



GERALDEVE

11 Primrose Hill Road, London NW3 3DG

Town Planning Statement on behalf of: Mr O Osoba

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Appendix 1 – No. 65 Quickswood Decision Notice & Site Plan

1 Introduction

- 1.1 This Planning Statement is submitted in support of an application for full planning permission made on behalf of our client, Mr O Osoba, for the erection of a three bedroom dwelling house on a plot of land currently within the demise of 11 Primrose Hill Road.
- 1.2 No. 11 Primrose Hill Road is an end of terrace property at the southeast corner of the Chalcots Estate which is owned by the applicant. It includes amenity space to the rear and to the side, and is set back from the corner of Primrose Hill Road and King Henry's Road. It is proposed that the new dwelling house is located immediately adjacent to No. 11 and it has been designed to ensure that it is homogenous with the matching 1960s terrace in terms of height, width, materials, detailing, roof form, colour and fenestration
- 1.3 The Planning permission is sought for:
- “Erection of an end of terrace dwelling house comprising basement, ground and two upper storeys (Class C3) and associated works”.**
- 1.4 This planning application follows two previous submissions (LPA ref. 2005/0353/P & 2013/7112/P) which have also sought permission to provide a family sized dwelling at this site. Following comments made previously by Planning Officers and nearby residents this submission has been amended and further justification has been provided as to why the proposals accords with development plan policy and other material considerations
- 1.5 The new dwelling has been designed by Undercover Architecture Ltd and is described in Section 4 of this Planning Statement, as well as in the accompanying Design and Access Statement.
- 1.6 This Planning Statement sets out the planning case in support of the application. It summarises the planning history of the site and assesses the development, by identifying the principal town planning considerations, in the context of relevant planning policies and guidance.
- 1.7 This Statement should be read in conjunction with the following documents which are submitted in support of the full planning application. These documents comprise:
- Design and Access Statement prepared by Undercover Architecture Ltd, which includes existing and proposed views from key locations as well as a commentary on the plan form of the Chalcots Estate;

- Existing and proposed drawings prepared by Undercover Architecture Ltd;
- Heritage Assessment prepared by Donald Insall Associates, which assesses the impact that the scheme would have on the nearby heritage assets;
- Daylight and Shadow Neighbouring prepared by Behan Partnership;
- Basement Impact Assessment prepared by ESI;
- Land Stability Report prepared by Soil Consultants;
- Sustainability/Energy Statement and BREEAM Assessment prepared by Metropolis Green;
- Arboricultural Impact Appraisal and Method Statement prepared by Barrell Tree Consultancy.

2 Site and surrounding context

- 2.1 No. 11 Primrose Hill Road is the southernmost of 14 properties, which are almost identical in terms of appearance, which form a three storey, flat roofed terrace at the eastern end of the Chalcots Estate. It is a dual aspect building with windows facing east and west. It shares a party wall with no. 13 to the north and has a blank frontage facing south. There is private garden space to the side and rear of the property. There are several trees and hedgerows within the garden. Hardstanding to the front of the house allows an area for car parking. A site location plan is included within the accompanying Design and Access Statement.
- 2.2 We understand that planning permission was granted for housing development across what was to become the Chalcots Estate in May 1963. This terrace was initially designed by Dennis Lennon & Partners and came forward as part of Phase 1 of the residential estate. Changes have been made to a number of the houses on the estate and the wider plan form has altered since it was developed. However the uniformity of this terrace in terms of height, width, materials, detailing, roof form, colour and fenestration gives it a strong identity and a unified appearance. The wider estate also retains a unified appearance, albeit with different block typologies.
- 2.3 The terrace is set back from Primrose Hill Road on a private road. This set back from the eastern boundary, the level of screening provided by fencing, hedges and mature tree cover on the southern boundary and the blank side wall ensures that the terrace does not have a direct relationship with either Primrose Hill Road or King Henry's Road. In turn, this means that the site is not in a prominent location in terms of views despite it being on the corner of two roads.
- 2.4 A study of key local views is provided within the Design and Access Statement. The principal views to the site are considered to be from the immediate vicinity along King Henry's Road.
- 2.5 Due to the set back of the building line from Primrose Hill Road and the curvature of the road, No.11 is not visible when the viewpoint is from the south of the site on Primrose Hill Road. It is also well screened from the north of Primrose Hill Road.
- 2.6 Although King Henry's Road is straight, the terrace is not visible in long views due to the position and amount of hedging and mature trees. The blank façade of No. 11 is visible immediately to the south, close to the road junction with Primrose Hill Road, to car passengers and pedestrians walking east to west and vice versa along King Henry's Road. However No. 11 is set back further than other houses on the north side of King Henry's Road

which form part of Chalcots Estate.

- 2.7 The plan form of Chalcots Estate is not symmetrical. However the terraces which form the boundary of the estate on Lower Merton Rise to the west, Adelaide Road to the north and Primrose Hill Road to the east feature defined straight building lines which run with no disturbances. The southern boundary of the estate, which is along King Henry's Road, does not have a pronounced building line like the other three boundaries, with some properties fronting the road and others set back further, bookending the road with blank frontages.
- 2.8 None of the properties within the terrace or on Chalcots Estate are listed and the site is not within a conservation area. At the southern side of King Henry's Road, immediately opposite the site, is the Church of St Mary the Virgin. This is a Grade II listed building and is also within the Elsworthy Road Conservation Area. Across Primrose Hill Road from the terrace, to the east and below this site, are entrances to the Grade II* listed Primrose Hill Tunnels which allow trains to travel through the railway tunnels underneath Primrose Hill.
- 2.9 The Core Strategy Proposals Map does not include any designations which cover the site.
- 2.10 The surrounding area is generally residential and suburban in nature though there is a row of shops on the north-eastern intersection of Primrose Hill Road and King Henry's Road. The residential properties in the wider area are typically older and taller than the houses on Chalcots Estate.
- 2.11 The site is in a location which is relatively well served by public transport. The Nos. 31 and C11 buses pass in close proximity whilst Chalk Farm and Swiss Cottage Underground Stations are within walking distance. The site has a Public Transport Accessibility Level (PTAL) of 3.

3 Relevant planning history

3.1 An examination of the Council's statutory planning register has been carried out. The most relevant planning history records are outlined below.

3.2 We understand that planning permission was granted for Chalcots Estate in May 1963 and that the terrace which this site forms part of was developed in the late 1960s.

3.3 On 25 February 2005, a planning application (2005/0353/P) was submitted at this site for erection of an end of terrace three storey dwelling house. The scheme was similar to the proposals within this application. This was refused for the following reason:

“The proposed 3 storey single family dwelling house, by reason of its siting being located beyond the established building line on King Henry's Road and its height and bulk would be detrimental to the established character and appearance of the townscape and adjacent Elsworthy Conservation Area. The proposal is therefore considered to be contrary to policies EN1 (General environmental protection and improvement), EN14 (Setting of new development), EN16 (Site layout), EN18 (Design of infill developments), EN23 (Reduction of garden amenity) and EN37 (proposals outside conservation areas) of the London Borough of Camden Unitary Development Plan”.

3.4 A further planning application (2013/7112/P) for a three storey dwelling at the southern end of the terrace was submitted on 4 December 2013. During the determination period the case officer informed the agent for this application that the Council did not consider the scheme acceptable as the proposed building would not fit with the streetscape and the building line would be brought forward of the new estate so that it would not align with the adjacent terrace. This application was withdrawn so that changes could be made to the scheme and to allow a further submission to be prepared to provide improved justification for the proposals.

3.5 In plan form, Chalcots Estate is bound by terraces with straight building lines to the west, north and east. The buildings to the south of the estate along King Henry's Road are not uniform so do not provide a definite building line. The terrace at the northeast part of the estate is on Quickswood.

3.6 On 4 July 2006, planning permission (2006/1426/F) was granted to erect a three storey end of terrace dwelling house immediately adjacent to 65 Quickswood. This is at the end of the row of terraced houses which is directly to the north of the 11-37 Primrose Hill Road terrace. The Council considered that this scheme complied with development plan policies for infill

development and increasing residential floorspace within the borough. A copy of the decision notice and site plan is attached as Appendix 1.

- 3.7 The town planning considerations for the permitted scheme at Quickswood are considered to be very similar to this set of proposals. Both seek to add an infill single dwelling house to an end terrace on Chalcots Estate by proposing a design which follows the defined building line of the terrace which is well screened from the nearby roads and is identical to the neighbouring buildings in terms of bulk, massing, layout, detail and cladding.
- 3.8 Additionally, the eastern side of No. 65 aligned with the front line of the 11-37 Primrose Hill Road terrace and it is considered that this relationship was stronger than the one which No. 11 Primrose Hill Road has with other properties fronting King Henry's Road.
- 3.9 An application to amend the design of the building adjacent to 65 Quickswood was submitted on 4 December 2009. Planning permission was refused by the borough on 15 January 2010 and the appeal was dismissed by the Planning Inspectorate on 8 September 2010. This was because the design no longer sought to provide a dwelling which was a facsimile of the adjacent houses but instead build a larger house featuring three bays rather than two.
- 3.10 The permitted scheme was amended (2013/5633/P) to include an additional single storey rear extension and to convert the garage to habitable accommodation. Conditions regarding hard and soft landscaping works, tree protection measures and building foundations have also recently been discharged (2013/5633/P & 2013/8174/P). This scheme is currently being built out and once completed the edge of the Quickswood terrace will no longer align with the building line of the 11-37 Primrose Hill Road terrace.
- 3.11 A further amendment application (2014/4054/P) at 65 Quickswood was registered on 9 July 2014. This seeks changes regarding the lower ground and basement levels.

4 Description of the proposals

- 4.1 This application seeks planning permission for the erection of a basement, ground plus two storey end of terrace dwelling house (Class C3), immediately adjacent to No. 11 Primrose Hill Road on a plot of land which is currently hard standing. This new self-contained house would be provided in what is currently the side garden of No. 11 and would extend the existing terrace southwards.
- 4.2 The proposed property has been designed so that it would be identical to the terrace which it would be added to, which is homogenous in terms of appearance. The house would also be the same width as neighbouring properties and share the same front and rear building lines. It would be constructed from rendered masonry and feature white painted metal windows frames and a flat roof, both of which are common characteristics of the wider Chalcots Estate. The fenestration, general detailing, style of doors, rear balcony and white painted timber slats would also match the neighbouring houses so that this building would replicate the form and design of the existing terrace.
- 4.3 The flank wall which would face south on to King Henry's Road would not include door or windows openings and, to soften its appearance in terms of visual amenity, would feature a green wall.
- 4.4 The house would comprise three bedrooms and measure 205.6 square metres over four levels. The basement would match the plan of the upper floors and be excavated to a depth of 3 metres. No pavement lights are proposed so the presence of the basement would not be visible from outside the building.
- 4.5 To accommodate the new property one 'Category C' tree would need to be removed to the southeast of the site, general pruning would be required and tree root protection methods would need to be utilised during construction works. However, the majority of trees, hedging and vegetation would be retained.
- 4.6 The proposed building has been designed so that it would benefit from a high environmental performance. The green wall would provide ecological benefits whilst efficient building fabric would limit the carbon footprint of the property.

5 Planning policy context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

5.2 The statutory development plan covering this site comprises:

- The London Plan (July 2011). This is the Spatial Development Strategy for Greater London. On 11 October 2013, the Mayor published Revised Alterations to the London Plan (REMA) which provided formal alterations. Further Alterations to the London Plan (FALP) were consulted on between 15 January and 10 April 2014. These changes will be the subject of an Examination in Public which is due to commence on 1 September 2014.
- The Camden Local Development Framework (LDF) comprises the Core Strategy and Development Policies document, which were both formally adopted on 8 November 2010, as well as a number of Camden Planning Guidance documents.
- At a national level, Central Government has published the National Planning Policy Framework document (27 March 2012).

National Planning Policy Guidance:

The National Planning Policy Framework (NPPF), March 2012

5.3 The NPPF document sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document previous national planning policy statements. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. The NPPF introduces the presumption in favour of sustainable development.

Regional Planning Policy: The London Plan (July 2011)

5.4 The London Plan sets out the relevant London-wide planning policy guidance, the relevant regional planning policy guidance for Camden and forms a component part of the statutory development plan.

5.5 It aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20-25 years. The London Plan is the London-wide policy context within which the boroughs set their local planning agendas.

5.6 The following policies within the London Plan are considered relevant to this planning application:

- 3.3 – Increasing housing supply;
- 3.4 - Optimising housing potential;
- 3.5 - Quality and design of housing developments;
- 5.3 – Sustainable design and construction;
- 5.10 – Urban greening;
- 7.9 – Heritage-led regeneration.

Local Planning Policy

5.7 Camden's Core Strategy sets out the key elements of the borough's vision and includes its strategic policies. It is the central component of its LDF. It covers the physical aspects of location and land use but also addresses other factors that make places attractive, sustainable and successful such as social and economic matters.

5.8 The following adopted Core Strategy policies are considered relevant to the determination of this application:

- CS1 - Distribution of growth;
- CS5 – Managing the impact of growth and development;
- CS6 – Providing quality homes;
- CS13 – Tackling climate change;
- CS14 – Promoting high quality places and conserving our heritage.

5.9 The Camden Development Policies document sets out the detailed planning policies that the Council will use when determining applications seeking planning permission so that the vision and objectives of the Core Strategy can be achieved. Due to the close relationship of the Core Strategy and Development Policies the documents were prepared in parallel. Both documents are currently being reviewed by the Council with a view to the production of an updated Local Plan.

5.10 The following adopted Development Policies are considered relevant to the determination of this application;

- DP2 – Making full use of Camden's capacity for housing;
- DP6 – Lifetime homes and wheelchair housing;

- DP18 – Parking standards and limiting the availability of car parking;
- DP22 – Promoting sustainable design and construction;
- DP24 – Securing high quality design;
- DP25 – Conserving Camden’s heritage;
- DP26 – Managing the impact of development on occupiers and neighbours;
- DP27 – Basement and lightwells.

5.11 There are eight Camden Planning Guidance (CPG) documents which provide advice and information on how the borough will apply its planning policies set out within its Core Strategy and Development Policies document.

5.12 CPGs relevant to this planning application include the following:

- CPG2 – Housing;
- CPG3 – Sustainability;
- CPG4 – Basements and lightwells;
- CPG6 – Amenity.

6 Key Planning Considerations

6.1 This section assesses the key planning considerations concerning the proposed development at this site.

6.2 The key planning considerations are as follows:

1. Principle of residential development;
2. Design;
3. Impact on heritage assets;
4. Basement development;
5. Car parking;
6. Trees;
7. Sustainability;
8. Loss of daylight/sunlight.

Principle of residential development

6.3 Paragraph 47 of the NPPF sets out that local planning authorities should seek to significantly boost their supply of housing. The document introduces the presumption in favour of sustainable development principle, with paragraph 49 specifically commenting that this should be applied when determining housing applications.

6.4 The Mayor recognises the pressing need for more homes within London. The current iteration of the London Plan, at policy 3.3, sets out that the annual average target for housing delivery is 32,210 units per year across London. To help achieve this regional figure, Camden is expected to provide 6,650 new homes within the period between 2011 and 2021. This figure is also set out at policy CS6 of the Camden Core Strategy.

6.5 FALP seeks to increase housing delivery across London to help meet insatiable demand. A revised target of 42,000 units per year across London is proposed. It should be noted that this level of delivery has not been achieved since the interwar period. It proposes to increase Camden's ten year housing target, covering the period between 2015 and 2025, to 8,892 homes. Accordingly, there is strong pressure for the local planning authority to deliver housing development.

6.6 Part Ee of policy 3.3 promotes the sensitive renewal of existing residential areas and policy 3.4 focuses on optimising housing output on all sites as long as development is consistent

with the local context and character.

- 6.7 Similarly, at local level, policy CS1 of the Core Strategy states that the Council will promote the most efficient use of land in Camden by seeking development which makes full use of sites. This sentiment is echoed by policy DP2 within the Development Policies document. Supporting paragraph 2.8 to this policy also sets out that “housing is regarded as the priority land use of the Local Development Framework” and that “the Council will make housing its top priority when considering the future of unused and underused land and buildings”.
- 6.8 CPG2 states that the LDF seeks to make full use of Camden’s capacity for housing to establish a plentiful supply and broad range of homes.
- 6.9 It is clear that there is unanimous policy support for the provision of additional housing at suitable sites across Camden. The addition of one house on this corner site would not result in over-development as the design would respect the local context by matching the neighbouring terrace and ensuring that a set back from the southern boundary is maintained. The local suburban character would also be maintained as the corner would still feature a number of trees, a hedgerow and a green wall.
- 6.10 Accordingly, the provision of a family sized residential unit within an urban location which benefits from good access to public transport is considered to be a key planning benefit given the current housing shortage within London and the difficulty of delivering units across the borough.

Design

- 6.11 Policy 3.5 of the London Plan expects housing developments to be of the highest quality internally, externally and in relation to their context and wider environment.
- 6.12 Local Policy DP6 sets out that all housing developments should meet lifetime homes standards.
- 6.13 Policy DP24 requires all developments to be of the highest standard of design and will expect the following points to be considered:
- a) character, setting, context and the form and scale of neighbouring buildings;
 - b) the character and proportions of the existing building, where alterations and extensions are proposed;
 - c) the quality of materials to be used;

- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space;
- i) accessibility.

6.14 Prescriptive residential design standards are provided within CPG2. This document sets out that all habitable rooms should have a minimum headroom of 2.3 metres, with the exception of basement habitable rooms which may have a 2.1 metre headroom. Minimum floorspace standards are set out in relation to the number of people who may live within a self-contained dwelling. The minimum floorspace for six people is 93 square metres. First and double bedrooms are required to measure 11 square metres or above and single bedrooms 6.5 square metres or above.

6.15 The two previous applications at this plot were either refused or considered contentious, primarily for design reasons. These included that the proposed building would not fit in with the streetscape, its height and bulk would be detrimental to the established character and appearance of the townscape and it would be located beyond the established building line on King Henry's Road.

- Streetscape impact / impact of height and bulk on the local townscape

6.16 The design rationale for the proposed building is for it to match the other houses which form this identical terrace, which runs from north to south on Primrose Hill Road. A design divergent from that of the existing terrace would not fit in with the local context and would look out of place.

6.17 The proposed dwelling would proportionally be the same as neighbouring properties as it would be identical in terms of width and share the same front and rear building lines. The masonry, white timber slats and white painted metal window detailing would ensure that the new building would match the terrace in terms of materiality. The flat roof, fenestration, door types and rear balcony would also ensure that it would tie in with the neighbouring properties. Accordingly, the proposed dwelling would not disrupt the strong identity created by the repeated form of dwellings within the terrace. It would also not affect the rhythm and symmetry along the terrace.

6.18 As the proposed house would be entirely consistent in terms of its external appearance with

the others on this terrace, it is considered that it would fit in comfortably with the Chalcots Estate streetscape.

- 6.19 As the height and bulk of the proposed building has been informed by that of the dwellings within the contiguous terrace, it would remain no taller than any other properties on the four corners of King Henry's Road and Primrose Hill Road. It would be a similar height to the flats across Primrose Hill Road and would very much be subservient in terms of height to the Church of St Mary the Virgin and the block of flats at the southern side of King Henry's Road.
- 6.20 Developing a property on this plot would mean that the side wall would be closer to King Henry's Road. However, at its closest point, the proposed building would still be set back over 1 metre from the boundary wall. This would ensure that a noticeable gap would be provided between the building and the boundary.
- 6.21 The current southern wall is a blank façade and offers no visual interest from the local views which it is visible within. The proposed south elevation would be a green wall which would instead provide visual interest. Accordingly any sense of openness that would be lost would be offset by the improvement of this frontage in local views. As there would be no windows at the façade there would be no overbearing impact or issues in terms of overlooking.
- 6.22 A comparison study of the existing and proposed local views which are considered to be the most important is included within the Design and Access Statement. Due to the street pattern, the set back of this terrace and screening provided by other buildings and mature trees, the plot is only visible from a relatively small number of local views. It is not considered that the new building line of the southern frontage would significantly impact on the quality of local views.
- Impact on the King Henry's Road building line
- 6.23 As set out in the site and surrounding areas section of this planning statement, the King Henry's Road boundary of the Chalcots Estate is not defined by a set building line unlike the terraces which form the boundary of the estate on Lower Merton Rise to the west, Adelaide Road to the north and Primrose Hill Road to the east.
- 6.24 The principal building lines which this development needs to continue are those of the 11-37 Primrose Hill Road terrace. Accordingly, the front and rear of the proposed house would match the western and eastern building lines of the terrace. The integrity of these building lines would not be affected.

- 6.25 The southern boundary of the estate does not have a pronounced building line, with some properties fronting the road and others bookending the road with blank frontages. The 11-37 Primrose Hill terrace faces away from the few properties which it does align with on King Henry's Road so it is not considered that there is a close relationship between the two.
- 6.26 This new house, which would be the south-eastern most building on the estate, would not protrude closer to King Henry's Road than the corner property on Lower Merton Rise, which is at the southwest corner of the estate. A further general pattern on this southern boundary, which this proposal would match, is that the end of terrace houses with sides wall are much closer to King Henry's Road than the dwellings which directly face the road.
- 6.27 It should be noted that the plan form of the Chalcots Estate has altered over time due to ad hoc changes and additions. Therefore the current plan form does not reflect the original design.
- 6.28 The importance of giving significant weight to preserving the plan form of the estate should also be considered in light of the decision to permit a new dwelling adjacent to No. 65 Quickswood. Rather than been aligned like it was previously, the new house projects in front of the building line of the 11-37 Primrose Hill terrace. The Officer's report considered that this would not harm the overall character of the estate or the streetscene in Primrose Hill Road. The importance of the plan form of the Estate did not appear to be a material consideration of great weight in that instance even though that development caused greater disruption to the plan form than this set of proposals.
- Other design considerations
- 6.29 The house would comprise three bedrooms and measure 205.6 square metres over four levels. Garden space would be provided to the rear of the property. The scheme would meet the lifetime homes standards and all the relevant size criteria in terms of unit and room sizes.

Impact on heritage assets

- 6.30 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.
- 6.31 Section 66(1) states that when considering planning applications special regard should be given to the desirability of preserving a listed building or its setting.

- 6.32 Section 72(l) sets out that with respect to any buildings or other land within a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 6.33 Under paragraph 128 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. Policy 7.9 of the London Plan also reflects this.
- 6.34 Policy CS14 sets out that Camden's rich and diverse heritage assets and their settings should be preserved or enhanced.
- 6.35 Policy DP25D states that outside of conservation areas development will not be permitted which causes harm to the character and appearance of that conservation area. Similarly, development will not be permitted for schemes which are considered to cause harm to the setting of a listed building.
- 6.36 None of the residential dwellings within the terrace or on Chalcots Estate are listed and the application site is not within a conservation area.
- 6.37 The southern side of King Henry's Road is within the Elsworthy Road Conservation Area. One reason why the 2005 application submitted at this site was refused was because the height and bulk of the proposed house was considered to be detrimental to the established character and appearance of the adjacent Elsworthy Road Conservation Area.
- 6.38 Opposite the site is the Church of St Mary the Virgin, an Early French Gothic style building constructed in red brick. This is a Grade II listed building. A new primary entrance to the church, accessed from the east off a small garden facing onto Primrose Hill Road, was built in 2005. The former main entrance, which is opposite this application site, is now used infrequently.
- 6.39 Across Primrose Hill Road from the terrace, to the east, and below this site are entrances to the Grade II* listed Primrose Hill Tunnels.
- 6.40 A full heritage assessment has been carried out by Donald Insall Associates and accompanies this submission. The principal heritage consideration concerns the impact of the new building on the setting of the nearby listed buildings and on the Elsworthy Road Conservation Area.

- 6.41 Due to the design of the proposed house matching the existing terrace and the green wall which will face southwards, Donald Insall Associates consider that the proposed development would have a very limited impact on the setting of the Church of St Mary the Virgin and due to its location would have no visual impact on the Grade II* listed railway tunnels.
- 6.42 Donald Insall Associates consider that the new house would provide a modest benefit to the character and appearance of the adjacent Elsworth Road Conservation Area. This is because a strong architectural termination would be provided to the south-eastern boundary of the Chalcots Estate which would reinforce the urban grain and enhance the townscape presence of the street edge.

Basement development

- 6.43 Policy DP27 sets out Camden's approach to basement development. In determining proposals for basements, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability to be undertaken and provided as part of the application. In addition, the loss of open space or trees of townscape or amenity value, any harm to the appearance or the setting of the property and the protection of important archaeological remains will be considered when determining basement schemes.
- 6.44 CPG4 reiterates that the Council will only permit subterranean development that does not cause harm to the built and natural environment and local amenity, result in flooding or lead to ground instability. It also sets out that a site specific Basement Impact Assessment is submitted with all applications seeking subterranean works.
- 6.45 This application seeks a one storey basement that does not extend beyond the footprint of the proposed building above. The basement would be 3 metres deep and would result in the excavation of the underlying London Clay. The basement footprint would measure 10.3 metres by 6.3 metres. It would accommodate gym and cinema facilities; therefore all habitable rooms would be provided at the ground and upper floors.
- 6.46 A Basement Impact Assessment prepared by ESI forms part of this planning submission along with a Land Stability Report prepared by Soil Consultants.
- 6.47 The ESI report sets out that it is likely that the nearest drain to the site discharges to the adjacent sewer and as the scheme would not result in any additional surface run off this

existing drainage will still be suitable.

- 6.48 As there would be no increase in surface run off, the proposed scheme would not increase the risk of flooding at the site or wider area.
- 6.49 Given the underlying London Clay, which is not highly permeable, the groundwater flow 3 metres below ground floor level is likely to be negligible. This has been confirmed by local borehole testing.
- 6.50 The Land Stability report confirms that the risk to ground stability will be low though further information is required regarding the nearby rail tunnels.
- 6.51 This site is not within an Area of Archaeological Potential therefore, as set out by Camden's Local Area Requirements for Planning Applications (February 2014), a desk based archaeological assessment is not required as part of this submission.
- 6.52 As the basement would be fully enclosed with no pavement lights or lightwells, the proposed subterranean development does not raise any design or amenity issues.
- 6.53 The impact that the basement would have in relation to the loss of open space and trees as well as on the appearance and setting of existing properties is considered in other sections of this report.

Car parking

- 6.54 Camden seeks to limit the supply of car parking so that congestion in the borough can be addressed. It therefore seeks to minimise the level of car parking provision at new developments.
- 6.55 Policy DP18 sets out that new developments should provide the minimum necessary car parking. Across the borough a maximum of 1 car parking space per dwelling is considered acceptable with one storage or parking space per unit expected for bicycles.
- 6.56 No additional car parking is proposed as part of the application. In addition, any changes to the parking arrangements would need to be agreed with the Chalcots Estate as car parking takes place on private roads. The development is therefore not considered to cause any adverse effects on parking in the area.

6.57 There is adequate space available on-site for secure bicycle storage.

Trees

6.58 Policy DP24 sets out that all developments will be expected to consider existing natural features such as garden space and trees. Supporting justification provided at paragraph 24.20 sets out that development will be resisted which occupies an excessive part of a garden.

6.59 An Arboricultural Impact Appraisal and Method Statement prepared by Barrell Tree Consultancy accompanies this application.

6.60 This scheme would lead to the loss of one small 'Category C tree'. This is considered low quality, so its loss would have no significant impact on the character of the area. There are no 'Category A' trees on-site and all 'Category B' trees, which are considered to be of moderate quality, would be retained, though appropriate protective measures would need to be undertaken during the construction works. These are set out in the Method Statement and can be the subject of a planning condition if the Council deem appropriate.

6.61 The private amenity space which would be lost at the plot is not considered significant, especially as residents at the new house and No.11 would still have garden access. The green wall is considered a planning benefit and in terms of greenery would offset the loss of one tree.

6.62 Minor pruning of trees would be required so that building works could place and provide a reasonable distance separation between the trees and house. This would not affect their health or have a significant impact on visual amenity as their profile from public viewpoints would be negligible.

Sustainability

6.63 Policy 5.10 of the London Plan sets out that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. It goes on to state that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening and include the provision of green walls if possible.

- 6.64 Policy CS13 encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.65 Policy DP22 sets out that the Council will require development to incorporate sustainable design and construction measures and should incorporate green roofs and green walls wherever possible.
- 6.66 CPG3 requires all new developments to minimise carbon dioxide emissions and that the most cost-effective way to minimise energy demand is through good design and high levels of insulation and air tightness.
- 6.67 A Sustainability and Energy Statement prepared by Metropolis Green accompanies this application, as well as a Code for Sustainable Homes pre-assessment. This follows detailed work undertaken between Metropolis Green and Undercover Architecture to design the most efficient building for the site.
- 6.68 This scheme would provide a new house in a sustainable urban location which benefits from good access to public transport.
- 6.69 To ensure that the new dwelling benefits from high environmental standards highly efficient fabric, an efficient gas boiler and high quality services would be provided. External equipment would be housed at roof level in a similar fashion to other dwellings on the terrace.
- 6.70 Water consumption would be reduced through the selection of water efficient fixtures and fittings so that the water efficiency target of 105 litres per person per day could be achieved. A rainwater collection system would also be installed which would be used to irrigate the garden area and provision of a green wall would provide ecological benefits.
- 6.71 The U-value of the glazing has been designed to allow a balance between beneficial solar gains and possible overheating. Passive ventilation through openable windows would allow the control of ventilation and heating.
- 6.72 A Code for Sustainable Homes pre-assessment accompanies this application and demonstrates that the proposed development could achieve a level 4 rating, with a score of 73.2%.

Loss of daylight/sunlight

- 6.73 The Building Research Establishment (BRE) Report 'Site Layout Planning for Daylight and Sunlight 2011' comprises tests to assess the impact that a new development will have on the light to neighbouring properties.
- 6.74 Policy DP26 seeks to protect the daylight/sunlight levels of residents neighbouring application sites by only granting permission for development that does not cause harm to neighbouring amenity.
- 6.75 CPG6 sets out that Camden expects all buildings to receive adequate daylight and sunlight and that daylight/sunlight reports, including the results of Average Daylight Factor (ADF) and Vertical Sky Component (VSC) studies, are required where there is potential to reduce existing daylight/sunlight levels.
- 6.76 The nearest residential properties are at 11 & 13 Primrose Hill Road and 60 King Henry's Road, though the new building would be parallel to the houses on Primrose Hill Road and the windows would be on the same frontages meaning that this development would not block out any light at these neighbouring properties.
- 6.77 A daylight assessment has been undertaken by Behan Partnership LLP and is submitted as part of this planning application. A sunlight analysis was not required as the assessed windows are all north facing.
- 6.78 The development's potential impact on daylight was assessed using the VSC and ADF methods. The results confirm that all of the neighbouring windows would retain adequate daylight levels and would fully comply with the BRE criteria.

7 Conclusion

- 7.1 This application seeks planning permission for the erection of a basement, ground plus two storey dwelling house at the southern end of the 11-37 Primrose Hill Road terrace.
- 7.2 The principle of development is considered acceptable as residential is considered to be the priority land use in Camden and the borough has a significant annual housing target. This is also set to increase shortly when FALP is adopted. Accordingly, the provision of a family sized residential unit within an urban location which benefits from good access to public transport is considered to be a key planning benefit given the current housing shortage within London and the difficulty of delivering units across the borough.
- 7.3 As the proposed dwelling house has been designed so that it replicates the neighbouring terrace it is considered that it would fit in with the current streetscape and as the development would not harm any key views it is not considered that its height and bulk would be detrimental to the local townscape. The proposed design matching the existing terrace is considered the correct approach.
- 7.4 Evidence is provided that the plan form of the Chalcots Estate has changed since it was originally developed and that the southern boundary of the estate does not have a well-defined building line, unlike the other three sides of the estate. In addition, it is not considered that the existing house at No. 11 Primrose Hill Road and the few properties on King Henry's Road which it is aligned with benefit from a close relationship. It is therefore considered that the proposed scheme would not detrimentally impact the plan form of the estate.
- 7.5 The applicant has taken specialist heritage advice regarding the impact that the proposals would have on the neighbouring conservation area and listed buildings. Donald Insall Associates consider the proposed development would have a very limited impact on the setting of the Church of St Mary the Virgin and, due to its location, would have no visual impact on the Grade II* listed railway tunnels. It considers that the new house would provide a modest benefit to the character and appearance of the adjacent Elsworthy Road Conservation Area.
- 7.6 The basement of the new house would be fully enclosed so would not affect neighbouring amenity. Similarly a daylight/sunlight report has been prepared which confirms that the proposed scheme would not lead to a material loss of daylight and sunlight at neighbouring properties.

- 7.7 The scheme is also considered to be policy compliant with regards to car parking, sustainability and tree retention.
- 7.8 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, this application meets the objectives and policies of the Development Plan including relevant London Plan and Camden policies. It is not considered that reasons provided to refuse previous similar schemes at this plot are sound.
- 7.9 We therefore consider that this application should be granted planning permission.