

5 Bacon's Lane Planning Statement

Simon Fraser

01 October 2024

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1.0 Introduction

Purpose of document

This Planning Statement has been prepared by Lichfields on behalf of our client, Simon Fraser and concerns the demolition of the existing house and single storey annexe and the development of a two storey house at 5 Bacon's Lane, Highgate, London, N6 6BL.

- 1.1 This Statement forms part of a planning application for the development which involves the:

“Demolition of the existing house and single storey annexe and the development of a two-storey house.”

- 1.2 The design vision behind these proposals can be described as threefold:

- to improve residential amenity and living conditions to meet the needs of current and future occupiers;
- to improve the energy performance and future longevity of a house on the site; and
- to enhance the setting of the heritage assets within the wider context of the site with an innovative and creative contextual response that contributes to their significance and sense of place.

- 1.3 The design of the proposals is further explored in the accompanying Design and Access Statement ('DAS') which should be read alongside this Statement.

- 1.4 This Planning Statement assesses the proposed development against relevant policies in the Statutory Development Plan, having regard to other material planning considerations.

- 1.5 The Statement is structured in the following sections:

- 1 Introduction
- 2 Baseline conditions
- 3 Background context
- 4 Planning policy
- 5 Planning assessment
- 6 Conclusion

2.0 **Baseline conditions**

Site and surrounding area

- 2.1 No. 5 Bacon's lane is a two-storey house with a single-storey annexe to the west and a garage to the east. The property has three bedrooms and is a brick construction with white painted render (total of 158 sqm GIA). The property was originally designed by Sir Anthony Cox of the Architect's Co-Partnership in 1957 before undergoing significant remodelling in 2007.
- 2.2 Bacon's Lane is a narrow lane on the slope south of South Grove, and benefits from views of the trees in Highgate West Cemetery. The entrance to this private road is marked by a metal barrier and by rough-hewn granite bollards and kerbs. The enclave was developed in the 1950s when a distinct group of eight houses were built on the site of the Old Hall kitchen garden and orchard of a 19th century house.
- 2.3 No. 5 Bacon's Lane is not listed but it is located within the Highgate Conservation Area and archaeological priority area. The site is adjacent to 6 Bacon's Lane which is Grade II listed and Highgate Cemetery which is designated as a Grade I Registered Park and Garden and Metropolitan Open Land 'MOL'. The site does not fall within any designated viewing corridors.
- 2.4 No. 5 Bacon's Lane was originally designed by Anthony Cox in 1957 and featured a mid-century design and simple boxed form. The house was remodelled in 2007 due to external and internal cracking caused by subsidence and water penetration into the timbers. Alterations included a replacement roof, windows and doors, over-rendering in white, and the additional of a timber-clad garage. The 2007 amendments are considered to have substantially changed the character of the house, erasing the mid-century character.
- 2.5 Overall, the character of Bacon's Lane comprises distinctive mid-century single houses of a similar height and architectural language. The narrow lane sloping south towards Highgate Cemetery features brick boundary walls on each side, obscuring views of the houses on either side. Due to the slope and curvature of the lane, No. 5 Bacon's Lane has limited visibility from the public realm on South Grove. Due to the significant tree cover the site is not visible from within Highgate Cemetery.
- 2.6 The site is adjacent to 6 Bacon's Lane which is Grade II listed and Highgate Cemetery which is designated as a Grade I Registered Park and Garden and Metropolitan Open Land 'MOL'. The site does not fall within any designated viewing corridors. St Michael's Church is not considered to be affected by the minor changes to the form of the building.
- 2.7 In the pre-application feedback dated 29 July 2024, the LPA describe the site as being a positive contributor to the character and setting of the Highgate Conservation Area. The LPA also observed from the pre-application site visit that the house has poor energy performance and is in need of upgrading to modern living standards.

Condition

- 2.8 Chapter 3 of the DAS and the submitted Condition & Feasability report explain that the property has severe structural issues caused by movement and also poor thermal

performance and weathering issues. Thermal imaging analysis reveals significant heat losses occurring in the external doors, windows and at the recessed wall junction between the ground and external rendered walls.

- 2.9 The existing condition of the house, and its poor environmental performance, are part of the need, and justification, for significant demolition of the house, with a proposed replacement.

3.0 Background context

Planning history

- 3.1 There are several historic planning permissions relating to external alterations and extensions at the site:
- 3.2 On 8 March 2007, planning application ref. 2007/0960/P was approved for:
- “Internal and external alterations to include replacement roof, windows and doors and erection of a timber framed garage to single family house”.*
- 3.3 On 5 December 2012, planning application ref. 2012/6463/P was submitted for:
- “Erection of a part one, part two storey side extension with terrace at rear first floor level to existing house (C3) following the demolition of the existing single storey side wing”.*
- 3.4 Application ref. 2012/6463/P was subsequently withdrawn and planning application ref. 2013/7019/P was approved on the 15 July 2014 for the same proposal. The planning permission subsequently expired on the 15 July 2017 and planning application ref. 2017/2646/P was submitted again on the 12 June 2017 for the same proposal. Conditional planning permission was granted on 29 September 2017 and the approval of details was granted for the following on the 31 July 2019:
- “Details of the construction management statement required by condition 6 of planning permission 2017/2646/P granted on 29/09/17 (for erection of part single, part 2- storey side extension with terrace at rear first floor level to existing house (C3) following the demolition of the existing single storey side wing)” (ref. 2019/3157/P).*
- 3.5 This was the only pre-commencement condition that required discharging. Condition 2 (facing material details) and condition 5 (green roof details) did not require discharging until the relevant part of the development commenced.
- 3.6 Following the approval of application ref. 2019/3157/P, ground works commenced in accordance with the planning permission and the initial foundations of the extension were constructed. Assent Building Control visited the site to approve the foundations and issued an inspection record on 5 August 2019 (see chapter 3.0 of the pre-application submission report). Planning permission ref. 2017/2646/P has therefore been implemented.
- 3.7 Works ceased after the construction of the foundations and no further submissions were made for Condition 2 & Condition 5.

Pre-application engagement

- 3.8 On 19 February 2024 a pre-application submission was validated by the Council for the following proposal:
- “Proposed two-storey residential extension to replace existing annexe. Reconfiguration and refurbishment works to existing house”.*
- 3.9 A site visit meeting took place on 10 May 2024 and the proposal was assessed by Daren Zuk with written feedback provided on the 29 July 2024.

3.10 Summary of the pre-application feedback:

- The principle, scale and height of the proposed two-storey residential extension was considered acceptable.
- In terms of appearance and materiality, the lower storey as brick was preferred to reflect the modern architectural approach and language of other buildings on Bacons Lane. The roof line was considered overly complicated with multiple ridge lines.
- The proposal would need to satisfy sustainability planning policies relating to reusing materials, undertaking a Whole Life Carbon (WLC) Assessment and a Sustainability and Energy Statement that would be commensurate with the scale of the development.

3.11 The proposed planning application addresses the pre-application feedback and seeks to resolve issues raised by the Council as detailed further in the following section.

3.12 The submitted DAS explains the iterative design process and modelling work that has been carried out since the pre-application stage to improve the proposal's design.

4.0 **Proposal**

4.1 The proposal at 5 Bacon's Lane, London, N6 6BL is for:

“Demolition of the existing house and single storey annexe and the development of a two-storey house”.

4.2 Full details of the proposal are set out in the accompanying DAS prepared by Simon Fraser RIBA. The proposed new house would be fit for purpose, meet the current building regulations and would be built to meet and exceed current embodied and operational carbon targets where possible – resulting in a new house that minimises its long-term impact on the environment. We have provided a summary of the proposed development below.

Proposed ground floor layout

4.3 Chapter 5 of the DAS shows a comparison between the existing, previously approved and the proposed ground floor plans. The line of the north-facing annexe wall would be retained and the line of the existing two-storey building is increased by 1 m to the rear. Overall, the proposed three bedroom house would have a total GIA of 306 sqm which is an increase of 48 sqm when compared to the 2017 permission.

4.4 The proposed ground floor layout would comprise:

- 1 the removal of both existing entrances and creation of one central front door and hallway to the north elevation adjacent to Bacon's Lane and an alternative entrance from the garage;
- 2 a new external bin store and Air Source Heat Pump (ASHP) is proposed to the north-west of the property in front of the north elevation of the house. A dense hedge is in front of the ASHP to conceal it;
- 3 the replacement of the existing garage with a new garage structure. The proposed new garage is relocated to the south of the existing garage and is of a reduced height. It includes a metal portico in the location of the existing garage and features a green roof; and
- 4 WC and utility spaces are located to the north facing ground floor whilst habitable spaces (kitchen, dining and living) are located to the south with an outlook to the garden.

First floor layout

4.5 At first floor level there would be a set back upper-storey. There would be two en-suite bedrooms, a studio and landing area.

Design and appearance

4.6 The proposal seeks to maintain a mass similar to the 2017 permission. The house would be a pre-fabricated modular construction. CGI images are provided in the submitted DAS to indicate the proposed external finish of the new house.

- 4.7 The ground floor elevation would comprise a 'mortar-slurried' low-carbon stone brick and the upper storey would be clad with timber modular panels within a vertical timber pier frame. The main entrance is marked by a lower-storey light timber and patinated metal pergola. To the rear, a patinated metal pergola is proposed to provide shading and to control solar gain.
- 4.8 The roof is proposed to be finished with a single-ply membrane and would maintain the same parapet height as previously approved in 2017. A new chimney is located in a similar position to the existing, in a material to match the north elevation lower level. Green roofs are proposed at first floor level to the south roof and on the lower level garage.

5.0 **Planning policy**

5.1 Statutory development plan 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

5.2 Paragraph 139 of the NPPF (2023) states that in determining applications, great weight should be given to 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 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.

5.3 The statutory development plan for the site comprises:

- 1 Camden Local Plan (2017)
- 2 Highgate Neighbourhood Plan (2017)
- 3 The London Plan (2021)

5.4 The National Planning Policy Framework (NPPF) (2023), National Planning Practice Guidance (NPPG), Adopted London Borough of Camden Supplementary Planning Documents (SPDs) and Highgate Conservation Area Appraisal and Management Strategy (2007) are also material considerations.

5.5 The Council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation. The draft Plan is a material consideration and can be taken into account in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

6.0 **Planning assessment**

6.1 The relevant planning issues which have been assessed are:

- 1 Principle of development
- 2 Design
- 3 Amenity
- 4 Biodiversity and ecology
- 5 Energy and sustainability
- 6 Archaeology
- 7 Transport
- 8 Planning Obligations/CIL

Principle of development

6.2 The proposal is for the demolition of the existing house and single storey annexe and the development of a two-storey house.

6.3 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 8b promotes sustainable development which includes supporting the delivery of a range of homes to meet the needs of present and future generations.

6.4 Local Plan Policy H3 seeks to ensure that proposals to existing houses continue to meet the needs of existing and future occupiers and resists proposals that would result in a net loss of residential floor space. The property would remain a three-bedroom home and the proposal would not result in a loss of residential floor space, but would be of the highest quality design, improve living conditions and enhance the energy performance of the property. The proposal is therefore acceptable in principle and in accordance with Local Plan Policy H3.

6.5 The Local Plan and Highgate Neighbourhood Plan set out the policies that will be used to determine planning applications for the redevelopment of a residential house and explains that proposals will be assessed against policies for design, neighbouring amenity, sustainability and the historic environment. These matters are therefore important to the acceptability of the proposal and are assessed below.

Energy and sustainability

6.6 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, and policies relevant to sustainability are set out throughout the NPPF.

6.7 London Plan Policy GG6 (Increasing efficiency and resilience) seeks to improve the energy efficiency of developments. Local Plan Policy CC1 (Climate change mitigation) further requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable. Policy CC1 also supports and encourages sensitive energy efficiency improvements

to existing buildings. Similarly, Local Plan Policy CC2 (Adapting to climate change) encourages the incorporation of bio-diverse roofs where appropriate and measures to reduce properties overheating.

- 6.8 In accordance with Local Plan CC1, a study was carried out in order to understand the benefits of demolishing the current property and replacing it with the proposed development. The report by Webb Yates Engineering shows that, in addition to ensuring structural safety, demolishing and rebuilding would lead to the most energy and carbon efficient design. In addition, a Whole Life Carbon (WLC) assessment has been undertaken to justify the proposed demolition works. A WLC assessment following RICS V2 methodology has been carried out using the AECB PHRibbon Software. This reports the same data as is normally found in the GLA's WLC spreadsheet. The proposal of the replacement house therefore considers the whole-life carbon impact.
- 6.9 The WLC assessment shows that, due to the extent of performance improvements in the new-build, the WLC operational and embodied emissions of the new build option are comparable over 60 years than that of the partial demolition option and significantly better than if the house was left in its current state with minimal internal changes. The reason why the new build is similar to the partial demolition in carbon terms is due to thermal inefficiency of the existing floor and walls and necessary rectification required should the existing structure be partially retained (see the submitted Condition & Feasibility Study Option Appraisal for further information).
- 6.10 Full demolition allows for the most energy efficient design to be proposed and to adopt a fabric first approach to reduce energy demand and improve thermal performance. It is proposed to use a number of energy efficiency measures to reduce the energy demand of the development in line with the London Plan energy hierarchy and Local Plan Policy CC1. Full details are provided by the Sustainability Statement produced by Webb Yates Engineers and include proposals for an ASHP, passive ventilation measures and overheating mitigation measures.
- 6.11 The submitted sustainability statement produced by Webb Yates Engineers concludes that the proposed passive and active design measures along with renewable technologies for the development results in an overall improvement over Part L of 68%, with a 65% improvement observed from energy efficiency measures. As a single residential development, an overall carbon reduction of 19% or more should be achieved. The degree of improvement observed comfortably meets this target, and the targets of 10% improvement at Be Lean stage and 35% at Be Green required for major developments.
- 6.12 Overall, the proposal meets local and regional planning policy requirements in relation to environmental standards.

Reusing materials

- 6.13 Paragraph 8.17 of the Local Plan states that all proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building; the Council expects developments to divert 85% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site.

- 6.14 London Plan Policy SI 7 sets a target of 95% of construction and demolition waste to be diverted from landfills (reuse, recycle, recovery) and 95% of excavation waste to be put to beneficial use. This means developments should aim to divert 95% of waste from landfill, comply with the Institute for Civil Engineers' Demolition Protocol, and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site.
- 6.15 The proposal would seek to maximise the use of recycled, responsibly sourced and low impact materials to greatly reduce the embodied carbon of the development. The proposed development would implement a Site Waste Management Plan (SWMP). Demolition waste would be minimised, reused and recycled, where practicable to meet the London Plan target. These measures would aid in minimising waste to landfill, with the aim of diverting at least 95% of demolition and construction waste from landfill. As part of this application a pre-demolition audit has been produced which identifies all materials within the building and documents how they would be managed. The report notes multiple opportunities to re-use existing brickwork, concrete and insulation materials on and off-site. The report also notes opportunities to utilise local timber re-use schemes.
- 6.16 Overall, the proposal is in accordance with the aforementioned policies and will significantly enhance the energy performance and sustainability credentials of the property compared to the existing situation and the extant planning permission.

Design

- 6.17 Policy at all levels requires high quality design. The NPPF attaches great importance to the design of the built environment; NPPF paragraph 139 states that in determining applications, great weight should be given to 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 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.
- 6.18 London Plan policy D4 promotes a design-led approach to development, stating that proposals should enhance local context by delivering buildings that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.
- 6.19 The Council's design policies are aimed at achieving the highest standard of design in all developments. Local Plan Policy D1 (Design) requires development to be of the highest architectural and design quality which improves the function, appearance, and character of the area. Camden's Design SPD (2021) emphasises Camden's commitment to design excellence and expects development schemes to consider:
- 1 the context of a development and its surrounding area;
 - 2 the design of the building itself;
 - 3 the use and function of buildings;
 - 4 using good quality sustainable materials;

- 5 creating well connected public spaces and good quality public realm;
- 6 opportunities for promoting health and well-being; and
- 7 opportunities for improving the character and quality of an area.

- 6.20 Highgate Neighbourhood Plan Policy DH2 (Development Proposals in Highgate's Conservation Areas) states that development proposals should preserve or enhance the character or appearance of Highgate's conservation areas, and respect the setting of its listed buildings and other heritage assets.
- 6.21 Chapter 5.0 of the DAS presents the design narrative and for the proposal in detail. The materiality has been carefully chosen to refer contextually to the surrounding houses and orchard walls to enhance the character of Bacon's Lane. The proposed materials are considered in depth in the DAS at chapter 5.5. The external materials include mortar-slurried bricks, cleft textured limestone, timber and patinated metal. The chosen materials provide more opportunity to use modular off-site construction and the embodied carbon content of materials used will be minimised as far as possible.
- 6.22 In term of appearance, the proposal introduces a continuous horizontal plane at first floor level. The first storey to the east is recessed back from Bacon Lane to be subordinate, maintaining an appropriate scale within the architectural enclave of Bacon's Lane. The upper storey is also set back to the south and south-west near the No. 4 boundary, further than the 2017 permission, to be subordinate to the form of the existing building and to emphasize the storey-high horizontality. The roofline is set-back so that the proportions of the upper storey are subordinate to the ground floor level.
- 6.23 The extent of glass on the south façade is based on principles to maximise solar gain whilst the introduction of horizontal metal louvres to the south upper level and Pergola are anticipated to mitigate overheating risk through passive design measures.
- 6.24 The design has been further refined since the pre-app to offer more depth, reveal and material interest on the North elevation whilst providing a consistent language throughout. The horizontality between the ground and first floor level has been accentuated around the building and deeper timber frame vertical piers have been introduced to rhythmically continue around all elevations.
- 6.25 The scale and massing of the proposal is considered acceptable in the context, given the existing different forms and massing on Bacon's Lane. The proposal will be set back at the first floor and the garage will be reduced in height, compared to the approved development.
- 6.26 Overall, the appearance, form and proportions of the proposed house positively respond to the local context and character of the area. The proposal will enhance the appearance of existing dwelling and the local area in accordance with Policy D2. The materials are of a high quality and complement the architectural style of the original dwelling. The proposed design and materials are therefore policy compliant.

Amenity

- 6.27 London Plan Policy D3 (Optimising site capacity through the design-led process) states that development proposals should deliver appropriate outlook, privacy and amenity. London Plan Policy D6 (Housing quality and standards) states that proposals should provide

sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

- 6.28 Local Plan Policy A1 (Managing the impact of development) 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 redevelopment that would not harm the amenity of neighbouring residents. This includes privacy, outlook, daylight, sunlight and noise. Camden's Home Improvements SPD (2021) provides specific guidance with regards to privacy and outlook.
- 6.29 Highgate Neighbourhood Plan Policy DH9 (The Environmental Health of Existing and Future Residents) seeks to ensure that new residential development offers suitable protection of amenity for existing and future users.
- 6.30 A Daylight and Sunlight Study has been prepared by Right of Light Consulting. The aim of the assessment is to consider the impact of the development on the light receivable by the neighbouring property at 4 Bacons Lane. The study concludes that the proposed development will have a low impact on the light receivable by its neighbouring properties and it is considered that the proposed development sufficiently safeguards the daylight and sunlight amenity of the neighbouring properties.
- 6.31 With respect to construction, Local Plan Policy A1 seeks to mitigate disturbance from vehicles during the construction phase to neighbouring properties especially when access to a site is via narrow residential streets. Further the Highgate Neighbourhood Plan Policy TR3 (Minimising the Impact of Traffic Arising from New Development) states that where planning permission is granted, opportunities to minimise disruption for the local community during the construction stage should be sought.
- 6.32 The Construction Management Plan ('CMP') produced by Lyons O'Neill Structural Engineers provides mitigation measures to safeguard neighbouring amenity. Measures are included to control noise and vibration during the construction stages, to control dust and pollution, and a process for contractors to liaise with neighbours. A Construction Traffic Management Plan has been produced in accordance with the requirements outlined in "*The Schedule, Construction Management Plan Highway Measures*", produced by the Council.
- 6.33 Given the conclusions of the Daylight and Sunlight Study and the submitted CMP the proposal will avoid harmful effects on amenity. The proposal is therefore in accordance with London Plan Policy D3 and Policy D6, Local Plan Policy A1, Highgate Neighbourhood Plan Policy TR3 and Camden's Home Improvements SPD.

Biodiversity and ecology

- 6.34 NPPF paragraph 186d details that opportunities to improve biodiversity in and around developments should be integrated as part of the design.
- 6.35 London Plan Policy G7 (Trees and woodlands) states that development proposals should ensure that, wherever possible, existing trees with amenity and biodiversity value are retained. Local Plan Policy D1 seeks to secure high quality design in development and requires development to be sustainable in design and to maximise opportunities for greening. Local Plan Policy A3 seeks to protect features with nature conservation value,

including gardens and requires the protection of trees during the demolition and construction phase(s) of development. The policy continues to note that development would be resisted where it would result in the loss of an excessive part of the garden or garden space which contributes to the character of the townscape. Policy A3 further states that it will assess developments against its ability to realise benefits for biodiversity in proportion to the scale of development proposed. Highgate Neighbourhood Plan Policy OS2 (Protection of Trees and Mature Vegetation) also seeks to retain trees within conservation which have townscape, ecological or amenity value.

- 6.36 Wassell's Arboricultural Services, who previously surveyed the site's existing trees as part of the 2017 permission, has updated their Arboricultural Report. The report recommends the removal of the Bay tree and replacement with a Hornbeam tree, ensuring less future impact on the house with slight relocation. In addition, a further Hornbeam is to be planted in the location of the former Apple tree, to reinvigorate the leafy streetscape. It is proposed to remove the existing tree prior to the construction works and replace the tree towards the end of the construction period. Three new Cherry Blossom trees are also proposed to the south of the site adjacent to the Highgate Cemetery boundary, as part of the minimum 10% Biodiversity Net Gain uplift.
- 6.37 The Biodiversity Net Gain assessment explains that the combination of the five proposed trees, enhanced landscaping measures and the development of green roofs provide an increase of at least 10% in biodiversity.
- 6.38 The proposal is therefore in accordance with London Plan Policy G7, Local Plan Policy A3 and Highgate Neighbourhood Plan Policy OS2.

Archaeology

- 6.39 NPPF paragraph 200 details that where a site on which development is proposed has the potential to include heritage assets with archaeological interest, local planning authorities should require desk-based assessment to support an application.
- 6.40 London Plan Policy HC1 (Heritage conservation and growth) states that development proposals should identify assets of archaeological significance and use this information to avoid or minimise harm. The site is located within the Tier 2 Highgate Archaeological Priority Area, as identified by the Local Plan. Local Plan Policy D2 (Heritage) states that the Council will protect remains of archaeological importance by ensuring measures to preserve them and their setting are taken, proportionate to their significance.
- 6.41 The site is located within a Tier 2 Archaeological Priority Area. There are no archaeological assets within the site and 50 m within the study area. These comprise 41 monuments and nine findspots.
- 6.42 An Archaeological Desk-Based Assessment (DBA) has been produced by Lichfields. In summary, there is considered to be low potential for pre-historic remains to exist within the site, a low potential for the site to contain archaeological remains from the Roman, early medieval and later medieval periods and a low to moderate potential for the site to contain postmedieval archaeological remains. The potential for modern archaeology is moderate to high, but limited to the existing building foundations, which are of no interest.

- 6.43 Overall, the archaeological potential of the site is generally expected to be low based on the desktop research prepared. The report states that in order to comply with the criteria outlined in the Camden Local Plan (Policy D2) and the London Plan (HC1), further archaeological mitigation may be required as part of the proposed scheme. The report provides further archaeological mitigation recommendations which could be considered by the Council and be addressed through the use of a planning condition.

Transport

- 6.44 Local Plan Policy T1 (Prioritising walking, cycling and public transport) states that the Council will seek to ensure that development provides for accessible, secure cycle parking facilities in accordance with London Plan Policy T5 (Cycling). For residential houses with two or more bedrooms, the requirement would therefore be two cycle parking spaces. Local Plan Policy T2 (Parking and car-free development) states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.
- 6.45 No additional off-street parking is proposed. The pre-application feedback confirmed that Policy T2 is not applicable to the proposal and there is no requirement to secure the development as residents parking permit (car) free because the site is in existing residential use and would be replaced with one larger house.

Planning Obligations/CIL

- 6.46 NPPF paragraph 55 states that:
- “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”*
- 6.47 NPPF paragraph 57 adds:
- “Planning obligations must only be sought where they meet all of the following tests:*
- a) necessary to make the development acceptable in planning terms;*
 - b) directly related to the development; and*
 - c) fairly and reasonably related in scale and kind to the development.”*
- 6.48 Local Plan Policy DM1 states that the Council will use planning contributions where appropriate to support sustainable development; secure the infrastructure, facilities and services to meet the needs generated by development; and to mitigate the impact of development.
- 6.49 Camden’s Developer Contribution SPD (2019) is consistent with the NPPF and paragraph 5.2 details that the Council will choose between imposing conditions or entering into a planning obligation based on the most appropriate mechanism for the particular application.
- 6.50 The pre-application feedback states that given the level of demolition and construction involved with the proposals, it is necessary that the development be subject to a draft DMP and CMP as submitted. The feedback also adds that it *may* also be necessary for an

associated Implementation Support Contribution of £4,194 and Impact Bond of £8,000 to be secured by means of a S.106 Legal Agreement. The reason provided for this is to ensure that the proposed development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network in accordance with Local Plan Policy A1.

- 6.51 The submitted draft CMP and DMP demonstrates that with the proposed mitigation measures, neighbouring amenity impacts would be controlled to an acceptable level in accordance with Policy A1. The Construction Traffic Management Plans detail restrictions on construction vehicle movements, a booking system to prevent multiple onsite deliveries at once and the presence of traffic marshals to keep routes clear. Given the scale of the proposal and the site, it is considered that the use of planning conditions instead of a S106 Legal Agreement to control the construction phase would form a more reasonable, proportionate and appropriate approach to dealing with neighbouring amenity and to secure the safe and efficient operation of the local highway network.

7.0 **Conclusion**

- 7.1 This Planning Statement provides a detailed assessment of the development proposed at the site in relation to national and local planning policy and guidance. This Statement concludes that the principle of development is supported by the NPPF and adopted Local Plan policies.
- 7.2 The primary objective is to improve the energy performance and longevity of the proposed development in comparison to the existing building. The development would be an example of exceptional architectural quality and energy and carbon efficient design in Highgate which fully accords with local design policies and the NPPF on what constitutes good design.
- 7.3 It is concluded that the proposal meets the principles of sustainable development promoted through the NPPF and complies with the objectives and requirements of the development plan.

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