

Planning Statement
32-34 Avenue Road

Relating to site at
32-34 Avenue Road, St John's Wood, NW8 6BU
May 2022



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1.0 Introduction

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of Ms Kitty Massey (“the Applicant”) in support of a planning application for the redevelopment of the site to create a replacement, single dwellinghouse at 32-34 Avenue Road, St Johns Wood, NW8 6BU (“the site”). The site is identified in figure 1 below.



Figure 1: Site location plan

- 1.2 The description of the proposed development is as follows:
- “Demolition of the existing house and replacement with a two-storey dwellinghouse plus an attic floor, basement, landscaping, parking and associated works.”*
- 1.3 The proposed scheme is heritage-led and is the result of a collaborative process between the architects, SHH, and heritage advisor, Heritage Information Limited. The energy and sustainability impacts of the proposed redevelopment have been a key consideration from the outset. Due to the low performance of the existing building’s fabric and internal conditions, the total carbon emissions (i.e., the embodied carbon and operational energy demand) associated with a replacement building are lower than if the building were to be retrofitted and extended. On this basis, the proposed redevelopment represents the most energy efficient solution in the long term.
- 1.4 Extensive pre-application discussions have been held with the London Borough of Camden (LB Camden) which have informed the current proposals and have resulted in an elegantly designed and energy efficient building which is appropriate in the setting of the Elsworth Road Conservation Area.
- 1.5 This Planning Statement provides an assessment of the proposed development against the development plan and other material planning considerations.
- 1.6 The submission is accompanied by supporting information as follows:
- Existing and proposed architectural drawings (please refer to SHH Drawing Schedule);

- Existing and proposed landscaping drawings (please refer to Kinland Design Drawing Schedule);
- Planning Statement;
- Application and CIL forms;
- Design and Access Statement;
- Heritage Statement;
- Townscape and Visual Impact Assessment;
- Energy and Sustainability Statement (including Sustainability Proforma at Appendix C);
- Whole Life Cycle Carbon Assessment (Comparative Study);
- Ground Investigation and Basement Impact Assessment;
- Construction/Demolition Management Plan (Pro forma);
- Arboricultural Impact Assessment;
- Environmental Noise Assessment;
- Daylight, Sunlight and Overshadowing Assessment;
- Construction Method Statement;
- Flood Risk Assessment and Drainage Statement;
- Bat Scoping Report and Ecological Assessment; and
- Air Quality Assessment.

2.0 The Site and Surroundings

The Site

- 2.1 The subject site comprises a large, 1960s two-storey house on the north side of Avenue Road within the Elsworthy Road Conservation Area. The property contains a large front and rear garden and is surrounded by large, mature trees to the north, south and west. Parking is provided on the forecourt to the front of the site and at semi-basement level via a sunken garage on the right-hand side (south-east) of the front elevation.
- 2.2 The site is recognised in the Elsworthy Road Conservation Area Audit as a “positive contributor” to the Conservation Area. However, as explained further in Section 7, Heritage Information Limited’s heritage assessment of the site concludes that it makes a minimal and neutral contribution to the Conservation Area (contrary to the recognition of the building as being a positive contributor), in part due to the building’s bland and architecturally uninteresting appearance.

Surrounding Area

- 2.3 The surrounding area is defined by the predominance of large, detached residential properties set within spacious plots, with heights of generally two to three storeys. The streets contain large, mature trees, particularly along Avenue Road.
- 2.4 A lot of the properties between 22-52 (even) Avenue Road were redeveloped in the 1960s/70s due to being badly bombed during the Second World War, therefore they largely date from the 20th century unlike other properties on the road. In the 21st century, many of the properties on Avenue Road were redeveloped again to create larger, modern properties that reflect the Neo-Georgian idiom, with some also including development basements. Of note, the following nearby properties within LB Camden have gained planning permission for full redevelopment, including:
- No. 36 – full demolition with basement;
 - No. 38 – full demolition with double basement; and
 - No. 40 – full demolition with double basement.
- 2.5 The site is accessible to a number of shops and services; St Johns Wood centre is located 0.5 miles (9-minute walk) from the site which contains an underground station (Jubilee Line), shops, restaurants, pharmacies, a post office, hospitals, schools and a synagogue. Primrose Hill is also located to the rear of the site providing a large open amenity space on the doorstep.
- 2.6 The site is also 0.5 miles from Swiss Cottage centre, which also has an underground station (Jubilee Line), many shops along Finchley Road, a leisure centre, library and restaurants.
- 2.7 The nearest bus stop is 0.3 miles from the site (Prince Albert Road) which provides bus services (Route 274) towards Angel. There is also a bus stop located 0.4 miles north of the site on Adelaide Road which provides services towards White City and Brent Cross (Routes 31 and C11).

Planning Designations

- 2.8 As noted above and on the Camden’s Policies Map (2019), the site (circled red in Figure 2 below) is located within the Elsworthy Road Conservation Area. The site is not listed, nor does it have any other designations.
- 2.9 The site is located within Flood Zone 1 (“low risk”) as identified on the Environment Agency’s Flood Map for Planning.
- 2.10 The site has a PTAL rating of 2 (on a scale of 0 to 6b where 0 is very poor access to public transport and 6b is excellent access).



Figure 2: Policies Map Extract (application site circled red)

3.0 Planning History

- 3.1 The site has a limited planning history; historically, there were two large houses on the site which survived the Second World War (as shown in Figure 3 below). However, by the 1960s, both houses had been demolished and the rear part of the site was syphoned off to form a new plot, which became 1 Radlett Place. The plots of 32 and 34 were then amalgamated and the house that exists today was built (see Figure 4 below).
- 3.2 Since the 1962 planning application, there has been very little in the way of planning history, save for some minor applications for works to trees.
- 3.3 A detailed analysis of the site's historic context is contained within the Heritage Statement.

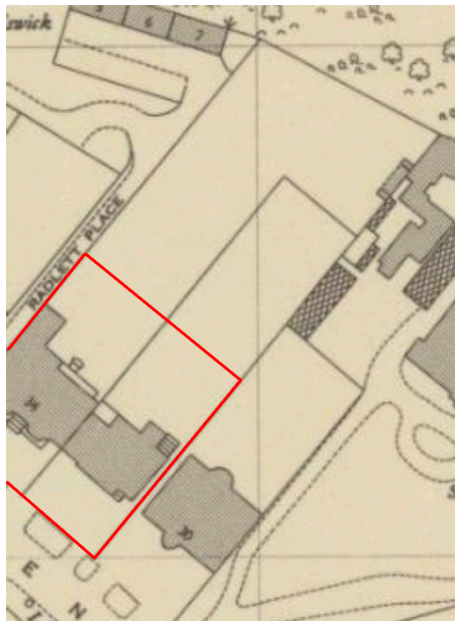


Figure 3: 1952-54



Figure 4: St John's Wood Eyre Estate Plan, 1960s

4.0 Pre-application Discussions

- 4.1 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.
- 4.2 The Applicant has undertaken extensive pre-application discussions with LB Camden as well as informal consultation with the nearest residential neighbours.
- 4.3 A first iteration of the scheme (shown in Figure 5 below) was presented to Camden officers on 2nd July 2021 and formal written pre-application advice was received thereafter.



Figure 5: First pre-application scheme

- 4.4 The principal advice received from Camden officers was as follows:
 - Principle of redevelopment - a robust sustainability statement, including carbon lifecycle analysis, is required to justify demolition and replacement of the existing house. In design and heritage terms, any harm to the Conservation Area caused by the demolition of the existing property would be at the lower end of the scale of “less than substantial harm” and therefore appropriate redevelopment could still preserve or enhance the Conservation Area.
 - The width of the property should be reduced to provide a more contextual response, although the proposed building line and height of two storeys plus a subservient attic storey is appropriate for the context.
 - The design should maintain the variety in the townscape and if based on a historic style, should be scholarly executed rather than as a modern “watered down version” (whilst in the City of Westminster, recent examples at 45 and 47 Avenue Road show what can be achieved in providing a variety using a historic design which still provide modern accommodation).
 - No lightwells should appear on the front elevation and attention should be given to retaining trees and reproviding a mature garden around the property.
 - A one storey basement could be supported subject to demonstrating compliance with relevant policy and guidance on basement development.
 - Subject to evidencing that the existing occupiers will be returning to reoccupy the property as their principal home, an exemption to the car-free policy can be given.

- It is unlikely that significant harm would be caused to the residential amenities of neighbouring and nearby properties given the size of the plot and distance between properties, however, a daylight sunlight assessment should be undertaken to confirm this.

4.5 The feedback was taken on board by the design team and a second pre-application meeting took place on 25th February 2022 to discuss the revised proposals (shown in Figure 6), including the results of the carbon lifecycle analysis. The amended scheme was well received by officers, namely:

- It was agreed that the principle of demolition and a replacement building could be justified in energy and sustainability terms based on the results of the carbon lifecycle analysis provided;
- The reduction in the width of the proposed building was welcomed, as was the fact that the architecture reflects that of the buildings at 45 and 47 Avenue Road. However, it was considered that the height of the roof and the size of the three front dormer windows should be reduced further.



Figure 6: Second pre-application scheme

- 4.6 Accordingly, in the proposed scheme, the height of the proposed building has been reduced by a further 0.5 metres, the slope of the roof has been reduced from 70 degrees to 65 degrees and the size of the dormer windows have also been reduced.
- 4.7 Further details of the evolution of the scheme are contained on pages 5 and 6 of the Design and Access Statement.

5.0 Proposed Development

5.1 The application seeks permission for:

"Demolition of the existing house and replacement with a two-storey dwellinghouse plus an attic floor, basement, landscaping, parking and associated works"

5.2 The design of the proposed scheme is based on a thorough understanding of the historic context of the site and has been guided by the pre-application advice received from LB Camden. The content and conclusions of technical assessments have also been fully considered in the design process.

5.3 A summary of the key characteristics of the proposed development is provided below:

- Demolition of the existing 1960s house and its replacement with a two-storey, 7-bedroom house plus attic floor and a one-storey basement;
- The proposed height of two storeys plus a mansard roof reflects that of many of the other houses along Avenue Road and is therefore in keeping with the streetscape;
- The existing vehicular accesses from Avenue Road are retained;
- Existing car parking in the semi-basement and on the front forecourt is reprovided for the existing occupier, Ms Massey, who is returning to the property following completion of the development;
- A landscaping scheme has been developed which incorporates the existing trees of significance to the front and rear and proposed new planting in the front and rear gardens and around the perimeter of the site;
- A secure bin store including recycling is proposed to the west of the building; and
- Low-carbon technologies have been utilised, such as air source heat pumps (ASHPs) as the primary heating system as well as the development of a highly insulated building envelope, a good air permeability rate, highly efficient lighting, and hot water systems.

6.0 Planning Policy Context

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

Development Plan

- 6.2 The development plan for the purposes of this application consists of:

- The London Plan (2021);
- Camden Local Plan (2017); and
- Camden Policies Map (2019).

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

- Policy G1 – Delivery and location of growth
- Policy H3 – Protecting existing homes
- Policy H6 – Housing choice and mix
- Policy H7 – Large and small homes
- Policy C6 – Access for all
- Policy A1 – Managing the impact of development
- Policy A3 – Biodiversity
- Policy A4 – Noise and vibration
- Policy A5 – Basements
- Policy D1 – Design
- Policy D2 – Heritage
- Policy CC1 – Climate change mitigation
- Policy CC2 – Adapting to climate change
- Policy CC3 – Water and flooding
- Policy CC4 – Air quality
- Policy CC5 – Waste
- Policy T1 - Prioritising walking, cycling and public transport
- Policy T2 – Parking and car-free development

- 6.4 Other material considerations in respect of planning policy include:

- National Planning Policy Framework (NPPF) (2021);
- Planning Practice Guidance (PPG) (2021);
- Elsworth Road Conservation Area Appraisal (July 2009);
- Camden Planning Guidance (CPGs):
 - Access for All (March 2019);
 - Air Quality (January 2021);
 - Amenity (January 2021);
 - Basements (January 2021);
 - Design (January 2021);
 - Energy Efficiency and Adaptation (January 2021);
 - Home Improvements (January 2021);
 - Housing (January 2021);
 - Transport (January 2021); and
 - Trees (March 2019).

7.0 Planning Assessment

7.1 This section considers the extent to which the proposed development accords with the relevant development plan policies and any other material considerations that ought to be taken into account. The key planning considerations relevant to the proposed development are:

1. Principle of development
2. Design and heritage
3. Residential amenity and impact on neighbouring properties
4. Basement development
5. Energy and sustainability
6. Flood risk and drainage
7. Highways and parking
8. Trees and landscaping
9. Biodiversity
10. Noise
11. Air quality

Principle of development

- 7.2 Paragraph 11 within the NPPF seeks to promote the development needs of an area through applying a *'presumption in favour of sustainable development'*. Furthermore, paragraph 153 states that plans should adopt a proactive approach to mitigation and adapting to climate change.
- 7.3 Chapter 11 of the NPPF promotes the effective use of land. Planning decisions should give substantial weight to the value of using suitable brownfield land for homes.
- 7.4 Policy H3 of Camden's Local Plan (CLP) resists development that would involve a net loss of residential floorspace or a net loss of two or more homes unless certain criteria are met.
- 7.5 The proposal seeks to demolish the existing building and replace it with a single-family dwelling, which does not result in a net loss of any homes in accordance with CLP Policy H3.
- 7.6 CLP Policy H7 states that a range of different homes and sizes will be sought by the Council to create mixed, sustainability communities. The proposals provide a large, family-sized dwelling to contribute to Camden's housing supply.
- 7.7 The existing house is in poor condition and does not meet modern, energy efficient building standards. A whole lifecycle carbon assessment was carried out to compare the carbon impact of a hypothetical refurbishment and extension scheme with the progressed new build proposal. This assessment concluded that when considering embodied carbon and operation energy, the total carbon emissions generated by the refurbishment scheme are higher than that of the new build option over a predicted 60-year lifespan. This is attributed to the lower performance of the building fabric and internal conditions from the refurbished option, compared to that possible from the demolition and erection of a new building. Further information is provided within the Energy and Sustainability Statement and within the accompanying carbon analysis study prepared by XCO2.
- 7.8 Overall, the proposed development would provide a more sustainable, energy-efficient family home by making the most effective use of brownfield land, the principle of which is supported in LB Camden's pre-application response.

Design and heritage

- 7.9 The NPPF requires heritage assets to be conserved in a "manner appropriate to their significance". Paragraph 202 adds that any harm should be weighed against the public benefits of the proposal including, securing its optimum viable use.

- 7.10 CLP Policy D1 states that the Council will seek to secure high quality design that respects local context and character, preserves or enhances the historic environment and assets, is sustainably designed and constructed, comprises high quality details and materials that complement local character and integrates well within the surrounding streets.
- 7.11 Policy D2 requires development within conservation areas to preserve or enhance the character and appearance of the area, resist demolition of an unlisted building that makes a positive contribution to the character or appearance of the area and preserve trees and garden spaces that contribute positively.
- 7.12 With regards to conservation areas, paragraph 206 of the NPPF requires local planning authorities to look for opportunities for new development within conservation areas to enhance or better reveal their significance, although it is noted at paragraph 207 that *“not all elements of a Conservation Area will necessarily contribute to its significance”*.

Assessment of heritage significant and impact on heritage assets

- 7.13 The Heritage Statement provides a detailed analysis of the site’s context; its contribution to the setting of the Conservation Area and any nearby heritage assets; and an assessment of the impact of the proposals, with reference to relevant planning policy and legislation.
- 7.14 In summary, an assessment of the building’s significance concludes that it possesses low archaeological interest, low to medium architectural and artistic interest, and low historic interest. The setting of the site is considered to be of medium significance. Contrary to the Elsworthy Road Conservation Area Appraisal’s (ERCAA) recognition of the building as a “positive contributor” to the Conservation Area, the Heritage Statement concludes that *“given the poor design and architectural detailing of the building, its contribution is in fact considered to be neutral, at best”*.
- 7.15 As well as the Elsworthy Road Conservation Area, the proposals may impact the setting of the St John’s Wood Conservation Area in the City of Westminster, the setting of statutorily listed buildings on Acacia Road (also within the City of Westminster), and the setting of the statutorily registered park and garden, Primrose Hill.
- 7.16 The proposed scheme comprises a replacement building which is of a higher quality and more architecturally appropriate within the context of the Conservation Area. The majority of trees to the front and rear will be retained and supplemented with further planting to reflect the suburban nature of Avenue Road.
- 7.17 The Heritage Statement concludes that the proposed scheme would therefore *“make a minimal and neutral to positive contribution to the character and appearance of the Elsworthy Road Conservation Area, a minimal and neutral to positive contribution to the settings of the St John’s Wood Conservation Area and the Grade II listed Nos. 30-31, 32-33 and 34-35 Acacia Road, and a negligible and neutral contribution to the setting of the Grade II registered Primrose Hill. The proposals would cause no harm to any heritage assets, nor to the settings of any heritage assets.”*

Design, scale, and appearance

- 7.18 The NPPF notes that good design is a key component of sustainable development and should contribute to making places better for people. The NPPF particularly establishes that the Government gives great importance to the design of the built environment and recognises that it is a key aspect of sustainable development and is indivisible from good planning. Paragraph 134 specifically states that great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

- 7.19 These principles are reflected in London Plan Policies D4 and D6 which seek high quality design in development and require new development to enhance the built environment of local places by taking into account their physical context, local character, density, tenure and land mix. Developments should make a positive contribution to streetscape and should incorporate high quality materials and landscaping appropriate to its context.
- 7.20 The design team have worked extensively with Heritage Information to create a high quality design that is more considered and architecturally literate than that of the existing building.
- 7.21 The proposed building has a Neo-Georgian architectural style, similar to other nearby replacement buildings which are considered to make a positive contribution to the character and appearance of Avenue Road by virtue of their architectural form and detailing. In common with those buildings, the proposed building is not intended to replicate a 19th century building, but to provide a modern take on the idiom, in an architecturally literate way.
- 7.22 The proposed height, bulk, scale and massing reflects that of many of the other houses along Avenue Road, so although the proposed building represents an increase in height, bulk, scale and massing, it would still sit comfortably within the streetscape. As noted in Section 4, the height of the proposed building has been lowered in response to the pre-application advice from LB Camden, and the proposed ridgeline would be lower than that of the houses at Nos. 30 and 38 Avenue Road,
- 7.23 The existing building is located off-centre within a usually wide plot; therefore, the site's redevelopment provides an opportunity to address the proportions of the site in a more appropriate way. Sufficient gaps either side of the replacement building are maintained in order to sustain the attractive green suburban qualities of the Conservation Area, and the landscaping scheme will help to minimise the impact of the larger built footprint of the proposed building in the streetscape.
- 7.24 In summary, the proposed scheme would result in a replacement building of a higher quality than the existing building, designed in a more architecturally literate Neo-Georgian idiom. It is, therefore, in accordance with Camden Local Plan Policies D1, D2 and London Plan Policies D4 and D6.

Residential amenity and impact on neighbouring properties

- 7.25 The NPPF seeks to secure a good standard of amenity for all existing and future occupants of land and buildings.
- 7.26 CLP Policy A1 seeks to protect the quality of life of occupiers and neighbours by only allowing development that does not cause harm to amenity. The Council's amenity guidance contains further details on how development should be designed to minimise the impact of the loss of daylight, sunlight, artificial light levels, outlook, privacy and noise.

Residential amenity

- 7.27 The proposed building would significantly exceed the nationally described space standards and would provide an excellent standard of residential amenity for the occupiers.

Impact on neighbouring properties

- 7.28 A Daylight, Sunlight and Overshadowing Assessment has been undertaken by XCO2. The report assesses the daylight, sunlight and overshadowing impacts that the proposed redevelopment may have on the existing properties surrounding the site, namely, 36 Avenue Road, Purifier House (1 Radlett Place), and 30 Avenue Road.
- 7.29 Overall, the development is not anticipated to have any notable impact on the daylight received by, or sunlight access to, neighbouring properties, in accordance with CLP Policy A1.

Privacy and overlooking

- 7.30 The proposed building is located on broadly the same plot as the existing building, albeit it is taller and wider than the existing house. Notwithstanding this, trees will remain on either side of the property and along its rear boundary which will provide screening to neighbouring properties at Nos. 30 and 36 Avenue Road and 1 Radlett Place.
- 7.31 The proposed building has been sensitively designed, scaled and orientated in a way to ensure that the amenity enjoyed by neighbouring occupants is not compromised. For example, windows on the flank elevations largely serve non-habitable rooms to minimise overlooking to neighbouring properties.
- 7.32 A balcony is proposed for the first-floor master bedroom; however, the balcony would be shielded from view by the bay windows either side of it. The balcony would also contain a 1.1 metre high stone balustrade in accordance with building regulation requirements.

Basement development

- 7.33 CLP Policy A5 states that basements should have a minimal impact on the host building and surrounding area, and should:
- f. not comprise of more than one storey;*
 - g. not be built under an existing basement;*
 - h. not exceed 50% of each garden within the property;*
 - i. be less than 1.5 times the footprint of the host building in area;*
 - j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;*
 - k. not extend into or underneath the garden further than 50% of the depth of the garden;*
 - l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and m. avoid the loss of garden space or trees of townscape or amenity value."*
- 7.34 The Basement CPG considers a single basement storey to comprise 3-4 meters in depth. It notes that swimming pools will be allowed a greater depth, where appropriate.
- 7.35 The proposed basement is one storey (4 metres below ground level, except for the swimming pool area, which extends to 6 metres). It has been designed to meet all of the criteria in Policy A5, as demonstrated on the 'Basement Calculations' drawing (0909)0004_PL01.
- 7.36 A Ground Investigation and Basement Impact Assessment has been prepared by Geotechnical and Environmental Associates Limited (GEA), which confirms that the basement is unlikely to result in any specific land or slope stability issues, in accordance with Policy A5 and the Basements CPG.

Energy and sustainability

- 7.37 All developments in LB Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage, in line with Policies CC1, CC2 and CC3 of the Local Plan. Part e. of policy CC1 requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building.
- 7.38 London Plan policy SI 2 states that a minimum on-site reduction of at least 35% reduction beyond Building Regulations is required for major development and 10% for residential development.

- 7.39 In response to the above-mentioned planning policy and pre-application discussions with LBC, an Energy and Sustainability Statement has been prepared by XCO2.
- 7.40 The report provides an energy strategy for the proposal which focusses on the efficiency of the fabric and building services. Energy efficiency is primarily achieved through a highly insulated building envelope, a good air permeability rate, highly efficient lighting, space conditioning and hot water systems. The proposal also incorporates air source heat pumps (ASHPs) as the primary heating system.
- 7.41 Overall, the development is expected to achieve regulated CO2 savings of 41.0%, exceeding the London Plan CO2 savings target of 35%.
- 7.42 A separate Whole Lifecycle Carbon Assessment has been undertaken by XCO2 and confirms that the proposed development (involving demolition and a replacement building) generates a lower total carbon emissions output over a projected 60-year lifespan (the standard timeframe for built assets, set out by the GLA guidance) than that of a refurbishment and extension scheme.
- 7.43 Key sustainability features of the proposal include:
- The redevelopment of previously developed land;
 - Effective site layout in response to the surrounding context;
 - Efficient design of internal layouts so that spaces benefit from natural daylight and sunlight levels;
 - The specification of water efficient fittings to limit water consumption to less than 105 litres per person per day for domestic uses; and
 - Retention and enhancement of trees and biodiversity.
- 7.44 Overall, the proposed development will deliver the most energy efficient solution for the site over the building's lifetime, exceeding the CO2 savings target outlined in the London Plan, and in accordance with CLP Policies CC1, CC2 and CC3.

Flood risk and drainage

- 7.45 CLP Policy CC3 requires development to incorporate flood resilient measures in areas prone to flooding, as well as utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy.
- 7.46 A Flood Risk Assessment and Drainage Strategy report has been prepared by Infrastruct CS Ltd. The FRA concludes that the site is at low risk of flooding from all sources and is therefore appropriate for a development of this nature. The report has assessed the feasibility of implementing the SuDS hierarchical approach and has confirmed that the proposed development is likely to be able to install suitable drainage measures. It is anticipated that full details of the drainage strategy will be submitted and approved at the detailed design stage via an appropriately worded planning condition.

Highways and parking

- 7.47 CLP Policy T1 states that development should provide accessible and secure cycle parking, exceeding the minimum standards outlined in the London Plan.
- 7.48 CLP Policy T2 states that *"the Council will limit the availability of parking and require all new developments in the borough to be car-free."*
- 7.49 However, paragraph 10.20 of the supporting text to Policy T2 states that the Council will consider retaining or reproviding existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed.

- 7.50 In accordance with Policy T2, the existing parking provision at the site (internally and externally) is being reprovided for the existing owner, Ms Massey, who plans to return to the property following its completion.
- 7.51 Secure cycle parking will be provided to the west of the property and will consist of a hardwood, timber clad structure to hold four bicycles, in accordance with London Plan standards outlined within Table 10.2.
- 7.52 The existing pedestrian and vehicular accesses remain unchanged.

Trees and landscaping

- 7.53 CLP Policy A3 states that the Council will resist the loss of trees and vegetation of significant amenity and biodiversity value and expects development to incorporate additional trees and vegetation where possible.

Trees

- 7.54 A detailed Arboricultural Impact Assessment (AIA) has been prepared by Landmark Trees. The assessment notes that the majority of existing trees on site are low quality or are unsuitable for retention. It concludes that the potential impacts of the development are relatively low with regards to the quality of trees being removed and also the root protection area (RPA) encroachments of trees being retained. The trees recommended for felling are of little significance and their loss will not affect the visual character of the area.
- 7.55 Trees of significance are proposed to be retained and protected, as indicated within the AIA. The landscaping scheme seeks to replace the low-quality specimens with high-quality planting.
- 7.56 Overall, the proposals will not have a significant impact on either the retained trees or the wider landscape, in accordance with Policies G1 and G7 of the London Plan and CLP Policies A3, A5, D1 and D2.

Landscaping

- 7.57 A high-quality landscaping scheme has been prepared by Kinland Design. Plant species have been carefully selected to maximise native species with ecological value.
- 7.58 Elements of hardstanding have been minimised in accordance with the pre-application feedback received, and where required, hardstanding elements are proposed as permeable paving as far as possible.
- 7.59 Overall, the landscaping scheme provides an array of different planting types and species, reflective of the character of Avenue Road and the wider Conservation Area. An Urban Greening Factor (UGF) score of 0.4 is achieved, in compliance with London Plan Policy G5.

Biodiversity

- 7.60 CLP Policy A3 seeks to protect features with conservation value such as gardens where possible and to avoid disturbance to habitats and species and ecologically sensitive areas.
- 7.61 A Bat Scoping Report and Ecological Assessment has been prepared by The Ecology Co-op to identify potential ecological constraints and opportunities in relation to the proposed development. No evidence of roosting bats was recorded within (or in association with the exterior) of the dwelling during the inspection, and the dwelling was assessed as having 'low' bat roosting potential on account of gaps beneath slate roof tiles. No further surveys are required; however, recommendations are made with regard to the need for careful supervised construction work and habitat clearance.

- 7.62 Recommendations have also been made with regard to planting of native species as well as species-specific enhancements through provision of integrated bat roosting features and swift nesting features; such measures have been included within the proposed landscaping scheme.

Noise

- 7.63 CLP Policy A4 states that development will not be granted if it will likely generate unacceptable noise and vibration impacts.
- 7.64 The proposed development would include plant and machinery within the basement. Accordingly, an Environmental Noise Assessment has been prepared by Acoustics Plus. The assessment indicates that any proposed installation of mechanical plant should not result in a noise impact greater than Laeq 24dB at the nearest considered noise sensitive receptor. Provided the selected plant meets this specification, the sound source will have a low impact and would comply with the LB Camden's noise limits for planning.

Air quality

- 7.65 London Plan Policy SI 1 states that proposals should not lead to the deterioration of air quality or create unacceptable risk of high levels of exposure to air quality.
- 7.66 CLP Policy CC4 states that the Council will ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough.
- 7.67 An Air Quality Assessment has been prepared by XCO2 to quantify the potential impacts on local air quality associated with the construction and operation of the proposed development. Based on the results of the assessment, it is considered that redevelopment of the site would not cause a significant impact on local air quality.
- 7.68 During the construction phase, the site has the potential to generate dust and particulate matter, however, through the implementation of a Dust Management Plan, the impacts will be effectively mitigated and are unlikely to be significant.
- 7.69 Air Source Heat Pumps are proposed as the energy strategy, therefore, there will be no significant combustion emissions associated with the site once operational. The mitigation measures outlined in the report will ensure that air quality will not pose a constraint to the redevelopment of the site as proposed.

8.0 Conclusion

- 8.1 This Planning Statement has been prepared by hgh Consulting on behalf of Ms Kitty Massey in relation to the planning application at 32-34 Avenue Road for the following development:

“Demolition of the existing house and replacement with a two-storey dwellinghouse plus an attic floor, basement, landscaping, parking and associated works.”

- 8.2 The proposal has been subject to extensive pre-application discussions with LB Camden planning and design officers and has evolved in response to the pre-application advice received.
- 8.3 The development involves the demolition of the existing building, which is architecturally uninteresting and poorly performing in thermal insulation terms, and its replacement with a higher quality building that is more architecturally appropriate within the context of the Elsworthy Road Conservation Area.
- 8.4 The proposed building has a Neo-Georgian architectural style, similar to other nearby replacement buildings which are considered to make a positive contribution to the character and appearance of Avenue Road by virtue of their architectural form and detailing. The proposed height, bulk, scale and massing reflects that of many of the other houses along Avenue Road, so although the proposed building represents an increase in height, bulk, scale and massing, it would still sit comfortably within the streetscape.
- 8.5 The Heritage Statement concludes that the proposed scheme would make a minimal and neutral to positive contribution to the character and appearance of the Elsworthy Road Conservation Area, a minimal and neutral to positive contribution to the settings of the St John’s Wood Conservation Area and the Grade II listed Nos. 30-31, 32-33 and 34-35 Acacia Road, and a negligible and neutral contribution to the setting of the Grade II registered Primrose Hill. The proposals would cause no harm to any heritage assets, nor to the settings of any heritage assets.
- 8.6 Sufficient gaps either side of the replacement building are maintained in order to sustain the attractive green suburban qualities of the Conservation Area. Trees of significance will be retained and supplemented with further planting, with a focus on native shrub species and flowering species of ecological value.
- 8.7 In energy and sustainability terms, it has been demonstrated through the lifecycle carbon analysis that the redevelopment of the site as proposed is far more sustainable than if the existing building were to be refurbished and retrofitted.
- 8.8 Other technical assessments have informed the design proposals and have demonstrated that the proposals will have no adverse impacts in respect of noise, biodiversity, air quality, daylight and sunlight or flooding.
- 8.9 For the reasons set out in this Statement, the proposed development accords with the development plan and constitutes sustainable development. Accordingly, planning permission should be granted without delay.



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