

Date: 23/10/2023
Your ref: APP/X5210/W/23/3320884
Our refs: 2020/0927/P
Contact: Daren Zuk
Direct line: 020 7974 3368
Email: Daren.Zuk@camden.gov.uk

**Advice and Consultation
Planning and public protection**
Culture & Environment Directorate
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Tel: 020 7974 5613
Fax: 020 7974 1680
planning@camden.gov.uk
www.camden.gov.uk/planning

Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Melanie Pugh,

**Town and Country Planning Acts 1990 (as amended)
Planning Appeal Statement (Authority)
Appellant: Manuela Eleuteri
Site: 31 Willoughby Road, London, NW3 1RT**

I write in connection with the above appeal against the Council's refusal to grant planning permission for the excavation of a basement with rear lightwell below an existing dwellinghouse (Class C3), demolition and reconstruction of single-storey side extension.

The application was a member's overturn. The background to the application is set out primarily in the Member's Briefing Report (ref: 2020/0927/P) that has already been sent with the questionnaire along with the Committee minutes. The following is the principal Statement of Case. Copies of relevant policies from the Camden Local Plan (adopted July 2017) and accompanying guidance were also sent with the appeal questionnaire.

The Council would be grateful if the Inspector would consider the contents of this letter which includes confirmation of the status of policy and guidance, comments on the Appellant's grounds of appeal and further matters that the Council respectfully requests be considered without prejudice if the Inspector is minded to grant permission.

1. Summary of the Case

- 1.1. The appeal relates to a three-storey single-family terraced building with rooms in the attic, located on the western side of Willoughby Road, in close proximity to the junction with Willow Road.
- 1.2. The appeal site is located within the Hampstead Conservation Area. Part of the side boundary of the application site is shared with the Willow Cottages on Willow Road, which are Grade II Listed.

1.3. Planning permission for the excavation of a basement and reconstruction of a single-storey side extension was refused on 02/02/2023.

1.4. The planning application was refused on the grounds that:

- In the absence of adequate surface water drainage mitigation the proposed basement excavation would result in an unacceptable risk to surface water flooding, contrary to policies A5 (Basements) and CC3 (Water and flooding) of London Borough of Camden Local Plan 2017.
- The proposed basement excavation, by virtue of the extent, depth and proximity to neighbouring listed buildings and the complexity of the construction sequence is considered to result in the potential for harm to Willow Cottages a heritage asset contrary to policies A5 (Basements) and D2 (Heritage) of London Borough of Camden Local Plan 2017 and BA2 of Hampstead Neighbourhood Plan 2018.

2. Relevant History

2016/7146/P – Excavation of basement with rear lightwell below dwellinghouse (C3); demolition and reconstruction of single storey side extension – **Withdrawn 12/04/2018**

2016/7151/P - Re-positioning of the existing rooflights to front and rear roof slopes of dwellinghouse – **Granted 17/03/2017**

9260057 – Partial demolition of existing rear conservatory – **Granted 29/05/1992**

3. Status of Policies and Guidance

Adopted Policies

3.1. The Camden Local Plan was adopted on 3 July 2017. The policies cited below are of relevance to the applications.

Camden Local Plan 2017

- D1 Design
- D2 Heritage
- A1 Managing the impact of development
- A3 Biodiversity
- A4 Noise and vibration
- A5 Basements
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development
- T3 Transport infrastructure
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding

Hampstead Neighbourhood Plan 2018-2033

3.2. In refusing the application, the Council also refers to supporting documentation in the Hampstead Neighbourhood Plan. The specific clauses most relevant to the proposal are as follows:

- Policy DH1 Design
- Policy DH2 Conservation areas and listed buildings
- Policy NE2 Trees
- Policy BA1 Local requirements for Basement Impact Assessments
- Policy BA2 Basement Construction Plans
- Policy BA4 Construction Management Plans
- Policy TT1 Traffic volumes and vehicle size

Camden Planning Guidance (2021)

3.3. In refusing the application, the Council also refers to supporting documentation in Camden Planning Guidance. The specific clauses most relevant to the proposal are as follows:

- CPG Basements
- CPG Design
- CPG Amenity
- CPG Home Improvements
- CPG Transport
- CPG Trees
- CPG Developer Contributions

3.4. The Hampstead Conservation Area Appraisal and Management Strategy was adopted in 2002 and defines the special character of a conservation area and sets out the Council's approach for its preservation and enhancement.

London Plan (2021)

3.5. The London Plan is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London. The current London Plan was recently adopted in March 2021.

NPPF (2023)

3.6. The National Planning Policy Framework (NPPF) was published in April 2012 and revised most recently in September 2023 since the application was determined. It states that proposed development should be refused if it conflicts with the local plan unless other material considerations indicate otherwise. Of particular relevance to this appeal is the NPPF 2021 update under para. 134 which states that:

'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'

As outlined in the decision notice, the development is contrary to CPG guidance and policies A5, D2, and CC3 of the Camden Local Plan, and policy BA2 of the Hampstead Neighbourhood Plan. Therefore, it is also considered contrary to para 134 of the NPPF 2021.

3.7. The Council's adopted policies are recent and up to date and should be accorded due weight in accordance with paragraph 219 of the NPPF. There are no material differences between the Council's adopted policies and the NPPF in relation to this appeal. The full text of the relevant adopted policies was sent with the questionnaire documents.

4. Reasons for Refusal

4.1. The LPA's reasons for refusal are outlined and addressed below, further expanding on the concerns the LPA has with the proposed basement and the impact on the adjacent heritage asset.

Reason for refusal no.1 (Basement Impact Assessment)

In the absence of adequate surface water drainage mitigation, the proposed basement excavation would result in an unacceptable risk to surface water flooding, contrary to policies A5 (Basements) and CC3 (Water and flooding) of London Borough of Camden Local Plan 2017.

4.2. Matters considered to be in doubt within the Basement Impact Assessment (BIA) were as follows:

(a) Not enough was known about ground and groundwater conditions for the design of the basement, for site specific assessment of subsidence risk and for protection of neighbouring property and the boundary retaining wall.

(b) The potential for the risk of groundwater flood affecting other property to be increased by the basement construction.

Underground River

4.3. The earlier versions of the BIA described a 19th century map of the subject site and immediate area, with an annotated overlay showing the principal water features in the region. The presence of a tributary of the River Fleet running beneath or very close to the site is incontrovertible. The possible presence of any residual pipes or a culvert located beneath the proposed building area does not appear to have been considered. The mapping indicates that Willow Cottages may originally have been specifically oriented to

have water closets located over the stream. Nevertheless, it is clear that once a sewer was established underneath Willow Road, new drains were laid beneath the rear yards of Willow Cottages to replace the original system and convey the sewerage to the new sewer.

- 4.4. The BIA outlined that the main flow of the River Fleet tributary was diverted into the sewer system as part of the development of Gayton Road by GW Potter. This includes an anecdotal recollection from GW Potter noting the presence of an underground stream concealed beneath the valley floor. No further details of this recollection have been presented and therefore remains some considerable uncertainty about what water flows have or have not been diverted, and how the present natural and artificial drainage systems now operate. There is therefore significant uncertainty surrounding what type of flooding may result in future significant rain events.
- 4.5. The diversion of a watercourse into a sewer does not necessarily capture all the flow associated with the watercourse. In this case, there were several springs located on the hillside below Flask Walk. Even if the main flow from one or several springs were diverted into pipes, there would inevitably have been residual sub-surface flow that was not captured and would follow any available permeable pathway along the original stream, including underneath the subject site.

Flood Risk

- 4.6. To determine the flood risk of the site, the lidar modelling published by the Environment Agency was utilised in identifying areas of surface water flood risk. The lidar modelling confirmed the line of the original stream as a low point. Therefore, despite being referred to the Environmental Agency mapping that identifies Willow Cottages as being at 1:100 risk of surface water flooding, the BIA refers to the risk being ten times lower and notes that the flood risk would not increase as a result of the development.
- 4.7. The Feb 2021 BIA Supplementary Note acknowledges the discrepancy but worryingly describes the tenfold difference in risk as being “immaterial”. This comment does not seem to have considered the special circumstances of Willow Cottages.
- 4.8. The guidance accompanying Policy CC3 explains that “*development can have an impact on the water environment beyond the site where it takes place by altering the flow of water both above and below ground and changing where water is absorbed or rises to the surface. Changing water movements can alter soil conditions in the wider area*”. The application did not include a Flood Risk Assessment (FRA) prepared in accordance with the national guidance for flood risk. This would require a detailed assessment of the potential for the development to increase flood risk elsewhere, in addition to assessing the site vulnerability to flooding. It is not clear why a new FRA was not commissioned following the criticism of the original FRA under the previous 2016 application.
- 4.9. The BIA asserts that the assessment of flood risk is summarised in Section 8; however, the section appears to be devoted solely to ground and groundwater and does not assess flood risk. Sections 4 to 7 of the BIA appear to be focused on the need for an FRA rather than constituting an actual FRA. The BIA further recognises that the potential for “*an increase of groundwater flood risk in the low-level access between the dwellings and the boundary retaining walls*” but, after numerical modelling, concludes that neither the

groundwater flood risk or the surface water flood risk will increase. It is considered that the robustness and clarity of the groundwater modelling contained in Appendix E of the BIA are questionable.

Ground Conditions

- 4.10. Differences are noted between the various borehole logs that have been prepared; however, upon review the key issue is that the new basement is expected to seal into essentially impermeable clay. There has been discussion about the porosity and permeability of the overlying soils; the fact that groundwater has been detected within these soils demonstrates that there is some degree of permeability. However, the assessment of ground conditions at 31 Willoughby Road starts with the understanding that the site consists of made ground that cannot be expected to be uniform or to lend itself well to any necessary presumption of uniformity for modelling purposes.
- 4.11. Analytical soil mechanics are difficult to apply to heterogeneous natural deposits such as it can be almost meaningless in made ground. Thus, a wide variety of theoretical assumptions need to be tested simply to provide a range of possible behaviours and the consequent level of uncertainty concerning any prediction of the behaviour of a basement foundation dug into made ground is under underestimated.

Groundwater

- 4.12. As described above, the surface water flood risk to Willow Cottages may increase as a result of the development obstructing a pipe, culvert, or former stream course or associated subsurface flow through more permeable alluvial deposits in the immediate vicinity of the stream course. The present FRA has relied on numerical modelling the ground behaviour as a material with relatively uniform engineering properties; this may not reflect the true ground water regime.
- 4.13. The initial proposal to install diversionary water mitigation measures around the basement were omitted following subsequent additional modelling; however, the proposal included some form of dewatering to prevent or limit unacceptable groundwater flows into the basement excavation. This implies an expectation that there will be possible encounters with more permeable natural or man-made water conduits than have previously been modelled. A large degree of reliance has been placed on this modelling, but it has not been made clear whether its robustness is at all limited in the face of extremely variable, non-uniform made ground that may be subject to intermittent saturation and contain conduits that have not been contemplated. There does not appear to have been a specific sensitivity analysis conducted of the modelling input assumption.
- 4.14. The Camden Local Plan 2017 (para 8.6) states that “*The most common form of groundwater flooding in Camden is from ‘perched’ groundwater, water that becomes lodged between the top layer and the impermeable London clay layer*” and acknowledges that “*this type of flooding is difficult to model*”.

Dewatering

4.15. The BIA initially considered temporarily lowering the groundwater table by some means. Following omission of the originally proposed permanent arrangement for external drainage below the structure, the construction method statement was subsequently amended to state that “*sub-formation collector drains and filtered sump pumps will be required to manage groundwater and prevent instability of formation*” and envisaged discharge of the collected water to the TW sewer. Groundwater controls were introduced into the modelling but it is understood that the model indicated that it would take approximately 2000 years to fully equilibrate. It is considered this may not be realistic.

Willow Cottages Construction

4.16. There has been uncertainty concerning the construction of Willow Cottages. No material evidence has been provided to support the contention that the cottages were built within a large excavation that involved substantial earthworks. It seems unlikely that a row of workers cottages built on a budget would have warranted the cost of such excavations.

4.17. The account of GW Potter mentioned above reports a 30ft deep valley containing the River Fleet tributary system. The mapping shown, and the prior existence of a route leading down what became Willow Road, would likely suggest that the cottages were constructed just above the stream level and aligned with the stream for the purposes of incorporating this feature into their sanitary design. The cottage yard levels stand at +83.10m OD and the stream bed seems to have been less than 1m below this.

4.18. Given the account of substantial filling of the valley above the site, it may be conjectured that the Willow Cottages were set on the natural hillside and that the higher ground seen around them, including Willoughby Road, has resulted from subsequently upfilling to suit subsequent development. This then suggests that the listed rear boundary walls of the cottage yards may not necessarily have been built as full earth retaining structures, a feature that may add to their fragility.

Analytical Method

4.19. Despite the analysis presented in the BIA, the Planning Committee did not consider the BIA to have sufficiently demonstrated that the proposed basement would not result in harm to the listed Willow Cottages. The BIA considered the scale of potential damage to both Willow Cottages and the rear retaining wall only by means of reporting the ground movements predicted by numerical modelling. In practice, although the outputs from numerical modelling need to be taken into consideration, all numerical modelling tools have limitations to their applicability and their output must therefore be subjected to reality and sensitivity checks. This type of analysis was challenged by Campbell Reith as it did not account for the possibility of ground movements caused during the installation of the basement underpinning.

4.20. The Willow Cottages have likely been subject to damaging past historic movements; however, the extent to which they or the rear retaining wall may suffer as a result of the development have been based on modelling the soil if it were to behave in a defined manner according to a set mode. There are therefore substantial uncertainties associated with this concept.

Consensus on Technical Matters

- 4.21. There does not seem to be a consensus on the technical matters resulting in a lack of clarity in presentation of the modelling, the limitations of the modelling techniques, and the interpretation of the assessment results. While Campbell Reith permitted the application to proceed on the basis of the collective information provided in the BIA Rev 4 (Oct 20) (doc F) plus subsequent supplementary notes (Feb 21) (docs I, J), it is the position of the Committee that a larger confidence gap existed between the technical experts.
- 4.22. The refusal decision can therefore be taken as a message that the Committee was not satisfied that the BIA, despite its impressive modelling and analytics, has sufficiently demonstrated the flood risk to the neighbouring heritage asset. Further, it is appreciated that a higher standard of review and confidence in a proposal is required in circumstances where there may be a perceived threat to a heritage asset, and that the benefit of a development would need to be demonstrated to outweigh any potential harm done to that asset.

Reason for refusal no.2 (Impact on Heritage Asset)

The proposed basement excavation, by virtue of the extent, depth and proximity to neighbouring listed building and the complexity of the construction sequence is considered to result in the potential for harm to Willow Cottages a heritage asset, contrary to policies A5 (Basements) and D2 (Heritage) of the London Borough of Camden Local Plan 2017 and policy BA2 of the Hampstead Neighbourhood Plan 2018.

Grade II Listed Willow Cottages

- 4.23. The Grade II heritage assets in question are located on the south side of Willow Road, known as Willow Cottages. The Historic England listing description is as follows:

“Terrace of 9 cottages. c1866. Stucco with rusticated quoins and 1st floor bands. Slated roofs. 2 storeys and semi-basements. 2 windows each. Square-headed doorways with splayed jambs, fanlights and panelled doors; Nos 33-37 with C20 Neo-Georgian doorcases and doors with arched heads. Entrances approached by stone steps with cast-iron railings. Round-arched recessed sashes with splayed jambs; ground floors with margin glazing. Shaped plaque inscribed “Willow Cottages” between 1st floor windows of Nos 37 and 38. INTERIORS: not inspected. HISTORICAL NOTE: built on the site of earlier almshouses.)”

- 4.24. The subject site at 31 Willoughby Road is located to the south of Willow Cottages and shares a boundary wall with multiple of the cottages. The boundary wall, which is also listed, can be described as a red-brick retaining wall abutting the flank and gardens of nos. 31 and 33 Willoughby Road. The retaining wall is under stress and has already been reinforced with steelwork.

Harm to Heritage Asset

- 4.25. It is considered that harm could occur to the boundary retaining wall as a result of the adjacent basement works. Inevitably, there will be movement associated with removing

the lateral support of this wall. Although the construction methodology has been described as relieving pressures that might presently be disturbing the wall, there does not appear to have been recognition that the wall must be withstanding lateral forces.

- 4.26. Both the boundary retaining wall and cottages themselves are undoubtedly frail structures and the foundations of each can be expected to shift merely as a result of changes in soil moisture levels, let alone by any potential hydrostatic effects or the consequences of flooding.
- 4.27. It is considered that the development is not of a routine nature in its complexity and potential impact on neighbouring properties. Therefore, the appellant was required to demonstrate, with a higher degree of confidence established through a BIA that the scheme would not present a potential risk of harm to the local residents.
- 4.28. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. If the retaining wall described above were to fail due to the basement works in question, the consequences for the listed buildings could be catastrophic.
- 4.29. The BIA has not satisfactorily demonstrated that the proposal will not cause underground disturbance such that harm may befall the listed buildings as a consequence. Paragraph 202 of the NPPF states that where a development proposal will lead to less-than-substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 4.30. Given that it cannot be guaranteed that the proposal will not lead to harm to the designated heritage asset and there is no public benefit, if the works are undertaken the listed buildings will be put at risk, contrary to policy D2 of the London Borough of Camden Local Plan 2017 and the NPPF.

Conclusion

- 4.31. The appellant considers that the development proposals would have no effect on surface water flooding and would therefore cause no harm to the heritage assets adjacent to the site. The Council considers that the proposal contains technical complexities, so much so that there are substantial uncertainties surrounding the existing and future ground and groundwater conditions. Further uncertainties include the history of the subject site and Willow Cottages with regards to their historic drainage, upfilling, and construction.
- 4.32. It is the Council's position that the Committee was correct to assess the proposals beyond the opinion of the planning officers and the BIA auditor and place greater weight than usual upon the need to prove there would be no unacceptable risk of damage to the heritage assets. They identified substantial uncertainties that could not be ignored, as the acceptability of potential impacts of the proposed works could not be identified until the present, pre-development risk levels have been suitably established. Assumptions that might in other circumstances be acceptably made in terms of configuration of the ground, hydrology, and below ground conduits and structure cannot be safely established where unusual past construction and drainage demand a correspondingly cautious approach.

5. Comments on the appellant's grounds of appeal

- 5.1. The appellant's statement of case is set out in multiple sections, with the main arguments being made in Section 6.0 The Main Issues in the Appeal (paragraphs 6.12 to 6.32).
- 5.2. The argument made in paragraphs 6.12 through to 6.19 regarding surface water are addressed in paragraphs 4.2 through to 4.22 above.
- 5.3. The argument made in paragraphs 6.20 through to 6.32 regarding the impact on the heritage assets are addressed in paragraphs 4.23 through to 4.30 above. It is worth noting that the Council considers the basement works could cause less than substantial harm to the listed Grade II cottages and associated rear retaining wall.
- 5.4. The appellant disagrees with the decision of the Committee, arguing that despite the recommendations of the Planning officers and independent advisors that they chose to discard it with no legitimate or justifiable reason thus constituting unreasonable behaviour. The Council disagrees with this statement, as the Committee has the unenviable task of forming a majority view in choosing between opposing technical submissions put forward by engineering professions of repute. While the Committee will have placed weight upon the technical advice provided by each of the three specialists (Eldred, Campbell Reith, GCG) they ultimately had to make a decision based both upon their own judgement using the criteria available to them. This is included technical information provided by local residents which supports the Committee and Council's position, demonstrating there were outstanding concerns which the appellant had not addressed.
- 5.5. The appellant has argued that the Council has behaved unreasonably in its decision to refuse the application. The Council does not agree with this position and considers it has followed its due process in the assessment of the planning application. The planning officer's recommendation were considered at a public meeting of the Planning Committee. The Council considered the application based on all the available including the officers report, internal consultees and third parties including expert witness. Members had reasonable concerns about the proposal to justify its decision. In cases where councillors overturn the advice of officers, the LGA/PAS guide to probity in planning for councillors and officers suggests that councillors should be ready to explain why they have not accepted the officer's recommendation. The reasons for refusal are backed up by planning policies and have been substantiated. The appellant needs to address these concerns and this appeal could not therefore have been avoided.

6. Conclusion

- 6.1. Based on the information set out above and having taken account of all the additional evidence and arguments made, the proposal is considered contrary to the Council's adopted policies.
- 6.2. The information submitted by the appellant in support of the appeal does not overcome or address the Council's concerns. For these reasons the proposal fails to meet the requirements of policy and therefore the Inspector is respectfully requested to dismiss the appeal.

7. Conditions

7.1. Should the inspector be minded to allow the appeal, it would be requested that conditions listed in Appendix A are attached the decision.

8. **S106 Legal Agreement:** should the inspector be minded to allow the appeal it would be requested that the attached Section 106 Legal Agreement is secured including the following head of terms:

- Approval in Principle
- Basement Construction Plan
- Construction Impact Bond
- Construction Management Plan
- Highways Contribution

The justification for these S.106 terms is included in the officer report, a copy of which has been provided with the questionnaire. It is also included as Appendix B in this document.

Should any further clarification or submissions be required, please do not hesitate to contact myself by the direct dial telephone number or email address quoted in this letter.

Yours faithfully,

Daren Zuk

Senior Planner
Supporting Communities Directorate

Appendix A

Recommended Conditions: 2020/0927/P

1. The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.

3. Prior to the commencement of the Prior to the commencement of works on site, tree protection measures shall be installed and working practices adopted in accordance with the Tree Survey Arboricultural Implications Assessment and Method Statement by Phelps Associates ref. PS 1037 dated 28th February 2019. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with BS5837:2012 and with the approved protection details. The works shall be undertaken under the supervision of the project arboriculturalist in line with the approved arboricultural report.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the Camden Local Plan.

4. The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.

5. The development hereby approved shall be carried out strictly in accordance with the BIA (and other supporting documents) compiled by Eldred Geotechnics Ltd as well as the recommendations in the Basement Impact Assessment Audit Report (Rev F) prepared by Campbell Reith, dated June 2021.

Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policy A5 of the Camden Local Plan 2017.

6. Prior to commencement of the relevant works, full details of hard and soft landscaping including details of any planters along the boundary with Willow Cottages, shall be submitted to and approved by the local planning authority in writing. Such details shall include details of any proposed earthworks including grading, mounding and other changes in ground levels. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, A5, D1, and D2 of the London Borough of Camden Local Plan 2017.