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London  
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**Via Planning Portal only**

15<sup>th</sup> February 2021

Dear Sir/madam

**FULL PLANNING PERMISSION - THE TOWN & COUNTRY PLANNING ACT 1990**

**AMALGAMATION OF TWO 3-BED FLATS TO CREATE ONE 5-BED FLAT THROUGH THE RECONFIGURATION OF THE INTERNAL LAYOUT**

**FLATS 23 AND 24, 55-57 HOLMES ROAD, LONDON, NW5 3AN**

Please accept this covering letter as an accompaniment to this full planning application for the proposed amalgamation and reconfiguration of flats 23 and 24 at 55-57 Holmes Road. This letter provides a summary of the site and the proposed development.

Please also find enclosed a completed application form and a full set of existing and proposed plans including site location plan.

**The site**

The application site comprises two 3-bed flats located on the fourth floor of the building located on the south side of Holmes Road. The existing building comprises a mix of commercial uses to the basement, ground and first floors, whilst the upper floors (level 2-6) are residential flats.

In terms of the site's planning policy context, it is located within the Kentish Town Neighbourhood Plan Area. The properties either side of the site at 41 and 63 Holmes Road are locally listed.

**The proposal**

This application seeks full planning permission to amalgamate the two existing 3-bed flats to create one 5-bed residential flat through the reconfiguration of the internal layout.

The proposed development includes no external alterations or extensions to the property.

Please refer to the supporting plans for full details of the proposed development.

## **Planning Policy**

### **National Planning Policy**

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental, and social. The following sections are relevant to the consideration of this application; Section 11 (making effective use of land), Section 12 (achieving well designed places), and Section 16 (conserving and enhancing the historic environment).

### **Local Planning Policy**

For the purposes of this application, the adopted Development Plan comprises the London Plan (Publication London Plan 2020), the Camden Local Plan (2017) and the Camden Planning Guidance (CPG) Documents. The following policies are considered relevant to the consideration and determination of this application:

#### **London Plan 2020**

- Policy D6 – Housing Quality and Standards
- Policy H8 – Loss of Existing Housing and Estate Redevelopment
- Policy H10 – Housing Size Mix

#### **Camden Local Plan 2017**

- Policy H3 – Protecting Existing Homes
- Policy H6 – Housing Choice and Mix
- Policy T2 – Transport
- Policy D1 – Design

#### **Camden Planning Guidance (CPG)**

- Housing CPG

The site also lies within the area of the Kentish Town Neighbourhood Plan (KTNP) although it is considered that there are no policies in the KTNP specific to the proposed development.

## **Planning Assessment**

### **Loss of Residential Unit**

Policy H3 of the Camden Local Plan seeks to protect existing homes throughout the Borough. It states that the Council will aim to ensure that existing housing continues to meet the needs of existing and future households by:

- a. *Resisting development that would involve a net loss of residential floorspace*
- b. *Protecting housing from permanent conversion to short stay accommodation*
- c. *Resisting development that would involve the net loss of two or more homes (from individual or cumulative proposals)*

The supporting text to the policy (paragraph 3.75) states that the net loss of one home is acceptable when two dwellings are being combined into a single dwelling.

The Camden Planning Guidance SPD 'Housing' reiterates the policy advice, stating that the Council does not generally seek to resist schemes combining dwellings where they involve the loss of a single home. As part of this assessment, the policy guidance advises that the Council will resist the incremental loss of homes through subsequent applications to combine further homes within the same building or site.

In this case, the proposal would comply with Policy H3 as it would result in the net loss of only one home, and the building has not been subject to any previous applications for proposals resulting in the net loss of any homes. Furthermore, no residential floorspace would be lost.

#### Car Parking

Policy T2 of the Camden Local Plan requires all new developments within the borough to be car-free. The policy states that the Council will not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits. In addition, the policy advises that the Council will limit onsite parking to spaces designated for disabled people where necessary and/or essential operational or servicing needs.

The supporting text to the policy does advise however that if the existing occupiers are to return to the address when the development is completed the Council will consider retaining or re-providing existing parking provision.

In this instance, the applicant currently resides at the property and will be a returning a resident. It is therefore considered acceptable for the applicant to retain the use of their existing one car parking space.

#### Residential amenity

Policy A1 of the Camden Local Plan seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. Further guidance is provided in CPG Amenity which sets specific standards of development.

The proposed amalgamation of the existing flats into one flat would have no discernible impact on the amenity of neighbouring occupiers by virtue of noise or disturbance, both to

neighbours within the building and in the surrounding area. No external alterations and extensions are proposed and as such the proposed development will not result in overlooking, loss of light or overbearing impacts to neighbours.

The resulting flat will meet required internal floorspace standards and as a result will provide a high-quality home in accordance with Policy H6 of the Camden Local Plan.

### Summary

As demonstrated within this letter and supporting documents, the proposed works and amalgamation of the existing two flats is considered acceptable in terms of the loss of a single residential unit, parking, and residential amenity. The development is in accordance with the relevant Development Plan policies and it is therefore respectfully requested that planning permission is granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the application but if you require any points of clarification or have any questions please do not hesitate to contact me.

Yours faithfully

**Stuart Minty**  
**Director**  
**SM Planning**