

**19 Holmdale Road, London NW6 1BJ**

# Housing Quality Assessment

For Mr Arnon Katz/Tribi Holdings Limited

**November 2020**



Doyle Town Planning + Urban Design

# 1 Housing Quality Assessment

## Introduction

- 1.1 This report assesses the quality of the proposed new or extended dwellings against the design standards for new homes in London set out in the 2016 London Plan and the Housing Supplementary Planning Guidance (SPG) published in March 2016 and Camden Local Plan Policy D1: Design.

## London Plan Policy on housing quality

- 1.2 London Plan Policy 3.5(a), Quality and Design of Housing Developments, states that Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. Developments should take account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live.
- 1.3 London Plan Policy 3.5(b), states that the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- 1.4 London Plan Policy 3.5(c), states that boroughs should seek to ensure that new development reflects requirements for accessibility and adaptability: minimum space standards and water efficiency. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process.
- 1.5 London Plan Policy 3.5(d) states that development proposals that compromise the delivery of elements of policy 3.5 may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.

## Housing Supplementary Planning Guidance (SPG)

- 1.6 The assessment below is structured using the headings set out in the London Plan Housing SPG, Part 2: Quality.

## Camden Local Plan 2017 Policy D1 Design

- 1.7 Camden Local Plan 2017 Policy D1 Design seek to secure high-quality design in development. The Council will resist development of a poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 1.8 Policy D1 requires that development:
- i. respects local context and character;
  - ii. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;

- iii. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- iv. is of sustainable and durable construction and adaptable to different activities and land uses;
- v. comprises details and materials that are of high quality and complement the local character;
- vi. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- vii. is inclusive and accessible for all;
- viii. promotes health;
- ix. is secure and designed to minimise crime and antisocial behaviour;
- x. responds to natural features and preserves gardens and other open space;
- xi. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- xii. incorporates outdoor amenity space;
- xiii. preserves strategic and local views;
- xiv. for housing, provides a high standard of accommodation; and
- xv. carefully integrates building services equipment.

1.9 Section 7.32 Design of housing (the explanatory text to Policy D1 Design) states that all residential developments are required to be designed and built to create high-quality homes and sets out a series of criteria:

- i. is self-contained and has its own secure private entrance;
- ii. has good ceiling heights and room sizes;
- iii. is dual aspect except in exceptional circumstances;
- iv. has good natural light and ventilation;
- v. has good insulation from noise and vibration;
- vi. has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities);
- vii. incorporates adequate storage space;
- viii. incorporates outdoor amenity space including balconies or terraces; and
- ix. is accessible and adaptable for a range of occupiers.

- 1.10 The Plan states that new dwellings and conversions to residential use will be expected to meet the government's nationally described space standard as set out in London Plan Table 3.3 and to adhere to the Mayor's Housing Supplementary Planning Guidance.

#### Description of development

- 1.11 The proposed development comprises three main elements:
- The creation of a **new** self-contained basement flat. As a new unit (as opposed to an existing dwelling that is being adapted or extended) this must fully meet relevant housing policies.
  - The **extension** and enlargement of an existing studio flat to form a one-bedroom flat.
  - **Internal** alterations to the layout of an existing ground floor one bedroom flat with amended rear garden access.

## 2 Assessment

### Standard 1 and 2 - Defining Good Places

*Development proposals should demonstrate:*

*a How the design responds to its physical context, including the character and legibility of the area and the local pattern of building, public space, landscape and topography.*

*b How the scheme relates to the identified character of the place, to the local vision and strategy or how bolder change is justified in relation to a coherent set of ideas for the place expressed in the local vision and strategy or agreed locally.*

*Standard 2 - Development proposals should demonstrate:*

*a How the scheme complements the local network of public spaces, including how it integrates with existing streets and paths.*

*b How public spaces and pedestrian routes are designed to be overlooked and safe, and blank elevations onto the public realm at ground floor have been avoided.*

*c For larger developments, how any new public spaces including streets and paths are designed on the basis of an understanding of the planned role and character of these spaces within the local movement network, and how new spaces relate to the local vision and strategy for the area.*

- 2.1 The proposed development involves a small-scale development of an existing property, and some of these standards are not therefore directly relevant.
- 2.2 The proposed opening out of the front light well and creation of a canted bay window at front lower ground floor level will reflect the historic form and details of the immediate neighbours and reinstate a characteristic feature of the street.
- 2.3 The proposals will not affect the school playground to the rear, which is at a higher level and masked by a tall boundary wall.

### Standards 3 and 4 - Communal and public open space

*Standard 3 - Development proposals should demonstrate that they comply with the LPAs' open space strategies, ensuring that an audit of surrounding open space is undertaken and that where appropriate, opportunities to help address a deficiency in provision by providing new public open spaces are taken forward in the design process.*

*Standard 4 - Where communal open space is provided, development proposals should demonstrate that the space:*

*is overlooked by surrounding development;*

*is accessible disabled people including people who require level access and wheelchair users;*

*is designed to take advantage of direct sunlight; has suitable management arrangements in place.*

#### Public open space

- 2.4 Camden Local Plan Map 2: Locations deficient in access to open space (page 199) indicates that the property is within 280m of two larger publicly accessible open space: This is the highest tier of accessibility.
- 2.5 The proposals will not affect the remaining area of the 160 Mill Lane Community Garden (Local Plan revised allocation CaL03) to the rear, which does not immediately adjoin the back of the application property.

### Layout

- 2.6 London Plan standards require a minimum of 5 sq. m of private outdoor space for 1-2 person dwellings with an extra 1 sq. m provided for each additional occupant. Camden's planning guidance states that new homes should meet the open space standard of 9 sq. m per resident.
- 2.7 The proposed development is small-scale and relates to an existing property.
- 2.8 The proposals retain a generous area of communal private open space to the rear.
- 2.9 The existing ground floor flats and proposed new basement flat will have direct access to private, communal outdoor amenity space of 57 sq m including a square lawn of 29 sq m.
- 2.10 The proposed basement Flat 3 will also enjoy access to a private rear patio area and a small area in the front light well in addition to access to the communal garden.
- 2.11 There will be no change to upper floor dwellings that have no access to private outdoor amenity space.

### Sunlight and daylight

- 2.12 The sunlight and daylight report submitted with the application (section 8.2) confirms that the proposed development does not affect sunlight to nearby gardens or amenity areas.
- 2.13 Section 8.4 of the sunlight and daylight report confirms that the recommendations of the BRE Guide on sunlight to amenity areas for the flats are satisfied.
- 2.14 The BRE Guide recommends that amenity or garden areas should have at least two hours of sunlight over 50% of the area on 21<sup>st</sup> March. The garden at the rear of the flats has sunlight to more than 50% of the area from sunrise to 1.30 pm.

### Accessibility

- 2.15 A level/very shallow threshold has been provided to the proposed extended rear ground floor apartment and from the proposed basement flat into the back patio.

### Standard 5 – Playspace

*For developments with an estimated occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the Mayor's Play and Informal Recreation SPG.*

- 2.16 The property is currently arranged as 6 x self-contained flats (3x 1-bed and 3x studios). The proposed extension of the ground floor rear flat and new basement flat will not increase the child occupancy above ten.

### Standard 6 – Density

*Development proposals should demonstrate how the density of residential accommodation satisfies London Plan policy relating to public transport access levels (PTALs) and the accessibility of local amenities and services and is appropriate to the location.*

- 2.17 There are 9 PTAL levels: 0, 1a, 1b, 2, 3, 4, 5, 6a and 6b where 0 is very low and 6 is very high. A location will have a higher PTAL if:
  - It is at a short walking distance to the nearest stations or stops

- Waiting times at the nearest stations or stops are short
- More services pass at the nearest stations or stops
- There are major rail stations nearby
- Any combination of all the above.

2.18 The PTAL score for 19 Holmdale Road is 5, the second-highest. The property, therefore, enjoys a high level of public transport accessibility and is close to local amenities and services.

2.19 Given these circumstances, the site is generally considered to be suitable for higher density development in accordance with the London Plan Density Matrix.

## Standard 7 – Residential Mix

*Development proposals should demonstrate how the mix of dwelling types and sizes and the mix of tenures meet strategic and local need and are appropriate to the location.*

2.20 The residential mix currently comprises:

Type	GEA	Bedroom size (sq m)	Bedspace*
Ground Floor 1 Bed Flat	38 sq m	15	2
Ground Floor Studio	22.1 sq m	-	1
First Floor 1 Bed Flat**	43.5 sq m	14	2
First Floor Studio**	26 sq m	-	1
Second Floor 1 Bed Flat**	43 sq m	11.5	1
Second Floor Studio**	24 sq m	-	1
<b>Total</b>	<b>6</b>		<b>8</b>

\*Occupancy/bed spaces have been determined according to London Plan standard -minimum area of a single bedroom should be 8 sq m. The minimum area of a double or twin bedroom should be 12 sq m.

\*\* First and second-floor flats do not form part of this application.

Figure 2:1 Existing Residential Mix- Unit Type

2.21 The proposed mix comprises (no changes are proposed to the first and second-floor flats, which are excluded from the application).

Type	GEA	Bedroom size (sq m)	Bedspace*
Basement 1 Bed Flat (new)	80 sq m	14.5	2
Ground Floor 1 Bed Flat	38 sq m	15	2
Ground Floor 1 Bed Flat (extended)	31 sq m	8	1
First Floor 1 Bed Flat**	43.5 sq m	14	2
First Floor Studio**	26 sq m	-	1
Second Floor 1 Bed Flat**	43 sq m	11.5	1
Second Floor Studio**	24 sq m	-	1
<b>Total</b>	<b>7</b>		<b>10</b>

\*Occupancy/bed spaces have been determined according to London Plan standard -minimum area of a single bedroom should be 8 sq m. The minimum area of a double or twin bedroom should be 12 sq m.

\*\* First and second-floor flats do not form part of this application.

Figure 2:2 Proposed Residential Mix – Unit Type

2.22 Camden Local Plan Policy H6, Housing choice and mix, states that the Council will negotiate types of housing included in a development and (i) 'require a range of dwelling sizes in accordance with Policy H7, Large and small homes'.

- 2.23 Camden Local Plan Policy H7 Large and small homes seeks to ensure that all housing development, including conversion of existing homes and non-residential properties:
- contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and*
  - includes a mix of large and small homes. We will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:*
  - the different dwelling size priorities for social-affordable rented, intermediate and market homes;*
  - any evidence of local needs that differ from borough wide priorities;*
  - the character of the development, the site and the area, including the impact of the mix on child density;*
  - site size, and any constraints on developing the site for a mix of homes of different sizes;*
  - the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and*
  - the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.*
- 2.24 The site area is below 0.5 ha. The proposed development relates only to the basement and ground floor of the building. The general configuration of the building constrains the achievable, viable mix.
- 2.25 The proposed development is only made viable by a net increase in unit numbers. The creation of the new basement flat, therefore, provides both the opportunity and cross-funding to improve the quality of the two existing ground floor flats.
- 2.26 The proposals extend a tiny and cramped ground floor rear studio apartment to create a more extensive one bed flat with garden access. The reduction in the number of studio units and increase in 1-bed flats is considered a better mix.
- 2.27 The proposed basement flat is to a generous standard. This new flat cannot accommodate any more habitable rooms, such as a second bedroom, because these rooms will fall too far below sunlight and daylight standards.
- 2.28 As noted in section 5, above, the proposed development will not increase the child occupancy above ten.
- 2.29 The net increase of 1 unit is considered insufficient in scale and value to cross-fund affordable housing provision on this site or elsewhere.

## Standard 8 and 9 – Entrance and approach

*All main entrances to houses, ground floor flats and communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm.*

*The distance from the accessible car parking space of standard 18 to the home or to the relevant block entrance or lift core should be kept to a minimum and should be preferably level or where level is not possible, gently sloping (1:60 – 1:20) on a suitable ground surface.*

- 2.30 The existing and new flat entrances are all directly accessible from the street.
- 2.31 The entrance to the extended ground floor rear flat will be accessible from the ground floor hallway, as at present.



- 2.32 The new basement flat will have a separate entrance via the front lightwell and staircase.

### Standard 10 – Active frontages

*Active frontages should be maximised and inactive frontages minimised on the ground floor of buildings facing publically accessible space, in order to provide natural surveillance and activity.*

- 2.33 The property already presents an active frontage to the street. The main entrance and bay window facing the street provide natural surveillance at ground floor level. The layout of flat 1 will be reversed with the living room facing the street, increasing surveillance.
- 2.34 The proposed lower ground floor front bay window faces the street and provides natural surveillance of the front light well, which is currently a dark and secluded space with inadequate surveillance.

### Standard 11 – Access

*90 per cent of new-build housing should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation requirement M4(3) 'wheelchair user dwellings'.*

- 2.35 The proposed development does not comprise new-build housing.
- 2.36 The proposed basement flat (Flat 3) is the only new dwelling created. This will have a level entrance threshold and entrance level toilet. There will be a level threshold between the rear living room and the back patio. The proposed bathrooms will meet 'lifetime homes' standard'.
- 2.37 The proposed enlarged flat (Flat 2) at ground floor level will have level flat entrance threshold and bathroom at entrance level. There will be a level threshold between the rear living room and the rear communal garden.

### Standards 12- 16 Shared circulation

*Each core should be accessible to generally no more than eight units on each floor.*

*An access core serving 4 or more dwellings should provide an access control system with entry phones in all dwellings linked to a main front door with electronic lock release. Unless a 24 hour concierge is provided, additional security measures including audio-visual verification to the access control system should be provided where any of the following apply:*

- *more than 25 dwellings are served by one core, or*
- *the potential occupancy of the dwellings served by one core exceeds 100 bed spaces, or*
- *more than 8 dwellings are provided per floor.*

*Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.*

*All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.*

*It is desirable that every wheelchair user dwelling is served by more than one lift.*

- 2.38 The development falls below the various standard thresholds. The existing building extends to three storeys, which will rise to four storeys with the addition of the basement level. Six dwellings will be accessible from the main stair core (as existing) with new basement flat accessed from the front light well.
- 2.39 The main staircase is illuminated from the glazed front entrance door and from above, via an existing skylight.

### Standard 17-19 Parking

*The maximum standards set out below should be the basis for considering planning applications*

*Each designated wheelchair accessible dwelling should have a car parking space that complies with Part M4 (3).*

*Careful consideration should be given to the siting and organisation of car parking within an overall design for open space so that car parking does not negatively affect the use and appearance of open spaces.*

- 2.40 The property is currently divided into six flats with no off-street parking provision and no capacity to provide this on site.
- 2.41 As noted above, the application site is located within an area of high public transport accessibility (PTAL 5), where there off-street parking is not encouraged. There are resident parking bays in front of the property.
- 2.42 The addition of one new 1-bed unit is expected to provide only a very marginal uplift in demand for on-street parking spaces.

### Standards 20-21 - Cycle Parking

*Standard 20 (Policy 6.9)- All developments should provide dedicated storage space for cycles at the following level:*

*1 per studio and one bed*

*2 per all other dwellings.*

*In addition, one short stay cycle parking space should be provided per 40 units.*

*Standard 21 - Individual or communal cycle storage outside the home should be secure, sheltered and adequately lit, with convenient access to the street. Where cycle storage is provided within the home, it should be in addition to the minimum GIA and minimum storage and circulation space requirements. Cycle storage identified in habitable rooms or on balconies will not be considered acceptable<sup>1</sup>.*

*1 For more detail see: Transport for London Cycle Design Standards available from <https://t.gov.uk/rate/publications-and-reports/cycling>*

- 2.43 London Plan Hosing Design Guide (3.4.1) states that all developments should provide dedicated storage space for cycles at the following levels:
- 1 per 1- or 2-bedroom dwelling; or
  - 2 per 3 or more-bedroom dwelling
- 2.44 The proposals include provision for three cycle parking spaces: Two to the rear communal garden space and one in the front lightwell.
- 2.45 There is insufficient space to provide cycle parking to the front garden. However, there are on-street covered parking spaces available in Holmdale Road near the junction with Mill Lane.

## Standards 22- 23 refuse and storage

*Standard 22 - Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.*

*Standard 23 - Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings.*

- 2.46 Bin storage for seven wheeled bins is proposed within the front garden area to allow easy collection from the public highway.
- 2.47 Storage provided will be as follows:
- 2 X 240L Residual Waste Bins
  - 4 x 240L Dry Recycling Bins
- 2.48 The refuse and recycling arrangements are set out in detail in the submitted plans.

## Standard 24 -dwelling space standards

*All new dwellings should meet the nationally described space standard1. 1 DCLG. Technical housing standards - nationally described space standard. 2015*

- 2.49 London Plan Policy 3.5 refers to the The Greater London Authority Housing SPG and Technical Housing Standards.
- 2.50 The Technical housing standards – nationally described space standards, adopted by the London plan includes minimum space standards for the creation of new residential flats.
- 2.51 The table below compares space standards for the existing and proposed schemes.

Floor	Unit No.	Mix	Area (sq m)	Hab. Rooms	Living dining kitchen	Bed 1	Bed 2	Bath 1	En suite/ ancillary
Ground Floor	Flat 1	1 bed	38	2	15.1	15 (2P)	-	Shower	-
	Flat 2	Studio	22.1	1	-	-	-	Shower	-
First Floor	Flat 3	1 bed	43.5	2	20	14 (1P)	-	Shower	-
	Flat 4	Studio	26	1	-	-	-	Shower	-
Second Floor	Flat 5	1 bed	43	2	20.2	11.5 (1P)	-	Shower	-
	Flat 6	Studio	24	1	-	10.4 (1P)	-	Shower	-

Figure 2:3 Habitable Room Standards (Existing)

- 2.52 Proposed mix- no changes are proposed to the first and second-floor flats, which are excluded from the application.

Floor	Unit No.	Mix	Area (sq m)	Hab. Rooms	Living dining kitchen	Bed 1	Bed 2	Bath 1	En suite/ ancillary
Basement	Flat A (new)	1 bed	80	2	35.5	14.5	-	Bath	WC
Ground Floor	Flat 1 (extended)	1 bed	31	2	15.1	15 (2P)	-	Shower	-
	Flat 2	Studio	22.1	1	-	-	-	Shower	-
First Floor	Flat 3	1 bed	43.5	2	20	14 (1P)	-	Shower	-
	Flat 4	Studio	26	1	-	-	-	Shower	-
Second Floor	Flat 5	1 bed	43	2	20.2	11.5 (1P)	-	Shower	-
	Flat 6	Studio	24	1	-	10.4 (1P)	-	Shower	-

Figure 2:4 Habitable Room Standards (Proposed)

- 2.53 The proposed basement flat will fully comply with minimum space standards as set out within the London Plan at Table 3.3 and the Housing SPG (Standard 24) and exceeds the relevant space standards.
- 2.54 The extended ground floor rear flat (Flat 2) will be extended from 22.1 to 31 sq m: This is a 140% increase, although still below the 37 sq m minimum.
- 2.55 The area of the existing ground floor front flat (Flat 1) will not change, although the internal layout will be improved.
- 2.56 London Plan Policy 3.5(d) Quality and Design of Housing Developments states that development proposals that compromise the delivery of elements of policy 3.5 (the housing standards) may be permitted if they are demonstrable of exemplary design and contribute to the achievement of other objectives of this Plan.

#### Storage space

- 2.57 The basement flat will have over 1.5 sq m of storage space and exceed the London Plan standard for 1-bed units.
- 2.58 The extended ground floor flat will have more than the one sq m of storage space and will meet the London Plan standards for a 1bed/ 1-person unit.

#### Standard 25 dwelling plans

*Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy and the furniture schedule set out in Approved Document Part M.*

- 2.59 The submitted proposed plans indicate the arrangement of furniture relating to the level of occupancy and demonstrate that the size and proportions of rooms and circulation are satisfactory.

## Standard 26 and 27– Private open space

*A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.*

*The minimum depth and width for all balconies and other private external spaces should be 1500mm.*

*‘External private amenity space of a sufficient size and type to satisfy its proposed residents’ needs. This is normally expected to be 20sqm per flat and 50sqm for family housing (including ground floor flats).’*

- 2.60 The London Plan Housing SPG sets out a baseline minimum standard amount for the provision of amenity space in new developments.

- 2.61 Camden Local Policy DMP 19, Residential Amenity Space, requires that all new dwellings have external private amenity space of sufficient size and type to satisfy its proposed residents’ needs.

Type	Private external space	Total
<b>Basement 1 Bed Flat (new)</b>	Private 6 sq m front lightwell patio Private 10 sq m rear patio. Stepped access to 31 sq m communal rear lawn (34%)	26.6 sq m
<b>Ground Floor 1 Bed Flat</b>	Access to 31 sq m communal lawn (33%)	10.2 sq m
<b>Ground Floor 1 Bed Flat (Enlarged)</b>	Access to 31 sq m communal lawn (34%)	10.2 sq m
<b>Total</b>	Total usable external amenity space*	47 sq m
* Excludes front garden footpaths, refuse area and rear side return passageway.		

Figure 2:5 Amenity Space Standards (Proposed)

- 2.62 The residents of each of the proposed new or adapted dwellings will have access to generous private and communal amenity space.
- 2.63 The proposals meet the London Plan Housing SPG. Table 8.5 levels.
- 2.64 The proposals will meet the residential amenity space target under Policy DMP19.

## Standard 28 – Privacy

*Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces (Based on: Secured by Design).*

- 2.65 The flats have been designed with principal aspects to the front and rear, limiting any privacy or overlooking.
- 2.66 Planting and opaque glazing to the rear side passage will ensure privacy.
- 2.67 The layout of the existing ground floor Flat 1 has been amended so that the living space is to the front, facing the street, with the bedroom to the rear.
- 2.68 The reinstatement of the front garden gate and walls will increase both privacy and enhance security.

## Standard 29 – Dual aspect

*Developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided<sup>1</sup>.*

*1 PPG 24 1994 ibid. See also CLG NPPF 2012 ibid para 123 DEFRA. Noise Policy Statement for England. Explanatory Note. DEFRA, 2010*

- 2.69 A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the exterior walls of a dwelling wrap around the corner of a building (the provision of a bay window does not constitute dual aspect).
- 2.70 All proposed new and adapted dwellings (Flats 1, 2 and 3) will have a dual aspect.

## Standard 30 (and Policy 7.15) - Noise

*The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound-sensitive rooms within dwellings.*

- 2.71 The 'stacking' of the proposed new and extended dwellings has been carefully arranged.
- 2.72 The proposed layout of ground floor Flat 1 has been adapted so that the living room is below the first-floor living room above and the bedroom is below the bedroom above: This improves considerably on the current stacking arrangement with a living room over a bedroom.
- 2.73 The living room of the extended ground floor Flat 2 is now positioned in the new conservatory extension. The existing flat above is a studio. The bed space of proposed extended Flat 2 will now be below the bathroom and kitchen rather than the higher traffic studio/living space, which improves upon the current arrangement.
- 2.74 The main living space of the proposed new basement Flat 3 will be below the main living space of Flat 2 above.
- 2.75 The floor level of the new basement flat has been deliberately made lower and ceiling higher to allow space for better noise insulation standards whilst still maintaining floor to ceiling heights. See submitted drawing reference 'Proposed Detail 1' (reference: 3019(PLA)312).
- 2.76 No internal circulation spaces- hallways and stairs- are positioned over habitable rooms.

## Standard 31 – Floor to ceiling heights

*A minimum ceiling height of 2.5 metres for at least 75% of the gross internal area is strongly encouraged.*

- 2.77 The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling.
- 2.78 The table below demonstrates that the proposals will fully meet the National standards and will partly meet the London plan standards.

Unit No.	Minimum Ceiling height Height in meters over at least 75% of the gross internal area of the dwelling.	
	Floor to ceiling heights	National Space Standards
Flat 1	3.0m	2.3
Flat 2	2.40m	2.3
Flat 3	2.40m	2.3

Figure 2:6 Ceiling Height Standards

- 2.79 It is impractical to change the ceiling heights of the existing ground floor dwellings, although both exceed national standards. Flat 1 exceeds both the National and London Plan standard.
- 2.80 The proposed basement flat floor to ceiling height exceeds the national standard but is slightly lower than the London Plan standard, which is 'strongly encouraged' rather than a requirement. Further increasing the proposed basement floor to ceiling height will increase construction impacts and increase the impact of construction on neighbours, which on balance is not considered desirable.

### Standard 32 Sunlight and daylight

*All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.*

- 2.81 The proposed development has been carefully designed, in association with on-going daylight, sunlight and overshadowing technical studies, to ensure that the proposed layout achieves good natural daylight and sunlight levels.
- 2.82 The Sunlight and Daylight Assessment submitted in support of the application shows that the quality of light within the development has been maximised wherever possible and concludes that the internal daylight and sunlight will meet or exceed the nationally prescribed standards.
- 2.83 The existing ground floor flats have been assessed against the BRE criteria and found to be suboptimal in several respects: This creates a strong impetus to consider alternative layouts that provides better lit accommodation.
- 2.84 The rooms at basement and ground floor of the new flats will all have daylight and sunlight that meets the recommendations of the BRE Guide.
- 2.85 All habitable rooms achieve recommended daylight targets, and all living rooms will receive direct sunlight.
- 2.86 The outer envelope of the building will not alter significantly; there will therefore be no adverse effect on daylight or sunlight to nearby buildings. The assessment demonstrates that there will be no alteration to the daylight and sunlight to surrounding properties.
- 2.87 The proposals, therefore, accord with London Plan Policy 7.6.

### Standard 33– Air quality

*Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).*

- 2.88 The proposed development is not expected to affect air quality.

### Standard 34– Environmental Performance

*All homes should satisfy London Plan policy on sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change.*

- 2.89 London Plan Policy 5.3, Sustainable Design and Construction, states that whilst all development proposals should demonstrate sustainable design, only ‘major’ development proposals should be subject to sustainability appraisal. The proposed development is a conversion project and is not classified as a ‘Major’ project.
- 2.90 The development does not incorporate cooling systems. However, it is unlikely to need to rely on such systems in the future (see standard 3.6 below).
- 2.91 A sustainable drainage strategy and sustainable urban drainage scheme submitted with the application sets out measures for efficient use of natural water resources.
- 2.92 The proposed development will not increase noise or air pollution. An increase in soft planted areas and sustainable urban drainage measures will reduce pollution as a result of urban runoff.
- 2.93 Proposed refuse arrangements will help to reduce waste and maximising reuse or recycling.
- 2.94 The proposed flood risk strategy and outline sustainable drainage scheme will avoid and mitigate impacts from natural hazards such as flooding.
- 2.95 The proposed rear garden soft planted area will increase support for biodiversity. The development will not affect the adjacent nature garden and will therefore protect biodiversity and green infrastructure.
- 2.96 The development will meet all relevant statutory standards set out in the Building Regulations - including energy efficiency, water efficiency, sanitation, sound resistance and ventilation: This includes Part L energy efficiency and carbon dioxide emissions and Part G limits on domestic water use.

### Standard 35 (and Policy 5.2) – Energy and CO2

*Development proposals should be designed in accordance with the LP energy hierarchy, and should meet the following minimum targets for carbon dioxide emissions reduction.*

*Year Improvement on 2013 Building Regulations 2014 - 2016 35 per cent<sup>1</sup>*

*2016 - 2036 Zero carbon (As set out in the Mayor’s Sustainable Design and Construction SPG 2014 (paragraph 2.4.3) and the Energy Planning - GLA Guidance on preparing energy assessments).*

- 2.97 Detailed energy assessments to demonstrate compliance with the zero-carbon target set out in London Plan Policy 5.2 are not a policy requirement for minor conversion schemes.
- 2.98 The development will comply with Part L of the Building Regulations covering energy efficiency and maximum carbon dioxide emissions for occupied buildings.



**Standard 36 (and Policy 5.9) – Overheating**

*Development proposals should demonstrate how the design of dwellings will avoid overheating without reliance on energy intensive mechanical cooling systems.*

- 2.99 The existing building is late Victorian and constructed of solid brick with dual aspect dwellings. It is therefore unlikely to need to rely on mechanical cooling systems.

**Standard 37 – Water**

*New dwellings should be designed to ensure that a maximum of 1051 litres of water is consumed per person per day in line with the optional requirement of Part G.*

*1 Excluding an allowance of 5 litres or less per head per day for external water use (as set out in MALP and 'optional' Requirement G2 of Schedule 1 to the Building Regulations 2010 )*

- 2.100 The development will meet the requirements of the updated Part G of the Building regulations.

**Standard 38 – Flooding and water**

*Where development is permitted in an area at risk of flooding, it should incorporate good resilient design in accordance with the NPPF and its associated technical Guidance<sup>1</sup> whilst ensuring level access is maintained.*

- 2.101 The Basement Impact Assessment prepared by LBHGEO has identified that the site to be within an area at a high risk of surface water flooding and a Flood Risk Assessment (FRA) is submitted with the application.
- 2.102 A Surface Water Drainage Strategy and Outline Sustainable Drainage Strategy has been prepared to mitigate any risk of flooding as a result of rainwater falling on the site. This assessment demonstrates the overall level of flood risk has been reduced through the appropriate application of sustainable drainage systems. The report outlines various SuDS features that will restrain runoff in accordance with Camden Local Plan Policy CC3.

**Standard 39 - Flooding and water**

*New development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of achieving a Green field run-off rate, increasing biodiversity and improving water quality. Surface water run-off is to be managed as close to source as possible.*

*1 Technical Guidance to the National Planning Policy Framework, Department for Communities and Local Government, March 2012 or any subsequent guidance on flood risk issued in support of the NPPF*

- 2.103 Details of a Drainage Strategy and Sustainable Urban drainage Scheme are submitted with the application.

**Standard 40 – Ecology**

*The design and layout of new residential development should avoid areas of ecological value and seek to enhance the ecological capital of the area in accordance with GLA best practice guidance on biodiversity and nature conservation.*

- 2.104 Proposed soft landscape enhancements will support biodiversity and nature conservation.
- 2.105 The proposals will not affect the designated nature area to the rear of the site.

## **Standard 41 – Design process**

*Developments should manage existing materials, specify sustainable materials that are robust and for purpose and secure the sustainable procurement of materials.*

- 2.106 Please refer further details of materials detailed in the submitted plans.