



## HAMPSTEAD NEIGHBOURHOOD FORUM

25 March 2021

Sofie Fieldsend  
Camden Planning Solutions Team

Re: Reference 2021/0143/P, 12 Eldon Grove London NW3 5PT

Dear Sofie,

### Over-development, loss of biodiversity

We believe the proposal for the two houses would be damaging to the conservation area by filling in most of the gaps, reducing the sense of openness and diminishing the important views beyond. The proposal also fails to improve biodiversity and in fact, by reducing the garden area and contributing to light pollution through the extensive use of glass, will harm wildlife and biodiversity. The proposal therefore is contrary to DH2 and NE4 of the Hampstead Neighbourhood Plan as well as other policies on the national and local level concerning biodiversity such as The London Plan, Policy G6 (D); the Camden Local Plan, Policy A3.

The new London Plan states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. We note that changes to the NPPF, currently under consultation, states that opportunities for development to pursue "biodiversity should be pursued as an integral part of their design".

The proposal identifies trees to be protected but otherwise, apart from a small area of green roof, does little to improve biodiversity or to mitigate the loss of garden and the impact of light pollution on wildlife.

In pre-planning, Camden noted the importance of retaining "the important views through generous gaps". Between nos. 12 and 13, the gap would range between 1 and 2 metres, which seems less than "generous". The gap between nos. 13 and 14 would vary, increasing on the upper floors, but on the ground floor, the new development would be both deeper and taller than the existing garage, which stands roughly a metre away from no. 14.

The proposal includes plans to increase the floor space for no. 12 by 50%. The full width extension, with a basement underneath all (extending 3m beyond the original footprint of the house), will consume nearly one-third of the available garden. Only a small portion of the original garden of no. 13 will remain uncovered by hard surfaces. Again, we have seen no measures that would result in a net biodiversity gain.

### Design issues

The application draws attention to several modern buildings in Eldon Grove (Eldon Court, Tower Close) that the Fitzjohns Netherhall Conservation Area Statement find "have no outstanding qualities". Tower Close . . . "has some positive elements but sits very close to the pavement which



gives too much emphasis to the height.” We find the design of no. 13, with the flat roof design language, relates poorly to the context of Eldon Grove and the wider conservation area.

#### Off-street parking provision

The Forum objects to the provision of two parking spaces. Policy T2 of Camden Local Plan requires all new developments to be car free. We note that where existing occupiers are to return to a property after it has been redeveloped, the Council will consider allowing the re-provision of parking available to them, but this could only apply to one of the properties as no one is living in the existing garage.

We would expect in accordance with T2 that the developer needs to provide evidence that he is currently living in the existing house and would be returning. We would recommend that a Sec 106 agreement secures that the property would be car-free for future occupiers.

#### Cumulative impact

We believe that the application fails to adequately address the cumulative impact of constructing two large basements less than two metres apart. We query whether the presence of a rail tunnel running underneath no. 13, as shown in the Heritage assessment, is a potential issue for a new basement.

#### Meeting Camden’s housing needs

A new development provides an opportunity to meet the priorities set forth in Camden Local Plan Policy H7, which the current proposal fails to do. Contrary to the Planning Statement, the Local Plan does not prioritise 4-bedroom homes available at market rent.

Unless these issues can be addressed, the Forum would recommend that Camden refuse this proposal.

Sincerely,

Janine Griffis

