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17 February 2025

**Via email only**

Dear Sir/Madam,

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

**REMODELLING, RENOVATION AND EXTENSIONS TO EXISTING DWELLING INCLUDING DEMOLITION OF FRONT PORCH, SIDE/REAR WRAP-AROUND EXTENSION AND GARAGE, ERECTION OF SINGLE-STOREY SIDE AND REAR EXTENSIONS, LOWER GROUND FLOOR EXTENSION, CREATION OF ROOF TERRACES, NEW GARDEN PATIO, ALTERATIONS TO EXISTING OPENINGS AND FRONT BOUNDARY TREATMENT, EXTERNAL REPAIR AND REFURBISHMENT WORKS AND INSTALLATION OF 2.NO AIR SOURCE HEAT PUMPS.**

**13 DALEHAM GARDENS, LONDON, NW3 5BY.**

Please accept this covering letter as an accompaniment to this householder planning application for proposed remodelling, renovation and extensions to the existing dwelling at 13 Daleham Gardens, London, NW3 5BY ('the site'). This letter provides a summary of the site and the proposed development.

Please also find enclosed the following documentation:

- Completed application form
- CIL form
- Location & block plans
- Full set of existing and proposed plans
- Design and Access Statement by Marek Wojciechowski Architects
- Basement Impact Assessment by Mark & Partners
- Noise Impact Assessment by Gillieron Scott Acoustic Design
- Arboricultural Impact Assessment by John Cromer's Arboricultural Company
- Heritage Appraisal by The Heritage Practice

### **The Site & Surroundings:**

The site is located on the west side of Daleham Gardens and comprises a large two-storey detached dwelling with lower ground floor level and accommodation in the roof, set in a spacious plot. The site is well landscaped with an existing vehicular access and a low boundary wall to the front. The existing vehicular access serves a driveway and garage which is attached to the neighbouring property to the south.

The planning history records indicates that the property may have been historically subdivided into two residences, but the property is in lawful use as a single dwelling. For the avoidance of doubt, a Certificate of Lawfulness was granted on 31<sup>st</sup> July 2024 for the existing use of the property as a single dwelling (Use Class C3) (ref: 2024/3111/P).

The site is located within Fitzjohns Netherhall Conservation Area. The property is not listed but is identified as a building which makes a positive contribution to the area. The nearest listed building is the grade II listed Roman Catholic Church of St Thomas More.

Daleham Gardens is one of the four parallel north-south planned Garden Avenues in the conservation area. Most properties are set-back behind small front courts or gardens. They are predominantly detached, two-storey properties with accommodation in the roof space and demonstrate a mix of Queen Anne and Arts and Crafts influences. Common features are bay windows, pitched roofed dormers and large gables. Front boundary treatments are mainly low brick walls, pillars and coated metal railings. The front boundary walls are generally consistent and are a combination of red and Staffordshire blue bricks with matching blue copings interspersed with Portland stone blocks. Street and garden trees/hedges create a verdant character and are an essential part of the special character of the conservation area.

The site has a PTAL rating of 4, meaning it benefits from good public transport access. The site is within Flood Zone 1, with a low to very low risk of surface water flooding.

### **Proposal:**

The proposed development involves the remodelling, renovation and extensions to the existing dwelling to enhance the external appearance of the property and provide a high-quality space fit for modern living. This includes:

- Demolition of the existing front porch, the existing side/rear wrap-around extension and the garage to the south of the site;
- Erection of single-storey side and rear extensions;
- Creation of roof terraces at upper ground floor and first floor level to the rear;
- Excavation to facilitate a LGF extension and lightwell/footpath around the rear external walls;
- Provision of a patio in the rear garden;
- Alterations to existing openings, front façade details including the reinstatement of original features and the replacement of windows;
- Alterations to front boundary treatment and enhancement of existing vehicular entrance;

- Installation of 2no. Air Source Heat Pumps in the rear garden.

The proposed single-storey side extension to the south elevation is to accommodate a garage with a single parking space, accessed via the existing vehicular access that is to be enhanced as part of the proposal.

The proposal has been subject of a recent pre-application enquiry (ref: 2024/3033/PRE). The council's written response was received on the 3<sup>rd</sup> October 2024 and confirmed support for the proposed development on all grounds. Please find the pre-application response attached to Appendix 1.

Given the positive pre-application feedback, only very limited and minor updates have been made to the scheme subject of this application. These are outlined at Section 3 of the submitted DAS and include revised window and railing design and developments to the proposed material palette.

### **Planning History:**

#### ***– The site –***

On the 13<sup>th</sup> February 1939, planning permission was refused (ref: TP/704/2955/54730) for the erection of a temporary potting shed.

On the 16<sup>th</sup> August 1962, planning permission was granted (ref: TP/704/W/6114) for the sub-division of existing dwelling house at 13, Daleham Gardens, into two flats.

On the 31<sup>st</sup> July 2024, a Certificate of Lawfulness was granted (ref: 2024/3111/P) for the existing use of the property as a single dwelling house.

There have also been two approvals relating to works on trees on site (refs: 2021/5341/T and 2021/5356/T).

#### ***– Surrounding sites –***

The planning history of the surrounding area demonstrates that a number of dwellings along Daleham Gardens have been subject to approvals for side, rear and basement extensions, new ground floor roof terraces, replacement windows, alterations to front boundary treatments and vehicular accesses and new garden patios. Some examples are included below.

### **2 Daleham Gardens**

On the 2<sup>nd</sup> March 2007, planning permission was granted (ref: 2006/5018/P) for the enlargement of the existing basement, including provision of basement rooflights to the front elevation to provide additional habitable accommodation, plus erection of a glazed extension to the Belsize Lane elevation and a glass balustrade to the existing terrace at second floor level on the southern elevation.

## 8 Daleham Gardens

On the 24<sup>th</sup> February 2022, planning permission was granted (ref: 2020/0630/P) for excavation of basement extension under part of existing property including installation of side lightwell and railings.

## 15 Daleham Gardens

On the 11<sup>th</sup> February 2003, planning permission was granted (ref: 2003/3428/P) for the remodelling and extending of the rear lower ground floor, replacement of the existing conservatory at rear ground floor level by a balcony, and alterations to windows at rear elevation.

## 16 Daleham Gardens

On the 16<sup>th</sup> December 2011, planning permission was granted (ref: 2011/5179/P) for the excavation of basement, enlargement of lower ground floor including creation of front light wells and single storey rear extension with ground floor level terrace with stairs to rear garden, replacement of existing garage with side extension at lower ground/ground floor level and alterations to chimneys in connection with the existing single-family dwelling house.

## 18 Daleham Gardens

On the 14<sup>th</sup> January 2010, planning permission was granted (ref: 2012/4673/P) for excavation to provide a rear extension containing a swimming pool at lower ground floor level, excavation of existing lower ground floor level for use as habitable accommodation including ancillary staff flat, creation of a roof terrace at rear upper ground floor level with privacy screens to both sides, alterations to windows/doors at lower/upper ground floor level (north, south and east elevation) of the dwelling house. (Not implemented).

On the 11<sup>th</sup> April 2011, planning permission was granted (ref: 2012/4673/P) for the enlargement of the dwellinghouse by erection of a full-width flat-roofed single-storey rear extension at lower ground floor level with roof terrace above and further excavation of the existing lower ground floor level for use as habitable accommodation including new front lightwell.

On the 25<sup>th</sup> August 2011, planning permission was granted (ref: 2011/3369/P) for amendment to planning permission 11/04/11 (2011/0861/P) including new front lightwell, namely erection of two-storey side extension at lower ground and ground floor level and alterations to side steps including creation of ramp.

On the 4<sup>th</sup> December 2012, a S73 application was approved (ref: 2012/4673/P) for the variation of condition 1 of planning permission dated 11/08/11 (2011/3369/P) (approved plans) including alterations to the fenestration within rear elevation at lower ground and upper ground floors, reconfiguration of the external stair leading from the upper patio to lower patio and garden, enlargement of the lower patio area and the removal of a window to the northern elevation at lower ground floor level.

### 19 Daleham Gardens

On the 14<sup>th</sup> July 2023, planning permission was granted (ref: 2023/1860/P) for alterations to front boundary treatment including reconstruction of front wall and widening of vehicular opening with new sliding gate; alterations to garage entrance, including new door; regrading of driveway.

### 23 Daleham Gardens

On the 14<sup>th</sup> November 2013, planning permission was granted (ref: 2013/5398/P) for erection of single storey rear extension, replacement of windows on rear and front elevations and replacement of entrance front door in association with ground floor residential flat (Class C3).

On the 16<sup>th</sup> September 2014, a Section 73 application was approved (ref: 2014/4631/P) for the variation of condition 3 (approved plans) pursuant to approved permission 2013/5398/P dated 14/10/13; namely to increase the depth of the rear ground floor extension by 60cm and minor alterations to hard landscaping.

### 25 Daleham Gardens

On the 30<sup>th</sup> October 2015, planning permission was granted (ref: 2015/4914/P) for erection of single storey lower ground floor extension, Reinstatement of terrace railing to Flat 2 upper ground floor. Realignment of garden retaining wall to allow for new garden patio.

### 27 Daleham Gardens

On the 11<sup>th</sup> November 2005, planning permission was granted (ref: 2005/3754/P) for erection of a single-storey rear extension and front side extension to provide additional habitable accommodation and a new integral garage for the single-family dwelling house.

## **Legislation, Policy & Guidance:**

### **Legislation**

Section 38(6) of the Planning & Compulsory Purchase Act provides that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

## **National Planning Policy**

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social.

The following sections of the NPPF are most relevant to the consideration of this application:

- Section 2 (Achieving sustainable development)
- Section 11 (Making effective use of land)
- Section 12 (Achieving well-designed places)
- Section 14 (Meeting the challenge of climate change, flooding and coastal change)
- Section 15 (Conserving and enhancing the natural environment)
- Section 16 (Conserving and enhancing the historic environment)

Paragraph 11 sets out the presumption in favour of sustainable development. For the decision-taking, this means approving proposals that accord with an up-to-date development plan without delay.

Paragraph 135 (c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

Paragraph 203 confirms that plans should set out a positive strategy for conservation and enjoyment of the historic environment, which should take into account the desirability of sustaining and enhancing the significance of heritage assets.

## **Local Planning Policy**

For the purposes of this site, the adopted Development Plan includes the London Plan (2021) and the Camden Local Plan (2017). Camden's Planning Guidance (CPG's) and Conservation Area Appraisals provide advice and information on how the council will apply their planning policies and manage development within conservation areas, which can be material considerations in planning decisions.

The following policies and guidance will likely be considered relevant to the proposed development:

### London Plan (2021)

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG4 Delivering the homes Londoners need
- GG6 Increasing efficiency and resilience
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design

- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public Realm
- D10 Basement development
- D14 Noise
- H2 Small sites
- HC1 Heritage conservation and growth
- G6 Biodiversity and access to nature
- SI 1 Minimising greenhouse gas emissions
- SI 7 Reducing waste and supporting the circular economy
- SI 13 Sustainable drainage
- T1 Strategic approach to transport
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking

#### Camden Local Plan (2017)

- H3 Protecting existing homes
- H6 Housing choice and mix
- A1 Managing the impact of development
- A3 Biodiversity
- A4 Noise and vibration
- A5 Basements
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC5 Waste
- T2 Parking and car-free development

#### Camden's Planning Guidance (CPG's)

- Amenity (2021)
- Basements (2021)
- Design (2021)
- Energy efficiency & adaptation (2021)
- Trees (2021)
- Biodiversity (2021)
- Transport (2021)
- Housing (2021)
- Home Improvements (2021)

## **Planning Assessment:**

### **Design & Heritage**

Camden Local Plan (CLP) Policy D1 requires development to be of the highest architectural and urban design quality and have particular regard to design and visual impact and to the context within which it is placed, and the contribution it makes to the landscape qualities of the area. The aim of this policy is reflected in London Plan Policy D4 (Good Design). Specific guidance in relation to extensions to existing properties and achieving good design is further provided in the 'Home Improvements' and 'Design' Camden Planning Guidance (CPG), which has informed this proposal.

CLP 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 and Listed Buildings. These aims are further reflected in London Plan Policy CH1 (Heritage Conservation and Growth).

The existing front porch and side/rear wrap around extension are considered to be unsympathetic alterations and extensions to the host dwelling by virtue of poor consideration to form and massing and the use of poor-quality materials which do not respond to the original design of the building. The existing garage to the south of the site is also a later and altered addition to the neighbouring property, with no particular historic or architectural merit. As confirmed within the council's pre-application response (Appendix 1), the demolition of these elements would therefore be acceptable and of merit on design and heritage grounds.

The Home Improvements CPG sets out basic principles for alterations and extensions to existing properties, including the need to ensure they respect and complement the character of the existing building. The Fitzjohns Netherhall Conservation Area Appraisal & Management Plan confirms that extensions should be subservient and unobtrusive to the existing landscape and townscape character of the area and in most cases should be no more than one storey in height.

Given the height, scale, massing and form of the proposed single-storey side extensions, together with their set-back from the front building line and construction materials, it is considered they respect and complement the character and the host property, encompass a suitable degree of subservience and result in a balanced appearance of the property within the street scene. A suitable degree of visible separation would be maintained between neighbouring properties and allows for sufficient views through to the heavily landscaped rear gardens which contributes to the special verdant character of the street.

The Home Improvements CPG confirms that rear extensions should be subordinate to the host building in relation to its location, form, footprint, scale, proportions, dimensions and detailing, and must be carefully designed in terms of height, width and depth. Full-width rear extensions can be acceptable where these objectives are met and where it responds to the existing common pattern and rhythm of rear extensions at neighbouring sites. A number of properties along the street have been subject to full width rear extensions, including No.'s 16 (ref: 2011/5179), 18 (ref: 2011/0861/P), 23 (ref: 2013/5398/P) and 27 (ref: 2005/3754/P).



The proposed single-storey rear extension would not extend beyond the rear building line of other dwellings on the west side of Daleham Gardens that have been subject to rear extensions. The construction of a full-width rear extension would not depart from the surrounding context and its stepped footprint with the large central porch would nevertheless reduce its bulk and massing. It is therefore considered that height, scale, massing and form of the proposed single-storey rear extension would respect the scale, footprint and proportions of the host dwelling and the surrounding pattern/rhythm of rear extensions.

The proposed roof terraces would be located to the rear of the property, are subservient to the overall roof form and incorporate traditional metal railings in line with guidance in the Home Improvements CPG. It is noteworthy that there is an existing ground floor roof terrace to the side/rear of the property and a number of properties on the street also benefit from roof terraces to the rear, as clear from the surrounding planning history.

The Fitzjohns Netherhall Conservation Area Appraisal & Management Plan confirms that extending into basement areas will only be acceptable where it will not involve harm to the character of the building or setting. Basement extensions should keep physical manifestations (such as light wells) to a minimum, so as to avoid adverse impacts on garden space and landscape character.

Basements and lower ground patios are common features of the dwellings along Daleham Gardens. By virtue of the limited scale of the proposed excavations and given the proposed lightwell/footpath is limited to the rear external walls, together with the provision of soft landscaping, it is argued that this aspect of the proposal would preserve and enhance the existing garden space and landscape character.

The proposed alterations to the front façade features have been informed by an analysis of lost and altered features of the original building and prevailing characteristics of dwellings along the street. The proposal would preserve and enhance the historic and architectural significance of the building by removing unsympathetic alterations and reinstating traditional features which respond to the original character and surrounding context. The proposed fenestration detailing has been also informed by the surrounding context and is considered to respect the character of the host property and wider street.

The Fitzjohns Netherhall Conservation Area Appraisal & Management Plan confirms that front boundary treatments are mainly low brick walls, pillars and coated metal railings. Front boundary walls are generally consistent and are a combination of red and Staffordshire blue bricks with matching blue copings interspersed with Portland stone blocks. Front garden hedges create a verdant character and are an essential part of the special character of the conservation area.

In this connection, the proposal would remove the unsympathetic concrete or brick pillars which have been rendered over along the front boundary and replace these with traditional brick. The installation of metal gates in black coating would not depart from the surrounding context and as such it is considered that this would have an acceptable visual/heritage impact. The verdant character of the front garden would be preserved and enhanced.

The material palette and fenestration detailing has been carefully considered and would result in an enhancement in the current 'tired' appearance of the building while achieving a high-quality and coherent external finish. External materials can be suitably controlled by condition.

Overall, it is considered that proposed remodelling and renovation of the existing dwelling encompasses a high-quality and coherent design that would preserve and enhance the character and appearance of the host dwelling and wider conservation area in line with CLP Policies D2 and CH1, the guidance contained within the Design and Home Improvements CPG's and Fitzjohns Netherhall Conservation Area Appraisal & Management Plan.

The submitted Heritage Appraisal identifies the architectural and historic interest of the building and the significance of the conservation area and supports the above position.

The council's pre-application response (Appendix 1) confirms that there is no objection to the proposed extensions to the dwelling. The council concur that the proposals would result in the enhancement of the property and conservation area.

### **Basement development**

The proposal includes excavation to facilitate a lower ground floor extension and lightwell/footpath around the rear external walls. CLP Policy A5 (criteria a-e) states that the council will only permit basement development where it is demonstrated that the proposal would not cause harm to neighbouring properties, the structural, ground, or water conditions of the area, the character and amenity of the area and the significance of heritage assets.

In determining proposals for basements and other underground development, the council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment (BIA). As part of this assessment, it requires criteria n-u of Policy A5 to be considered. These criteria require the applicant to demonstrate a 'very slight' risk of damage to neighbouring properties, to avoid adverse drainage or water environment impacts, avoid harm to amenity of neighbours, to provide satisfactory landscaping and soil depth, avoid harm to the property and the established character of the area, protect archaeological remains and not prejudice the ability of the garden to support trees, where they are part of the character of the area. Camden's Basements CPG provides further detail on the application of Policy A5.

This application is accompanied by a Basement Impact Assessment (BIA) which demonstrates that the proposal would have acceptable impacts on drainage, flooding, groundwater conditions and structural stability. The upper bound damage category for surrounding structures within the zone of influence of the proposed development has been assessed at Category 0 – Negligible, in accordance with the Burland Scale. The BIA is currently undergoing the verification process by Campbell Reith (CR) and CR's final comments are currently being addressed by the applicant's structural engineers.

CLP Policy A5 also states that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property, and provides a set of specific criteria (criteria j-m) which need to be met. As confirmed under the pre-application enquiry, the proposal

would comply with criteria j-m and while the proposal would require a few trees to be removed, these are Category C trees which are not considered to be of townscape or great amenity value (see further details in following section).

As demonstrated above, the proposed LGF extension meets the requirements of policy A5 and is therefore acceptable.

### **Trees, Landscaping & Biodiversity**

CLP Policy A3 confirms that the council will protect and enhance sites of nature conservation and biodiversity. The council will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development.

The council will also protect and seek to secure additional trees and vegetation in new developments. The loss of trees and vegetation of significant amenity, historic, cultural or ecological value will be resisted. Where the loss of existing trees is justified, the council will require replacement trees or vegetation.

An Arboricultural Impact Assessment accompanies this application and confirms that the impacts upon trees would be negligible acceptable subject to appropriate management and mitigation. The proposal requires the removal of a few Category C trees, which are of no particular value or merit. Tree planting is proposed indicatively and will mitigate such losses. All retained trees will be easily protected from harm during the project. These matters can be suitably controlled by condition.

The Environment Act 2021 introduced the requirement for new development to deliver at least a 10% net gain in biodiversity. However, given the proposal is for householder development, the proposal would be exempt from the statutory BNG requirement.

Nevertheless, the indicative landscaping and green roofs have maximised opportunities to enhance biodiversity proportionate to the scale and nature of the development.

Given the above, it is argued that the proposal would be acceptable on arboricultural, biodiversity and landscaping grounds, in line with the provisions of CLP Policy A3.

### **Neighbour Amenity**

CLP Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. This requires consideration to be given to overlooking, privacy, outlook, daylight and sunlight, artificial light, construction management and noise and vibration. Camden's Amenity CPG and Home Improvements CPG provides further guidance in this respect.

The Amenity CPG confirms that balconies and roof terraces should be carefully sited and designed to reduce potential overlooking of habitable rooms and gardens of neighbouring residential buildings. The Home Improvements CPG indicates that large terraces will be resisted where it is considered that their scale could result in an intensive use that could generate noise and disturbance impacts to the detriment of neighbour amenity.

It is noteworthy that there is an existing roof terrace located above the existing single storey wrap around side/rear extension and there are a number of other roof terraces to the rear of properties along the street. The proposed roof terrace is not of a scale or form that could result in an over-intensive use. It would be set further from the shared boundary with No.15 Daleham Gardens than the existing. The existing mature boundary trees provide screening between the site and neighbouring gardens. The boundaries of the site can be reinforced through additional landscaping and the detailed landscaping/planting plan can be suitably controlled by condition.

The submitted Noise Impact Assessment demonstrates that the proposed Air Source Heat Pumps and enclosure would not have adverse noise impacts subject to ensuring that the acoustic enclosure provides a minimum 14dB(A) reduction. This is a matter which can be suitably controlled by condition.

Given the siting, scale and massing of the proposed extensions as well as the arrangement of new windows and external terraces and their relationship to neighbouring plots, including intervening distance, it is not considered that the proposal would give rise to unacceptable impacts upon neighbour amenity with regarding to overbearing impacts, privacy, outlook or daylight and sunlight. Subject to appropriate mitigation, the proposed plant would not give rise to unacceptable noise or disturbance. A Construction Management Plan and associated Implementation Support Contribution and Impact Bond will be secured by legal agreement to ensure that the proposed development is carried out without unduly impacting neighbouring amenity. The proposal would therefore comply with CLP Policy A1.

### **Transport & Parking**

CLP Policy T1 requires development to provide for prioritising walking, cycling and public transport. CLP Policy T2 confirms that the council will limit the availability of parking and require all new developments in the borough to be car free.

The council's pre-application response confirms that the replacement of the existing garage with a new garage is acceptable in parking terms given this is an existing situation and no additional parking spaces are being created. The proposal would also introduce an electric vehicle charging point which would promote the use of low emission vehicles as an improvement to the existing situation and in line with the aims and objectives of the development plan.

The site is in a sustainable location in relation to distance from local services and facilities which would support active travel. Adequate room for bicycle storage has been provided in the proposed garage which would further encourage sustainable modes of transport. Three secure cycle spaces would be provided to the rear of the garage, thus exceeding the London Plan (2021) standards.

The pre-application response confirmed there is no objection to the replacement of the garage and widening of the front wall to enhance vehicular access. The proposal does not include the widening of the existing vehicular crossover and would not therefore result in the loss of any on street parking.

A Construction Management Plan and associated Implementation Support Contribution and Impact Bond will be secured by legal agreement to ensure that the proposed development is carried out without unduly impacting the local highway network.

Given the above, it is considered that the proposal is acceptable on parking and transport grounds and would accord with CLP Policies T1, T2 and the corresponding aims and objectives of the London Plan (2021) and NPPF (2024).

### **Energy & Sustainability**

CLP Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. The council will promote zero carbon development and require all development to reduce carbon dioxide emissions in line with the energy hierarchy.

CLP Policy CC2 requires all development to adopt appropriate climate change adaption measures such as new green infrastructure, reducing surface water run off through SuDS, incorporating biodiverse roofs and reducing overheating impacts. The council also promote sustainable design and construction measures.

CLP Policy CC3 confirms that council will seek to ensure that new development does not increase flood risk and reduces the risk of flooding where possible. The council will require development to incorporate water efficiency measures and utilise SuDS in line with the drainage hierarchy.

The proposal includes the installation of 2no. Air Source Heat Pumps which would support energy efficiency and reduce carbon dioxide emissions in the long-term. The replacement double glazed windows (as opposed to single glazed) would improve the thermal efficiency of the building. In addition, the proposal incorporates green roofs which is a sustainable design feature and the submitted DAS presents an uplift in permeable paving to the front garden.

Furthermore, the existing fabric (existing façade wall, lower ground floor slab as well as the existing roof) will be insulated internally to further improve the buildings thermal performance. All new fabric will be constructed to meet the minimum limiting performance or exceeding current building regulation requirements. Internally, all new lighting is to be supplied with low energy fittings and any new appliances will be selected so that they are of low energy and water consumption.

For the avoidance of doubt, the submitted BIA includes a SuDS strategy which concludes a very low flood risk for the site post development and that the proposal will not increase flood risk elsewhere.

The proposed development incorporates energy efficiency and sustainability enhancements proportionate to the scale and nature of the proposed development. The proposed development

would not increase flood risk and includes measures for climate change adaption. It is therefore argued that the proposal would align with the CLP Policies CC1, CC2, CC3 and the corresponding aims and objectives of the London Plan (2021).

**Summary:**

As demonstrated within this letter and supporting documents, the proposed development would enhance the character and appearance of the host property and conservation area. The proposed LGF extension accords with the required design criteria would not have adverse impacts on drainage, flooding, groundwater conditions or structural stability. The proposal would not result in any adverse impacts upon neighbour amenity or the local highway network. It has been demonstrated that the proposal would have a negligible impact upon trees and any loss will be suitably mitigated. Opportunities to enhance biodiversity have been maximised through landscaping and green roofs and the proposal incorporates energy and sustainability enhancements, including renewable energy and SuDS.

The development is therefore in accordance with the aforementioned Development Plan policies, and it is respectfully requested that planning permission is granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the application but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

**Stuart Minty**  
**Director**  
**SM Planning**