

**MADDOX PLANNING**  
**PLANNING**  
**STATEMENT**

**LAMORNA, DARTMOUTH PARK ROAD, NW5 1SU**

**13/03/2025**

---

## Description of development

Proposed demolition of existing single dwelling and construction of a new five-storey plus basement residential building consisting of six self-contained residential flats (use class C3).

---

## Type of application

Full Planning Application

---

## Applicant

HGG London Limited

---

## List of supporting documents

1. Plans and drawings, bureau de change architects (September, 2024)
  2. Design and access statement, bureau de change architects (October, 2024)
  3. Planning statement, Maddox Planning (October 2024)
  4. Basement Impact Assessment, Talon Consulting (September 2024)
  5. Energy and sustainability statement, Ensphere (October 2024)
  6. Condition and Feasibility Study, with Whole Life Carbon Assessment (February 2025)
  7. Heritage statement, HCUK (October 2024)
  8. Plant Noise Assessment, ALN acoustic design (September 2024)
  9. Daylight and sunlight assessment, Point 2 (October 2024)
  10. Drainage strategy & flood risk assessment, Pitman associates (January 2025)
  11. Financial Viability Assessment Report, Roscoe Group (August 2024)
- 

## Development plan

The adopted development plan comprises:

1. The London Plan, 2021
2. Camden Local Plan, 2017
3. Dartmouth Park Neighbourhood Plan ('The Neighbourhood Plan'), 2020

The emerging development plan comprises:

1. Draft New Camden Local Plan, January 2024 (Regulation 18)
- 

## Policies map

The following designations on the policies map are particularly relevant:

1. Dartmouth Park Neighbourhood Plan Area
  2. Dartmouth Park Conservation Area
-

## Planning policies

The following adopted planning policies are particularly relevant:

Policy number	Policy title	Referred to in paragraph number of this statement
<b>London Plan (2021)</b>		
D3	Optimising site capacity through the design-led approach	
D6	Housing quality and standards	4.18, 4.19, 4.23, 4.24
D7	Accessibility	4.20
H1	Increasing housing supply	4.3
H2	Small Sites	4.3, 4.4
H5	Threshold (affordable housing) approach to applications	4.31
T5	Cycling	
<b>Camden Local Plan (2017)</b>		
G1	Delivery and location of growth	
H1	Maximising housing supply	
H4	Maximising the supply of affordable housing	4.27, 4.28
H6	Housing choice and mix	4.6, 4.18, 4.20
H7	Large and small homes	4.6, 4.7, 4.9
A1	Managing the impact of development	4.37
A4	Noise and vibration	4.25, 4.37
A5	Basements	4.32, 4.35, 4.36
D1	Design	4.10, 4.17, 4.46
D2	Heritage	4.15, 4.17
CC1	Climate change mitigation	4.42, 4.43
CC2	Adapting to climate change	4.42, 4.45, 4.46, 4.47
CC5	Waste	4.51
T1	Prioritising walking, cycling and public transport	4.48, 4.50
T2	Parking and car-free development	
<b>The Neighbourhood Plan (2020)</b>		
DC2	Heritage Assets	
DC3	Requirement for good design	

H1	Meeting housing need	
H2	Affordable housing	
H3	Accessible housing	
ES3	Biodiversity	
ES4	Energy Efficiency	
TS2	Cycling improvements	
TS3	Traffic reduction	

In this Statement, the Applicant gives full weight to policies contained in the development plan but, in accordance with section 38(5) of the Planning and Compulsory Purchase Act 2004, if a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved, or published.

## Other material considerations

Other material considerations (such as national planning policy and supplementary planning documents, area action plans and design briefs) include:

1. National Planning Policy Framework, December 2024
2. National Planning Practice Guidance
3. London Plan Housing SPG, 2016
4. Camden Planning Guidance ('CPG') Developer Contributions, 2019
5. CPG Amenity, 2021
6. CPG Design, 2021
7. CPG Basements, 2021
8. CPG Energy efficiency and adaptation, 2021
9. CPG Housing, 2021
10. CPG Transport, 2021
11. CPG Sustainability, 2021
12. CPG Water and Flooding, 2021

## Relevant planning decisions

Reference/address	Description	Status/decision date	Referred to in paragraph number of this statement
On-site			
2010/4432/P	Erection of rear extension at ground floor level and conversion of garage plus associated elevational alterations to provide additional habitable accommodation to existing single dwelling house (Class C3).	Approved / 11 October 2010	
2007/1042/P	Erection of an extension on top of existing garage to create a habitable	Refused / 15 May 2007	

	room to single family dwelling house (C3).		
--	--	--	--

---

## Density and height

Units per hectare	321 u/ha
Habitable rooms per hectare	909 habitable rooms/ha
Beds per hectare	588 beds/ha
Floor area ratio (total gross external area of all floors/site area)	384%
Site coverage ratio (gross external area of ground floors/site area)	67%
Maximum height in metres above ground level of each building and at AOD (above sea level)	15m

---

## Contents of this statement

1. Site and area description
2. Pre-application and community engagement
3. Proposed development
4. Considerations
5. Conclusions

## Appendices

1. Flyer sent to residents

## Main benefits of the scheme

The proposed development is an excellent opportunity to improve the economic, social, and environmental conditions of the area and it is in overall accordance with the development plan policies on housing.

Notably, the proposed development will:

- Deliver new housing on a brownfield site in an accessible location in line with national and local planning policy objectives.
- Deliver a new building that will improve the local townscape, in line with the priorities of the NPPF, London Plan and Local Plan.
- Deliver much needed two bedroom and family housing provision, as required by London Borough of Camden.
- Further create local employment opportunities through the construction of the development and provision of management roles during the operational phase.
- Encourage new residents and visitors to use more sustainable modes of transport through the provision of easily accessible cycle storage.
- Provide for a contribution towards the Council's Community Infrastructure Levy that will enable the delivery of wider benefits to London Borough of Camden.

---

## 1.0 Site and area description

- 1.1 The site address is Lamorna, Dartmouth Park Road, NW5 1SU. The site area is approximately 182sqm.
- 1.2 The site currently comprises a two-storey detached dwelling (use class C3) of early 20<sup>th</sup> century construction. The property has a single storey garage within the eastern portion of the site that has been converted into a study. A setback in the house's footprint to the rear allows for a small garden along the rear boundary wall of no. 4 Chetwynd Road. There is a short band of hedgerow along the front (western) elevation and the dwelling has a boundary wall at the rear.
- 1.3 Vehicular and pedestrian access to the site is off Dartmouth Park Road to the west, and the site has one on-site parking space. The site has a PTAL score of 4 which indicates that it has a good level of accessibility by public transport.
- 1.4 The site is situated within Flood Zone 1 (as per the Environment Agency's Flood Map for Planning), and therefore has a low probability of flooding. The property is located within the Dartmouth Park Conservation Area, albeit is not statutorily or locally listed. The Conservation Area statement does not include the property, which results in the building having a 'neutral' contribution to the character and appearance of the Conservation Area. No's 1 to 5 Grove Terrace (Grade II listed) is located approximately 25m to the north west, whilst Grove End House (30m to the south east) is also Grade II listed.
- 1.5 The property is situated within a residential area, with the neighbouring buildings ranging from two to four storeys (plus basements). As outlined within the Dartmouth Park Conservation Area Appraisal and Management Statement (January 2009), this western end of Dartmouth Park Road is characterised by handsome semi-detached villas with semi-basements, and front gardens enclosed behind low garden walls or railings.
- 1.6 Dartmouth Park Road has on-street parking available, which is restricted to permit holders only between 10am – midday between Monday and Friday.

---

## 2.0 Pre-application and community engagement

### Pre-application ref. 2023/0595/PRE

- 2.1 Pre-application engagement has taken place prior to the submission of this planning application with Officers at London Borough of Camden (LBC). An initial pre-application enquiry was submitted to LBC in February 2023, with subsequent site and virtual meetings being held, in addition to the proposals being presented to the Design Review Panel (DRP) in September 2023 and April 2024 (outlined in further detail within the following paragraphs). A written pre-application response was received on 20 February 2024 (ref. 2023/0595/PRE).
- 2.2 The submitted pre-application scheme was for: *‘Proposed demolition of existing single-family dwelling and construction of a new five-storey plus basement residential building consisting of 6x self-contained residential flats (Class C3)’*.
- 2.3 The written response was supportive towards the development, with Officers concluding that the proposals “support the principle of additional housing on the site”, and that subject to the submission of “detailed design and materiality of the building... the proposal as presented could be supported”. Officers outlined some key matters that would need to be addressed in progressing a full application for the site. This principally included justification for the demolition of the existing building, together with finer refinement to the design, height and massing. A full summary of the feedback is provided below:

Table 1 – LBC Officer pre-application commentary

Planning Officer comments	Maddox response
The principle of additional residential accommodation in this location is supported.	This is welcomed.
On balance, the proposed unit mix is acceptable, meeting identified housing needs.	This is welcomed.
A proposal of six units would be expected to deliver a payment-in-lieu towards affordable housing.	Refer to paragraphs 4.27-4.31 of this planning statement.
Each of the six units meet the national standard minimum GIA for their respective unit types and sizes.	All units meet the London Plan internal floor space standards.
Although it is considered each unit would receive sufficient daylight/sunlight throughout the year, a daylight/sunlight assessment should be submitted with any future planning application to ensure the basement unit complies with BRE guidelines.	Daylight and Sunlight Assessment has been prepared by Point 2, with its findings summarised within paragraph 4.21-4.22 of this statement.
It is considered each of the six units would provide suitable residential accommodation including daylight/sunlight, outlook, GIA, internal layout, and private outdoor amenity.	Units will continue to provide acceptable levels of internal daylight and sunlight, outlook, size, internal layout and private outdoor amenity.
The existing building is of 20th century construction, which does not form any resemblance to the neighbouring buildings in terms of scale, height, bulk, or design. Its removal is not considered harmful to the character and setting of the wider Conservation Area; however, its removal will need to be justified on sustainability grounds as discussed in other sections of this document	Energy Statement has been submitted in support of the application, with its findings summarised within paragraphs 4.42 – 4.44 of this statement.



The roof level should be further reduced to create a more sensitive height and massing, together with an increase in setback on the flank elevations.	An arched roofline has been proposed to soften the appearance of the top floor. The extruded portal has been removed, creating a visual setback.
Along the side elevations, detailing should be significantly reduced or removed to be simpler and more characteristic of the surrounds.	Side elevations have been simplified to be more characterful of the surrounds.
Shaping and detailing of the upper floors should be incorporated into the ground floor in order to tie them together in a more cohesive manner.	The detailing and material of the upper floors have been extended down to the ground floor and continued onto the basement level to create a more cohesive front elevation.
Officers suggest increasing the solidity to the balustrade and banding between the first and second floors.	Balustrade and banding has been solidified, achieved through white stone balconies that are more pronounced and brought forward.
The principle of a basement is acceptable in this instance, albeit Basement Impact Assessment (BIA) required for application submission.	Basement Impact Assessment has been submitted.
The proposed development, pending the submission of a satisfactory daylight/sunlight assessment and noise impact assessment, would not have any negative impacts on the amenity of any neighbouring residential occupier with regards to loss of daylight/sunlight, sense of enclosure, or overlooking/loss of privacy.	Daylight and sunlight assessment submitted, as summarised within paragraphs 4.39 – 4.40.  The submitted Noise Impact Assessment has been summarised within paragraphs 4.25-4.26.
Robust Sustainability Statement including a Carbon Lifecycle Analysis should be submitted to demonstrate the difference in carbon emissions/savings associated with the option of retaining and refurbishing the majority of the existing building against the full demolition option currently proposed.	Sustainability Statement including a Carbon Lifecycle Analysis has been submitted.
A Flood Risk Assessment is required for the planning application submission.	Combined Drainage Strategy and Flood Risk Assessment has been submitted.
The provision of a cycle store at ground floor level accessed from the side entrance to the building is acceptable in principle.	This has been carried through to the full planning application.
Car-free development supported.	This is welcomed.
The proposed refuse and recycling storage accessed from a separate external bin storeroom, is acceptable.	This has been carried through to the full planning application.

## DRP

- 2.4 The Applicant has engaged extensively with the LBC Chair's Design Review Panel, firstly reviewing a fully contemporary scheme in September 2023, and then a revised scheme in April 2024, which contextually re-imagined traditional elements and techniques. This third design iteration was prepared in response to the pre-application enquiry comments received in February and presented to the DRP in April 2024.
- 2.5 The latest DRP was fundamentally positive, with the DRP supportive of the scheme in principle, considering that the proposals progressed positively since their initial review. They provided the following feedback in April 2024:
- While the proposed height can be justified as part of the scale change along the south side of Dartmouth Park Road, the panel asks that more recessive materials are tested for the set-back upper storey, to reduce the impression of height in views from the east.
  - The panel thinks the architecture is inventive, enjoyable, potentially exciting and more strongly related to the surrounding context.

- Consideration should be given to frontage of building, including the potential for simplification, through stronger horizontal elements to reduce the impression of scale, the reworking of the arches, and the selection of a single material.
  - Further refinement required to rear elevation to mitigate against overlooking, for example through potential removal of the blank bays.
  - The use of waste-based bricks is positive.
- 2.6 Following receipt of the written feedback of both Officers within pre-application ref. 2023/0595/PRE and the associated DRPs, the design of the scheme has been amended to reflect a materiality that is more in keeping with the surrounds, and with lesser associated visual impact.
- 2.7 The revised approach to the design has been taken forwards as part of the planning application submitted herein, alongside several other design adjustments and enhancements. This is summarised within pages 39-42 of the submitted Design and Access Statement ('DAS') as prepared by bureau de change architects.

### Community engagement

- 2.8 The Applicant has sought to engage with neighbours and residents immediately surrounding the site prior to the submission of this application. Residents were notified via letter drop on 14 October (Appendix 1) that they could view the emerging proposals on the Maddox Planning consultation website and provide independent feedback via an online form.
- 2.9 17 properties were notified (see image of notification area below), and 32 responses were received via the consultation website from local residents. The consultation website ran from 14 October 2024 and remained live until 31 October 2024.



*Map of neighbour consultation notification area*

- 2.10 A summary of the responses, and responses to these are provided below:

Table 2 – Response to neighbour comments

Neighbour comments	Maddox response
There is a lack of family sized housing	As set out within paragraphs 4.6-4.9 of this Planning Statement, the scheme comprises 17% family sized housing, to assist in meeting the

	identified local plan need and addresses the high demand for two- and three-bedroom dwellings.
The Site is not brownfield land	Brownfield land (i.e. previously developed land for the purpose of national policy) is defined as 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land' within the NPPF 2024. 95% of the Site is hardstanding, and does not comprise any garden land, ensuring that the Site meets this definition.
Do not support the design and consider that it is not characterful of the area	<p>The proposals have been fully informed by the characteristics of the Dartmouth Park Conservation Area and sub-area of Dartmouth West. Please refer to pages 19-25 and 43 of the DAS.</p> <p>The proposals are therefore considered to adequately satisfy the provisions of relevant design and heritage Local Plan policies D1 and D2, together with the Design CPG.</p>
The height and massing of the building is unacceptable	The height of the proposed buildings is either the same height, or lower in height than its neighbouring buildings. The massing has been carefully configured, as set out within pages 26-28 of the DAS.
The scheme is unsuitable given its location within a Conservation Area	Refer to pages 16 - 36 of the Design and Access Statement for Design Principles, and the submitted heritage statement prepared by HCUK, which assesses that the proposals would have no harm to the significance of the Conservation Area, and that they have the potential to bring about the potential for enhancement within the Dartmouth Park Conservation Area.
The proposals do not comprise affordable housing	<p>As set out within paragraphs 4.27-4.31 of this Planning Statement, Policy H4 does not require the delivery of on-site affordable housing for a scheme of this size. A payment in lieu will therefore be sought.</p> <p>As set out within the Financial Viability Assessment prepared by the Roscoe Group, the proposed scheme incurs a deficit even without the provision of affordable housing. As such, given the development economics of the scheme as demonstrated within the Financial Viability Assessment, the proposed scheme cannot viably provide any affordable housing contribution.</p>
The scheme would have unacceptable noise impacts	Refer to the Environmental Noise Assessment prepared by ALN Acoustics, which outlines that it will be feasible to achieve plant noise levels significantly below the background noise level and therefore avoid causing any significant impact at the neighbouring residential properties.
The scheme would obstruct views	Private individuals do not have a right to a view, and this is not a material consideration.
Concerns over the proposed basement	Refer to the BIA prepared by Talon Consulting which assesses that the proposed excavation and construction are considered likely to be maintained within acceptable development limits

	and are unlikely to cause significant damage to property.
The scheme would have unacceptable environmental impacts	Refer to the Energy and Sustainability Statement that has been prepared by Ensphere, which quantifies that through ASHP, the carbon savings from renewables are estimated to be >20% in line with policy requirements, with also a >19% CO2 reduction below Part L Building Regulation. A Carbon Lifecycle Analysis assessment has also been prepared, which indicates that that the proposed scheme would be responsible for approximately 39% less carbon emissions per square metre over its lifetime relative to the theoretical refurbishment of the existing building.

- 2.11 Dartmouth Park Neighbourhood Forum (DPNF) provided comments via email on 24/11/2024. While the DPNF did not object to replacing the existing building, the DPNF had concerns about the proposal's size, bulk, and impact on local amenities and character. An acknowledgement of the comments was issued by the Applicant. These key themes are addressed in Table 2 above and within the supporting design and technical documents submitted as part of this planning application.
- 2.12 Prior to the submission of the planning application, all parties who provided comments as part of the consultation (including the DPNF) were contacted, with a summary of the design and how this has evolved in addressing any perceived concerns. The letter also set out timings for the application submission in seeking to keep individuals aware and informed.

*Engagement with Ward Councillors*

- 2.13 Prior to the application submission, the Applicant engaged with the three Highgate Ward Councillors ('Cllrs'), hosting a meeting with Cllr Lorna Russell on 26 February 2025 and Cllr's Anna Wright and Camron Aref-Adib on 5 March 2025. This was led by Concillio on behalf of the Applicant with Maddox, bureau de change, and the HGG London in attendance.
- 2.14 Within both meeting's, clarifications were provided to the Councillors in respect of the nature of the scheme, and key considerations (for example neighbouring amenity impacts) that should be addressed as part of the planning application submission.

---

## 3.0 Proposed development

- 3.1 The proposed description of development is for the ‘*Proposed demolition of existing single dwelling and construction of a new five-storey plus basement residential building consisting of 6x self-contained residential flats (use class C3)*’.

**Table 3: Existing floorspace**

	Existing GIA (sqm)
Total	151

**Table 4: Proposed accommodation schedule**

Unit no	No bedrooms and persons	GIA (sqm)	Private amenity space (sqm)
1	3B5P	117	25.4
2	1B2P	61.8	7.9
3	2B4P	75.2	7.9
4	2B4P	75.2	7.9
5	1B2P	50.8	7.9
6	2B3P	82	7.9

### Layout

- 3.2 The proposed building is a broadly rectangular shape, with a single core central to the development. The proposed residential accommodation is arranged across five storeys (+basement), with the site accessed off Dartmouth Park Road. Cycle storage is provided at lower ground floor and ground floor level, and two separate waste and recycle room and plant rooms are provided to the south west of the main block. Generally, accommodation is arranged so that there is one dwelling per floor, albeit unit 6 is a mezzanine flat, situated across the third and fourth floors.

### Scale and massing

- 3.3 The proposed building is five storeys in height (+basement), with the fifth storey being set back from the front of the building.

### Tenure

- 3.4 The proposed residential units are private units.

### External appearance

- 3.5 The building is proposed to be a contemporary style, with the predominant façade material finished with light beige bricks, with the protruding bays being white stone. The brickwork will be detailed with reliefs, adding depth and interest in the same manner as Victorian architecture, but with a contemporary look.

### Landscaping

- 3.6 Green roofs are proposed across the scheme, together with planting beds. There is opportunity for native planting within private terraces and balconies

### **Amenity space**

- 3.7 As outlined with Table 4, each unit has access to private amenity space in accordance with local and London Plan standards, through a combination of balconies or roof terraces.

### **Access and parking**

- 3.8 Vehicular and pedestrian access to the site is off Dartmouth Park Road to the north west. The development is car free, and thus no car parking is proposed. A total of 13 cycle spaces (11 long stay and two short stay) are proposed. For the upper units (3,4,5,6), cycle storage is provided at ground level in a secure and easily accessible locker off the entry walkway, ideally located between the building entrance and the street. Two additional cycle storage spaces will be provided under the communal staircase on the Ground Floor. For unit 1 on the Lower Ground Floor, two spaces are provided in the large front terrace in a covered store. Two short-stay visitor cycle parking spaces are provided at the front of the entry walkway. This delivers a policy compliant quantum of cycle parking.

### **Accessibility**

- 3.9 Five (83%) of units are compliant with Part M4(2) standards (accessible and adaptable) and one (10%) is compliant with Part M4(3) standards (wheelchair user dwelling). Unit 2 on the ground floor is a Part M4(3) dwelling.

### **Refuse and servicing**

- 3.10 The proposal includes refuse and recycling storage accessed from a separate external bin storeroom, and collection can take place easily off Dartmouth Park Road.

---

## 4.0 Considerations

- 4.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws on the application documents listed at Section 1 of this statement. The main planning considerations are:

- Principle of development
- Housing mix
- Design and conservation
- Standard of accommodation
- Affordable housing
- Basement considerations
- Neighbouring amenity
- Sustainability
- Flood risk and drainage
- Transport and servicing

### **Principle of development**

- 4.2 LBC's most recent published figure for the Housing Delivery Test (HDT) was 69%, meaning that Camden's development plan policies are treated as being out-of-date in relation to housing proposals, and therefore the presumption in favour of sustainable development in paragraph 11(d) of the National Planning Policy Framework (NPPF) is engaged, and there is a need to place great weight on the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.
- 4.3 London Plan Policy H1 (Maximising housing supply) and Table 4.1, set a 10- year housing target for Camden of 10,380 additional homes from 2019/20 to 2028/29 (1380 net completions per annum). This policy sets out that Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through planning decisions, especially on sites with existing PTALs of 3-6 or small sites (in line with Policy H2 as expanded upon further below). The site constitutes a 'small site' as defined within London Plan Policy H2.
- 4.4 London Plan policy H2 states that Boroughs should pro-actively support well-designed new homes on small sites below 0.25 hectares in size through both planning decisions and plan-making to significantly increase the contribution of small sites to meeting London's housing needs and achieve the minimum housing targets for small sites. Being below 0.25ha in size, the proposal would deliver a meaningful quantum of homes required to be provided on small sites.
- 4.5 The delivery of six (net increase of five) use class C3 dwellings would make a positive contribution towards the Borough's housing targets. Within this context, and within the context of Section 11 'Making effective use of land' of the NPPF (2024), there is an overwhelming need for housing to be delivered in Camden, and that the net delivery of five Class C3 dwellings would carry weight in favour of the proposed development.

### **Housing mix**

- 4.6 Policy H6 (Housing choice and mix) of the CLP seeks to secure a variety of housing suitable for existing and future households. Policy H7 (Large and small homes) seeks a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities, and reduce mismatches between housing needs and existing supply.

4.7 Policy H7 includes a Dwelling Size Priorities Table as set out below:

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

4.8 The scheme proposes the following unit mix:

Table 5: residential mix

	1-bedroom (or studio)	2-bedroom	3-bedroom
Number of units	2 (33%)	3 (50%)	1 (17%)

4.9 The housing mix proposed has been configured to meet the identified needs of the Local Plan and addresses the high demand for two- and three-bedroom dwellings. The proposed housing mix will provide for both individuals and families and meet the needs of various groups and the Council, and therefore accord with Policy H7 (as confirmed by Officers within pre-application discussions).

#### **Design and conservation**

4.10 Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance, and character of the area.

4.11 Camden's Design CPG emphasises Camden's commitment to design excellence and expects development schemes to consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials;
- Creating well connected public spaces and good quality public realm;
- Opportunities for promoting health and well-being; and
- Opportunities for improving the character and quality of an area.

4.12 The scheme is design led and follows a considered a lengthy pre-application process with the Council, and two DRP's. As explained in the Design and Access Statement, the current design responds to advice received within the pre-application enquiry and DRP's, to ensure that the proposals enhance the appearance of the site.

4.13 Officers confirmed within pre-application ref. 2023/0595/PRE that the existing building is of 20<sup>th</sup> century construction, which does not form any resemblance to the neighbouring buildings in terms of scale, height, bulk, or design. Officers confirmed that the building's removal is not considered harmful to the character and setting of the wider Conservation Area.

4.14 Officers considered within pre-application ref. 2023/0595/PRE that pending minor alterations to the design and massing at roof level and the design of the front and side facades, the scheme *"could be considered acceptable in design and heritage terms, and offers a modern, sympathetic, and legible design within the context of the Conservation Area."* As set out within page 41 of the DAS, the use of white stone to the front and rear elevations creates a more cohesive material language with the rest of the building, and the lighter colour will make the top floor appear more recessive. In addition, the set-back balconies between the first and second floors have been replaced with stone balconies that are more pronounced and brought forward, to reduce the impression of scale and connect the building to the proportions of the buildings on either side.



- 4.15 Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.
- 4.16 A supporting Heritage Statement has been prepared by HCUK, which assesses that the proposals would have no harm to the significance of the Conservation Area (as a designated heritage asset) has been identified within this assessment to the extent that paragraph 208 of the NPPF need not be applied and there will be preservation (of significance) for the purposes of the Council's duty under section 66(1) of the NPPF. The proposals have been assessed here to bring about the potential for enhancement within the Dartmouth Park Conservation Area for the purposes of section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. It concludes that there will be no harm to heritage assets.
- 4.17 As such, the proposals are considered to adequately satisfy the provisions of relevant design and heritage Local Plan policies D1 and D2, together with the Design CPG.

### **Standard of accommodation**

#### *Space standards and layouts*

- 4.18 CLP policy H6 confirms that new residential development should conform to the Nationally Described Space Standards, and this is reflected in London Plan policy D6 which sets the same minimum space standards in Table 3.1 of the London Plan 2021. Policy D6 requires schemes to optimise the number of dual-aspect homes in development.
- 4.19 As set out within Table 4, the proposals exceed the minimum standards, and have floor to ceiling heights more than 2.5m as required by policy D6. Units 1 and 2, located at basement and ground floor levels, will be dual aspect facing north and south. Units 3 and 4 are quadruple aspect, facing north south and featuring obscure glazed windows facing east and west. Unit 5 is triple aspect, with windows facing north and obscure glazed windows facing east and west. Unit 6, located over two levels, is also quadruple aspect. As such, the proposals fully accord policy D6 in respect of maximising dual aspect provision.

#### *Inclusive design*

- 4.20 CLP policy H6 and London Plan Policy D7 requires 90% of new-build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair user dwellings). The flats have been designed to meet these requirements with one flat (16%) being constructed to M4(3) standards, with the remaining five flats (84%) being constructed to M4(2) standard.

#### *Internal daylight and sunlight*

- 4.21 In support of the application, a daylight and sunlight assessment has been carried out by Point 2. The report assesses the quality of daylight and sunlight that will be provided internally within the scheme itself.
- 4.22 In line with the assessment criteria prescribed by the BRE Guidelines, The internal daylight and sunlight amenity to the proposed development will predominantly be very good. Whilst three rooms do not achieve full compliance, the daylight amenity remains good for a lower ground floor apartment. As stated in Camden's Planning Guidance, when considering daylight and sunlight '*flexibility [should be given] where appropriate, taking into account site specific circumstances and context.*' Therefore, daylight and sunlight should be considered in conjunction with other competing constraints and requirements, to ensure that the potential of the site is optimised.

#### *Amenity space*

- 4.23 Local Plan Policy A2 encourages opportunities to provide private amenity space which is reflected in a requirement to provide amenity space in London Plan Policy D6. Policy D6 specifically seeks a minimum of five sqm per one-two bedroom dwelling, and an extra one sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

- 4.24 Each flat has a private balcony or terrace exceeding the required standards of Policy D6.

#### *Noise and vibration*

- 4.25 Local Plan Policy A4 outlines that the Council will seek to ensure that noise and vibration is controlled and managed, meaning that planning permission will not be granted for developments that generate an unacceptable level of noise and vibration. A Plant Noise Assessment has been prepared by ALN Acoustic Design, which outlines that it will be feasible to achieve plant noise levels significantly below the background noise level and therefore avoid causing any significant impact at the neighbouring residential properties.
- 4.26 In summary, and as per Officer comments within the pre-application enquiry, the proposals are considered to provide suitable residential accommodation including daylight/sunlight, outlook, size, internal layout and private amenity, and therefore meet the relevant amenity related standards of both the Local Plan and London Plan.

#### **Affordable housing**

- 4.27 Policy H4 (maximising affordable housing) requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The policy states that where developments have a capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing.
- 4.28 The uplift of residential accommodation of 420.5m<sup>2</sup> creates capacity for four homes. Given the proposed residential uplift of 420.5sqm the sliding scale in Policy H4 (d) applies, starting at 2% for one home and increasing by 2% for each home added to capacity. The additional residential area would have capacity for four homes which equates to a target of 8% affordable housing on the sliding scale.
- 4.29 Applying the payment in lieu of £5,000 per sqm as set out in the Housing CPG, the total payment under the policy target would be £168,200 as set out below:

Table 6: Affordable housing calculator

Additional residential floorspace (GIA sqm)	Capacity (rounded floorspace addition/100sqm)	Affordable housing % target	Affordable housing floorspace target	Payment in lieu required
420.5	4 additional new homes	8%	8% x 420.5 = 33.64	33.64 x £5,000 = £168,200

- 4.30 The application is supported by a Financial Viability Assessment (FVA) prepared by Roscoe Group, which sets out the viability position of the proposed development, and the affordable housing contribution that can be delivered as part of the scheme. As per the findings of the report, the proposed scheme incurs a deficit even without the provision of affordable housing. As such, given the development economics of the scheme as demonstrated within the Financial Viability Assessment, the proposed scheme cannot viably provide any affordable housing contribution.
- 4.31 The submission of the Financial Viability Appraisal, which clearly outlines how the proposal cannot viably deliver affordable housing contributions, is deemed acceptable and complies with the policy and guidance set out in London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG. Policy H5 specifies that where an application does not meet the requirements of the Fast Track Route, the Viability Tested Route must be followed.

#### **Basement considerations**

- 4.32 Policy A5 states that the Council will only grant permission for basements where it is demonstrated that no harm will be caused to:

- a. neighbouring properties;
  - b. the structural, ground, or water conditions of the area;
  - c. the character and amenity of the area;
  - d. the architectural character of the building; and
  - e. the significance of heritage assets
- 4.33 The proposal includes removal of the existing detached dwelling and excavation of a basement level encompassing the entirety of the footprint of the proposed building to provide residential floorspace for Unit 1. The excavation would also include a front lightwell for main access to the unit and a rear courtyard/garden area at the same level.
- 4.34 The basement would comprise a single storey, would not extend beyond the footprint of the proposed extension, and does not result in the loss of garden space or trees.
- 4.35 Local Plan Policy A5 on basements states:
- ‘The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding. Outside of these areas, where basement accommodation is to provide living space (possibly for staff), it will be subject to the same standards as other housing in terms of space, amenity and sunlight. Suitable access should also be provided to basement accommodation to allow for evacuation. Further guidance is contained in the Camden Planning Guidance on Housing.’
- 4.36 The site is located within Flood Zone 1, and therefore as acknowledged by Officers within pre-application ref. 2023/0595/PRE, the principle of a basement is acceptable in this instance as it complies within Policy A5 and guidance within CPG Basements. A Basement Impact Assessment has been submitted with the planning application, which confirms that based on the identified ground conditions, anticipated loadings and depth of excavation, and through the adoption of good practice during construction, ground movements due to the proposed excavation and construction are considered likely to be maintained within acceptable development limits and are unlikely to cause significant damage to property. The excavation and construction are not considered abnormal and are typical of urban/residential basement developments.
- Neighbouring amenity**
- 4.37 Local Plan policies A1 and A4 and the Amenity CPG are relevant to the proposals, which require careful consideration of the impacts of development on light, outlook, privacy and noise.
- 4.38 The proposal has been sensitively designed to mitigate amenity impacts on neighbouring residential occupiers located to the east and west of the site on Dartmouth Park Road, and those occupiers located to the south of the site on the north side of Chetwynd Road. Due to the proposed setbacks and the significant separation distance between neighbouring properties, the new units are unlikely to have direct views into the properties along Dartmouth Park Road, nor those on Chetwynd Road. Additionally, the proposed balconies are sited to the front of the property, further reducing any potential overlooking impacts into the rear of the Chetwynd Road properties. Side windows will be obscured where necessary to avoid any overlooking impacts upon properties situated on Dartmouth Park Road.
- 4.39 The Point 2 Daylight and Sunlight Assessment has assessed the impact of the proposed development on the daylight and sunlight to surrounding properties. The assessment found that the proposals fully comply with BRE guidelines in terms of daylight and sunlight impacts to properties along Chetwynd Road and First House, and the overshadowing of the neighbouring amenity areas will be negligible and compliant with the BRE guidelines.
- 4.40 In respect of noise, the submitted Plant Noise Assessment outlines that it will be feasible to achieve plant noise levels significantly below the background noise level and therefore avoid causing any significant impact at the neighbouring residential properties.
- 4.41 Overall, it is considered that the design of the development will maintain good levels of amenity for neighbouring residents and the impacts are acceptable for this dense residential location.

## **Sustainability**

- 4.42 Local Plan policies CC1 and CC2 require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. As required by Policy CC1, an energy and sustainability statement has been submitted which demonstrates that through Air Source Heat Pumps and space heating (as well as several other design enhancements), the carbon savings from renewables are estimated to be >20%; in line with policy requirements, with also a >19% CO2 reduction below Part L Building Regulations.
- 4.43 Policy CC1 (Part E) of the Local Plan requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building.
- 4.44 As part of the energy and sustainability statement, a Carbon Lifecycle Analysis has been prepared in order to demonstrate the difference in carbon emissions/savings associated with the option of retaining and refurbishing the majority of the existing building against the full demolition currently proposed. The assessment outlines that the proposed scheme would be responsible for approximately 39% less carbon emissions per square metre over its lifetime relative to the theoretical refurbishment of the existing building.

## **Flood risk and drainage**

- 4.45 Local Plan Policy CC2 notes that flooding and drought are key risks which require mitigation and adaptation measures in the borough. The location of development can impact the way that water flows around and underneath new and existing structures. Therefore, development proposals need to consider the risk of flooding, especially where they are located within the identified areas, which must be designed to prevent causing additional pressure on adjoining sites and the sewer system.
- 4.46 Local Plan policies CC2 and D1 encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping.
- 4.47 In accordance with Policy CC2, a combined drainage and FRA has been submitted with the application, which confirms that there will be no flooding on the site for rainfall events up to the 100yr return period plus a 40% allowance for the potential impact of climate change. The drainage strategy incorporates SuDS features such as capturing rainwater from roof areas for re-use, and green roofs will be provided where practical.

## **Transport and servicing**

### *Transport*

- 4.48 In line with Policy T1 of the Local Plan, the Council expects cycle parking at developments to be provided in accordance with the standards set out in the London Plan. The London Plan requires 1 space for a 1 bed/studio, 1.5 spaces for a 2bed, and 2 spaces for all other dwellings for long stay – resulting in a total residential requirement of 13 spaces.
- 4.49 A total of 13 spaces (11 long stay and two short stay) are proposed. For the upper units (3,4,5,6), cycle storage is provided at ground level in a secure and easily accessible locker off the entry walkway, ideally located between the building entrance and the street. Two additional cycle storage spaces will be provided under the communal staircase on the Ground Floor. For unit 1 on the Lower Ground Floor, two spaces are provided in the large front terrace in a covered store. Two short-stay visitor cycle parking spaces are provided at the front of the entry walkway. This delivers a policy compliant quantum of cycle parking.
- 4.50 In respect of car parking, Policy T1 of the Local Plan requires car free development across the Borough, which would be secured as part of the development. The Applicant will enter into a legal agreement to “car cap” the development to preclude future occupants from obtaining on-street car parking permits.

*Refuse and recycling*

- 4.51 Local Plan Policy CC5 requires developments to include facilities for the storage and collection of waste and recycling. The proposal includes refuse and recycling storage accessed from a separate external bin storeroom, and collection can take place easily off Dartmouth Park Road.

---

## 5.0 Conclusions

- 5.1 The proposed development complies with Section 38(6) of the Planning Compulsory Purchase Act 2004, which states that determination of planning application's must be made in accordance with the Development Plan unless material considerations indicate otherwise. This Planning Statement has demonstrated that the proposal is in accordance with the aims of the Development Plan, with a range of planning benefits that weigh strongly in favour of the scheme.

### **Benefits of the proposal**

- Delivery of new housing on a brownfield site in an accessible location in line with national and local planning policy objectives.
  - Delivery of a new building that will improve the local townscape, in line with the priorities of the NPPF, London Plan and Local Plan.
  - Delivery of much needed two-bedroom and three-bedroom family housing provision, as required by London Borough of Camden.
  - Further create local employment opportunities through the construction of the development and provision of management roles during the operational phase.
  - Encourage new residents and visitors to use more sustainable modes of transport through the provision of easily accessible cycle storage.
  - Provide for a contribution towards the Council's Community Infrastructure Levy that will enable the delivery of wider benefits to London Borough of Camden.
- 5.2 The application is supported and has been informed by several technical reports which demonstrate the proposal is acceptable and comprises a valid planning application.