



MARCH 2024

# Planning Statement

Darwin Court, 2 – 24 Gloucester Avenue, London NW1 7BG

Iceni Projects Limited on behalf of  
Airspace Group Ltd

March 2024

ICENI PROJECTS LIMITED  
ON BEHALF OF AIRSPACE  
GROUP LTD

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**Planning Statement**  
DARWIN COURT, 2 – 24 GLOUCESTER AVENUE,  
LONDON NW1 7BG



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# 1. INTRODUCTION

1.1 This Planning Statement has been prepared by Iceni Projects Limited ('Iceni') on behalf of Airspace Group Ltd ("the Applicant") in support of a planning application for the construction of eight new dwellings via a single storey roof extension to the five buildings comprising Darwin Court, 2 – 24 Gloucester Avenue, London NW1 7BG ('the site').

1.2 This application is submitted for Full Planning Permission. The proposed description of development is as follows:

'Construction of a single-storey roof extension to the five buildings comprising Darwin Court to provide residential units, together with a range of upgrades to the existing buildings including accessibility enhancements, fire safety upgrades, waste and refuse store enhancements, landscaping and other works'.

1.3 The purpose of this Planning Statement is to provide the London Borough of Camden with an overall summary of the existing site and surroundings; the relevant planning history for the site and to provide justification for the Proposed Development in the context of London Borough of Camden Development Plan and national planning policies. Furthermore, this Planning Statement demonstrates that the scheme detailed in this planning application fully aligns with the Economic, Social and Environmental pillars of the National Planning Policy Framework as evidenced in a later section.

1.4 This application has been submitted following an intensive pre-application consultation process where the Applicant and their design team have discussed and refined the proposals following discussions with existing occupants of Darwin Court, officers at the London Borough of Camden and other local stakeholders and amenity groups.

## **The Applicant and Objectives**

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1.5 The proposal is being promoted by Airspace Group, a specialist consultancy and development company that follow a unique modular design approach that focuses on transforming existing roofs with minimal disruption across London.

1.6 The Airspace Group also seek to improve existing residential buildings as this is central to their ethos both commercially and ideologically. Development proposals would improve the standard of

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accommodation for occupants by creating high quality new dwellings whilst providing significant improvements to the quality and value of existing buildings.

- 1.7 Airspace Group has ensured that the thoughts and feedback of residents and neighbours have been considered through consulting with residents and neighbours over the past 12 months.

### **Submission Documents**

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- 1.8 In addition to this Planning Statement and Application Form prepared by Icen Projects as part of the planning application, the following documents and drawings have been prepared and submitted in support of this planning application:

<b>Document title</b>	<b>Author</b>
Site Location Plan	Tony Fretton Architects
Full suite of Drawings	Tony Fretton Architects
Design and Access Statement	Airspace Group
Daylight and Sunlight Assessment	Schofield
Heritage, Townscape and Visual Impact Assessment	Icen Projects
Landscape drawings	James Aldridge
Noise Impact Assessment	Scotch Partners
Statement of Community Engagement	Thornclyffe Communications Ltd.
Sustainability and Energy Statement	Envision
Fire Statement	Delta Fire Engineering
Financial Viability Assessment	Bidwells

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## 2. APPLICATION SITE AND BACKGROUND

### Site Description

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- 2.1 The Site is located along the southern portion of Gloucester Avenue in the London Borough of Camden. The Site is bounded by Gloucester Avenue to the west, neighbouring buildings to the north, Regent's Park Road to the south and the railway track to the east. The linear Site accommodates Darwin Court, a 1970s residential development divided into five blocks rising between four and six storeys. It comprises of five flat roofed apartment buildings. The buildings are constructed in linear form and are set within large plots with area of soft landscaping.
- 2.2 Darwin Court is located within the Primrose Hill Conservation Area. It is identified as being a building which detracts from the character and appearance of this part of the Conservation Area within the Conservation Area Appraisal. There are no designated heritage assets within the Site boundary. The Site is also subject to an Article 4 Direction which restricts the erection of gates, fences, walls, and enclosures which abut a highway.
- 2.3 The Site is in close proximity to Grade II Listed building Cecil Sharp House and 10 Regents Park Road to the west. The wall to the southeast of the side garden of 90-105 Darwin Court is identified within the Conservation Area Appraisal as making a positive contribution to the Area.
- 2.4 The site is located within Flood Zone 1, the lowest probability of flood risk.

### Site Context

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- 2.5 The Site's immediate surroundings comprises of predominantly low-rise residential with buildings heights ranging from 3-4 storeys. To the immediate east of the Site is the west coast mainline, with a line of verdant vegetation providing a visual buffer.
- 2.6 The Site is accessible, located approximately a 3-minute walk away from Regent's Park Road station and a 10-minute walk from Camden Town station. As such it benefits from a public transport accessibility level (PTAL) of 3.

### Planning History

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- 2.7 The site has been subject to various planning applications and are summarised in Table 2.1 below.

**Table 2.1 Summary of relevant applications**

<b>Application ref.</b>	<b>Description</b>	<b>Status</b>
J11/14/A/20634	Revised vehicular access arrangements involving means of access to the highway from the east end of Block E, and bricking up of access to the basement car parking area of Block E.	Conditional – 10 <sup>th</sup> April 1975
9501072	The erection of an additional storey on Blocks B C and E to provide twelve two-bedroom flats. as shown on drawing numbers 403/05 /06B /07B /08B /09A /10A /11A /12A /13C /14 and /15.	Refused – 16 <sup>th</sup> June 1995
P9600389	Erection of a mansard-type roof extension on two blocks (Blocks B & C) to provide eight additional self-contained flats and twelve car parking spaces in the basement behind Block C.	Refused (Subject to appeal decision) – 12 <sup>th</sup> February 1996
P9601290	Rebuilding of 20m length of boundary wall, as shown on drawing number DAR/96/CJC/01/	Grant full planning permission (Conds) – 29 <sup>th</sup> April 1996
C9600419	Demolition of a 20m section of unsafe boundary wall and its reconstruction, as shown on drawing number DAR/96/CJC/01.	Grant Conservation Area consent (conds) – 14 <sup>th</sup> of February 1996
PEX0200025 / CEX0200026	Demolition of approx. 34m of boundary wall and rebuild omitting gate feature as to match existing, but omitting 2 sections around the trees. As shown on drawing numbers:	Refused planning permission/ conservation area consent – 4 <sup>th</sup> February 2002

Application ref.	Description	Status
	2x photographic Schedules DC/4 05-09	
PEX0200023 / CEX0200024	Demolition of approx. 34m of boundary wall and rebuild including gate to match existing, but omitting 2 sections around the trees, and erection of railings to bridge this gap. As shown on drawing numbers: Photographic Schedule, DC/4 04B, and O6-09	Grant Full Planning Permission (conds)/ Conservation Area Consent (conds) – 22 <sup>nd</sup> April 2002.
2010/3788/P	Erection of an additional storey on each of the five buildings to provide 5 x 3-bedroom flats at roof level to the existing buildings.	Refused – 18 <sup>th</sup> October 2010

2.8 Whilst application 2010/3788/P also proposed an upward extension, it was a very limited submission comprising only drawings, a brief written statement and a low-quality architectural design. In discussions with officers, the Applicant and design team have agreed that the delivery of a cohesive and complimentary architectural approach to the roof extension is key to unlocking the potential of the Site.



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### **3. PRE-APPLICATION DISCUSSIONS AND PUBLIC CONSULTATION**

#### **Pre-Application Planning Advice**

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- 3.1 In advance of submitting the planning application, the applicant has engaged in formal pre-application discussions with the London Borough of Camden (ref. 2022/5303/PRE), with feedback received from Planning Officers on transport, urban design and the design of the upward extension and its relationship within the conservation area. The proposals have evolved in response to the feedback received, as outlined in the Design and Access Statement and this Planning Statement.
- 3.2 Overall, the pre-application process identified that the Council were supportive of additional housing on site through roof extensions. This was primarily down to the high-quality design of the roof extensions, which seek to incorporate unique architectural elements from the existing buildings.
- 3.3 Further discussion on key outcomes from this process are below.

#### **Impact on Conservation Area**

- 3.4 Officers highlighted that the Site is a 'negative' contributor in the Conservation Area Appraisal. It is considered that the buildings detract from the character and appearance of this part of the Conservation Area due to inappropriate qualities such as bulk, scale, height, and materials. The Primrose Hill Conservation Area is made up of a series of well laid out Victorian terraces and has a predominately residential character. Because of the vicinity to Primrose Hill and Regent's Park, it is also well provided with open space. The Darwin Court blocks are therefore in a prominent position on Gloucester Avenue and are appreciated in a number of longer views. The current status of the existing buildings are negative contributors to the Conservation Area. Therefore, officers considered that the employment of high-quality materials, architectural details, landscape and public realm improvements, and sensitive design further mitigate the harm caused.
- 3.5 Officers also highlighted that the proposal results in several public benefits including the provision of eight, high-quality and high-priority dwellings; payment-in-lieu of affordable housing; and improved accessibility access for existing residents of Darwin Court. Under these circumstances, it is considered that the proposal balances the harm caused by the roof extensions and is therefore acceptable on conservation grounds.

#### **Dwelling Mix**

- 3.6 Officers have welcomed the proposed unit mix as it aligns with policy H7 aim to contribute to meeting the priorities set out in the Dwelling Size Priorities Table and includes a mix of large and small homes.

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### **Roof Extensions**

- 3.7 Officers expressed a favourable view on the proposed roof extension deeming them acceptable in design and scale with minimal impact on neighbouring structures or the public realm. They note improvements in the current design, emphasising its alignment with the host buildings and enhanced continuity in the existing architecture of the building.

### **Amenity**

- 3.8 Officers considered that the proposed roof extensions, by reason of their setbacks, separation distances, and other mitigation measures, results in a proposal that will not have a significant negative impact on the amenity of any neighbouring residential occupier with regards to loss of daylight/sunlight, sense of enclosure, or overlooking/loss of privacy.

### **Transport**

- 3.9 Officers have informed that the provision of cycle parking should be shown on future plans and its provision will need to be secured by condition. In accordance with Policy T2 of the Local Plan, it is expected that all new development to be car free. The new residential units will need to be secured as on-street Resident parking permit (car) free by means of a Section 106 Legal Agreement. This will prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport.

### **Sustainability**

- 3.10 Officers were supportive of the current proposal as it would result in the retention and refurbishment of the existing building.
- 3.11 Furthermore, Officers have suggested air source heat pumps, solar panels and blue/green roofs as part of the proposal to maximise carbon reduction, biodiversity and attenuation benefits.

### **Statement of Community Engagement**

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- 3.12 A community meeting was held on the 17<sup>th</sup> of August 2022 with members of the project team and Darwin Court residents. The following topics were discussed:
- Service charge split between existing and proposed flats.
  - Overlooking and impact on view from the new flats.
  - Questions on water tanks and water table.

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- A question regarding the applicant's history.
  - A question on the timeline of common parts works.
  - Discussion about a fund to handle disputes, warranties, etc.

3.13 The Statement of Community Involvement by Thorncliffe Communications Ltd. fully demonstrates the applicant's commitment to thorough and meaningful public consultation and meets the requirements set out by the council.

3.14 A further public consultation took place on 6<sup>th</sup> March 2024 and gave residents the opportunity to ask further questions through an online platform.

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## 4. PROPOSED DEVELOPMENT

4.1 This planning application seeks full planning permission for the following:

### Description of Development

'Construction of a single-storey roof extension to the five buildings comprising Darwin Court to provide residential units, together with a range of upgrades to the existing buildings including accessibility enhancements, fire safety upgrades, waste and refuse store enhancements, landscaping and other works'.

### Development Layout and Design

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4.2 The development proposals for Darwin Court would comprise the following works:

- Construction of 8 x new dwellings via a single storey setback roof extension to each property.
- The three central properties would be provided within 2 x 2-bed dwellings and the two end buildings would be provided with 1 x 3-bed dwellings.
- The design of the roof extensions have sought to provide a crowning and complementary feature at roof level to help improve the buildings relationship with the local area.
- The installation of green roofs would be provided to all area of flat roof to improve water retention, urban greening and biodiversity.
- Improvements to existing buildings to provide inclusive, level access.
- The delivery of dedicated refuse/recycling storey.
- The delivery of cycle parking spaces for the new dwelling.
- Other interventions including improvements to the pedestrian exit from the car park and a new post room.

4.3 Further details of the proposals can be found within the design documentation prepared by Tony Fretton Architects and Airspace Group.

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## Dwelling Mix

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4.4 The proposal comprises a total of 8 residential units, with the following dwelling mix:

**Table 4.1 Proposed Dwelling Mix**

Unit Type	Number of Units	Percentage (%)
Two Bed	6	75%
Three Bed	2	25%

### Affordable Housing

4.5 The proposed development would not trigger a requirement to provide affordable housing on site, in line with Policy H4 of the Local Plan. The Applicant has submitted viability evidence with the application which, when independently reviewed, shall determine whether it is viable to make a financial contribution.

### Accessible and Adaptable Dwellings

4.6 As detailed in the Design and Access Statement which accompanies this planning application, all residential units have been designed to be accessible in accordance with the Building Regulations. All apartments will be Compliant with M4(2) of Approved Document M Volume 1 of the Building Regulations, with the exception of those criteria which are not practically possible to meet because of the constraints of the existing building, such as the communal corridors, doors and landing sizes.

4.7 The proposal would provide refurbished lifts and external platform lifts which will significantly improve access arrangements into the buildings for all residents and each apartment would have step free access from the ground floor lobby. The lift and staircase are a vertical continuation of that on the lower floors and would be achieved by extending the lift shaft and staircase cores.

### Appearance and Materials

4.8 The approach at Darwin Court is to undertake a single storey extension on each building, maintaining the uniform architectural treatment to each block and providing an improved termination to the buildings which is in-keeping with the ethos of the original architect. This approach ensures the blocks continue to be read as a family of buildings. The proposed façade compliments the existing building, avoiding adding a new material treatment. The brick is envisaged as subtly different, reflecting the tone of the existing brickwork without matching it exactly. This is in part a response to the uniform and lower quality existing brick, but moreover a way of making the additional storey clearly a terminating element. White aluminium frames in between the brickwork reflect the treatment of existing windows.

4.9 The proposal references the language of the existing building through the continued use of brick planes to create the long façades and windows that echo the building's proportion and rhythm. This

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enhances their relationship with the character of the existing building, being envisaged as an approach that the original architect might have taken.

- 4.10 The proposed new storey is envisaged as a set-back attic storey that provides a more successful and resolved termination to the buildings, whilst being consistent with their architectural language. The setbacks also remove the potential for overlooking and reduce the perceived impact on neighbouring buildings and the Conservation Area.
- 4.11 The proposed form of the rooftop apartments naturally reduces visual impact of the additional storey on the residential properties which face Darwin Court, and by the same virtue also reduce the perception of overlooking. Enhancements in landscaping to the front and rear of the buildings, as well as other benefits which the extension facilitates, will create an improvement to the Conservation Area. Further details can be found in the DAS.

#### **Landscaping**

- 4.12 The proposed landscaping offers an opportunity to contribute to the conservation area in terms of greenery and contribute by repairing the boundary walls and enhancing landscaping, whilst also providing a greater level of privacy and creating a better sense of ownership over the landscaping for residents.
- 4.13 The proposed scheme would retain the existing boundary walls and trees as well as provide green roofs. The addition of a low metal railing and a wide band of transparent naturalistic planting would separate public from private space. The style of planting would compliment the existing trees and retain the open appearance. Improved access would be created with new wider paths to each block and the addition of platform lifts.
- 4.14 The planting would be naturalistic in style but bold enough to balance the mass of the facade. Furthermore, the planting will create a visual cue and encourage residents to use the gravel paths and to deter non-residents from accessing the lawn areas. Furthermore, planting will be added along the public realm and the rear of the building and will help balance the mass of the façade. Simple ellipse shaped lawns are also proposed for the rear of the Site.
- 4.15 The proposed extensive green roofs would consist of plant communities that can easily deal with sun, wind and drought.
- 4.16 Further details can be found in the DAS.

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## 5. PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principal planning policy considerations which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations. The current development plan consists of:

- London Borough Of Camden Local Plan (2017)
- London Plan 2021.

5.2 Other material considerations include:

- National Planning Policy Framework (2023)
- National Planning Practice Guidance (2021)
- Camden Planning Guidance (2021)
- Primrose Hill Conservation Area Statement (2000)
- Conservation Area Appraisal (2000).

5.3 The National Planning Policy Framework (NPPF) provides the planning policies for England and how these should be applied. This section provides an overview of the Government's national planning policy and guidance that is relevant to the proposed development.

### London Plan

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5.4 The London Plan was adopted in March 2021 and is the spatial development strategy for Greater London.

5.5 **Policy D4 Delivering good design** sets out that developments should ensure they bring forward a high quality design.

5.6 **Policy D5 Inclusive Design** notes that proposals should support the creation of inclusive neighbourhoods.

5.7 **Policy D6 Housing Quality & Standards** requires proposals to be of high-quality design and provide adequately sized rooms with comfortable and functional layouts. Single aspect units should be

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avoided where there is no other appropriate design solution. Due consideration is to be given to minimum space standards and design, Sunlight/Daylight, passive ventilation, privacy, over-heating, amenity space and waste; with specific requirements noted in the policy and SPD to guide designers.

- 5.8 **Policy D7** maintains that developments should aim to provide suitable housing for London's diverse population.
- 5.9 **Policy D12 Fire Safety** requires proposals to achieve the highest standard of fire safety
- 5.10 **Policy D14 Noise** maintains that developments should aim to reduce, manage and mitigate noise.
- 5.11 **Policy G5 Urban Greening** sets out that proposals should contribute to the greening of London
- 5.12 **Policy H1 Increasing Housing Supply** seeks to increase the overall supply of housing within London during the plan period.
- 5.13 **Policy H2 Small sites** supports well-designed new homes on sites below 0.25ha in order to not only increase housing supply, but also diversify the mix and type of housing across London.
- 5.14 **Policy H10 Housing size mix** requires developments to consist of range of unit sizes
- 5.15 **Policy HC1 Heritage conservation and growth** reflects that proposals should consider the historic environment and heritage values of sites.
- 5.16 **Policy T6 Car Parking** supports car free developments
- 5.17 **Policy SI 2 Minimising greenhouse gas emissions** seeks to reduce greenhouse gas emissions and a reduction in energy demand.

#### **Local Plan**

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- 5.18 The London Borough of Camden Local Plan sets out the spatial strategy and the vision for the Borough and was formally adopted in July, 2017.
- 5.19 In addition to the above, the policies in Table 4.2 are relevant to the proposal.



**Table 5.1 Relevant Local Plan Policies**

<b>Policy Number</b>	<b>Policy Synopsis</b>
Policy G1	<b>Delivery and Location of Growth</b> - The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting projects that optimise their sites based on considerations such as design, sustainability, heritage, and accessibility. There is a commitment to resisting inefficient land use and encouraging a mix of uses, especially in accessible areas, with a preference for self-contained housing where feasible. Additionally, the Council supports coordinated development approaches across multiple sites that align with strategic objectives and prioritise key priorities outlined in the Plan.
Policy H1	<b>Maximising Housing Supply</b> - The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.
Policy H4	<b>Maximising The Supply of Affordable Housing</b> - The Council will aim to maximise the supply of affordable housing.
Policy H6	<b>Housing Choice and Mix</b> - The Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.
Policy H7	<b>Large and Small Homes</b> - The Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The Council will seek to ensure that all housing development, including conversion of existing homes and non-residential properties: a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and b. includes a mix of large and small homes.
Policy A1	<b>Managing the impact of development</b> - The Council will seek to protect the quality of life of occupiers and neighbours.
Policy A2	<b>Open spaces</b> - The Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure.
Policy A3	<b>Biodiversity</b> - The Council will protect and enhance sites of nature conservation and biodiversity.
Policy D1	<b>Design</b> - The Council will seek to secure high quality design in development. Development projects must integrate well with the surroundings, promoting accessibility, health, and safety while incorporating green spaces and

Policy Number	Policy Synopsis
	landscape design. Additionally, housing is expected to meet elevated accommodation standards, ensuring a positive impact on the community and environment.
Policy D2	<b>Heritage</b> - The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. Development within conservation areas are required to preserve or enhance the area's character, resist significant demolition of contributing unlisted buildings, oppose development outside the area causing harm, and safeguard trees and gardens that contribute to the conservation area's character.
Policy T1	<b>Prioritising walking, cycling and public transport</b> - The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
Policy T2	<b>Parking and Car-free development</b> - The Council will limit the availability of parking and require all new developments in the borough to be car-free.
Policy C6	<b>Access For All</b> - The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.
Policy CC1	<b>Climate Change Mitigation</b> - The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
Policy CC2	<b>Adapting to Climate Change</b> - The Council will require developments to adopt appropriate climate change adaptation measures.
Policy CC4	<b>Air Quality</b> - The Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.
Policy CC5	<b>Waste</b> - The Council will seek to make Camden a low waste borough.
Policy DM1	<b>Delivery and Monitoring</b> - The Council will deliver the vision, objectives and policies of the Local Plan by collaborating with partners to explore growth opportunities, securing necessary infrastructure, and actively managing land use. Planning contributions will be used to support sustainable development, address infrastructure needs, and mitigate the impact of development. The Council will also oversee scheme implementation, coordinate with neighbouring boroughs, and regularly monitor the implementation of Local Plan policies and infrastructure provisions.

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### **Emerging Policy**

- 5.20 The council is currently consulting on the new draft Local Plan from Wednesday 17 January to Wednesday 13 March 2024 to replace the current Camden Local Plan (2017) and Site Allocations Plan (2013). The local plan is anticipated to be to be adopted by Summer 2026 and will cover the period 2026-2041.

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## 6. PLANNING ANALYSIS

- 6.1 This section reviews the key planning considerations arising from the Proposed Development. It provides a reasoned justification for the Proposed Development in the context of relevant policy and the specifics of the site and its surroundings.

### **Principle of Development**

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- 6.2 The emerging proposed development would see the provision of eight high quality residential apartments.
- 6.3 Policy H1 of the Local Plan (2017) notes that housing is the Council's land use priority throughout the borough and the optimisation of sites to deliver as many new homes as possible is encouraged. The policy notes that the Council wish to exceed a target of delivering 16,800 new homes between 2016/17 and 2030/31. The proposed development would therefore positively contribute to the Council's aims of exceeding their housing targets and land use priorities. Additionally, the proposal for an upward extension of residential units aligns with the principle of development, as the current function of the residential accommodation already supports the principle of residential use.
- 6.4 Policy D4 within the emerging local plan suggests that roof extensions will be supported in principle where they do not adversely impact on conservation areas in accordance with policy D5 -Heritage. The proposed development will not adversely affect the conservation area but contrastingly, would improve the impact of the buildings on the conservation area as explained below.
- 6.5 The principle of delivering new housing on site should therefore be acceptable in principle, subject to addressing the relevant design, heritage and other technical considerations.

### **Affordable Housing**

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- 6.6 Policy H4 of the local plan which aims to increase the delivery of affordable housing and requires a payment-in-lieu of affordable housing for developments which have capacity for fewer than 10 additional dwellings.
- 6.7 The Financial Viability Assessment demonstrates that the Proposed Development cannot sustain any payment in lieu of affordable housing. The Proposed Development generates a development profit which is below current market requirements, however a relatively small improvement in sales values would see this profit improve to a level where it could be delivered by a rational developer.

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- 6.8 Whilst the proposed development does not completely comply with policy H4 of the Local Plan, the financial viability assessment demonstrates why this is acceptable for this scheme.

### **Design**

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- 6.9 Good design is paramount for new development, particularly new development in Conservation area as demonstrated in Policy D4 of the London Plan and D1 of the Local Plan. This has been a key part of pre-app discussions and how the design has evolved.
- 6.10 The scheme therefore responds to policy as the proposal envisages a set-back attic storey which is consistent with the architectural language of the building. The proposal references the language of the existing building through the continued use of brick planes to create the long façades and windows that echo the building's proportion and rhythm, enhancing their relationship with the character of the existing building, being envisaged as an approach that the original architect might have taken.
- 6.11 Furthermore, the HTVIA report notes that the Site is also noted in the Conservation Area Appraisal (2000) as a negative contributor; therefore, the recommended changes provide an opportunity to reduce the impact it has on the conservation areas aesthetic.
- 6.12 Further detail regarding the proposed design is set out within the Design and Access statement from Tony Fretton Architects.
- 6.13 The proposal is therefore of a good design and in line with policy D4 of the London Plan and D1 of the Local Plan.

### **Landscaping**

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- 6.14 Policy G5 of the London Plan notes that proposals should contribute to the greening of London, this is reinforced by policy A2 of the Local Plan which aims to protect, enhance and improve access to open spaces and other green infrastructure.
- 6.15 The proposed landscaping offers an opportunity to contribute to the conservation area in terms of greenery and contribute by repairing the boundary walls and enhancing landscaping, whilst also providing a greater level of privacy and creating a better sense of ownership over the landscaping for residents. The landscape would be enhanced through the addition of green roofs, better access created with new wider paths. Additionally, the style of planting would compliment the existing trees as well as to deter non-residents and balance the mass of the façade.
- 6.16 Further detail regarding the proposed design is set out within the Design and Access statement from Tony Fretton Architects.

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- 6.17 Therefore, the proposal complies with policy G5 and A2 as the landscaping enhances green infrastructure.

### **Residential Quality and Mix**

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- 6.18 Policy H10 of the London Plan and H6 and H7 of the Local Plan set out that schemes should consist of a range of unit sizes and Policy D6 requires housing development to be of a high-quality design and provide adequately-sized rooms.
- 6.19 The proposed residential units would be designed to deliver a high-quality residential environment for future residents. Particular regard has been given to floor to ceiling heights, orientation, providing dual aspect units and providing adequate private amenity space. Proposed plans showing internal layouts have been submitted as part of this application.
- 6.20 The unit mix of the proposals would comprise 2 x 3-bed units and 6 x 2-bed units to response to the Council's priority for market housing to be 2- and 3-bed units.
- 6.21 The proposed development would also be equipped with a lift ensuring that each new apartment would be able to provide level access in line with Part M4(2) of the Building Regulations.
- 6.22 Consequently, the proposal aligns with policy H10 of the London Plan and policy H6 and H7 of the Local Plan as the plan delivers high-quality dwellings of a range of unit mix which comply or exceed the relevant space standards as set out in London Plan (2021) and the Local Plan (2017). Full regard will be given to all the relevant internal residential standards set out within the Housing CPG, including all baseline and best practice standards.

### **Heritage and Townscape**

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- 6.23 Policy HC1 of the London Plan and H1 of the Local Plan aim to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.
- 6.24 It is concluded that the proposed development is sympathetic to the setting of the surrounding heritage assets, namely the Grade II listed Cecil Sharp House, and 10 Regent's Park Road, through subtle references and appreciation of the detailing and materiality of bold twentieth century buildings, which are distinctive within the Primrose Hill Conservation Area.
- 6.25 The proposal would provide high-quality and contextual urban design whilst also optimising the Site.
- 6.26 Furthermore, it is noted that the Site is considered to be an acceptable location for increased height, despite the height being relatively modest in the wider context of taller buildings in the surrounding

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area. Additionally, the quality of the design would either elevate the existing building or have a neutral effect on visual amenity and townscape character and is thus considered to be acceptable in regard to both national and local policy requirements.

- 6.27 Therefore, the proposal is considered to meet Policy HC1 and H1 of the London Plan and the Local Plan.

### **Daylight and Sunlight**

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- 6.28 Policy H6 and A1 of the Local Plan and Policy D6 of the London Plan seek to ensure that sunlight, daylight and overshadowing levels are adequate in order to preserve the quality of life of occupiers and neighbours and to secure high quality homes.
- 6.29 The results of the tests show that whilst reductions would occur to individual windows, the amount of residual daylight received to each dwelling would remain high all within the recommended 0.80 times the former values for both VSC and NSL.
- 6.30 A similar pattern occurs with the sunlight APSH assessment where all rooms considered pass the BRE recommendation of no more than 0.80 times the former values.
- 6.31 The proposed scheme is therefore fully compliant with the BRE Guidance and Policies H6, A1 and D6.

### **Sustainability and Energy**

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- 6.32 Policy SI 2 of the London Plan and CC1 of the Local Plan seek to reduce greenhouse gas emissions and a reduction in energy demand.
- 6.33 A reduction in emissions would be achieved through adopting efficient building fabric, including new insulation and highly efficient glazing. Measures are also incorporated to minimise pollution, footprint of the development and reduce water use. The scheme would incorporate a range of energy-saving measures and is to achieve a 73.13% reduction in carbon emissions, compared to a notional existing building baseline. A 21.04% saving has been achieved through the inclusion of highly efficient ASHPs and PV.

### **Lighting**

- 6.34 External lighting shall be provided at the new roof level, designed by a lighting specialist, to facilitate safe pedestrian access around the building, with control implemented through a presence and daylight sensor array to prevent nuisance lighting.

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- 6.35 Internal lighting within the building would be meticulously crafted by a specialist to ensure a welcoming ambiance and adequate illumination for inhabitants, incorporating a combination of downlights, pendant fittings, and manual, PIR, and daylight dimming controls.

#### **Ventilation**

- 6.36 Mechanical ventilation with heat recovery and natural ventilation would be the preferred method to sustain the environment within the dwellings. Natural ventilation would be provided to reduce the risk of overheating in the summer by a method suitable to the space and also with full consideration to security and safety. Additional natural ventilation and purge would be achieved by utilising the openable windows. The design of the ventilation systems would be undertaken in conjunction with the project Architect to provide a fully integrated solution. The ventilation openings would be designed to achieve ventilation at a rate to satisfy the latest building regulations part F. The kitchens, bathroom, bedrooms and living room areas will be provided with type 4 continuous mechanical supply and extract ventilation with heat recovery.
- 6.37 The development is therefore considered to comply with the London Borough of Camden's Energy and Sustainability policy CC1, along with those found within Policy SI 2 of the London Plan.

#### **Noise**

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- 6.38 Policy D14 of the London Plan and policy A4 of the Local Plan seek to ensure that noise and vibration is controlled and managed.
- 6.39 The submitted Noise Impact Assessment concludes that the level of noise emissions from building services plant, when assessed at any noise-sensitive neighbour is expected to be in line with the 'Green' category set out in the Camden Local Plan 2017. Additionally, it sets out that noise ingress from environmental surroundings such as rail and road traffic can be mitigated via glazing and opaque façade elements such that internal noise levels in relevant noise-sensitive spaces is expected to be in line with the 'Green' category set out in the Camden Local Plan 2017.

#### **Fire Safety**

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- 6.40 Policy D5 and D12 of the London Plan sets out that all developments should achieve a high standard of fire safety as well as accessibility and inclusive design.
- 6.41 The submitted Fire Statement identified that the existing building lacks significant fire safety measures such as ventilation and adequate provisions of fire service access. Therefore, it is Delta's opinion that the building in its current form does not meet the Functional Requirements B1 to B5 of Part B of the Building Regulations and the existing building do not comply with the London Plan Policies D5(B5) and D12. The proposal of the additional level provides an opportunity to significantly enhance the fire safety measures within each of the blocks in the Darwin Court development to



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comply with policy. This would be done through the addition of firefighting lifts, automatically opening vents, dry risers, cross corridor doors to create protected stair and lift, sprinklers, and improved alarm detection and signage.

## **Transport**

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- 6.42 Policy T1 and T2 of the Local Plan and T6 of the London Plan state that the council will promote sustainable transport by prioritising walking, cycling and public transport in the borough and require all new developments in the borough to be car-free and will encourage the use of more sustainable modes of transport such as walking, cycling and public transport. As the development will be car-free, it aligns with all the above policies.
- 6.43 The existing building does not contain any formal cycle parking areas. The proposal would deliver 16 secure cycle parking space which would be accessed via the central accessed road and would benefit the wider buildings.

## **Servicing, Deliveries and Refuse**

- 6.44 Deliveries and servicing would be accommodated as per the existing situation. With regard to refuse store, the existing reduce store located at the centre of the site would be reconfigured to accommodate the additional refuse requirements.

## **Ecology and Trees**

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- 6.45 Policy A3 of the Local Plan seeks to protect and secure additional trees and vegetation. The on-site existing trees would be retained and the green space surrounding the Site and the communal garden would be enhanced through the proposed landscaping works. This includes the introduction of new planting which would increase the biodiversity of the Site.
- 6.46 The proposed green roofs would facilitate a thriving ecosystems within an urban environment, contributing significantly to biodiversity and ecological balance. They would create vibrant habitats that could support a diverse array of plant and animal life and would attract and sustain insects. Bees, butterflies, and other pollinators, contributing to the crucial process of pollination and this would not only enhances the local flora on the green roof itself but also has positive cascading effects on the surrounding environment. The green roofs would also encourage a variety of bird species.
- 6.47 Overall, the introduction of green roofs and an increase in planting across the site would greatly enhance and support the biodiversity of the Site in accordance with Policy A3.

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## 7. SUMMARY AND CONCLUSION

- 7.1 This Planning Statement has been prepared on behalf of Airspace Group Ltd., in support of an application for full planning permission at Darwin Court, 2 – 24 Gloucester Avenue, London NW1 7BG.
- 7.2 These proposals include a rooftop extension to facilitate the creations of up to eight new residential dwellings (Use Class C3).

### **Economic Benefits**

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#### **Local Economy**

- 7.3 The proposal would also increase the provision of job through the construction of an additional housing. Furthermore, the addition of residents living within the extended property may increase demand for local services, therefore contributing positively to the local economy.

### **Social Benefits**

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- 7.4 The proposed development provides social benefits as it delivers a high-quality mix of units that increases the housing supply of a highly demanded mix.
- 7.5 Further benefits of the building for all residents include landscaping upgrades, new refuse and bike stores, internal upgrade works to the entrance of the lobbies of the existing building as well as the provision of platform at each entrance to create better mobility access on site.
- 7.6 The development also facilitates significant fire safety upgrades for the existing building. These upgrades include new ventilation to existing corridors, automatically opening vents to the heads of stairs, new dry-risers to every building, fire-fighting lifts in the taller buildings, improved signage and detection.
- 7.7 The proposed development also provides a CIL and S106 contributions that will benefit the wider community. Additionally, updated infrastructure through the provision fibre broadband installation will also benefit the public through enhanced internet access.

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## **Environmental Benefits**

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### **Active Travel**

- 7.8 The provision of increased residents cycle parking and storage provides environmental benefits therefore encouraging active travel. Furthermore, the ecological value will be enhanced through the urban greening and general landscape improvements.

### **Energy Efficiency**

- 7.9 The proposed development also aims to improve energy efficiency thereby resulting in a reduction in carbon emissions. Energy efficiency measures include high performing fabric with low target u-values, good air permeability performance, low-energy lighting, mechanical ventilation with heat recovery, space and water heating provided by air source heat pumps, PV panels on new roof and improved energy efficiency of existing fabric through new roof. Further details of these benefits are included in the DAS.

## **Overall Conclusion**

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- 7.10 The Development Proposals submitted for approval as part of this application would provide an increased the housing supply, improved building amenities and fire safety as well as environmental benefits through the encouragement of active travel and enhanced energy efficiency.
- 7.11 In conclusion, these proposals are considered to be compliant with London Borough of Camden's Local Plan (2017) and national policies. The proposal would respect the surrounding design and location and would not result in an unacceptable level of noise and disturbance to nearby residential properties. The proposal would not have an unacceptable impact on neighbouring amenity or the historic environment and will result in less than substantial harm or neutral impacts to the conservation area.
- 7.12 Accordingly, we consider the proposal is in line with the Development Plan and in accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), should be considered favourably and approved without delay.