

Planning Statement **69 Avenue Road**

Relating to site at
69 Avenue Road, NW8 6HP

May 2020



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1.0 Introduction

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of Mr Goulandris. It accompanies a planning application for an extension to the property at 69 Avenue Road, NW8, within the London Borough of Camden (“the Site”).
- 1.2 The proposed scheme is for:
- “Demolition of existing side extension and erection of a single storey side and rear extension; erection of a two storey rear extension with associated roof alterations; excavation of a basement; and associated works.”***
- 1.3 The proposal has been subject to extensive pre-application discussions with the London Borough of Camden (“LBC”) planning and design officers and the submitted proposal has evolved in response to the feedback received. Further information on this can be found in section 3.
- 1.4 This application should be read in conjunction with supporting plans and documents, including:
- Existing and proposed drawings;
 - Design and Access Statement;
 - Heritage Statement;
 - Arboriculture Impact Assessment;
 - Basement Impact Assessment;
 - Noise Impact Assessment;
 - Sustainability and Energy Statement; and
 - Surface Water Flow and Flood Risk Assessment.
- 1.5 The statement provides a detailed assessment of the proposal in relation to planning policy and other material planning considerations. It provides a reasoned justification as to why planning permission for the proposed extension should be granted. The structure of the report is set out in the following sections:
- **Section 2** describes the site and its surroundings;
 - **Section 3** summarises the pre-application advice received;
 - **Section 4** describes the proposed development;
 - **Section 5** identifies key planning policy;
 - **Section 6** contains a planning assessment of the proposal, and
 - **Section 7** provides a summary and conclusion.

2.0 Site and Surroundings

- 2.1 69 Avenue Road is a large 1930s, detached, three storey dwellinghouse located on the western side of Avenue Road. An aerial view of the Site is shown in **Figure 1**.

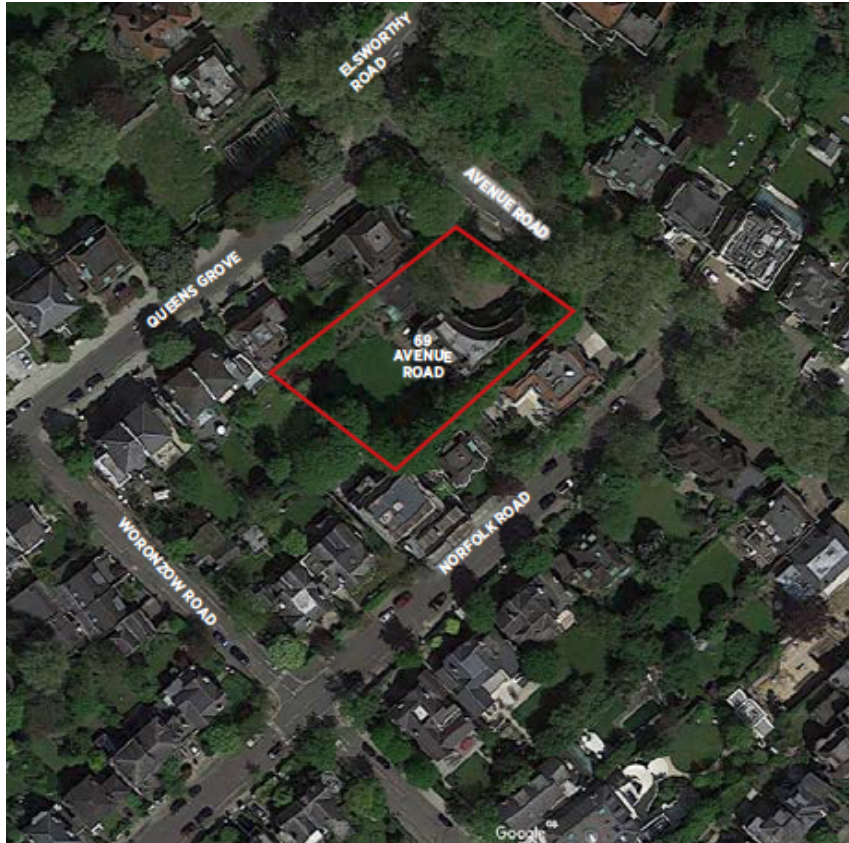


Figure 1: Aerial view of the Site

- 2.2 The Site is not listed, neither statutorily nor locally, nor is it located within a Conservation Area, however there are two nearby Conservation Areas which form part of its setting: the Elsworthy Road Conservation Area and St John's Wood Conservation Area, both within the LBC.
- 2.3 The dwellinghouse is an unusual curved shape, set around a protected tree (see Figure 2). There are three trees in the front garden which are subject to Tree Preservation Orders (TPOs), including a Tree of Heaven immediately adjacent to the single storey extension to the right of the house.
- 2.4 The dwelling sits within a large plot and behind a prominent brick wall with openings for the in / out carriage driveway indicated by rendered piers with stone embellishments.
- 2.5 The principal elevations have remained remarkably unaltered since construction in 1937, although the original building has notably been enlarged to the north west with a large single storey extension incorporating a garage, creating a blank façade to Avenue Road. The extension is not of good quality and detracts from the architectural qualities of the building.



Figure 2: Principal front elevation viewed from the driveway

- 2.6 The Site has a Public Transport Accessibility Level (PTAL) rating of 4 (where 0 is worst and 6b is best). The nearest stations are St John's Wood and Swiss Cottage (on the Jubilee line), both approximately a 9 minute walk. South Hampstead station is also an 11 minute walk, providing London Overground services to Watford and London Euston. The nearest amenities are located within St John's Wood and Swiss Cottage.
- 2.7 The Site is located in Flood Zone 1 ("low risk") as identified on the Environmental Agency's Flood Map for Planning.

Surrounding Area

- 2.8 Avenue Road is characterised by large, detached dwellings and blocks of flats. The street originally comprised large semi-detached and detached villas in the early to mid 19th century. However, in the early part of the 20th century, many of these buildings were demolished and replaced with large detached neo-Georgian style domestic houses. Some of the historic plots were amalgamated with single large villas built over two sites, such as the subject Site.

Planning History

- 2.9 The Site has a limited planning history. The only notable application (ref: 2005/1489/P) was for the erection of a flat roof over the existing courtyard plus new brickwork above existing doors to create a garage. This application was approved in June 2005.

3.0 Pre-application

- 3.1 The Revised National Planning Policy Framework (NPPF), Localism Act and strategic local policies and guidance emphasise that early engagement and good quality pre-application discussion enables better coordination between public and private resources.
- 3.2 The applicant has responded to this policy and guidance by notifying immediate neighbours of the proposal and undertaking a thorough pre-application process with LBC, involving two pre-application meetings, held in February and September 2019 respectively.
- 3.3 In summary, the principle of a large extension was considered acceptable by LBC officers, and the two storey rear extension was noted as being of good design and in keeping with the character and appearance of the wider area.
- 3.4 However, at the first pre-application meeting, concerns were raised regarding the size of the extension and the proposed alterations to the roof. The following alterations to the design were therefore recommended by LBC officers:
- Remove the first floor element from the proposed side extension;
 - Reduce the depth of the proposed single storey side and rear extension;
 - Reduce the size of the proposed basement to comply with all indicators of Policy A5;
 - Scrutinise the design and construction of the proposed alterations to the roof of the main building; and
 - Conduct further tree investigation works to determine whether any existing trees would be affected by the proposal and amend the scheme / propose appropriate mitigation measures as necessary.
- 3.5 The design team has taken on board all of the feedback, which is reflected in the current proposal. Since the first pre-application meeting, the following key design changes have been made:
- The first floor element of the proposed side extension has been removed so that it is now single storey as per the existing side extension;
 - The depth of the rear single storey pavilion has been reduced by 24%, resulting in a more comfortable relationship with the host dwelling and garden; and
 - The size of the basement has been reduced by 35% as a result of further tree investigations and consultation with the tree officer, and to ensure it is fully compliant with Policy A5.
- 3.6 Further details including diagrams showing the evolution of the scheme are contained in section 3 of the Design and Access Statement.

4.0 Proposed Development

4.1 The application seeks permission for:

“Demolition of existing side extension and erection of a single storey side and rear extension; erection of a two storey rear extension with associated roof alterations; excavation of a basement; and associated works.”

4.2 With reference to the conceptual diagram in Figure 3 below, the proposal divides the property into three main elements:

- The main house – the majority of which is being retained;
- The rear extension – a traditionally designed extension to the main house; and
- The garden pavilion – a single storey contemporary wing forming an adjunct to the main house.

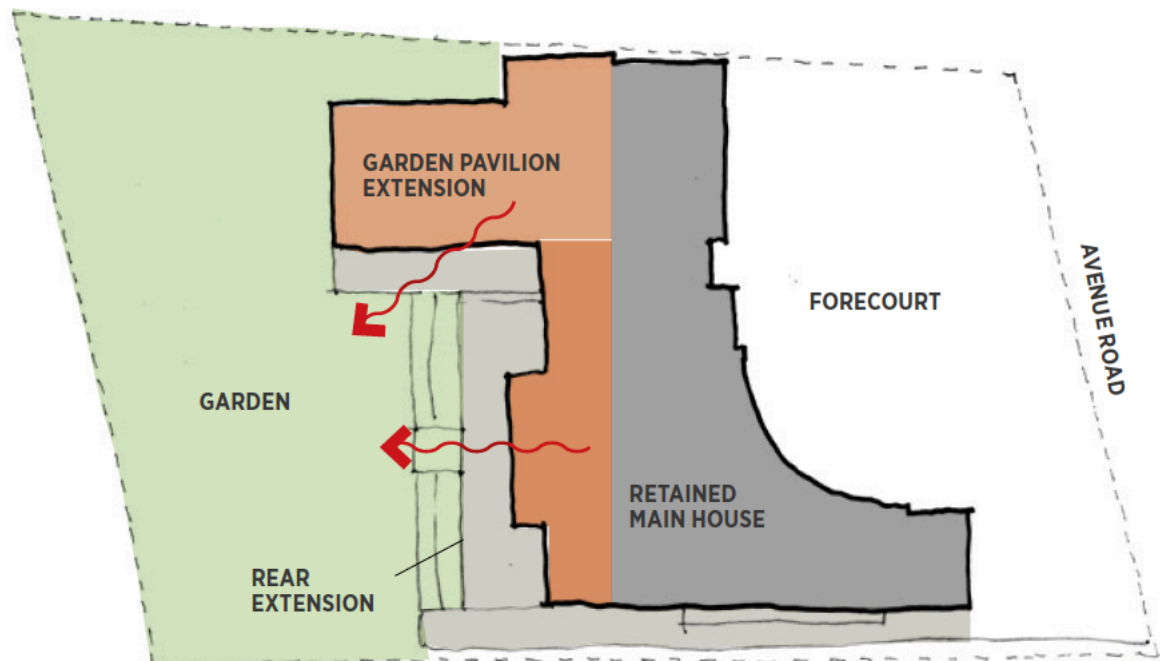


Figure 3: Conceptual diagram of the proposed building elements, KSR Architects

4.3 Formal living and entertaining rooms, bedrooms, service and ancillary spaces are all located within the main house, split over three floors. The proposed garden pavilion contains additional family accommodation linking directly to the terrace and garden. The proposal also comprises a basement, located largely beneath the footprint of the existing house, providing a pool, gym and entertainment area, as well as back of house uses.

- 4.4 The proposed extensions are designed in two contrasting but complementary styles; the main house has a more traditional design to reflect the style of the retained façade, while the new garden pavilion is designed in a “lightweight” contemporary language.
- 4.5 In terms of massing, the main house will remain as the principal element by retaining the existing roof profile. The modern side extension will be subservient to the main house, being lower than the eaves of the principal element, as shown in Figure 4. A “glazed link” feature is proposed to separate the two forms and allow them to be clearly articulated. Further details of the proposal, such as the materials, are contained within the Design and Access Statement.

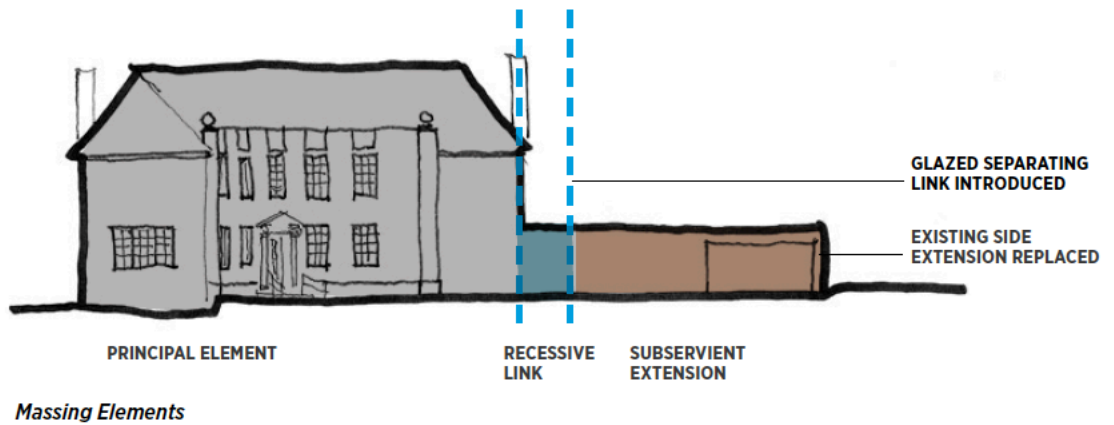


Figure 4: Proposed front elevation, KSR Architects

5.0 Planning Policy Framework

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

Development Plan

5.2 The development plan for the purposes of this application consists of:

- The London Plan (2016 – consolidated with alterations);
- The Camden Local Plan (2017); and
- Camden Policies Map (2019).

5.3 The relevant policies within the Camden Local Plan are as follows:

- Policy G1 – Delivery and location of growth
- Policy A1 – Managing the impact of development
- Policy A4 – Noise and vibration
- Policy A5 – Basements
- Policy D1 – Design
- Policy CC1 – Climate change mitigation
- Policy CC2 – Adapting to climate change
- Policy CC3 – Water and flooding

5.4 Other material considerations in respect of planning policy to be taken into account include:

- The Revised National Planning Policy Framework (“NPPF”) (2019)
- Planning Practice Guidance (“PPG”) (2019)
- The draft new London Plan (2019)
- Camden Planning Guidance (“CPG”) (2019):
 - CPG Altering and extending your home
 - CPG Design
 - CPG Energy efficiency and adaption
 - CPG Water and flooding
- Camden Planning Guidance (2018):
 - CPG Amenity
 - CPG Basements

6.0 Planning Assessment

6.1 This section considers the extent to which the proposed development accords with the relevant development plan policies and other material considerations. The key planning considerations relevant to the proposed development are:

1. Design and scale;
2. Heritage;
3. Neighbour amenity;
4. Basement development;
5. Trees; and
6. Transport and planning obligations.

Design and scale

6.2 The Revised NPPF states that good design is a key component of sustainable development and should contribute to making places better for people.

6.3 Camden's Planning Guidance ("altering and extending your home") states that extensions should be secondary and subordinate to the building being extended and side extensions should be no higher than the height of the porch.

6.4 London Plan Policy 7.4 encourages development to have regard to the form, function and structure of an area, and the scale, mass and orientation of surrounding buildings. Policy 7.6 states that architecture should be of the highest quality, responsive and complementary to the surrounding context and cause no unacceptable harm to the amenity of surrounding land and buildings.

6.5 This is reflected in Local Plan Policy D1, Policy A1, and CPG policies on design, which all require high quality design in development. Paragraph 7.3 of the supporting text to Policy D1 ("design") states:

"The Council will welcome high quality contemporary design which responds to its context, however there are some places of homogenous architectural style (for example Georgian Squares) where it is important to retain it."

6.6 The proposed extensions, which consist of a two storey rear extension designed in a traditional Neo-Georgian idiom, and a new north wing designed in a contemporary idiom, have been designed to the highest standards in order to integrate successfully with the surrounding built environment. The design of the rear extension reflects the Neo-Georgian architecture of the original house and therefore integrates successfully with the existing built form on the site and in the surrounding area. This includes the use of a symmetrical composition, use of red brickwork, classical proportions and hierarchy to the window openings, and traditional timber sash windows and French doors.

6.7 Furthermore, the height and massing of the proposed rear extension reflects that of the existing building, so any appreciation of the house from the St John's Wood or Elsworth Road Conservation Areas will not be affected despite the slightly extended footprint at the rear. This is acknowledged within the pre-application advice received from LBC, which notes:

“the rear of the building currently has some architectural merit, with the two large curved bay windows; however, the proposed rear extension is of good design, is in keeping with the host building and is not objectionable.”

- 6.8 In contrast to the traditional design of the rear extension, the proposed new north wing has been designed in a modern idiom in the style of a garden pavilion to be visually subservient and distinct from the main house. It has an elegant “lightweight” contemporary design; is located comfortably to the north of the main house; and does not visually compete with it in views from the rear garden. The discreet siting of the pavilion ensures it will not be visible within the settings of the St John’s Wood Conservation Area and the nearby Grade II Listed buildings fronting Queen’s Grove.
- 6.9 The existing single storey side extension at the front of the house is of low quality and detracts from the appearance of the host building. Its demolition and replacement with a high quality single storey side extension is therefore acceptable in principle, and will enhance the setting of the nearby Conservation Areas. The extension will be subservient to the main house by its comparable height and massing and continuation of red brickwork.

Heritage

- 6.10 The Revised NPPF (paragraph 189) stipulates that applications for planning permission which may affect heritage assets must describe the significance of the heritage assets, including the contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 6.11 Paragraph 200 of the Revised NPPF states:
- “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*
- 6.12 London Plan Policy 7.8 and Local Plan Policy D2 require development proposals affecting Conservation Areas to preserve or enhance their character and appearance, for example, by protecting the setting.
- 6.13 The Site is not listed nor is it located within a Conservation Area, however, there are two Conservation Areas nearby which form part of its setting: the Elsworthy Road Conservation Area and St John’s Wood Conservation Area.
- 6.14 A Heritage Statement has been submitted as part of the application, which provides an analysis of the Site and the contribution it makes to the settings of the two nearby Conservation Area and other identified heritage assets (the Grade II Listed buildings at 34 – 37 Queen’s Grove). It then appraises the significance of the Site before assessing the impact of the proposed development upon the Site’s significance and on the settings of the identified heritage assets.
- 6.15 The Heritage Statement identifies that the significance of the Site lies primarily in its front elevation, which is not proposed to be altered, and its contribution to the setting of the Elsworthy Road Conservation Area.

- 6.16 The proposal will sustain and preserve the settings of both Conservation Areas through the retention of the front façade of the original building and the sensitive and well considered design of the proposed new rear extension and north wing. The proposal will be barely discernible from the public realm, but have responded to the contribution made by the subject Site to the settings of the two adjoining Conservation Areas.
- 6.17 Overall, the proposed development will have a minimal and neutral to positive impact on the settings of the Elsworthy Road Conservation Area and St John's Wood Conservation Area, and on the settings of the nearby statutorily listed buildings fronting Queen's Grove.

Amenity

- 6.18 London Plan Policy 7.6 and Local Plan Policy D1 state that a high level of residential amenity and functionality is required for all residential development. They also require all development to seek to safeguard the amenity of neighbouring occupiers.
- 6.19 Given the location and single storey height of the rear north wing extension, and the single storey height of the side extension (which matches the height of the existing side extension), the proposed development will not result in any adverse impacts to neighbouring properties.
- 6.20 The proposed development incorporates mechanical plant at basement level; therefore, a Noise Impact Assessment has been undertaken by Noise Solutions Ltd to ensure it would not have a detrimental impact on the amenities of neighbouring occupiers in terms of noise and vibration. The assessment has demonstrated that noise from the proposed new plant will meet LBC's noise requirements.
- 6.21 The proposed development will enhance the existing residential accommodation at 69 Avenue Road by providing additional bedrooms and living space. The development will result in a high standard of living accommodation within an existing family dwelling which accords with local and national policy.

Basement development

- 6.22 Local Plan Policy A5 says that basement development will only be permitted where the proposals would 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.
- 6.23 The policy also says that in determining proposals for basements and other underground development, the council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment.
- 6.24 A one storey basement is proposed beneath the main house and the new side extension.

- 6.25 In accordance with Policy A5, a Basement Impact Assessment has been prepared by Geotechnical and Environmental Associates Ltd and submitted with the application. This concludes that the proposed development will have a minimal impact on surface flows, groundwater and land stability.
- 6.26 Policy A5 also requires basements to be subordinate to the host buildings and therefore:
- a) not comprise of more than one storey;
 - b) not be built under an existing basement;
 - c) not exceed 50% of each garden within the property;
 - d) be less than 1.5 times the footprint of the host building in area;
 - e) extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
 - f) not extend into or underneath the garden further than 50% of the depth of the garden;
 - g) be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
 - h) avoid the loss of garden space or trees of townscape or amenity value.
- 6.27 There is no basement on the Site currently. The proposed basement is one storey and demonstrably meets all of the above criteria, as shown within the Design and Access Statement. It is noted that the size of the proposed basement was substantially reduced during pre-application discussions with LBC and, as a result, it is fully compliant with Policy A5.

Trees

- 6.28 London Plan Policy 7.12 says that trees of value should be retained and where loss is unavoidable, they should be replaced with high quality trees in the correct location. Local Plan Policy A3 states that the council will protect and seek to secure additional trees and vegetation. The council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value and expect developments to incorporate additional trees and vegetation wherever possible.
- 6.29 An integral part of the design process has focused on retaining as many trees as is possible, whilst facilitating the proposed development. As such, a small number of trees will require removal in order to make space for the proposed development.
- 6.30 A thorough Arboriculture Impact Assessment (AIA) and Tree Protection Plan have been prepared by Landmark Trees in support of the planning application.
- 6.31 The proposal will require the pruning of seven trees and the removal of one moderate quality (“category B”) tree group and the partial removal of one low quality (“category C”) tree group. This comprises a relatively small portion of the total number of trees surveyed (28), and it should be noted that the pollarding of the category B group is recommended regardless of development. Their loss can be mitigated with new planting, bringing its own benefits of enrichment and diversification.
- 6.32 Of the trees to be retained, the proposed development will encroach into the theoretical Root Protection Area (“RPA”) of seven trees. Of these seven encroachments, six comprise less than 5% of the total area; accordingly, they are assessed as being likely to be of very low impact. The impact to retained tree ‘T28’ is more significant on plan, comprising 14.9% of the total area (albeit, an RPA encroachment of < 20% is still considered to be “low impact”). However, it is likely that the RPA shown on the plans is an overstatement of the actual minimum area required to maintain the viability

of the tree given its previous management history and small leaf area compared to stem diameter. Furthermore, a radar scan has been undertaken which supports this assessment.

- 6.33 The impacts to all trees from the basement excavation will be mitigated through design and precautionary measures, such as the hand digging of the top 1 metre of the basement line through RPAs in conjunction with pre-emptive root pruning under the supervision of a qualified arboriculturalist. These measures will be detailed in a Method Statement, secured by way of an appropriately worded planning condition.
- 6.34 The AIA concludes that the potential impacts of development are all relatively low in terms of both quality of trees removed and RPA encroachments of retained trees. The species affected are generally tolerant of root disturbance / crown reduction and the retained trees are generally in good health and capable of sustaining these low level impacts. As a result, the proposed development will not have a significant impact on either the retained trees or wider landscape, thus complying with Policy 7.21 of the London Plan and Policies A3, A5 and D1 of the Local Plan.

Transport and planning obligations

- 6.35 The proposal would not involve the creation of any additional car parking spaces within the boundary of the Site and is therefore acceptable in terms of transport.
- 6.36 The pre-application advice received endorses this by saying:
- “As the proposal would not result in the creation of any new or additional residential dwellings, there is no requirement to restrict car parking either on or off site or to provide additional cycle parking.”*
- 6.37 It is envisaged that a Construction Management Plan will be secured by Section 106 Legal Agreement in order to mitigate the construction impacts of the scheme. This will set out how construction matters would be dealt with, for example, deliveries, how materials would be stored, and construction waste removed from the Site.

7.0 Conclusion

7.1 This planning statement has been prepared by hgh Consulting and submitted on behalf of Mr Goulandris in support of a planning application at 69 Avenue Road for the following proposed development:

“Demolition of existing side extension and erection of a single storey side and rear extension; erection of a two storey rear extension with associated roof alterations; excavation of a basement; and associated works.”

7.2 The proposal has been subject to extensive pre-application discussions with LBC planning and design officers and has evolved in response to the pre-application advice received.

7.3 The proposed extensions are modest in scale and subordinate to the host building, in accordance with Camden’s requirements. The design has been heritage-led and informed by a thorough understanding of the host building and surrounding area. The result is a high quality and innovative scheme which complements the character of Avenue Road. In heritage terms, the development will have a minimal and neutral to positive impact on the settings of the Elsworth Road Conservation Area and St John’s Wood Conservation Area, and on the settings of the nearby statutorily listed buildings fronting Queen’s Grove.

7.4 It has been demonstrated that there will be no adverse impacts upon the amenity of neighbouring residents and no harm caused to the trees within the garden of the host building or neighbouring properties.

7.5 Overall, the proposal will contribute to improving the building as a family residence and will enhance the setting of the nearby Conservations Areas through the demolition of the existing low quality side extension and its replacement with a high quality single storey extension.

7.6 For the reasons set out in this statement, the proposal development accords with the development plan; accordingly, planning permission should be granted without delay.



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