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**Via Planning Portal only**

9<sup>th</sup> December 2022

Dear Sir/Madam,

**HOUSEHOLDER PLANNING APPLICATION - THE TOWN & COUNTRY PLANNING ACT 1990**

**SITE: 31 LADY MARGARET ROAD, LONDON, NW5 2NG**

**PROPOSAL:** LOWER GROUND FLOOR REAR EXTENSION WITH GREEN ROOF, CREATION OF TERRACE AT UPPER GROUND FLOOR LEVEL, INSTALLATION OF PLANT (AIR SOURCE HEAT PUMP, PHOTOVOLTAIC PANELS AND AIR CONDITIONING UNIT), NEW BOUNDARY TREATMENTS, ALTERATIONS TO SIDE ACCESS, INSULATING AND RENDERING SIDE ELEVATION, NEW DOOR TO FRONT LIGHTWELL AND NEW BIKE STORE IN FRONT GARDEN.

Please accept this covering letter as an accompaniment to this householder planning application for proposed works at 31 Lady Margaret Road, London, NW5 2NG. This letter provides a summary of the site, the proposed development, and an assessment against the relevant adopted policies.

Please also find enclosed a completed application form accompanied with a full set of existing and proposed plans and elevations and a Design and Access Statement.

**The Site:**

The application site comprises a large end of terrace 4 storey dwellinghouse located on the western side of Lady Margaret Road. Lady Margaret Road is a wide avenue with established street planting characterised by three to four storey dwellings. Generally, the properties have a front porch and balcony detailing, are finished in brick or render, with butterfly roofs and closet wings.

The property is not listed but is located within the Kentish Town Conservation Area and considered to have a positive contribution to the area.

### **The Proposal**

This application seeks full (householder) planning permission for proposed extensions and alterations to the existing property. The development can be described as:

*'Lower ground floor rear extension with green roof, creation of a terrace at upper ground floor level, alterations to side access, new boundary treatments, installation of plant (air source heat pump, photovoltaic panels and air conditioning unit), insulating and rendering of side elevation, new door into front lightwell, new bike store in front garden'.*

In greater detail the proposed works includes:

- A rear lower ground floor extension, projecting 2.8m from the rear wall of the dwelling, to line up with the existing closet wing. Including new opening to the garden, skylight and green roof.
- Creation of a terrace at upper ground floor level. The terrace will extend 3m from the rear of the dwelling and include new door, balustrades and new access into the garden.
- Replacement of existing trellis (located on top of existing brick boundary walls) with new timber fencing and the retention of the existing brick walls.
- Insulating and rendering the side elevation of the dwelling, to reduce heat loss and improve energy efficiency.
- Installation of an air source heat pump, and the installation of photovoltaic panels and air conditioning unit on the roof.
- Creation of a ramped side entrance (within the existing side passageway) to provide step free access into the dwelling, with a new side door.
- Creation of new door in the existing front basement lightwell, to provide access for maintenance.
- New bike store in the front garden.

For full details of the proposed development please refer to the supporting plans and the Design and Access Statement.

## **Relevant Planning History**

The application site has no relevant planning history. However, there are a number of nearby planning consents that are relevant precedents in this instance. These are listed below and are covered in more detail in the Design and Access Statement.

19 Lady Margaret Road (2019/0798/P) – Planning permission was granted for a rear roof terrace with associated openings at first floor level.

7 Lady Margaret Road (2014/0464/P) – Planning permission was granted for a rear terrace and associated openings.

33 Lady Margaret Road (2013/4091/P) – Planning permission was granted for a rear extension, including green roof.

42 Lady Margaret Road (2011/1113/P) – Planning permission was granted for a ground floor rear extension with green roof and second floor balcony.

## **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 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 for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017) and Camden Planning Guidance Documents (CPG).

The below policies and documents are considered most pertinent to the determination of the application:

## London Plan (2021)

## Camden Local Plan (2017)

Policy A1 – Managing the impact of development

Policy A4 – Noise and Vibration

Policy D1 – Design

Policy D2 – Heritage

Policy CC1 – Climate Change Mitigation

Policy CC2 – Adapting to Climate Change

Policy T1 – Prioritising walking, cycling and public transport

## Supplementary Planning Guidance (Camden Planning Guidance)

Home Improvements (2021)

Energy Efficiency and Adaption (2021)

Design (2021)

Amenity (2021)

Kentish Town Conservation Area Appraisal and Management Strategy (2011)

## **Planning Assessment**

### Principle of development

The proposal involves the upgrade and improvement of a residential dwelling house, to improve accessibility, layout, energy efficiency and overall appearance. The alterations will enhance the usability of the home and ultimately result in rejuvenating and maintaining the housing stock of the area. As such, the principle of the works is considered acceptable and supported by adopted policy.

### Design, visual and heritage impact

Section 12 of the NPPF refers to well-designed places. Paragraph 130 (c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Further, paragraph 130 states that where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.

Policy D1 of the Camden Local Plan (the Local Plan) requires development to be of the highest architectural and urban design quality, and have particular regard to design and visual impact and to the context within which it is placed. Policy D2 of the Local Plan states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and

their settings, including conservation areas. The aims of these policies are further reflected in London Plan Policies D3 (Design) and HC1 (Heritage) and the 'Design' Camden Planning Guidance.

The Kentish Town Conservation Area Appraisal and Management Strategy (CAA) specifically refers to Lady Margaret Road and identifies the property as making a positive contribution to the conservation area. Overall, the CAA identifies the residential areas as being homogeneous both historically and by design.

The proposed rear extension to the lower ground floor level has been designed to have a minimal impact on the overall design and appearance of the dwelling. A flat green roof has been incorporated to enhance the energy efficiency of the building, whilst ensuring that the scale and design is in keeping with the local character. Being at lower ground floor level, the height will remain below the existing boundary treatments, ensuring views of the proposal will be limited. The proposal also includes the removal of the existing, modern UVPC window and its replacement with a new glazed door that follows the diminishing proportions of the elevation, as a whole. The materials will match the existing dwelling.

The proposed rear terrace, at upper ground floor level, will extend 3m from the existing rear wall, ensuring it remains set back from the existing rear wall of the adjacent dwelling (No. 33). The proposal will involve the installation of a new rear door and balustrading, which will be sympathetic to the existing dwelling and wider conservation area.

The proposed boundary treatment works involve the removal of the existing trellising, which is in a poor state of repair, and its replacement with a new timber fence. The existing trellising and proposed timber fencing is sited on top of the existing brick wall, to which no changes are proposed. The timber fencing will enhance privacy to the rear garden and those of the neighbours, whilst preserving the character of the area.

The alterations to the side access, involving the creation of a ramp from the front garden to the new side door, and the installation of a new door in the front lightwell. These are considered minor modifications to the dwelling which would have a negligible impact on the street scene and the wider conservation area, whilst allowing for improved access and maintenance of the dwelling. The replacement doors (side access and lightwell) will have a high-quality specification and will be in keeping with the architectural detailing and appearance of the property. Furthermore, the new side access would allow for the repositioning of the refuse storage, off the front boundary, which would improve the appearance of the dwelling from the street.

The proposed environmental enhancements comprise the side wall insulation, air source heat pump, photovoltaic panels and air conditioning unit. All of which have all been carefully considered to ensure that they do not disrupt the historical character of the building. With regards to the side wall insulation, given the narrowness of the side passageway, this will have limited views from the public realm (see the Design and Access Statement). Whilst covering of the original brick wall is unfortunate, the benefits in terms of energy efficiency far outweigh the minor impact it would have on the appearance of the dwelling. Furthermore, the

rendering itself is not obtrusive, and would appear wholly in keeping with the residential character of the street. With regards to the air source heat pump, photovoltaic panels and air conditioning units, these have been sited within the existing building envelope and well screened and obscured from view on the roof. The proposals are therefore not considered to have a detrimental impact on the appearance of the dwelling or the character of the street or wider conservation area.

For the reasons outlined above, the proposed development represents a high-quality design which is sympathetic to the existing character and appearance of the existing property and neighbouring properties. It is considered that the proposed works will enhance the quality of the host dwelling and consequently the townscape quality of the area. There will be no adverse effect on the wider views of the Conservation area. The proposed development is therefore considered acceptable, with regard to its impact on the street scene and wider conservation area.

### Neighbouring Amenity

Policy A1 of the 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. London Plan Policy D3 requires development to provide suitable outlook, privacy and amenity.

The proposed lower ground floor level will have a total height of 2.9m, but only be 2m above ground level, meaning that it will not exceed the height of the neighbouring boundary treatment. The extension will have a flat, green roof with no openings to the side elevation. As such the proposal is considered to have a limited impact on the attached dwelling (No. 29) by virtue of overlooking, outlook or access to daylight/sunlight.

The proposed development introduces a new terrace area to the rear of the property. The proposal creates a small sitting out area, off the cloak room, and a new access from the garden into the upper ground floor level. In order to ensure this area does not have any detrimental impacts on the adjacent neighbour, it has been stepped back from the rear wall of No. 33 by 1.4m, ensuring that any views from the terrace are significantly restricted. Furthermore, a new planted roof is also proposed which will provide a buffer between the terrace and the adjacent dwelling (No. 33), further reducing the potential for any views or overlooking to occur.

The new boundary treatments will not exceed the height of the existing boundary treatments and as such will not result in any detrimental impacts to outlook or light to the adjacent dwellings.

The new side access will involve the installation of a new side door, however it will replace an existing window and as such is not expected to result in any significant change to the existing amenities. Furthermore, the adjacent dwelling No. 33 does not have any openings at this level on this elevation.

The application is accompanied by an Environmental Noise Assessment which considers the potential noise and vibrations arising from the installation of new plant (air conditioning unit and air source heat pump). The assessment confirms that the proposed plant will meet the Council's noise criteria with the installation of the proposed acoustic enclosures. Therefore, the proposed plant will not result in any harm to the amenity of surrounding properties by way of noise or vibration.

The proposed development is minor in nature and scope and would not give rise to any abnormal or significantly disruptive works. The proposal would not give rise to unacceptable neighbour amenity impacts during construction.

Given the above, by virtue of the size, scale and location of the proposed works, the proposed development will not have an adverse impact on neighbouring amenity. The proposal complies with CLP Policies A1 and A4 and the guidance contained within the 'Amenity' CPG.

### Energy and Sustainability

Policy CC1 and CC2 of the Local Plan required new developments to minimise the effects of climate change by encouraging all developments to meet the highest feasible environmental standards. Policy CC1, part a requires developments to reduce carbon dioxide emissions by following the steps in the energy hierarchy. Part d of Policy CC1 sets out that the Council will support and encourage sensitive energy efficiency improvements to existing buildings. The Council's CPD Energy Efficiency and Adaption provides a high level of detail on how buildings should improve their energy efficiency.

The existing dwelling has a single, solid brick wall to the side elevation (facing No. 33). As identified by the Council's Home Improvement CPD, can allow nearly twice as much heat to pass through them if they are un-insulated. The proposal seeks to mitigate against this by installing external wall insulation (about 100mm thick) on the outside of the dwelling. Whilst the CPD acknowledges that such insulation could affect the character and appearance of the building and wider area, in this instance it is considered to be appropriate. Regard was given to internal insulation, however, given the width of the existing hallway and the existence of original features of cornicing and the like, it was not considered suitable. Given the narrowness of the side passageway, and therefore the closeness of the adjacent dwelling, limited views of the insulation of the dwelling will be possible from the street. Furthermore, there is an existing example of similar development at 1 Lady Margaret Road, which is in a more visually prominent location. The provision of such insulation, in order to improve the energy efficiency of the existing building, it is considered to be in accordance with policies CC1 and CC2, and Energy Efficiency CPD, with the environmental benefits far outweighing any minor impact on the overall appearance of the dwelling.

The proposal also includes the provision of solar PV panels and an air source heat pump on the roof. These measures are both supported in principle by the Council's Home Improvement and Energy Efficiency CPD's. The solar panels will have limited (if any) visibility from outside the side, as they have been installed on the south facing ridge of the butterfly roof (to maximise solar gain).

A green roof is proposed over the lower ground floor rear extension, and to the rear of the proposed terrace. The installation of green roofs improves surface water drainage. In addition, green roofs support the improvement of air quality, biodiversity and environmental cooling. The provision of green roofs is wholly supported by the Council's CPDs and adopted policies.

The proposal also includes the provision of an air conditioning unit with associated acoustic enclosure, to be sited on the roof, behind the existing parapet and therefore screened from view. Whilst it is accepted that the CPD discourages such proposals, in this instance it is considered appropriate. The alternative measures suggested in the CPD have also been incorporated in the scheme (green roofs and insulation), however, given that the property is a terrace dwelling within a conservation area, many of the suggestions (triple glazing, blinds, shutters) would not be appropriate. The clients intend the building to use low amounts of energy, which is why a heat pump has been selected and the walls are to be insulated. In addition to reducing the heating requirement, the addition of wall insulation will reduce the overheating risk by keeping out the heat during a hot day. However, it will not eliminate the overheating risk. Air conditioning is not being proposed throughout the home, only in bedrooms, to ensure that the rooms are comfortable for sleeping. This will use small amounts of energy as they are likely to operate only after sunset. It is also proposed to air condition the home office as this will often be occupied during the day. This is a small room so will require only a small amount of air conditioning compared with the other reception rooms. As such, the installation of an air conditioning unit is considered appropriate. The submission is accompanied by a noise assessment, ensuring it would not result in any detrimental impacts to surrounding residential properties.

Policy T1 of the Local Plan supports sustainable transport by prioritising cycling. Part H states that the Council will seek to ensure that development provides for accessible, secure cycle parking facilities. The dwelling currently does not have provision for any secure on-site cycle parking. The provision of cycle storage within the front garden will allow for high quality, secure storage on site, in line with this adopted policy.

The scheme will result in several environmental enhancements to the existing property, updating and improving the energy efficiency of the whole building, in line with the London Plan, adopted Council policies and CPD's.

## **Summary**

As demonstrated within this letter and supporting documents, the proposed works are considered to have an acceptable impact on the character and appearance of the building, the setting of the Conservation area, and neighbouring amenity, whilst significantly enhancing the sustainability credentials of the property. 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**