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Ms B Wootton
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Dear Becky

23 DARTMOUTH PARK HILL, LONDON NW5

Further to your email of 12 February 2020 and our subsequent telephone discussion, I attach the amended Planning Statement (the amendments are at paragraphs 1.1, 4.1, 4.10, 4.11, 4.12, 4.13, 4.15, 4.16, 4.17 and 4.20).

I will be writing to you shortly on the matters I discussed with you on the telephone today.

Yours sincerely



ANTHONY R J KEEN

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23 DARTMOUTH PARK HILL
LONDON NW5

PROPOSED DEMOLITION OF EXISTING REAR ADDITION
AND CONSTRUCTION IN ITS PLACE
OF NEW SINGLE-STOREY REAR AND SIDE INFILL EXTENSION
TOGETHER WITH CONSTRUCTION OF NEW BASEMENT

JOINT PLANNING STATEMENT AND HERITAGE STATEMENT

1 INTRODUCTION

- 1.1 The planning application seeks permission for the demolition of the existing single-storey rear and side infill addition, its replacement with a new single-storey rear and side extension, and the construction of a basement under the rear part of the house.
- 1.2 The property is the survivor of a pair of semi-detached houses built in the 1870s, the other house having been demolished as a result of Second World War bomb damage and replaced with a two-storey dwelling.
- 1.3 The site lies in the Dartmouth Park Conservation Area. The house is not a listed building and there are no listed buildings in the immediate vicinity.
- 1.4 The planning history of the site is given in the Design and Access Statement; the existing rear extension was built in about 2007 pursuant to planning permission 2007/2811/P.
- 1.5 This Planning Statement, which addresses the planning merits of the proposal in the context of the relevant local and national planning policies, should be read in conjunction with the Design and Access Statement and the Basement Impact Assessment prepared by the project architects, Architecture for London.

- 1.6 A Design and Access Statement is not a legal requirement in this case (see Article 9(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015), but is provided in order to explain fully the design principles that have been applied to this proposal.
- 1.7 In view of the limited scale and impact of the proposed extension, in a position not visible from the road or any other public place, a specific Heritage Statement is considered unnecessary in this case; the relevant heritage issues are adequately addressed in the Design and Access Statement and in this Planning Statement (see the advice at paragraph 012 of Planning Practice Guidance: Conserving and Enhancing the Historic Environment).

2 LEGAL FRAMEWORK

- 2.1 The application property is an unlisted building within the Dartmouth Park Conservation Area. The relevant legislative requirements are summarised below.
- 2.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with adopted development plan policies, unless material considerations indicate otherwise.
- 2.3 The site is in a designated conservation area and the Council will be aware of the duty imposed by section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to ensure that new development should preserve or enhance the character or appearance of the Conservation Area.

3 PLANNING POLICIES

- 3.1 The development plan consists of:
- . The London Plan 2016; and
 - . Camden Local Plan 2017.

- 3.2 Also of relevance is the guidance in the following documents:
- . Camden Planning Guidance: Basements (March 2018);
 - . Camden Planning Guidance: Design (2018);
 - . Dartmouth Park Conservation Area Appraisal and Management Statement 2009 (the DPCAAMS); and
 - . National Planning Policy Framework 2019 (the NPPF);
- 3.3 I set out below a summary of the local and national policies that I consider relevant to this proposal.

The London Plan

3.4 *Policy 7.4 – Local Character*

Policy 7.4 requires new buildings to provide a high quality design that has regard to the existing urban grain in terms of scale, proportion and mass, and makes a positive contribution to the character of the area.

3.5 *Policy 7.6 – Architecture*

This requires that buildings:

- . be of the highest architectural quality;
- . use design and materials that complement, not necessarily replicate, local character;
- . not cause unacceptable harm to the amenity of neighbouring buildings in relation to privacy and overshadowing;
- . provide high-quality indoor space and integrate well with surrounding streets; and
- . optimise the potential of sites.

3.6 *Policy 7.8 – Heritage Assets*

This policy seeks to sustain and enhance the significance of heritage assets, including conservation areas, and requires that new development should “conserve, restore, re-use and incorporate heritage assets” and be “sympathetic to their form, scale, materials and architectural detail”.

Camden Local Plan

3.7 *Policy A1 – Managing the Impact of Development*

This policy seeks to protect the quality of life of occupiers and neighbours taking into account factors such as privacy, outlook, sunlight, daylight, overshadowing, transport and noise.

3.8 *Policy A5 – Basements*

This policy relates specifically to the planning issues associated with the development of basements and light wells, and stresses that such proposals should not cause harm to:

- . neighbouring properties;
- . the structural ground or water conditions of the area;
- . the character and amenity of the area;
- . the architectural character of the building; and
- . the significance of heritage assets.

The policy requires the submission of a Basement Impact Assessment (BIA) to address technical matters relating to drainage, flooding, groundwater and structural stability. The policy goes on to list, at items (f) to (u), criteria that must be satisfied by basement developments.

3.9 *Policy D1 – Design*

This policy states that the Council will seek to secure high quality design and requires new development to:

- . respect local context and character;
- . preserve or enhance heritage assets;
- . be sustainable in its design and construction;
- . include details and materials that complement local character;
- . incorporate high quality landscaping; and
- . incorporate outdoor amenity space.

3.10 *Policy D2 – Heritage*

This heritage policy reflects the guidance in the NPPF and, amongst other things, states that development that results in “less than substantial harm” will not be

permitted unless the public benefits of the proposal convincingly outweigh the harm. The policy also seeks to preserve trees and garden spaces that contribute to the character and appearance of conservation areas.

Camden Planning Guidance: Basements (March 2018)

3.11 This supplementary planning guidance (which replaces previous basement guidance in Camden Planning Guidance 4: Basements and Lightwells – July 2015) seeks to provide detailed advice on the application of the criteria set out in policy A5 of the Camden Local Plan. The key points made in the planning guidance are that basement proposals should:

- . not harm neighbouring properties;
- . not harm structural, ground or water conditions;
- . not harm the character and amenity of the area;
- . not harm the heritage significance of the area;
- . be subordinate to the host building;
- . not be more than one storey; and
- . be accompanied by a Basement Impact Assessment.

Camden Planning Guidance 1: Design (July 2015)

3.12 Whilst there is nothing in this guidance on design that relates specifically to basement developments, the general advice (at section 4), in relation to extensions and alterations, that works should respect the character and design of the property and its surroundings, applies to any parts of a basement and light well proposal that might affect the external appearance of a building.

3.13 With regard to rear extensions, the Camden Planning Guidance on design advises, at paragraph 4.10, as follows:

“Rear extensions should be designed to:

- . be secondary to the building being extended, in terms of location, form, scale, proportions, dimensions and detailing;
- . respect and preserve the original design and proportions of the building, including its architectural period and style;

- respect and preserve existing architectural features, such as projecting bays, decorative balconies or chimney stacks;
- respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space;
- not cause a loss of amenity to adjacent properties with regard to sunlight, daylight, outlook, overshadowing, light pollution/spillage, privacy/overlooking, and sense of enclosure;
- allow for the retention of a reasonably sized garden; and
- retain the open character of existing natural landscaping and garden amenity, including that of neighbouring properties, proportionate to that of the surrounding area.”

3.14 With respect to the use of materials, paragraph 4.7 of the design guidance states:

“Wherever possible you should use materials that complement the colour and texture of the materials in the existing building, see also CPG3 Sustainability (Sustainable use of materials chapter). In historic areas traditional materials such as brick, stone, timber and render will usually be the most appropriate complement to the existing historic fabric; modern materials such as steel and glass may be appropriate but should be used sensitively and not dominate the existing property.”

Dartmouth Park Conservation Area Appraisal and Management Statement (2009)

3.15 This statement includes general advice on basement development and indicates that the provision of light wells, with their associated railings and grilles, can harm the appearance of the building and the streetscape, and can occupy an excessive proportion of the front garden (see page 48 of the DPCAAMS).

3.16 This document includes, at page 56, the following comments on rear extensions within conservation areas:

“Within conservation areas there are many interesting examples of historic rear elevations, many of which are exposed to public views from the surrounding streets. The original historic pattern of rear elevations within a street or group of buildings is an integral part of the character of the area and as such rear extensions will not be acceptable where they would diverge significantly from the historic pattern.”

National Planning Policy Framework (2019)

3.17 The new NPPF was issued in July 2019. Those parts of the NPPF that are relevant to this application are:

- . Chapter 11 Making effective use of land (and especially the advice at paragraph 123(a));
- . Chapter 12 Achieving well designed places (and especially the guidance at paragraph 127); and
- . Chapter 16 Conserving and enhancing the historic environment (and especially the guidance at paragraphs 189 to 196).

4 PLANNING ASSESSMENT

4.1 The proposed development consists of two main elements: the basement and the replacement rear and side extension. I will deal with each in turn and then address the heritage considerations arising from the proposals.

The basement

4.2 The property already has a small basement of about 12 square metres, but this has a restricted ceiling height of some 1.35 metres. The proposal is to construct an enlargement to this basement, extending under the replacement rear extension, providing two rooms and a separate WC/shower room.

4.3 The Camden Local Plan indicates that planning permission for basement developments will be granted provided the proposal satisfies the relevant requirements of policy A5. There is no general presumption against the construction of basements.

4.4 The key policy affecting the proposal is policy A5 of the Camden Local Plan (see paragraph 3.8 above), supported by the detailed guidelines in Camden Planning Guidance: Basements (see paragraph 3.11 above). Having regard to the provisions of these documents, together with other relevant planning factors, the principal arguments in support of the proposed basement are set out at paragraphs 4.5 to 4.9 below.

- 4.5 A Basement Impact Assessment has been carried out (by Architecture for London), which indicates that the development would give rise to no difficulties with respect to drainage, flooding risk, groundwater conditions, structural stability or physical impact on neighbouring properties.
- 4.6 Since no part of the basement development could be viewed from the public domain, the proposal would cause no harm to the character or appearance of the Dartmouth Park Conservation Area.
- 4.7 The only element of the development that would affect the external appearance of the house (the light wells at the rear) would be sensitively designed and discreetly located and would have no adverse impact on the design of the dwelling.
- 4.8 The enlarged basement would not extend significantly beyond the footprint of the existing house and would occupy about 50% of that footprint.
- 4.9 It is clear that the proposed basement would satisfy all the relevant criteria in policy A5 (and the supporting Camden Planning Guidance: Basements), but for the avoidance of doubt, I set out below the position in relation to each of the requirements at items (f) to (u).
- (f) The basement would be one storey only, as is the existing.
 - (g) The basement enlargement would not be built under the existing basement.
 - (h) The basement would not extend under the garden.
 - (i) The basement would not exceed 1.5 times the footprint of the house; it would occupy only 50% of the footprint.
 - (j) The basement would not extend under the garden.
 - (k) The basement would not extend under the garden.
 - (l) The basement would be set back a reasonable distance from the boundary with 21 Dartmouth Park Hill.
 - (m) The basement would result in no loss of garden space or trees.
 - (n) The BIA demonstrates that the proposal would not harm either of the neighbouring houses.
 - (o) The BIA shows that the proposal would not adversely affect drainage, surface water run-off or other aspects of the water environment.
 - (p) The proposal would not give rise to cumulative impacts.
 - (q) The proposed basement would not harm the amenities of neighbouring houses.

- (r) The proposal includes hard and soft landscaping of the rear garden.
- (s) The basement would not harm the appearance of either the house itself or the surrounding area.
- (t) The proposal would not affect any archaeological remains.
- (u) The basement development would have no impact on any trees in the area.

The rear and side extension

- 4.10 The existing rear extension projects approximately 6.97 metres from the rear wall of the original building and is set back from the boundary with 21 Dartmouth Park Hill by about 2.3 metres. The extension is constructed of brick under a flat roof.
- 4.11 The proposed rear and side extension would project from the rear wall of the original building by 6.97 metres, the same as the existing extension, but would occupy a greater width of the plot, leaving a set-back of approximately 0.75 metre from the boundary of No. 21. The development would incorporate a gap about 1.8 metres wide, inset between the rear wall of the main house and the new rear extension in order to create a light well for the basement accommodation. Two further light wells would be formed adjacent to the rear wall of the new extension.
- 4.12 The proposed extension, in common with the existing rear and side addition, would appear as a subordinate element to the main house, and its use of contemporary form, design and materials would create an innovative addition that is architecturally distinct from, and does not seek to mimic, the host building.
- 4.13 It should be stressed that the proposal involves the removal of the existing rear and side extension and that, taking into account the light well between the original building and the new addition, the development would result in a slight increase of seven square metres (from about 48 square metres to 55 square metres) in footprint at ground-floor level.
- 4.14 There is no reason, in principle, why contemporary design, if carefully considered, cannot be acceptable within conservation areas. The use of contemporary and non-traditional forms of design in appropriate circumstances is supported at national level by the NPPF, which states, at paragraph 127(c), that local planning authorities should “not prevent or discourage appropriate innovation or change”. Indeed, it is relevant to note that in 2015 the Council granted planning permission for a full-width rear extension of contemporary design in respect of the neighbouring house (25 Dartmouth

Park Hill), which has been implemented (see the penultimate page of the Design and Access Statement).

4.15 Having regard to the following factors:

- . the set-back between the side (south) elevation of the proposed rear extension and the boundary with No. 21;
- . the limited height of the proposed extension, which would be the same as the existing rear addition;
- . the position of No. 21 to the south of the application site; and
- . the absence of any windows in the side (south) elevation;

I consider that the development would have no significant impact on the residential amenities of the occupants of No. 21 in terms of daylight, sunlight, overshadowing, outlook or privacy.

4.16 Also, the development would have no detrimental effect on the neighbouring house to the north (No. 25) because the proposed rear and side extension would be the same height and project the same distance from the rear wall, as the existing addition.

4.17 The proposed replacement rear addition would comply with the general design principles for rear extensions set out at paragraph 4.10 of the Camden Planning Guidance on design (see paragraph 3.13 above) because it would:

- . be secondary to the original building (as is the existing rear extension);
- . respect and preserve the design of the original building (as does the existing extension);
- . have no effect on the local townscape;
- . cause no significant loss of amenity to adjacent properties (see paragraphs 4.15 and 4.16 above);
- . result in no reduction in the area of garden; and
- . maintain an adequately landscaped the rear garden.

4.18 For the above reasons, it is considered that the design of the development is well-conceived and appropriate to the context of the site, and is compliant with the following:

- . policies 7.4 and 7.6 of the London Plan;
- . policy D1 of the Camden Local Plan;

- paragraph 4.10 of Camden Planning Guidance: Design; and
- paragraph 127 of the NPPF.

Heritage considerations

- 4.19 The heritage asset that is potentially affected in this case is the Dartmouth Park Conservation Area. Paragraph 7.55 of the Dartmouth Park Conservation Area Appraisal and Management Statement (the DPCAAMS) describes the features of conservation significance in Dartmouth Park Hill and includes the following:

“Dartmouth Park Hill The road marks the eastern boundary of the Conservation Area as well as being the Borough boundary with the London Borough of Islington. It rises from Tufnell Park Station to Highgate making gentle curves but with a considerable climb. Development mainly started in 1860s and a few of the earlier properties survive. At the southern end no.21 replaced a bomb damaged house, with the survivor of the semi-detached pair (Tambling, 1879) adjoining. No.25 is a large detached three storey house (Tambling); Nos 27-29 (Ball, 1872) an elaborate pair with Italianate influence and iron window-box holders.”

- 4.20 The development that is proposed at the rear of 23 Dartmouth Park Hill would have no adverse impact on the architectural and townscape features that are noted in the DPCAAMS. The street scene in the vicinity of the site would be unaffected by the single-storey replacement rear and side extension at No. 23. The proposal would, therefore, in the context of the guidance in the NPPF, cause no harm at all to the significance of the heritage asset.
- 4.21 There are no policies or guidance in any of the relevant planning policy documents (see 3.1 and 3.2 above) that preclude the use of contemporary design in this Conservation Area.
- 4.22 Since the proposal would cause no harm (whether substantial or less than substantial harm) to the significance of the heritage asset, it is unnecessary to consider whether the proposal would produce any public benefits that might outweigh any harm caused.
- 4.23 For the reasons explained above, the proposed development would be appropriate in heritage terms and would accord with the following policies and requirements:
- section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990;
 - London Plan policy 7.8

- . Camden Local Plan policy D2;
- . the DPCAAMS; and
- . NPPF Chapter 16.

Conclusion

4.24 For the reasons set out in this Statement, and in the related Design and Access Statement, the proposed development would:

- . be suitable in its design and its effect on its surroundings;
- . preserve the character and appearance of the Conservation Area;
- . protect the amenities of the neighbouring properties; and
- . comply with the relevant planning policies.

4.25 The Council is therefore invited to grant planning permission subject to appropriate planning conditions.

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February 2020