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**Our ref: 2021/4917/PRE**

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**Planning Solutions Team  
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2<sup>nd</sup> Floor

5 Pancras Square

Dear Mr Dawe,

**Re: Pre-app enquiry 2021/4917/PRE for The Studio, St Johns Lodge, Harley Road, NW3 3BY**

I refer to your pre-planning application enquiry (2021/4917/PRE) for. I confirm receipt of your pre-application pack and the pre-application fee (£460). Following our online meeting on 29<sup>th</sup> November I now provide our comments in response to your amended proposals which you sent by email on December 21<sup>st</sup> 2021.

## **1. Proposal**

The proposal is for the demolition of the existing building and the erection of a new part four storey/part three storey dwelling. The three storey part would occupy the site of the existing three storey part adjacent to St John's Lodge at the entrance to Harley Road and it would be vertical at the front with abundant glazing. It would be tiered at the rear, with an extension at first floor level at the rear, a further ground floor element and glazing.

The four storey part would occupy the site of the main building on the site and it would have the same separation to 1 Harley Road to the south. The front and rear elevations would be steeply sloped and it would have front and rear roof slopes. The front elevation would be faced with a terracotta baguette system with full width glazing on each level and a terrace would be formed behind the terracotta cladding on the third floor.

The treatment at the rear would be the same with the terracotta clad surface interspersed with full width glazing at each level and a third floor terrace. No floor plans are included with the revised proposals.

## **2. Site description**

The site is located on the north-eastern side of Harley Road, to the south of the junction with King Henry's Road. It comprises a three storey semi-detached residential property. The site lies within the Elsworth Conservation Area and is not statutory or locally listed and can be deemed as a neutral contributor to the surrounding conservation area. It is worth noting that properties either side and to the rear of the site (St John's Lodge, No.1 Harley Road and 157 King Henry's Road) are identified within the Conservation Area Appraisal as buildings of positive merit and may be seen as undesignated heritage assets by the council. The site lies within a flood risk zone of 1 and a public transport accessibility level (PTAL) of 5/6a.

### 3. Relevant planning history

On the 10th of April 2006, planning permission was granted for a single storey rear extension (reference 2006/0902/P).

On the 20th of July 2005, planning permission was refused for a three storey rear extension (reference 2005/2827/P).

On the 10th of October 1997, planning permission was granted for the erection of an ancillary single storey structure in the rear garden (reference PE9700616).

On the 24th of June 1996, planning permission was granted for the conversion of the main building into five self-contained units, alterations to the elevations at lower and upper ground floor levels, demolition of rear annexe building and its redevelopment for a single dwelling house by the erection of a three-storey building as well as associated landscaping and boundary wall treatments (reference P9601047R1).

### 4. Relevant policies and guidance

National Planning Policy Framework 2021

Technical Housing Standards – Nationally Described Space Standards

The London Plan March 2021

Camden Local Plan 2017

A1 Managing the impact of development

D1 Design

D2 Heritage

CC1 Climate Change Mitigation

CC2 Adapting to climate change

CC3 Water and flooding

CC4 Air quality

CC5 Waste

T1 Prioritising walking, cycling and public transport

Camden Planning Guidance 2021

CPG Design

CPG Amenity

CPG Home Improvements

CPG Energy Efficiency and Adaptation

CPG Transport

Elsworthy Conservation Area Appraisal and Management Strategy 2009

## 5. Assessment

### Design/Heritage

Local Plan Policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

The existing building does not make a positive contribution to the character and appearance of the Conservation Area and there would be no loss of significant heritage asset if it was redeveloped. The layout, scale and form of the proposed dwelling would broadly respect the spacial character of the townscape. It would be preferable if the canopies on the upper floors and the screen on the top floor could align with the brick feature bands on both the immediately neighbouring houses, if possible. That would contribute to the preservation of the appearance of the Conservation Area.

The finished appearance of the front and rear elevations needs clarification. It is not clear what the front and rear walls would be made of and how the material would appear behind the terracotta cladding. We would also want confirmation of the exact colour of the terracotta cladding which should blend with the surrounding brickwork.

As indicated on your proposed images, the boundary treatments at the front should be in keeping with the historic walls and railings and the front and rear of the site should be landscaped in the interests of the appearance of the streetscene and townscape in general with no significant increase in, or the provision of unsightly/inappropriate hard surfacing or outbuildings/stores.

On Google Images there do not appear to be any trees which would have to be removed. However, this should be confirmed in any planning application. Additionally, the existing and proposed front and rear external space treatments should be indicated.

### Design Review Panel

Camden's Design Review Panel is an independent and impartial panel of built environment experts (architects, landscape designers and urban designers) who assess the design of a proposal with the aim of improving the quality of buildings and places for the benefit of the public.

Given the nature of the proposals, it may be that the proposals will have to be presented to the Design Review Panel. More information on Camden's design review process can be found by following the link below.

<https://www.camden.gov.uk/camden-design-review-panel2>

### Amenity

Policy A1 (Managing the impact of development) of the Camden Local Plan seeks to ensure that the amenity of neighbouring properties are protected, particularly with regard to visual privacy, outlook, sunlight, daylight and overshadowing, noise and vibration levels.

Due to the proposed increase in height and depth alongside and beyond windows and the garden of 1 Harley Road it will be necessary for you to submit a Sunlight/Daylight Assessment to show that there would be no significant loss of light at this site. The proposal would not appear to result in any significant loss of light at any other adjoining sites but this should also be examined in the Sunlight/Daylight Assessment.

Due to the relationship with adjoining sites Officers do not consider that the proposal would result in any significant direct overlooking of any neighbouring rooms or gardens. However, this may need to be checked when the final application drawings are submitted.

In terms of outlook, the new dwelling would be higher and deeper in relation to the rear windows at 1 Harley Road. But Officers do not consider that there would be any significant change to the outlook from any rooms or the garden at this site which would remain open to the rear (east) and side (south).

The use of the new dwelling and its external areas would be unlikely to result in a significant increase in noise levels for neighbouring occupiers. However, operations during construction would have the potential for noise nuisance and disturbance. The Council seeks to control operations during construction through Construction Management Plans. It would be preferable if this could be provided with the application.

### **Quality of residential accommodation**

CPG Interim Housing requires development to provide high quality housing that provides secure, well-lit accommodation that has well-designed layouts and rooms.

The Council uses the Nationally Described Space Standards for proposals for new houses. There is no specific requirement for a 5 bed 10 person house but the minimum area for a 5 bedroom 8 person house is 134 sq m. Then double bedrooms should have a minimum of 11.5 sq m. The proposed garden space would appear to be in keeping with neighbouring dwellings in area and adequate. There should therefore be no objections in terms of the quality of accommodation.

### **Transport**

No changes are proposed to the access to the site and there should be no significant impacts on the highway. New residential development should be car free. However, the replacement of an existing house for the existing occupiers would be able to include on-site car parking as existing. Cycle parking facilities in accordance with London Plan (2021) standards would be supported and so too would the provision of appropriately designed waste and recycling storage facilities.

In order to ensure there are no adverse effects on the safety or free flow of the highway during the course of the construction it will be necessary for a Construction Management Plan to be submitted, approved and implemented. This would be required under a S.106 agreement which would be required to be completed prior to planning permission being granted.

### **Sustainability**

All new development should comply with the Local Plan policies for sustainability and climate change. Further guidance is available in the CPG Energy Efficiency and Adaptation 2021.

A Sustainability Statement will be required to demonstrate how the development would comply with the Council's Sustainable Design and Construction Principals and it will also be necessary to demonstrate the measures that will be taken to comply with the Energy Hierarchy (i.e. Be Lean, Be Clean, Be Green).

The Council attaches conditions to restrict water use to new houses and details of the green roof to demonstrate biodiversity and sustainability will be required by a condition.

The site lies on a historically flooded street and so it will be necessary to indicate the flood resilient and evacuation measures which would be provided within the Sustainability Statement.

Policy CC1 (part e) of the Local Plan requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Paragraph 8.16 of the Local Plan describes how the construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed. Furthermore, the Council will expect developments involving substantial demolition to divert 95% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site.

Therefore, any subsequent planning application for the proposed demolition and replacement of the existing house should be accompanied by a robust sustainability statement including a Carbon Lifecycle Analysis to demonstrate the difference in carbon emissions/savings associated with the option of retaining and refurbishing the building against the demolition and rebuild option currently proposed.

## **Conclusion**

In principle there should be no objections to the proposed redevelopment/re-modelling of the house, subject to further discussion on the detailed design of the proposals. However, further information on the re-use of the existing building and materials is needed to be able to report on the sustainability implications of the development. Further discussion is also needed on the overall size and design of the proposed development in order to assess the impact it would have on the appearance of the townscape and the wider Conservation Area.

A Sunlight/Daylight Assessment will be needed to demonstrate that the proposals would not result in a significant loss of light at any neighbouring rooms or gardens.

The proposal would appear not to result in any loss of privacy or outlook at any adjoining sites. This will need to be the case with any future application drawings.

An Energy and Sustainability Statement will be needed to demonstrate that the proposal complies with the Council's policies and guidance for sustainability and climate change mitigation.

If you submit a planning application, I would advise you to submit the following for a valid planning application:

- Completed form (Full planning permission)
- 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 and section drawings at a scale of 1:50 labelled 'existing' and

- 'proposed'
- Design and Access Statement including proposed materials
  - Energy and Sustainability Statement
  - Construction Management Plan
  - Arboricultural Report
  - The appropriate fee

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice on or near the site. We would also place an advertisement in the local press. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be 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.

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 Adam Greenhalgh on [Adam.Greenhalgh@camden.gov.uk](mailto:Adam.Greenhalgh@camden.gov.uk).

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Adam Greenhalgh

Planning Officer

Planning Solutions Team