



## **\*APPELLANT DRAFT STATEMENT OF COMMON GROUND (submitted with notice of Planning Appeal)**

APPEAL REFERENCE TBC

DATE OF HEARING/INQUIRY TBC  
where known

### **SITE ADDRESS AND DESCRIPTION OF THE DEVELOPMENT**

15 Lyndhurst Terrace, London, NW3 5QA

APPELLANT Mr & Mrs Mond

LOCAL PLANNING AUTHORITY London Borough of Camden

This statement addresses the following areas of common ground:

1. Description of the site (including agreed dimensions)
2. Description of the area
3. Planning history of site
4. Development plan (including relevant policies) & any draft development plan (including stage reached and weight to be attached).
5. Relevance of any supplementary planning guidance published by LPA (and /or of supplementary planning guidance published under previous provisions and still in place.)
6. Others [eg. where applicable, agreed traffic (and/or other) data and circumstances]

It will be helpful also to identify matters which are the subject of specific disagreement

Enter text of common grounds. Please sign at the end.

## **1. Description of the site**

The Site is 15 Lyndhurst Terrace, London, NW3 5QA. The existing residential dwelling at the site is part single and part two storey. The existing dwelling spans that full width of the site. There is a driveway and combination of hard paving and gravel surface to the front garden, providing parking space for three cars. The rear garden is part hard surface, part gravel.

There are no trees located within the front or rear gardens of the site.

## **2. Description of the area**

The Site is located within the Fitzjohns / Netherall Conservation Area.

The Fitzjohns / Netherall Conservation Area Statement (2001) ("FNCAS") identifies 'Sub-Area Two: Rosslyn' within which the Site is located.

The FNCAS describes Sub-Area Two: Rosslyn in summary as '*The street layout in this sub-area has a smaller and more intimate character, with gentler gradients, and the architecture ranges from the earlier period of the 1860s to the 1880s*'.

## **3. Planning history of site**

There is no planning history held by LB Camden relating to the existing building at the Site.

Application reference 2012/0653/T in relation to a Section 211 Notice of Works to Trees in a Conservation Area was approved on the 12<sup>th</sup> March 2012 and allowed the removal of two trees within the rear garden.

Application reference 2015/6278/P in relation to full planning permission for development described as 'Demolition of existing house to provide a new dwelling' was refused on the 12<sup>th</sup> February 2016.

## **4. Development plan (including relevant policies) & any draft development plan (including stage reached and weight to be attached).**

The Development Plan for the Site comprises:

Camden Local Plan (2017)

The London Plan – the spatial development strategy for London consolidated with alterations since 2011 (March 2016)

Relevant policies are:

Camden Local Plan (2017)

G1 Delivery and location of growth  
H1 Maximising housing supply  
H6 Housing choice and mix  
A1 Managing the impact of development  
A2 Open space  
A3 Biodiversity  
A4 Noise and vibration  
A5 Basements and Lightwells  
D1 Design  
D2 Heritage  
CC1 Climate change mitigation  
CC2 Adapting to climate change  
CC3 Water and flooding  
CC5 Waste  
T1 Prioritising walking, cycling and public transport  
T2 Parking and car-free development  
T3 Transport infrastructure  
T4 Sustainable movement of goods and materials  
DM1 Delivery and monitoring

The London Plan – the spatial development strategy for London consolidated with alterations since 2011 (March 2016)

*Policy 3.5 Quality and Design of Housing Developments*

**5. Relevance of any supplementary planning guidance published by LPA (and /or of supplementary planning guidance published under previous provisions and still in place.)**

Relevant adopted LB Camden supplementary planning guidance:

Fitzjohns / Netherall Conservation Area Statement (2001)

CPG1 Design (2015)  
CPG2 Housing (2015)  
CPG3 Sustainability (2015)  
CPG4 Basements and lightwells (2015)  
CPG6 Amenity (2011)  
CPG7 Transport (2011)  
CPG8 Planning Obligations (2015)

Local List (2015)

Relevant draft LB Camden supplementary planning guidance:

CPG Housing  
CPG Amenity  
CPG Basements  
CPG Public open space

Relevant London Mayor's supplementary planning guidance:  
*Housing* SPG (March 2016)

## **6. Others [eg. where applicable, agreed traffic (and/or other) data and circumstances]**

Matters that are agreed:

- a) The proposed basement element of the development would not cause harm to neighbouring properties or the structural, ground, or water conditions of the area and therefore complies with Local Plan policy A5 parts (a) and (b)
- b) The proposed development would not cause undue harm to any trees or vegetation adjacent to the application site, including the mature Horse Chestnut tree at no.17.
- c) The proposed development would increase biodiversity at the Site
- d) The proposed development would provide a good standard of accommodation for future occupiers
- e) The proposed development would not cause undue harm to the visual and residential amenities of nearby and neighbouring residential properties
- f) The proposed development would be acceptable in sustainability terms
- g) Restriction of on-street parking permits, a final Construction Management Plan, and highways contributions to undertake repair works outside of the application site can be secured by a legal agreement

Matters the subject of disagreement:

- h) The contribution of the existing building at the site to the character and appearance of the Conservation Area, and the resulting impact of demolition upon the significance of the Conservation Area
- i) Whether the existing building at the site was designed by architect Ted Levy
- j) The correct application of NPPF paragraph 134
- k) Whether the proposed replacement building would preserve or

- enhance the character and appearance of the Conservation Area
- l) Whether the proposed basement element of the development would cause harm to the character and amenity of the area, the architectural character of the building, and the significance of heritage assets
  - m) Whether the proposed development provides adequate amenity space for future occupiers

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|-------------------------------|--|
| Signed on behalf of Appellant | Signed on behalf of Local Planning Authority |
| Date                          | Date   |
| Position                      | Position                                     |