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Dear Helen Barrett,

Re: 5-7 Belsize Grove, NW3 4UT

Thank you for submitting a pre-planning application enquiry for the above property.

The advice below is based on the information provided by the applicant, Google and Bing aerial views and general desktop assessment. An initial virtual meeting on MS Teams took place on 23/09/2021 where the applicant team clarified some elements of the proposed scheme.

Development Description

Deep retrofit of two buildings to include eternal and/or internal insulation, secondary glazing and/or replacement of windows and new heating systems.

Due to the nature of some of the proposed works, planning permission would not be required. The advice would clarify when this is the case.

Site description

The application site is located on the western side of Belsize Grove, in between the crossroads with Primrose Gardens and Belsize Park Gardens.

The site comprises two semi-detached buildings with fourth floors and rooms in the attic. The front of the buildings is rendered, whilst the rear is mainly brick with rendered bay windows. The buildings are currently in use as an HMO (Sui Generis).

The site lies within Belsize Conservation Area. The conservation area statement mentions as negative features that the properties have been denuded of all original details.

Assessment

- What works constitute Permitted development
- What works would require Planning permission and what are the main issues for consideration, these include:
 - Sustainability

- Design and Heritage
- Impact on amenity
- Trees and vegetation

Permitted Development

- As the properties are not listed, any internal works to the buildings would not require planning permission, such as secondary glazing, internal wall insulation and internal roof insulation.
- In order to receive a formal confirmation from the council that the works would not require planning permission you can apply for Certificate of Lawful Development.

Internal insulation:

- This type of work would not require planning permission.
- This would require less maintenance and have a much longer lifespan as it would not be exposed to the elements.
- The documentation indicates that some of the rooms within the HMO would result in being uninhabitable if insulation is installed internally. If this is the case, then it is likely that the rooms in their current form do not provide a good standard of accommodation and you are advised to re-consider the internal layouts.

Windows

Secondary glazing:

- Secondary glazing would generally be supported and would not require planning permission. See below info about double and triple glazing.

Double glazing:

- This works would not require planning permission (as are not considered development) - subject to the replacement windows matching the existing windows in terms of shape and dimensions of window opening, frame material and dimensions to include frame profile width and depth, fenestration pattern, to include the layout/pattern of glazing bars, size and placement of structural glazing bars, opening method such as sliding sash outward or inward opening casement window, tilt-and-turn etc. Please see CPG Home Improvements – External alterations – windows and doors
- You are can consider Slim double glazing windows and if more airtightness is required, you can also install secondary glazing. Again, if the material and detail match the existing, these works do not require planning permission.

Planning permission

As the property lies within Belsize Conservation Area, officers have the statutory duty to ensure that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the conservation area, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013. Given the nature of the works currently proposed it is unlikely that they would enhance the character and appearance of the building and therefore the test relies on preservation.

External insulation to front:

- The front of the buildings is rendered, with no particular architectural details; however, there are some elements such as window sills, bay window cornice and soffits which contribute to the character and appearance of the building.
- Front insulation would require planning permission and would result in loss of these remaining elements, deeper and uncharacteristic reveals for this type of building which would not preserve the character and appearance of the building, nor it would enhance it. This would therefore not be supported in the event of a future planning application.
- You are advised to consider and explore internal insulation throughout the building.

External insulation to rear:

- The rear of the building is mainly brick with rendered bay windows. The rear of the properties can be glimpsed through a gap between the buildings on Howitt Road.
- Option 1 – insulate the rear elevation and add brick slips on top to match existing. Generally, brick slips are not supported in conservation area and it is likely that this type of development would harm the appearance of the building. It would require continuous maintenance and therefore not adequate in this instance.
- Option 2 – insulate the rear elevation and fully render it. As indicated above in relation to the front elevation, there are elements which contribute to the appearance of the building which would be lost as a result of insulation and therefore harmful to the overall character and appearance of the building. As the rear of the property holds less significance, we can reassess this option if can be demonstrate that the insulation cannot be achieved internally.
- Overall, you are advised to consider and explore internal insulation throughout the building.

Heating systems

Ground Source Heat Pumps

- Planning permission would be required and a Noise and Vibration assessment for any external plant equipment, which demonstrates that noise levels are below the background noise limit as set out in policy A4.
- This would occupy largely the whole garden area of both properties, with 25-30 bore holes at a depth of 250m which is required to meet peak and annual heat load.
- There are several mature trees of significant amenity value at the rear and adjacent neighbouring sites. Therefore, any proposal would have to be supported by an Arboricultural Assessment to demonstrate that the trees would not be harmed by the proposed development.
- Any external manifestation of the pumps should be carefully considered and housed away from the streetscene, preferably at the rear.

Air Source Heat Pumps

- For heating only would be supported.
- Planning permission would be required along with a Noise and Vibration assessment as supporting document, which demonstrates that noise levels are below the background noise limit as set out in policy A4.
- In the meeting it was reference that ASHP could be an option and proposed to be housed on top of the roof of the building or to the rear.

- If on the roof of the buildings, careful consideration should be given to their visibility and impact from the streetscene and wider area. Currently there are some structures on the roof of the buildings which could be seen on aerial views, and streetscene. There are no planning records for these structures and it is unlikely that any additional bulk would be supported in the event of a future planning application
- Location in the rear garden should not be so problematic in terms of impact on character of the building, so you are advised to consider this as more feasible option.

Windows

- Triple glazing – based on the information we have at this stage it is unlikely that timber frames of similar dimensions with existing could accommodate triple glazing; however, we would be willing to see some examples of where this has been achieved successfully.
- Due to the increase thickness it is likely that this work would require planning permission.

Mechanical ventilation

- Any external manifestation of this to the front and side of the buildings would require planning permission. If manifested to the front, it is unlikely it would be supported in the event of a future planning application.
- In terms of sustainability of the buildings, and carbon reduction, this is not generally supported as it requires more energy to run which outweighs the environmental benefit of the other elements proposed. Given the age of the building, you are advised to consider fabric improvements to the building which would still function well with natural ventilation.
- As part of the submission you would need to demonstrate how all the other elements of carbon reduction and energy efficiency have been considered before proposing active cooling. You need to submit a completed table in the Appendix 1 of CPG Home improvements.

Recommendations:

- Please see CPG Energy efficiency and adaptation section 8. Energy efficiency in existing buildings; CPG Home Improvements – Sustainability Section; Historic England – Energy efficiency and Historic Buildings; LETI climate emergency design guides and Retrofit guide to be issued in due course.
- The existing layout of the HMO should be considered to ensure it provides an acceptable standard of accommodation.
- In terms of the energy efficiency hierarchy, loft insulation should be a priority. Most of the heat is lost through the roof and adequate insulation has the potential to significantly improve the energy efficiency of the building and reduce the energy bills costs.
- Other important elements of energy efficiency which should be considered initially are: maintain natural cooling, insulating pipes and servicing, draught proofing, lights and appliances, heating controls.

- Given the building has solid walls, heat loss through walls is not particularly significant in this instance, compared to the heat loss through the roof and existing single glazed windows.
- Mechanical ventilation would require energy to run and therefore is not desirable in the context of carbon reduction and general sustainability for the buildings. You are advised to carefully consider the balance between the elements of the building which could be improved without requiring mechanical ventilation as a result.
- You are advised to consider some element of renewable energy provision such as Solar PV panels. The rear slopes of the roofs could accommodate PV panels and not result in harmful impact on the character and appearance of the buildings.
- **Insulation:** you are advised to consider internal insulation throughout the building
- **Windows:**
 - Secondary glazing would generally be supported and not require planning permission
 - slim double-glazed windows matching existing would generally be supported and would not require planning permission
- **GSHP:** generally supported and requires planning permission
 - Would require an Arboricultural Assessment and Noise and Vibration assessment for external elements of plant equipment (if any)
- **ASHP:** generally supported for heating only and requires planning permission accompanied by a Noise and Vibration assessment
 - The location of the plant should be away of the public views and be mindful of its position in relation to the host buildings and neighbouring amenity.
- **Mechanical ventilation:** generally not supported for domestic properties. You should consider maintaining natural ventilation and improvements to the building fabric which would not result in harm.
- **Renewable energy:** the proposal does not include provision of renewable energy which is expected for a deep retrofit. The rear roof slopes can accommodate PV panels without harming the character and appearance of the host building and wider conservation area. It is noted that these would be on the west facing elevation, however given the new technologies it is likely that even in this position there would be some improvement to the energy efficiency of the building.

National Planning Policy Framework (NPPF) indicates that when harm would be caused to heritage assets (such as properties in Conservation Areas), public benefit would have to outweigh the harm. The environmental benefit of the proposals would have some weight; however, the NPPF test applies when harm cannot be avoided, and in this instance most of the works could be installed internally and therefore the harm can be avoided.

Please see appendix 1 for supplementary information and relevant policies.

If you have any queries about the above letter or the attached document please do not hesitate to contact Nora Constantinescu (0207 974 5758)

Please Note: This document represents an initial informal officer view of your proposal 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.

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

Yours sincerely,

Nora Constantinescu

Senior Planning Officer
Planning Solutions Team

Appendix 1:

Relevant policies and guidance:

- **National Planning Policy Framework 2021**
- **London Plan 2021**
- **Camden Local Plan 2017**
 - Policy DM1 Delivery and monitoring
 - Policy A1 Managing the impact of development
 - Policy A3 Biodiversity
 - Policy A4 Noise and vibration
 - Policy D1 Design
 - Policy D2 Heritage
 - Policy CC1 Climate change mitigation
 - Policy CC2 Adapting to climate change
- **Camden Supplementary Guidance 2021**
 - CPG – Design
 - CPG – Amenity
 - CPG – Energy efficiency and adaptation
 - CPG – Biodiversity
- **Belsize Conservation Area Appraisal 2003**

Planning application information:

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

- Completed full planning application form
- The appropriate fee
- Location Plan (scale 1:1250)
- Site Plan (scale 1:200)
- Floor plans (scale 1:100) labelled 'existing' and 'proposed'
- Elevations and sections (scale 1:100) labelled 'existing' and 'proposed'
- Section drawings (scale 1:100) labelled 'existing' and 'proposed'
- Design and Access and Statement

- CPG Home improvements – Appendix 1 table completed.

Certificate of lawful development information

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

- Completed Certificate of Lawful development - Proposed
- The appropriate fee
- Location Plan (scale 1:1250)
- Site Plan (scale 1:200)
- Floor plans (scale 1:50) labelled 'existing' and 'proposed'
- Elevations and sections (scale 1:50) labelled 'existing' and 'proposed'
- Section drawings (scale 1:50) labelled 'existing' and 'proposed'

More about supporting information for planning applications [here](#).

We are legally required to consult on applications with individuals who may be affected by the proposals. We notify neighbours by displaying a notice on or near the site and placing an advert in the local press. We must allow 23 days from the consultation start date for responses to be received. We encourage you to engage with the residents of adjoining properties before any formal submission.