

**GLOUCESTER LODGE
GLOUCESTER GATE
REGENT'S PARK
LONDON
NW1**

PLANNING STATEMENT

July 2017

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Montagu Evans on behalf of Iconic Properties Ltd.
- 1.2 It is written in support of applications seeking Minor Material Amendments (submitted under Section 73 of the Town and Country Planning Act (as amended)) to planning permission reference 2016/4549/P and an associated Listed Building Consent.
- 1.3 For the avoidance of doubt, this Planning Statement and all other supporting material forming part of these applications reassess the proposals in their entirety. As an application under Section 73 results in a new, 'stand-alone' planning permission it is necessary for the scheme to be assessed afresh against the Local Planning Authority's Development Plan and all other material considerations. The Listed Building Consent also seeks approval for all permitted works again, except in limited areas where the proposed works are different to those permitted.
- 1.4 The extant permission and consent are of course material considerations to which great weight should be attached. However a full reassessment of the proposals is also made necessary because Camden Council have adopted a new Local Plan since the extant scheme's approval. The new Local Plan replaces a series of key policies against which the previous scheme was found to be acceptable.
- 1.5 Our proposed descriptions of development for works to Gloucester Lodge, Gloucester Gate, Camden, NW1 are as follows:

Section 73 - Minor Material Amendments

'Works permitted by extant planning permission 2016/4549/P, subject to Minor Material Amendments including internal and external alterations to Gloucester Lodge and 12 and 13 Gloucester Mews. Associated hard and soft landscaping.'

Listed Building Consent

'Works permitted by extant Listed Building Consent 2016/4554/L, subject to internal and external alterations to Gloucester Lodge and 12 and 13 Gloucester Gate Mews. Associated hard and soft landscaping.'

- 1.6 This Planning Statement will examine the proposals' material planning considerations, including the principle of demolition, basement impact, design, sustainability, amenity and trees. The building is Grade I Listed and set within the Regent's Park Conservation Area and so whilst this statement touches upon matters of heritage, a separate Heritage Assessment accompanies the application. These documents, in combination with all other supporting material, demonstrate that the

proposals are acceptable in light of relevant material considerations and planning policy at local, regional and national levels.

- 1.7 The proposals seek to sensitively reconfigure and restore Gloucester Lodge, referred to as 'the main house' in this document. The proposals also include the erection of a single storey rear extension connecting the main house with 12 Gloucester Mews, the demolition and replacement (behind retained facades) of 12 and 13 Gloucester Mews and the creation of a single storey basement below the mews properties and rear garden.
- 1.8 The vast majority of this development already benefits from planning permission and Listed Building Consent.
- 1.9 This application's design, nature and supporting material is the product of detailed discussions with Camden Council Officers and, separately, a site visit and discussion with Historic England.
- 1.10 Paragraph 128 of the NPPF requires that applications for development that effect the historic environment describe the significance of the identified assets so that the impact of the proposals may be understood. The Heritage Statement submitted with this application will fulfil this requirement by presenting an historic and architectural appraisal of the property and a statement of significance.
- 1.11 Section 2.0 of this report provides a detailed description of the site, the buildings it accommodates and their locality. Section 3.0 describes the extant planning permission and listed building consent and how this proposal differs, whilst Section 4.0 provides a summary of the applicable planning policies. Section 5.0 demonstrates the compliance of the scheme in these respects combined with a consideration of important material considerations. Conclusions are provided in Section 6.0.
- 1.12 The application is accompanied by the following the documents:
- Application Forms (Section 73 Minor Material Amendments and Listed Building Consent);
 - Ownership Certificates (B);
 - CIL Forms;
 - Site Plan;
 - Site Location Plan;
 - Existing Drawings (Plans, Elevations and Sections) – Make Architects;
 - Permitted Drawings (Plans, Elevations and Sections) – Make Architects;
 - Demolition Drawings (Plans, Elevations and Sections) – Make Architects;
 - Proposed Drawings (Plans, Elevations and Sections) – Make Architects;
 - Previously Approved Design and Access Statement and Addendum – Make Architects;
 - Updated Heritage Statement – Montagu Evans;
 - Updated Planning Statement – Montagu Evans;

- Previously Approved Arboricultural Impact Assessment and Addendum – Environmental Services;
- Previously Approved Draft Construction Management Plan (See Also Techniker Addendum Report) – Techniker;
- Previously Approved and Updated Basement Impact Assessment - Techniker, including:
 - Ground Movement Assessment;
 - Structural Stability Report; and
 - Local Ground Conditions Testing.
- Updated Sunlight and Daylight Assessment – eb7.

2.0 THE SITE

- 2.1 The site comprises 835m² and is located on Gloucester Gate, on the north eastern corner of Regent's Park. It accommodates three buildings, Gloucester Lodge, 12 Gloucester Mews and 13 Gloucester Mews. Gloucester Lodge and 12 Gloucester Mews operate as a single dwelling and these proposals seek minor material amendments to a permitted scheme that incorporates 13 Gloucester Mews into that planning unit as a single dwelling.
- 2.2 The site is located within the London Borough of Camden, within the Regent's Park Conservation Area. The site enjoys a PTAL of part 3 and part 5.
- 2.3 Detailed descriptions of the site's context, its constituent buildings and the proposals can be found in the Design and Access Statement (and Addendum Design and Access Statement) and updated Heritage Statement that accompany this application.

Planning History (Chronological)

- 2.4 An application for, 'Alterations at rear to house lift and staircase at Gloucester lodge, 12, Gloucester Gate, Camden' was approved by Camden Council on 8th September 1967.
- 2.5 An application for Listed Building Consent (Ref. 9370129) was approved on 15th October 1993 for '*Demolition of single storey service annexe in rear garden together with internal and external alterations including the reinstatement of period details as shown on drawing numbers GG12/1A 2A 3A 4A 5 6A 7A 9A 10A 11A 12 13A 14A 15A 16A 17A 18 14C & 15B*'.
- 2.6 On 12th December 1993 an application was approved for the '*Submission of new cornice details pursuant to condition 03 of the listed building consent dated 18th October 1993 (Reg No: HB/9370129/R2) for the demolition of single storey annexe in rear garden together with internal and external alterations including the reinstatement of period details. In accordance with Hayles & Howe cornice details as specified in your letter dated 3rd November 1993.*'
- 2.7 We note that there is no record of the Listed Building Consent (Reg No: HB/9370129/R2) referred to in this decision on Camden's online record.
- 2.8 Various applications for works to trees in the Conservation Area has been submitted and approved or withdrawn. Of these only Camden's 'no objection' to Notification to Carry Out Emergency Works to Protected Tree(s) (*DD 1x pendulous ash, FELL - dead, centre of front garden of 12 Gloucester Gate, London NW1*) is relevant. The proposals include the felling of this tree that remains in situ.
- 2.9 Planning Permission (ref. 2016/4549/P) was granted on 22nd December 2016 for '*Erection of single storey extension connecting 12 Gloucester Gate to mews building;*

insertion of rooflight; excavation of basement to extend below rear courtyard and mews properties; remodelling of mews properties with sash windows at upper ground floor (facing courtyard), parapet height raised, and erection of hipped, pitched roof to 12 Gloucester Gate Mews following demolition of 12 and 13 Gloucester Gate Mews behind retained elevation facing Gloucester Gate Mews.'

- 2.10 Listed Building Consent (ref. 2016/4554/L) was granted on 22nd December 2016 for *'Erection of single storey extension connecting 12 Gloucester Gate to mews building; insertion of rooflight; excavation of basement to extend below rear courtyard and mews properties; remodelling of mews properties with sash windows at upper ground floor (facing courtyard), parapet height raised, and erection of hipped, pitched roof to 12 Gloucester Gate Mews following demolition of 12 and 13 Gloucester Gate Mews behind retained elevation facing Gloucester Gate Mews and internal alterations to 12 Gloucester Gate including installation of lift and alterations at 1st and 2nd floor level.'*
- 2.11 Planning Permission ref. 2016/4549/P and Listed Building Consent ref. 2016/4554/L are extant and it is these that the current applications seek to vary with minor amendments. Throughout this document, this scheme is referred to as the 'extant scheme'.

3.0 EXTANT AND PROPOSED DEVELOPMENT

Design Evolution

- 3.1 The extant scheme was the result of detailed pre-application discussions with Camden Officers and Historic England.
- 3.2 Montagu Evans undertook extensive archival research into the history of the site and buildings. The results of this research are detailed in the Heritage Statement and the Design and Access Statement, making clear that the buildings have undergone several significant alterations over the years.
- 3.3 The alterations to the extant scheme that are now sought are in large part due to further historic information coming to light since that scheme was permitted. Again, details of this further historic evidence and its significance in determining the sensitivities of the existing building are set out in the Design and Access Statement and the Heritage Statement.
- 3.4 The design team have reappraised small elements of the extant scheme in light of this historic information and Make Architects produced draft proposals that were submitted to Camden Council and Historic England for comment. It is following meetings and extensive discussions with both, that we submit these proposals.

The Proposals

- 3.5 Reference should be made to the drawings and the Design and Access Statement Addendum prepared by Make Architects submitted with this application. In summary the application proposes the following changes (listed first) to the already permitted works (listed second):

Proposed Minor Material Amendments

- Revised internal basement layout (NB the depth, extent and soil cover depth remains unchanged);
- Garden level lowered by approximately 200mm;
- Insertion of lift / in fill of side lightwell (south elevation);
- Set back of bay on southern side of eastern elevation;
- Garden room roof becomes flat / solid (previously glazed and pitched);
- Secondary stair at second floor dismantled and relocated;
- Insertion of roof light over lift shaft;
- Reconfigured / additional windows at second floor on the southern elevation;
- Reconfigured roof lights at second floor roof (one becomes openable); and,
- Relocation of door and widening of garage door in eastern elevation of 12 Gloucester Gate Mews.

Permitted Changes Included in Proposals

- Replacement of two trees in the forecourt of the main house (1 x Ash – Dead, 1 x Cherry – poor specimen. Please refer to Arboricultural Impact Assessment for more details);
- Internal alterations to the main house (Please refer to the Design and Access Statement for further details);
- Demolition and reinstatement of the mews properties (behind retained facades) with regularised roof profile;
- Creation of single storey basement below mews properties and rear garden, including 'roof' light;
- Erection of single storey Garden Room connecting rear of main property to the rear of 12 Gloucester Mews with stair connection to main house.

4.0 PLANNING POLICY

The Statutory Development Plan

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.
- 4.2 As set out earlier in this Statement, the site lies within the administrative jurisdiction of the London Borough of Camden. Camden Council adopted the new Local Plan in July 2017. It is these policies against which this application should be assessed, unless material considerations indicate otherwise.
- 4.3 The statutory Development Plan for the site comprises:
- London Plan (2016); and
 - LB Camden Local Plan (2017).

The London Plan

- 4.4 Relevant policies from the London Plan that informed the proposals include:
- 4.5 Policy 7.4 on Local Character seeks to encourage a contextual approach, based on an assessment of the physical characteristics of an area appropriately interpreted and applied.
- 4.6 Policy 7.8 encourages design appropriate to its context and of high quality, comprising details and materials that complement, without necessarily replicating local architectural characteristics.
- 4.7 Policy 7.8 part (i) seeks development that optimises the potential of all sites having regard, of course, to general design and contextual considerations as well as issues of amenity, transport and so forth.
- 4.8 Policy 7.9 is consistent with the NPPF considerations and encourages councils and developers to have regard to the significance of all heritage assets in the development process, both for the quality of life they bring but also because the refurbishment of older buildings can have a particularly powerful regenerative effect.

Camden Local Plan

- 4.9 Relevant policies from Camden Council's Local Plan include:
- G1 Delivery and location of growth;
 - H3 Protecting existing homes;
 - A1 Managing the impact of development;

- A3 Biodiversity;
- A5 Basements;
- D1 Design; and
- D2 Heritage.

National Planning Policy

- 4.10 The National Planning Policy Framework (NPPF) was published on 27 March 2012. The NPPF sets out the Government's approach to planning matters, and is a material consideration in the determination of planning applications.
- 4.11 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through decision-taking (paragraph 14). In the context of decision taking, this means *"Approving development proposals that accord with the development plan without delay"*.
- 4.12 In assessing whether a development is 'sustainable', regard has to be had to all policies of the NPPF and how these sit in a wider balance of considerations. Three fundamental dimensions to sustainable development are set out at paragraph 7 of the NPPF, which require the planning system to perform a number of roles:
- *"an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
 - *"a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
 - *"an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*

- 4.13 In March 2014 the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG consolidates previous circulars and guidance into single source of guidance at the national level.

Supplementary Planning Documents and Supplementary Planning Guidance

- 4.14 The Mayor of London has published a range of supplementary planning guidance that are material considerations in the determination of these applications, for example:

- SPG: The control of dust and emissions during construction and demolition (July 2014);
- SPG: Shaping Neighbourhoods: Character and Context (June 2014);
- SPG: London Planning Statement (May 2014); and
- SPG: Sustainable Design and Construction (April 2014).

4.15 The LB Camden has also produced a substantial suite of planning guidance documents to assist applicants in the interpretation of local policy and the delivery of compliant schemes. Of particular relevance for this scheme are:

- CPG 1 Design;
- CPG 2 Housing;
- CPG 3 Sustainability;
- CPG 4 Basements and lightwells; and
- CPG 6 Amenity.

5.0 PLANNING POLICY ASSESSMENT

5.1 The material considerations in assessing the merits of the scheme are considered to be:

- Extant Planning Permission (ref. 2016/4549/P) and Listed Building Consent (ref. 2016/4554/L) for majority of proposed works.

In light of new Camden Local Plan:

- Principle of development (demolition behind a retained façade) and proposed basement works;
- Height, bulk and mass;
- Detailed design and architectural style;
- Impact on Listed Building and Conservation Area;
- Residential amenity / privacy / sunlight and daylight considerations; and
- Trees / landscaping considerations.

5.2 The following policy analysis sets out how relevant Development Plan policies seek to ensure development respects and maintains the existing characteristics of an area, whilst also encouraging a creative design approach, making use of the highest quality materials.

5.3 This section will demonstrate how the proposals comply in these respects and how they respond successfully to material considerations and the local planning policy context.

Extant Planning Permission and Listed Building Consent

5.4 LB Camden has adopted a new Local Plan since permitting the extant scheme, however the extant scheme's existence and the applicant's ability to implement that scheme remains a material consideration to which considerable weight must be attached. We note also that whilst all previous policies have been replaced, the spirit and aims of their equivalent replacements are very similar in the vast majority of cases as to ensure the proposed scheme and changes remain acceptable in planning terms.

5.5 Each aspect of the extant scheme and proposed amendments are assessed afresh against current plan policy in the following sections.

5.6 It is important to note that whilst this application does not seek any changes to the permitted basement, its extent does exceed certain thresholds in the newly adopted policy, A5 Basements. This aspect of the proposals and the way in which it should be considered against policy and other material considerations are set out in detail below.

Principle of Development (and demolition behind retained façade)

- 5.7 The proposal includes an element of demolition (of the mews properties) behind the retained façade of the existing buildings. No Development Plan policies seek to prevent principle of such development.
- 5.8 During the determination of the extant scheme, both officers and Historic England accepted that this aspect of the proposal was acceptable in the circumstances.

The Officer's report for the extant scheme read:

“No. 13 Gloucester Gate Mews has no interior floorpan/layout/joinery etc. remaining. From the demolition that has already taken place it is evident that the interior was of low significance. The mews facing elevation is important and this would be retained. However the interior of No.12 retains its modest residential first floor with the layout and joinery of historic interest. While this type of interior is increasingly rare, it is clearly not of the grade I calibre of the main house and subsequently is of much less significance. The loss of the interior of No.12 at first floor level is considered modest. It would not be appropriate to refuse the application on this basis as it would be difficult to defend at appeal. A photographic record of the interior and an agreement for the salvage of the joinery would be secured by condition for the listed building consent.”

- 5.9 Since this decision Local Plan Policies D1 Design and D2 Heritage have been adopted. It is our assessment that the principle of development (including demolition) accords with the requirements of both policies. This a position shared with Camden officers and Historic England, confirmed during pre-application discussions, taking account of both the proposed changes and the changed policy context.
- 5.10 A detailed analysis of this aspect of the scheme and its impact on Designated Heritage Assets, including the Grad I Listed Gloucester Lodge and the Regent's Park Conservation Area, is set out in the Heritage Statement.

External Alterations to Mews Properties

- 5.11 The mews properties will be constructed behind retained facades, thus ensuring very little change to the streetscape of Gloucester Gate Mews. Minor alterations, such as widening a garage door and relocating a pedestrian door to the southern end of the elevation, are proposed, however these are considered to enhance he mews property's contribution to the Conservation Area through renewing tired fabric and preserving the existing character.
- 5.12 As with the extant scheme, the remodelled mews buildings will be topped with a rebalanced roof arrangement that will enhance the character and appearance of the Conservation Area and the setting for the Grade1 listed building. Details of the

existing and proposed roof arrangement can be seen on Existing Drawings PD1001 Rev.01, PD1101 Rev.01 and PD1205 Rev.01 and Proposed Drawings PE2001 Rev.01, PE2101 Rev.00 and PE2205 Rev.00.

- 5.13 Also replicating the extant scheme, three irregularly shaped windows in the rear elevation of the mews properties are replaced by six equally sized and evenly spaced windows. Please refer to Existing Drawing PD1205 Rev.01 and Proposed Drawing PE2205 Rev.00.
- 5.14 These openings are not visible from the public realm and as such have no effect on the character and appearance of the Conservation Area (thus preserving it). They do contribute however to the setting of Gloucester Lodge and in this regard they enhance that setting by returning the mews properties' rear elevation to an arrangement typical of such properties.
- 5.15 In these respects therefore the extant scheme, combined with proposed alterations, continues to accord with the unchanged requirements of the NPPF and London Plan and also accords with the requirements of both Policy D1 Design and D2 Heritage.

Amalgamation of Single Residential Unit

- 5.16 The proposals include the amalgamation of Gloucester Lodge (including the already integral 12 Gloucester Mews) with another property, 13 Gloucester Mews which abuts 12 Gloucester Mews to the north.
- 5.17 Camden's Development Plan, and Part c. of Policy H3 Protecting existing homes seeks to prevent development that '*would involve the net loss of two or more homes...*'. The policy very deliberately therefore does not seek to restrict development that results in the loss of a single residential unit.
- 5.18 This being the case, we are of the view that the proposals accord with the relevant policies of Camden's Development Plan in this respect.

Garden Room

- 5.19 As described in detail in the Design and Access Statement, the proposals include the construction of a Garden Room, serving to connect the main dwelling with the mews properties to the rear.
- 5.20 Policy D1 Design and CPG1 Design set out the design requirements of development proposals. The policy's relevant requirements, and CPG1's guidance, have informed the proposals' design from the outset, including the minor alterations now proposed.
- 5.21 The Garden Room will differ to a small extent from that which already has planning permission and Listed Building Consent. Its height will remain the same, its flat, gently pitched roof will change only in so far as it will be solid as opposed to glazed. The

structure will be longer by virtue of removing the existing rear bay of the main dwellinghouse. The Garden Room's section will simply be extruded to meet with the setback rear façade of the main dwelling.

- 5.22 The room will remain a lightweight structure, predominantly glazed, with a modest footprint and height, bulk and mass allowing it to sit comfortably within the rear amenity space. The proposals therefore respect the character, setting, context and the form and scale of the surrounding buildings (thus meeting the requirements of part a. of Policy D1).
- 5.23 In occupying a small proportion of the garden area, with a roof height of 3m, the structure will appear entirely subservient to both Gloucester Lodge and 12 Gloucester Mews. In this way, the relationship of these two buildings will remain readily understood and their character and overall appearance will be respected and maintained. In this way, part a. and part b. of Policy D1 will be satisfied.
- 5.24 Part e. requires the use of high quality materials. The applicant intends to use extremely high quality glazing systems complimented by fixtures and fittings of the highest quality. To ensure that this is the case and that part e. is satisfied, the applicant is willing to accept conditions that require sample materials to be submitted and approved by Camden Council.
- 5.25 The application is accompanied by an Arboricultural Impact Assessment that states the proposals will have no impact on trees that will not be replaced by equivalent specimens, such that amenity and the character of the garden is not affected. Part k. of Policy D1 will therefore be satisfied.
- 5.26 Accessibility is necessarily highly restricted across the site owing to its historic nature and inherent design. The changes in levels across the buildings and site cannot be remedied within the scope of this application, nor would such work be likely to be acceptable with the constraints of the building's Grade I listing. Level access from the rear mews and into the garden room are provided however. Part g. is therefore satisfied within what would be considered acceptable in heritage terms.

Neighbour Amenity - Overlooking / Privacy

- 5.27 Another important consideration in assessing the proposals is whether the proposed new-build structures would unduly affect the levels of amenity, privacy and daylight and sunlight enjoyed by neighbours and future occupiers on the site.
- 5.28 London Plan Policy 7.6 states that buildings and structures should not "*cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate*".
- 5.29 The provisions of Policy A1 Managing the impact of development, also requires that development proposals fully consider their impact on their occupiers and neighbours.

- 5.30 Policy A1 and CPG6 Amenity, provide detailed criteria that the Council will use to assess a proposals' impact on residential amenity (both of neighbours and future occupiers of the development). The Council will consider issues of (a) visual privacy and overlooking and (b) sunlight, daylight and overshadowing. Impacts from the construction phase are considered in the following section.
- 5.31 Taking each of these considerations in turn, the issue of overlooking and privacy has been addressed by limiting the Garden Room's height to only 300mm in excess of the existing southern boundary wall. In this way these proposals will not afford the occupants of Gloucester Lodge any greater opportunity to 'overlook' or otherwise denude the existing levels of privacy enjoyed by neighbouring properties.
- 5.32 Again by virtue of the limited additional height of the boundary wall, it would not be reasonable to conclude that that addition would result in unacceptable levels of overshadowing. We note that the same additional height would not materially affect any property's outlook and so could not be deemed unacceptable in this regard.
- 5.33 In terms of daylight and sunlight impacts, this application is supported by a Daylight and Sunlight Report by eb7, which provides an objective assessment of the proposed scheme with regard to Development Plan policy requirements and also the latest BRE Guidelines.
- 5.34 The Report concludes that:
- "The current proposal remains broadly the same as those of the consented scheme with only changes to a small number of external elements of the scheme. Given the high retained levels shown by the consented scheme, coupled with the nature of the marginal changes, the impacts are likely to be wholly compliant with the BRE criteria."*
- 5.35 We are therefore satisfied that the proposed Garden Room meets with all relevant tests set out in the Development Plan and as such will form an appropriate and neighbourly addition to the built environment.
- 5.36 Again, please note an assessment of the Garden Room's implications for surrounding Designated Heritage Assets is conducted in the Heritage Statement.

Basement Development and Construction

- 5.37 As explained in Paragraph 5.6, the basement remains entirely unaltered from that which already has planning permission and Listed Building Consent. It will comprise a single basement level beneath the rebuilt mews properties and the rear garden of the main house.
- 5.38 In order to assess whether there was need to deal with any geotechnical issues before commencing development, a Basement Impact Assessment – Screening and

Scoping was prepared by consultant engineers Techniker as part of the extant scheme applications.

- 5.39 The applications were also accompanied by an Outline Construction Management Plan that set out construction methods addressing, insofar as is necessary at this stage, the previously relevant plan policies and now, Policies A1 Managing the Impacts of Development; A5 Basements; London Plan Policy 5.21 Contaminated Land; NPPF paragraph 120; and CPG 4 Basements and lightwells.
- 5.40 Both the BIA and the CMP (included and updated in this application), were independently audited and approved by Campbell Reith (Camden's retained Structural Engineers). Campbell Reith agreed that there was nothing unusual or exceptional in the permitted development or the findings of the investigation that gave rise to any concerns with regard to matters of stability or flood risk.
- 5.41 The Basement Impact Assessment includes a Ground Movement Assessment that concludes that ground movements will be minimal and that Damage Impact in accordance with the Burland Scale will be Category 1 (Very Slight). Control of construction activities to mitigate ground movements, including an outline monitoring proposal, are also presented in the Basement Impact Assessment.
- 5.42 Officers and Campbell Reith were satisfied that any further investigatory work and construction methodology could be secured by condition, by ensuring compliance with the Basement Impact Assessment.

Policy A5 Basements

- 5.43 As explained, the basement is already permitted. However since this time Camden has adopted Policy A5 Basements as part of the new Local Plan 2017. This sets out a number of general criteria against which basements should be assessed because:

'The siting, location, scale and design of basements must have a minimal impact on, and be subordinate to, the host building and property.'

- 5.44 The policy's intention is unequivocal, basements must be subordinate, and its impacts on the host building must be minimal. With this spirit and intention in mind, Policy A5 states that basements should not exceed a series of broad proportions, relative to the host building and to the individual gardens within the property. In using the word should, the policy is rightly taking a pragmatic approach whereby these proportions should not be seen as absolute requirements but rather as series of indicators by which, in the round and in combination, a basement may be seen as unacceptably large and / or resulting in unacceptable impacts.

Subordinate to Host Building

- 5.45 The basement is a single storey in depth (Policy A5, part f.). It is not built under an existing basement (Policy A5, part g.). Comprising only 194m² GIA, it is far less than 1.5 times the footprint of the host building in area (Policy A5, part h.). It avoids the loss of garden space or trees of townscape or amenity value (Policy A5, part m.).
- 5.46 The basement does exceed the notional limits of extent into and under gardens. However, this is a result of a disproportionately small rear courtyard as opposed to the basement not being subordinate to the host building.
- 5.47 To make this point clear, it is worth considering that the proposed basement will be 194m² GIA, which compares with 738m² GIA in the rest of the property. At only 26% of the host building's floor area, it seems reasonable to describe this as subordinate to the host building in this sense.
- 5.48 Further, the basement's proposed floor to ceiling height is 2.9m, less than the existing lower ground rooms at 2.97m and ground floor rooms at 3.58m. Again, clearly subordinate to the proportions of the host building.

Minimal Impact of Host Building

- 5.49 Turning to the 'impact' on the host building, the basement as proposed has been fully assessed by both the applicant's and Camden's structural engineers. The maximum expected impact on existing structures is 'very slight'. Notwithstanding the content of Policy A5, there can be no reasonable doubt that the basement will avoid undue impact on the host building, or those nearby.
- 5.50 It is for these reasons we consider the basement, unchanged from that already permitted, accords entirely with the spirit and intent of Policy A5 i.e. to ensure basements remain subordinate to their host buildings and that they minimise their impacts upon them.
- 5.51 Further, the extant Planning Permission and Listed Building Consent are material considerations to which significant weight should be attached. It is essential that this weight is added into the assessment of the basement's acceptability against newly adopted policies. This, coupled with the policy assessment set out above, means we are firmly of the view that on balance the basement is acceptable in planning terms.

Trees and Landscaping

- 5.52 The existing trees on the site have been the subject of a detailed survey and discussions with the relevant officers at the Council have been held to ensure the proposals are appropriate in arboricultural terms.
- 5.53 The front garden or 'forecourt' will be untouched by these proposals with the exception of replacing two trees as detailed in the Arboricultural Impact Assessment.

5.54 As stated at Paragraph 5.15, the application will have no impact on trees that will not be replaced by equivalent specimens, such that amenity and the character of the garden is not affected in this way. Part v. of Policy A5 will therefore be satisfied.

6.0 CONCLUSIONS

- 6.1 The proposals seek only Minor Material Amendments to a permitted scheme, though for completeness the scheme has been assessed in its entirety against the newly adopted Camden local Plan policies.
- 6.2 The Heritage Statement concludes that the proposals represent an enhancement to the Grade I listed building and the Regent's Park Conservation Area.
- 6.3 In combination with the Heritage Report this statement has addressed the material planning considerations at the site and assessed the scheme in accordance with the relevant Planning Policy and guidance. This has demonstrated that the proposed development is acceptable in planning terms and on this basis we invite the Local Authority to permit these minor changes and Listed Building Consent.

