed replacement and its impact upon the host dwelling. The replacement two storey (plus basement) extension would be contrary to the Council's adopted CPG 'Altering and extending your home' and would be considered to have a harmful impact on the character and appearance of the host dwelling and Avenue Road streetscene. This guidance states that side extensions should be no higher than the height of the porch. In this instance the extension would meet the eaves, compromising the form of the host building by visually undermining the prominence, composition and proportions of the principal elevation of the dwelling. It would also effectively double the width of the dwelling. Whilst this width is not harmful at single storey height (as existing), at two storey height (above ground) the addition would begin to visually compete with the host dwelling. Though a glazed link is retained, the works would still appear as a single, double fronted mass fronting onto Avenue Road, which would effectively mean the loss of the existing gap/view over

towards mature trees to the rear. The existing gaps/views between the semi-detached and detached houses are characteristic of the street, allowing space for the buildings themselves to breathe and allowing views to rear gardens and trees. The proposed two-storey extension would compromise the space around the host building and its neighbour, and would limit views of the trees in the rear garden of the host building and trees in the rear gardens of houses on Queen's Grove.

The single storey side addition extends further into the garden creating a large kitchen and dining area. The garden is unusually large and can accommodate an extension in this position; however, the depth of the extension should be revisited to ensure it does not compete with the main building and overwhelm its garden setting. The modern design and material palette of the extension are welcome.

Rear extension

It is also proposed to create a large two-storey rear extension with extensions to the roof slope to ensure the extension appears as part of the main body of the building. The rear of the building currently has some architectural merit, with two large curved bay windows; however, the proposed rear extension is of good design, is in keeping with the host building and is not objectionable.

Roof extension

The proposal includes the adaption of the roof to accommodate the proposed two-storey rear extension and provide 3 x replacement rear dormers. Although sections have been submitted showing how the roof would be altered, it would be helpful to have additional information showing exactly how this would be articulated. It is essential the design and construction of the roof is of exceptional quality and utilises traditional materials and detailing that are reflective of its context.

Neighbour amenity

The proposed addition of a first floor to the side extension could have some adverse impact on the nearest rear habitable windows at the adjacent neighbouring property No. 71 in terms of loss of light/overshadowing. A Daylight and Sunlight report would demonstrate whether this is the case; however, it is not recommended that such a report is prepared as the proposed first floor element is considered unacceptable in design terms as highlighted above.

The proposed drawings indicate that new plant will be installed at basement level. A noise impact assessment for any proposed plant would be required to be submitted as part of any future planning application to ensure that it would not have a detrimental impact on the amenities of neighbouring occupiers in terms of noise and vibration. As will be discussed in the transport section, impacts from construction are also of concern and would require mitigation.

Basement development

The proposed basement would not comply with indicators j) and k) of Policy A5 (Basements) of the Camden Local Plan, and this is acknowledged within the pre-application advice cover letter. The specific indicators of policy A5 are in place to

ensure that basements are subordinate in scale and form to the host building, and to protect planting space to sustain growth of vegetation and trees. The site occupies an ample plot, and there is therefore no justification for non-compliance with all of the indicators of the policy. The proposed basement should therefore be revised to be reduced in size to comply with all indicators of policy A5.

The proposed basement also includes a proposed rear lightwell. Whilst there is no objection to the creation of a lightwell to the rear of the building, the size and detailed design of the lightwell should be carefully considered to ensure that it relates well to the host building and rear garden. Any proposed lightwells should be secured by a metal grille as per CPG 'Basements' guidance.

The site is subject to underground constraints (subterranean groundwater flow, surface water flow and flooding, slope stability, and lost rivers).

A Basement Impact Assessment (BIA) which has been prepared in accordance with the processes and procedures as set out within CPG Basements would need to be included with any future planning application for a basement development on this site. This BIA would then need to be independently audited by a third party before planning permission can be granted for any such basement development.

Please see Appendix 1 below and CPG 'Basements' for full details of the procedure for basement applications.

Trees

The Council's Tree Officer has reviewed the submitted Arboricultural Impact Assessment and Tree Protection Plan and has attended a site visit with the report's author. The Tree Officer has confirmed that the main areas of concern in this scheme are with the impact of the proposed extension and basement works in the region of T1 within the front garden of the site; T17 and T18 to within the rear garden along the southern-eastern boundary of the site; and G26 and T28 within the rear gardens of Nos. 69 and 71 along the north-western boundary of the site. Before an assessment can be made as to the acceptability of the proposed basement works in the locations adjacent to these trees, further investigation needs to be undertaken in the form of trial pits excavated by trained arboricultural professionals or ground penetrating radar surveys. The results of these trial pits or ground penetrating radar surveys, as well as proposals for dealing with what is discovered, should be included within the Arboricultural Impact Assessment for any formal submission.

The Arboricultural Impact Assessment and Tree Protection Plan should ensure that they detail any tree works required above or below ground to facilitate implementation. Attempts should be made to keep tree works to a minimum where possible, and consideration should be given to equipment such as scaffolding or piling rigs that may require additional clearance. The submission should also include a method statement for works or other related operations within root protection areas (RPAs) and tree protection measures.

Transport and planning obligations

Car Parking and Cycle Parking

The proposal would not involve the creation of any additional car parking spaces within the boundary of the site, which is acceptable in terms of transport. As the proposal would not result in the creation of any new or additional residential dwellings, there is no requirement to restrict car parking either on or off site or to provide additional cycle parking.

Construction Management Plan

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

Given the scale of the proposed works and the location of the site directly adjacent to a cycle route, which is due to be upgraded as part of the Cycle Superhighway route 11 (CS11), the Council's Transport Planner has confirmed that the Council would require a Construction Management Plan (CMP) to be secured by a Section 106 Legal Agreement, in order to manage and mitigate the construction impacts of the scheme. This would need to set out how construction matters would be dealt with, for example deliveries, how material would be stored, and construction waste removed from site etc. For further details on CMPs, please refer to the sections on CMPs in CPG Amenity.

The CMP would need to be completed using the Council's Pro-forma template and would need to be approved by the Council prior to works commencing on site. A CMP Implementation Support Contribution of £3,136 would also need to be secured as a Section 106 planning obligation in order to fund 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.

Highways Contribution

If planning permission were to be granted for a revised proposal, a financial contribution for highway works would need to be secured by a Section 106 planning obligation in order to cover the costs of any repairs to transport infrastructure or landscaping as necessary following construction damage and to reinstate all affected transport network links and road and footway surfaces.

CIL

The scheme would be liable for both the Mayor of London's and Camden's own Community Infrastructure Levy (CIL), as more than 100sqm of new floorspace is proposed. The Mayor's CIL applies to all development that adds one or more dwellings or more than 100sqm of floorspace at a rate of £80 per sqm. The Council's CIL equally applies at a rate of £500 per sqm. Please refer to the Council's [website](#) for further information on the Borough's CIL.

3. Conclusion

Whilst there is scope to extend the host dwelling, any such proposed extensions need to be carefully configured to ensure that they do not have a detrimental impact on the

character and appearance of the building and the Avenue Road streetscene. The two-storey side extension, depth of the side and rear extension and size of the basement in the current proposals are considered unacceptable in design terms, and it is recommended that the following alterations are undertaken prior to the submission of a planning application:

- Remove the first floor element from the proposed side extension.
- Explore in greater detail the depth of the proposed single storey side and rear extension.
- Reduce the size of the proposed basement to comply with all indicators of policy A5.
- Scrutinise the design and construction of the proposed alterations to the roof of the main building.
- Conduct further tree investigation works to determine whether any existing trees would be affected by the proposals, and amend the scheme/propose appropriate mitigation measures as necessary.

Please see Appendix 1 for supplementary information and relevant policies.

Thank you for using Camden's pre-application advice service; I trust this is of assistance in progressing your proposal.

Yours sincerely,

Charlotte Meynell
Planning Officer
Planning Solutions Team

Appendix 1:

Submitted drawings and documents

Cover Letter (prepared by HGH Consulting, dated 22 January 2019); Heritage Statement (prepared by Heritage Information, dated January 2019); Arboricultural Statement and Arboricultural Impact Assessment Plans (prepared by Landmark Trees, dated 22 January 2019); Pre-App Design & Access Statement (prepared by KSR Architects, dated January 2019); Avenue Road Street Analysis (prepared by KSR Architects, received 5 April 2019); Proposed Front Elevation (Revised) P300 (prepared by KSR Architects, received 5 April 2019); Section Diagram P900 (prepared by KSR Architects, received 5 April 2019).

Relevant planning history

2017/6417/PRE – Follow up pre-app Demolition of single dwellinghouse and erection of two 9xbed detached dwellings with basements. **Pre-application advice issued 09/02/2018**

2017/1212/PRE – Demolition of single dwellinghouse and erection of two 9xbed detached dwellings with basements. **Pre-application advice issued 06/07/2017**

2005/1489/P – Erection of a flat roof over existing courtyard plus new brickwork above existing doors for the formation of a garage. **Planning permission granted 22/06/2005**

Relevant policies and guidance

- **National Planning Policy Framework (2019)**
- **London Plan (2016)**
- **Draft New London Plan (2017)**
- **Camden Local Plan (2017)**
 - G1 – Delivery and location of growth
 - A1 – Managing the impact of development
 - A3 – Biodiversity
 - A4 – Noise and vibration
 - A5 – Basements
 - D1 – Design
 - D2 – Heritage
 - H4 – Maximising the supply of affordable housing
 - CC1 – Climate change mitigation
 - CC2 – Adapting to climate change
 - CC3 – Water and flooding
 - DM1 – Delivery and monitoring
 - T1 – Prioritising walking, cycling and public transport
 - T2 – Parking and car-free development
 - T3 – Transport infrastructure
 - T4 – Sustainable movement of goods and materials

- **Camden Planning Guidance**
 - CPG Altering and extending your home (2019)
 - CPG Amenity (2018)
 - CPG Basements (2018)
 - CPG Biodiversity (2018)
 - CPG Design (2019)
 - CPG Developer contributions (2019)
 - CPG Energy efficiency and adaption (2019)
 - CPG Interim Housing (2019)
 - CPG Transport (2019)
 - CPG Trees (2019)
 - CPG Water and flooding (2019)

Basement application procedure

A Basement Impact Assessment (BIA) is required to be submitted for all planning applications for basement development.

The BIA should 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 details on BIAs can be found in CPG ‘Basements’. For completeness, please ensure that the report details the author’s own professional qualifications, noting the varying qualification requirements within CPG ‘Basements’ for the different elements of a BIA study.

The submitted BIA will be required to 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.

Please note that the Council’s preferred provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charges a fixed fee dependent on the category of basement audit, outlined in Appendix A of Camden’s BIA audit service terms of reference.

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. You will need to complete the Basement Impact Assessment Audit Instruction Form on Camden’s website; please see Section B of this form for a full list of items to be included in your BIA. You will need to fill out this section of the form and return to us alongside any formal submission. Please note that a £20 administration fee will be added to the overall invoice for the BIA audit to cover the costs of the Council processing the application.

Planning application information

The following documents should be included with the submission of a valid planning application:

- Completed application form – Householder Planning Permission
- The appropriate fee (£206)
- 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'
- 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
- Arboricultural Impact Assessment and Tree Protection Plan
- Basement Impact Assessment (BIA)
- BIA Audit Instruction Form with section B completed
- Noise Impact Assessment for proposed plant
- Please see [supporting information for planning applications](#) for more information.

We would strongly encourage you to share and discuss your proposals with neighbouring properties before submitting a planning application. We are legally required to consult on applications with individuals who may be affected by the proposals. We will 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.

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.