

OBJECTION TO PLANNING APPLICATION 2025/1375/P FOR THE REDEVELOPMENT OF THE SITE OF LAMORNA ON DARTMOUTH PARK ROAD NW5

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1. CAMDEN HOUSING POLICY

The London Borough of Camden's housing policy includes "*securing self-contained housing as the priority use of the Local Plan, including sufficient affordable housing to meet the needs of our residents*" (paragraph 2.6 of the *Camden Local Plan*). This is to be welcomed, but does not mean that it is necessarily appropriate for the density of residential development to be increased on any or every site in Camden. There are situations in which a significant increase in the density of development would be damaging to the surroundings. If, as the Applicant states, the object of their proposed development is to increase the number of residential units in the Borough, it would be difficult to find a less suitable location on which to achieve this than this very small site in a conservation area.

The areas in which an increase in housing density would be appropriate are identified in the Camden Plan and include "*Central London and town centres of Camden Town, Finchley Road / Swiss Cottage, Kilburn High Road, and West Hampstead*" (paragraph 2.8 of the *Camden Local Plan*). While this does not preclude development in other areas, it is noted that the Dartmouth Park Conservation Area, in which the Lamorna site is located, is not one of the priority growth areas.

Consultants working for the applicant wishing to develop the Lamorna site, claim that their "*proposal will regenerate an under-utilised brownfield site through the delivery of much-needed new homes*". They also argue that the existing house on the site, Lamorna, "*does not meet environmental standards and is currently inefficient in its use of energy given its leaky envelope, lack of insulation, and single glazing*". These statements appear to be an attempt to suggest that the existing house on the site has little or no social or functional value and that its demolition would therefore be justified.

The problem with the first of these arguments is that the existing house, Lamorna, has a footprint of about 75 percent of its site. In that respect its site is more densely utilised than most family houses with gardens in the conservation area. As to the argument that the house is inefficient in its use of energy, the same argument can be applied to a large proportion of houses built in previous centuries, not only in the Dartmouth Park Conservation Area, but also in the country as a whole. There are simpler and more sustainable ways in which to deal with the technical shortcomings of existing housing stock than knocking it down.

2. LAMORNA

Built in the 1930s, Lamorna is a well-appointed 4 bedroom family house of considerable character. More spacious and comfortable than it appears from the outside, it is conveniently planned for family life in the twenty-first century, cleverly combining traditional domestic spaces, such as its timber panelled living room, with a modern sense of light and space in its recently extended kitchen dining room.

Although not as imposing architecturally as the grander mid-nineteenth century semi-detached villas on Dartmouth Park Road, the two storey Lamorna sits comfortably between the semi-detached villa, 1 & 3 Dartmouth Park Road (three storeys over a half-basement), and the two-storey late twentieth century First House, reducing the scale of the buildings at the western end of the road. This is appropriate because Chetwynd Road and Dartmouth Park Road run very close together at this point, so that there is very little distance between the back of houses on the respective streets. In order to protect privacy, daylight and overlooking, the scale of buildings on these sites is smaller than other houses on these streets.

Lamorna is a house that makes a neutral impact externally but internally, provides high quality residential accommodation. This is exactly the kind of domestic architecture that many people are particularly attracted to. Nor is the fact that Lamorna differs architecturally from its immediate neighbours uncharacteristic of the area. Dartmouth Park Conservation Area is described in its *Appraisal and Management Statement* as having “a variety and complexity that charts the history of domestic architecture from the late 18th century to the present day. Late 18th century houses contrast with contemporary housing estates; tiny cottages, large mansion blocks and Victorian villas, all exist together in Dartmouth Park” (see page 4).

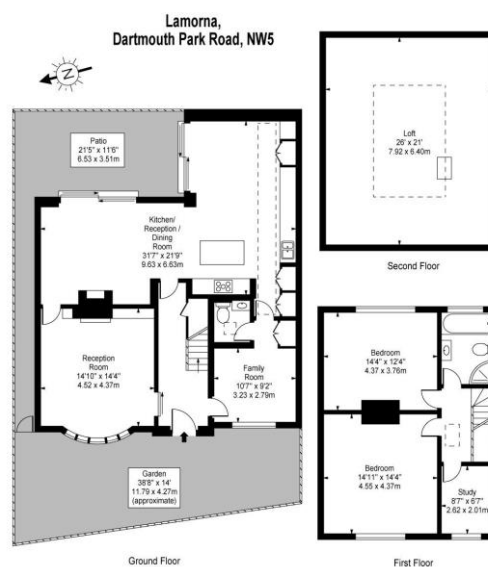


Figure 1.

Floor Plans of the existing Lamorna



Figure 2. Lamorna seen from Dartmouth Park Road



Figure 3. Lamorna front garden

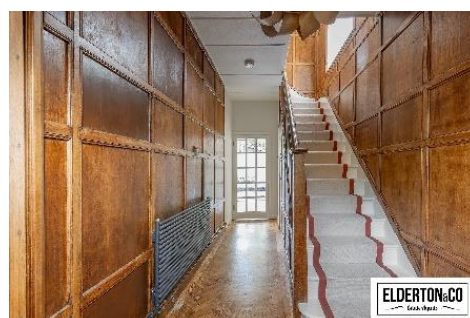
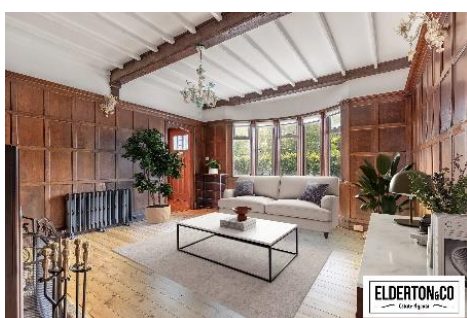


Figure 4. Lamorna existing living room. Figure 5. Lamorna existing entrance hall.



Figure 6. Lamorna existing open-plan Kitchen/dining room



Figure 7. Lamorna existing bedroom



Figure 8. Lamorna existing Patio garden.

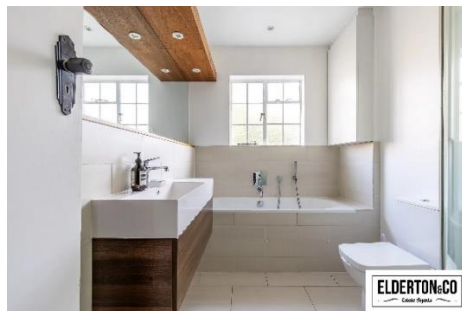


Figure 9. Lamorna existing bathroom. Note original arts and crafts door furniture.

As part of the historic heritage of the Dartmouth Park Conservation Area, there should be a presumption in favour of the retention of Lamorna, unless it can be demonstrated that its replacement would “*preserve or enhance the character or appearance of the Dartmouth Park Conservation Area*” (see *Conservation Area Appraisal and Management Statement* page 53), while at the same time having no detrimental impact of neighbouring properties. The proposal to demolish it would represent a loss in terms of its cultural value, and the physical materials and embodied energy that would be wasted.

2. A BRIEF HISTORY OF THE LAMORNA SITE

In order to understand the context in which this development is proposed, it is helpful to look at the evolution of this corner of the Dartmouth Park Conservation area. Before the land of the Dartmouth Park Estate was developed, the positions of the western end of both Dartmouth Park Road and Chetwynd Road had been determined by the development of properties on Grove Terrace and Grove End on the east side of Highgate Road. The problem, however, was that these two roads, if extended in parallel, would have been too close together to permit the development of the grand scale of houses planned for the Dartmouth Park Estate.

The solution was to shift the extension of Dartmouth Park Road to the north in order to create more space between it and Chetwynd Road (see Figure 10 below). This enabled the new properties on Dartmouth Park Road to have generous gardens separating them from the back of the houses of Chetwynd Road. The footprint of the semi-detached villas on Dartmouth Park Road and Grove End generally occupy significantly less than 50% of the site area on which they stand and the open and green outlook this provides is important to the character of the conservation area.



Figure 10. OS maps showing the western end of Dartmouth Park Road and Chetwynd Road in 1894 prior to the development of the Gardens of the Grove End houses, and in 1936 following the development Chetwynd Villas and Lamorna.

Much later, in the 1930s, part of the garden of Cumberland Villa was sold off and Lamorna was built (see Figure 10 above). At about the same time most of the garden of Grove End House was sold and the terrace of houses called Chetwynd Villas on Chetwynd Road, was built. Because the sites for new house Lamorna and the new Chetwynd Villas terrace were so close together, they could not accommodate buildings of the scale of those on Grove End and Dartmouth Park Road. Instead a smaller scale of domestic architecture was employed, that would not to unduly affect the privacy or overshadow the buildings opposite (see Figure 11).

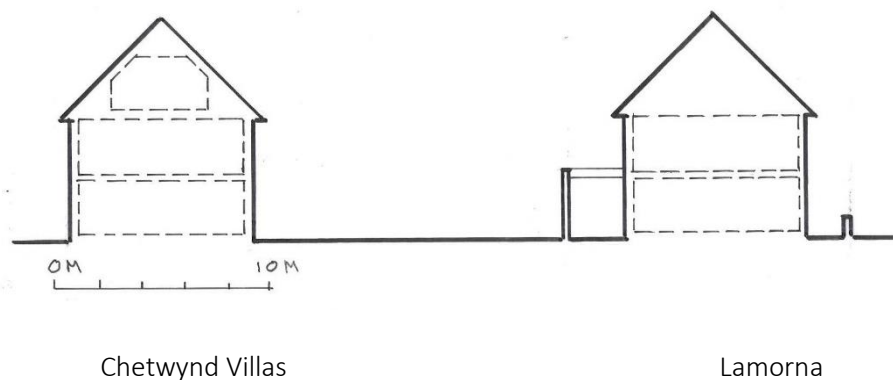


Figure 11. Section through the existing Lamorna on Dartmouth Park Road and Chetwynd Villas on Chetwynd Road.

Later still, The site on which First House now stands was developed in the 1990s and was also treated as an infill site with a modest two storey scale of development. When the owners of First House applied for planning permission, in the late 1980s, they were told by Camden planning Department that it must not be any higher than Lamorna, so as to protect the amenity of Chetwynd Villas.



Figure 12. View of the Lamorna site showing the development of the gardens of Grove End House, Cumberland Villa and Linton Villa on Grove End. Lamorna is marked with a red dot.

Meanwhile, over the decades, Grove End House, Cumberland Villa and Linton Villa on Grove End, had all been converted into flats. There has, therefore, already been a significant densification of the western end of Dartmouth Park Road and Chetwynd Road in the twentieth century.



Figure 13. OS map of the south west corner of the Dartmouth Park Conservation Area.

3. THE DEVELOPMENT POTENTIAL OF THE LAMORNA SITE

The most obvious characteristic of the Lamorna site, when considering its development potential, is its very small size. The total site area is 182 square metres and because of the proximity of neighbouring houses, the site offers only a limited opportunity to increase the number of residential units in the borough, without having a negative impact on neighbouring properties. Whatever is built on the Lamorna site should respect the scale and character of its immediate neighbours, Chetwynd Villas on Chetwynd Road and First House on Dartmouth Park Road.

The applicant argues that a contextual approach to developing the Lamorna site would be to echo the scale of the large Victorian semi-detached villas to the east on Dartmouth Park Road. This is a very two dimensional way of looking at the site context, but it is easy to understand why the applicant has chosen to make this case. It is an attempt to rationalise and justify a multi-storey redevelopment in order to make the development more profitable. A more three dimensional assessment of the site context shows that there is a change in the scale of developments at this end of Dartmouth Park Road and that the Lamorna and Chetwynd Villas sites are 'infill' sites which, in urban design terms, belong to a different scale of development.

A more correct way in which to assess the development potential of the Lamorna site is to look at the constraints on development that are set out in Camden's Planning Guidance. Where new developments are concerned, Camden Council aims to protect the quality of life of occupiers and neighbours through a number of supplementary planning documents that give guidance on development standards. An important aspect of this policy is to ensure that habitable rooms and amenity spaces in any new development, and in any existing properties affected by a new development, do not suffer a loss of amenity through overlooking and loss of sunlight and daylight.

Camden's Planning Guidance in Paragraph 2.4 of 'Amenity', states *"To ensure privacy, it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties directly facing the proposed (either residential or non-residential) development, assuming a level topography."* The rear gardens of the Chetwynd Villa houses behind the Lamorna site are 14 meters deep. This means that the rear windows of any new development on the Lamorna site, at first floor level or above, facing south, would need to be set back by a minimum distance of 4 metres from the existing rear boundary in order to comply with Camden's good practice guidance.

In addition, para 6.5, the Camden Local Plan states that: *"To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (BRE Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011)."* Using this guidance, the potential acceptable height and mass of a development the Lamorna site can be assessed by drawing a section, in accordance with Para 2.2.5 and Figure 14 of the guidance, through both the Lamorna site and the site of Chetwynd Villas behind (see Figure 14).

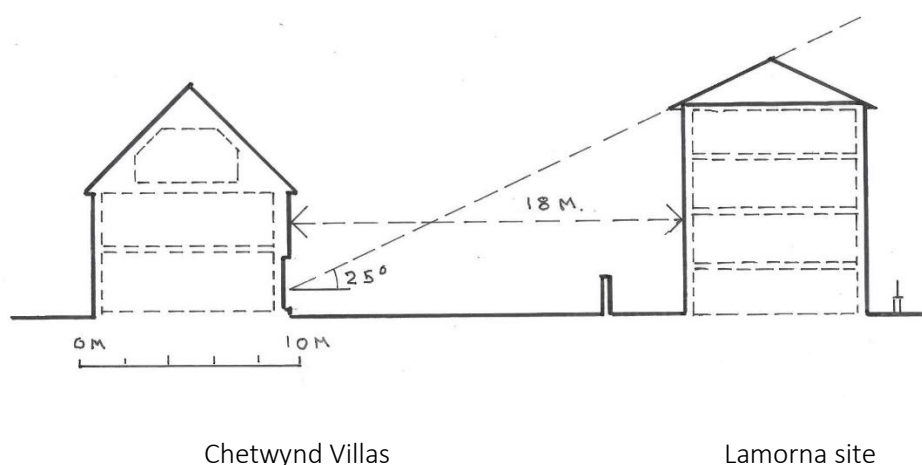


Figure 14. Section through the Lamorna site showing the maximum accommodation that could be placed on the site while respecting Camden's good practice planning guidance on Daylight, Overlooking and Privacy in relation to Chetwynd Villas on Chetwynd Road.

This demonstrates the maximum volume that could be accommodated on the Lamorna site within a daylight angle of 25 degrees from the centre of the ground floor windows on the rear elevation of Chetwynd Villas, while maintaining a distance of 18 metres between the windows of the two developments, would be four stories.

This does not mean, of course, a higher standard should not be used to protect the amenity of Chetwynd Villas. The section in Figure 14 shows what a significant impact a development of even 4 floors would have on the houses opposite.

4. THE APPLICANT'S PROPOSED SCHEME

4.1 Overdevelopment

Figure 15 below shows a section through the applicant's proposal for the Lamorna site and Chetwynd Villas. Comparing this section with Figure 14 above shows that the height, depth and volume of the applicant's scheme is significantly greater.

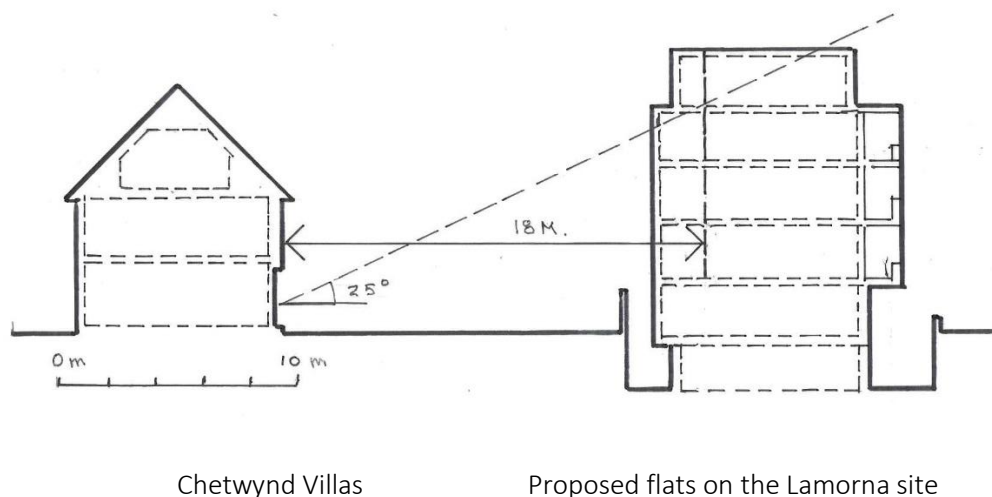
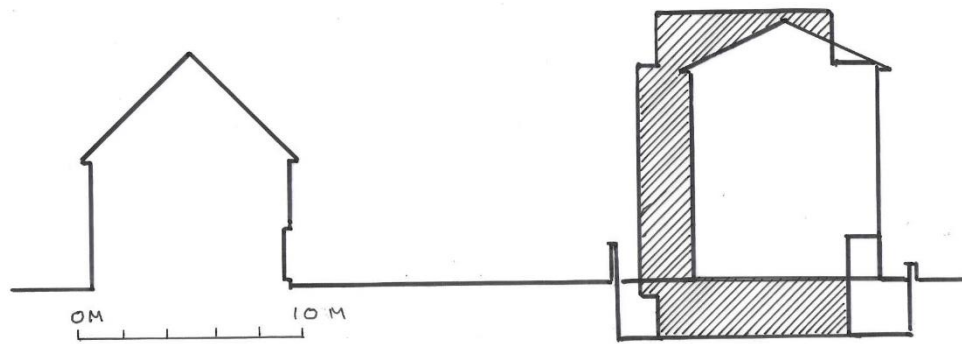


Figure 15. Section through the proposed development on the Lamorna site and Chetwynd Villas.

The applicant was informed in the planning officer's letter dated 20th February 2024 that the scheme "*fails to pass the 25 degree test in relation to the proposed development*" (see document 2023/0595/PRE Final Pre-Application Comments in the planning application documentation, third paragraph in item 12, Amenity). The volume of the scheme has not been reduced in response to that direction.

Superimposing the section in Figure 15 onto that in Figure 14 (see Figure 16), the extent to which the bulk of the applicant's proposal exceeds the volume of accommodation that could reasonably be located on the site without having a negative impact on the surrounding properties can be seen hatched.



4 Chetwynd Villas

The Lamorna site

Figure 16. Diagram showing the difference between the analysis of the development potential of the site shown in Figure 14 and the Applicant's proposal in Figure 15. The hatched area is development that would not meet Camden Council's design guidance on good practice.

4.2 Basement development

It will not have escaped notice that in Figure 16 above the basement flat has been hatched. This is because the design of this residential unit would not meet Camden's good practice standards in a number of other respects. The applicant's proposal is for a three bedroom flat located in a full basement completely below the existing ground level (see Figure 17). This flat would have very poor outlook and daylight. The walls surrounding the front area would be 3 metres tall and those around the patio at the back 5 metres tall. Given that this patio is only 2 metres wide, this would cut out nearly all sunlight and daylight. It is noted that the Applicant's own daylight and sunlight consultants confirm in their report that *"overall ... this apartment will not achieve full compliance with the guidelines"* (see item 8.4 in the *Daylight and Sunlight Report* by Point 2 Surveyors Ltd dated September 2024).

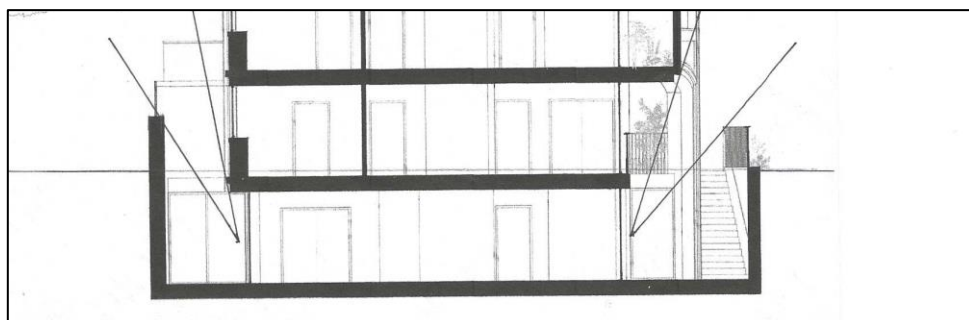


Figure 17. Section through the basement flat of the proposed development for the Lamorna site showing the limited outlook and daylight that would reach the interior.

In addition this flat would have no lift access, and no front entrance lobby and the means of escape in case of fire from all three bedrooms would be through the kitchen, dining, living room which, under the building regulations, would constitute a potential fire hazard. The bedrooms would also be very close to the ventilation louvres of the plant room containing six heat pumps.

As it states in *Camden Planning Guidance Basements*, “The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding. Outside 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.” (Para 2.7).

And as it states in the *Dartmouth Park Conservation Area Appraisal and Management Statement*: “The Council will normally resist basement development fronting the highway due to its impact on the appearance of the conservation area” (see *Basement Development* p 57). The council should refuse planning permission for a basement floor on the Lamorna site on the basis that it would not meet the amenity and safety standards for residential accommodation advocated by Camden.

4.3 Overbearing volume

The impact of the applicant’s proposed block of flats on Chetwynd Villas can also be envisaged by looking at the current view from back of 3 and 4 Chetwynd Villas shown in Figures 18 and 19.



Figure 18. View of the Lamorna from the rear of no 3 Chetwynd Villas



Figure 19. View of the Lamorna from the rear of no 4 Chetwynd Villas

In these views, only the first floor and the roof of Lamorna can be seen, but if the proposed development were to be executed, an additional second and third floor levels, and a set-back fourth floor, all with windows overlooking the houses and gardens of Chetwynd Villas, would be added to the height of the development on the Lamorna site, which would also extend closer than the existing Lamorna to the back of Chetwynd villas.

The proposed flats seen from the rear of Chetwynd Villas, would block out much of the view of the sky and its bulk would be overbearing and out of a keeping with the scale of its surroundings (see Figures 20 and 21 below).



Figure 20. 3D view of the proposed block of flats, shown in green, seen from the south showing that it would be much taller than its immediate neighbours.



Figure 21. 3D view of the proposed block of flats, shown in green, seen from the north showing that it would be much taller than its immediate neighbours.

In addition to the impact on Chetwynd Villas, the depth of the proposed development on the Lamorna site, as shown in the applicant's proposal, would reduce morning sunlight from the east to the rooms and garden of First House on Dartmouth Park Road and evening sunlight from the west to the rooms and garden of 1 Dartmouth Park Road, 1 to 5 Chetwynd Villas and more. The height of the proposed flats would also block morning sunlight reaching no 2 Dartmouth Park Road which is located directly to the north of the Lamorna site on the opposite side of Dartmouth Park Road.

As it states in Camden Planning Guidance 'Amenity', *"Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers"* (see para 2.14). The proposed development clearly does not meet these standards and shows that the applicants have not given enough consideration to the impact of the development on Chetwynd Villas.

4.4 The impact of the Applicant's proposal on Dartmouth Park Road

Also important is the impact the proposed development would have on Dartmouth Park Road. It is good to see that the important gap between the proposed development and First House has been maintained in the applicant's proposal. Such gaps are a characteristic that is mentioned more than once in the *'Dartmouth Park Conservation Area Appraisal and Management Statement'*. On page 22 it states that *"The small but significant gaps between buildings and between parallel rows of house-backs provide important views of greenery and backs of houses."* In addition the guidance on *Development in Gap Sites* given on page 57 states: *"Gaps between buildings represent an important established feature of relief in an otherwise densely developed environment ... The Council will resist development in these areas."*

The gap between First House and Lamorna was the subject of planning decisions in the past and it is important that it continues to be protected (see planning decision in relation to application 2007/1042/P dated 15th May 2007 in which a proposal to add a first floor in the gap was refused).

The proposed front elevation of the Applicant's proposed scheme is presented as being informed by its context. The designers have selected a miscellaneous collection of architectural details from buildings in the area and, in doing so, have created an architectural hybrid that bears no relation to any specific domestic architectural style either in the Dartmouth Park Conservation Areas or indeed the rest of the Borough of Camden.

It has been argued by the applicant that the architectural style of the existing house Lamorna *"has little relation to the surrounding buildings"*. There are in fact quite a number of houses in the Dartmouth Park Conservation area that are Arts and Crafts or 1930s suburban in character. Apart from the question of architectural style, however, which is very subjective,

the real issue in relation to this proposal is the impact its height and scale would have on its surroundings. A comparison of the existing Lamorna and the applicant's proposal shows the impact it would have on Dartmouth Park Road (see Figures 22, 23, 24, 25 below).



Figure 22. View of the existing house Lamorna showing its relationship to the neighbouring buildings on Dartmouth Park Road



Figure 23. Perspective rendering of the proposed flats showing their relationship to the neighbouring buildings on Dartmouth Park Road.



Figure 24. View of the existing house Lamorna seen along Dartmouth Park Road from the east

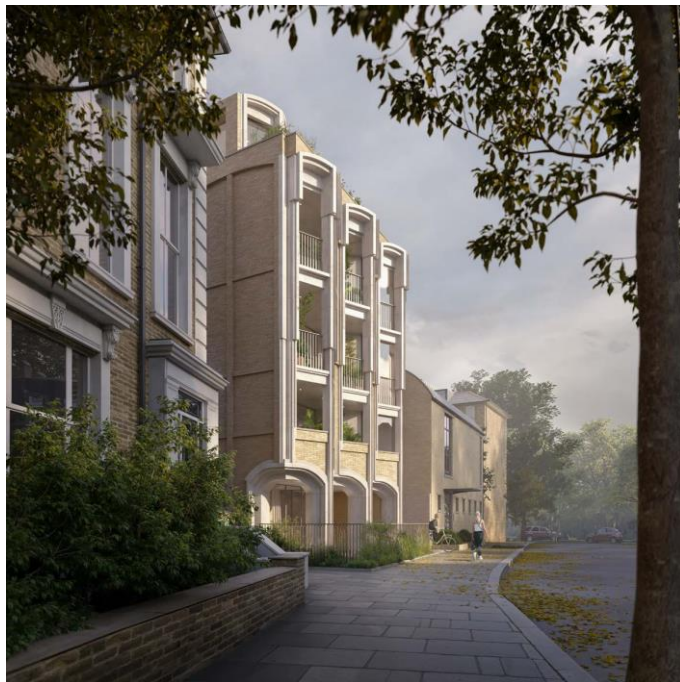


Figure 25. Perspective rendering of the proposed flats seen along Dartmouth Park Road from the east.

What these comparisons show is that the proposed development for the Lamorna site would be dramatically taller than Lamorna, First House and Chetwynd Villas and would completely fail to respond to the smaller scale of development at the western end of Dartmouth Park Road. The vertical emphasis of the proposed elevation is in strong contrast to all of the surrounding houses on Dartmouth Park Road, many of which are linked as semi-detached villas on order to give them more classical balance of vertical and horizontal proportions. The tripartite vertical division and serrated façade of the proposed scheme is out of keeping with its context and serves to further emphasise its excessive height.

Whatever is put on the Lamorna site should mediate between the scale of the semi-detached villas on Dartmouth Park Road and the two storey First House. In terms of urban design, this could, arguably, be slightly taller house than Lamorna. A three storey building on the Lamorna site could provide an appropriate balance when seen beside its three and a half storey neighbours on Dartmouth Park Road on one side and First House on the other, but the rather showy, busy five storey unhistorical pastiche proposed would look over assertive and overbearing and would be wholly out of keeping with the ordered domestic character of the area.

6 CONCLUSIONS

An critical issue to be considered when assessing the applicant's proposal is whether it will meet to requirement *"to preserve or enhance the character or appearance of the Dartmouth Park Conservation Area"* As it states in the Camden Plan, *"all developments in Camden, large or small, wherever it is located should take place in accordance with all relevant policies of this Local Plan and other documents that form part of Camden's development plan, in order to deliver the Councils vision and objectives for the borough"* (see page 17). The amount of development that could be accommodated on the Lamorna site, while at the same time respecting the amenity of neighbouring dwellings, should therefore be determined by the requirements of Camden's planning guidance, properly applied in the context of this conservation area. There is no justification why any development of the Lamorna site should not meet the highest good practice standards required by Camden's planning policy and design guidance both in spirit and in fact.

This proposal is a classic example of an attempt to put more building mass onto a site than is appropriate, in an attempt to make a scheme more profitable, with little consideration for its social or its urban architectural context. What is the point of a Conservation Area, one wonders, if it is not to provide protection against developments of this kind? If approved, this scheme would set a dangerous precedent for unconstrained development in Dartmouth Park and would initiate open-season for developers in all the conservation areas in Camden.