Address:	Lamorna Dartmouth Park Road London NW5 1SU		**1**
Application Number(s):	2025/1375/P	**Officer:** Daren Zuk	
Ward:	Highgate		
Date Received:	28/03/2025		
Proposal:	Demolition of existing single dwelling and erection of a new five-storey building comprising 5no. residential units (Class C3).		

Background Papers, Supporting Documents and Drawing Numbers:

Existing and Proposed Drawings:
A001 P1, A100 P1, A101 P1, A102 P1, A103 P1, A104 P1, A110 P3, A112 P3, A113 P3, A114 P3, A115 P3, A116 P3, A117 P3, A200 P1, A201 P1, A202 P1, A203 P1, A210 P2, A211 P2, A212 P2, A213 P2, A215 P1, A300 P1, A310 P2, Location Plan

Documents:
Covering Letter (prepared by Maddox Planning, dated 11/08/2025), Design and Access Statement Addendum (prepared by Bureau de Change, dated August 2025), Heritage Statement (prepared by HCUK, dated July 2025), Planning Statement (prepared by Maddox Planning), Daylight and Sunlight Report V4 (prepared by Point2, dated July 2025), Flood Risk Assessment Rev 01 (prepared by Aegaea, dated 25/07/2025), Surface Water Drainage Strategy Rev 02 (prepared by Aegaea, dated 25/07/2025), London Sustainable Drainage Proforma, Sustainability & Energy Statement V2 (prepared by Ensphere, dated December 2025), Development Options Appraisal (prepared by Bureau de Change, dated July 2025), Condition and Feasibility Study with Whole Life Carbon Assessment V3 (prepared by Ensphere, dated December 2025), Whole Life Carbon – Assessment Excel Template, ASHP Data Sheet (Mitsubishi Ecodan R32), Plant Noise Assessment Rev D (prepared by ALN, dated 03/07/2025), Addendum Financial Viability Assessment Report (prepared by Roscoe Group, dated July 2025), Financial Viability Assessment Audit – Addendum Report 2 (prepared by BPS, dated 03/09/2025)

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	**Agent:**
HGG London	Ollie Cooper Maddox and Associates Ltd. 33 Broadwick Street London W1T 0DQ

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
C3	Dwellings (flats)	151	448	+ 297
Total	**All uses**	**151**	**448**	**297**

Proposed housing mix and tenure						
Tenure	Studio	1 bed	2 bed	3 bed	4 bed	**Total**
Market	/	1	3	1	/	**5**
Total homes	**/**	**1**	**3**	**1**	**/**	**5**

Existing and proposed homes			
Tenure	Existing homes	Proposed homes	Difference in homes
Market homes	1	5	+ 4
Tenure	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Market homes	151	448	+ 297

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	1	0	-1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	0	10	+10
Cycle – residential short stay	0	2	+2

EXECUTIVE SUMMARY

i) The site comprises a two-storey detached single dwellinghouse built in the late 1920s or early 1930s, infilling the open plot of land adjacent to 1 Dartmouth Park Road. The building is not listed but is located within the Dartmouth Park Conservation Area and is noted as a neutral contributor in the Conservation Area Statement.

ii) The proposal includes demolition of the existing building and erection of a five-storey residential building comprising five new residential dwellings. Given the emphasis on maximising housing supply in Camden Local Plan H1 and the NPPF, and Camden's current Housing Delivery, the provision of housing on this site is positive and should be given significant weight.

iii) The scheme will provide a well-designed infill residential building on brownfield land, opening up the opportunity for the site to be utilised to its full potential. The additional height is considered appropriate given existing context and heights of neighbouring buildings within the wider Conservation Area. The proposal will have very limited impact on the amenity of neighbouring occupiers.

iv) The design and material palette is high-quality; however, officers have identified less than substantial harm (very low end) to the Dartmouth Park Conservation Area due to the proposed architectural approach detracting from the adjacent ordered and classically proportioned villas. The massing and scale of the proposed building is considered appropriate within the site's context.

v) This harm should be given considerable weight and importance in decision making. However, the level and nature of the harm have been carefully considered and viewed in the context of the fact that the development comes with increased density which would deliver five homes, four of which would be suitable for families for which there is a great need.

vi) As well as supporting environmental improvements through car-free development, the proposal also exceeds key energy and carbon reduction targets through a sustainable development. Greening and sustainable drainage measures reduce the risk of flooding in the area while supporting biodiversity. The scheme provides residential growth in an area with good walkability and access to public transport.

vii) The scheme complies with the development plan as a whole and is recommended for approval.

OFFICER REPORT

Reason for Referral to Committee:

The Director of Economy, Regeneration and Investment has referred the application to Planning Committee for determination due to the level of public interest.

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Conservation Area	Dartmouth Park
Neighbourhood Plan Area	Dartmouth Park
PTAL (Public transport accessibility)	4 (good)
Underground development constraints and considerations	- Historically flooded street (Dartmouth Park Road) - Subterranean (groundwater) - Slope stability

Table 1 - Site designations and constraints

Description

1.2 The application site is located on the south side of Dartmouth Park Road, to the east of the junction with Highgate Road. It comprises a two-storey detached dwelling (Class C3) of early 20th century construction.

1.3 The site is located within both the Dartmouth Park Conservation Area and the Dartmouth Park Neighbourhood Plan Area. The subject building is not listed and is mentioned within the Dartmouth Park Conservation Area Appraisal; however, as neither a positive nor negative contributor. The area is primarily residential, with mostly Victoria semi-detached villas and terraced dwellings.

Figure 1 – The existing site

1.4 The site has a Public Transport Accessibility Level (PTAL) rating of 4 (good) which indicates that it has a good level of accessibility by public transport – 482m from Gospel Oak Overground Station, 804m from Tufnell Park Underground Station, and 965m from Kentish Town Underground Station. Local bus stops are also located close to the site at the junction of Dartmouth Park Road and Highgate Road.

2. THE PROPOSAL

2.1 The proposal is for the demolition of the existing two-storey single dwellinghouse (Class C3) and erection of a five-storey residential building providing five self-contained homes (Class C3). The five new homes comprise one one-bedroom home, three two-bedroom homes, and one three-bedroom maisonette home. Cycle parking, refuse and recycling stores, and plant facilities are provided at ground floor level.

Revisions

2.2 During the course of the application, the proposal was revised to omit the proposed basement due to concerns over flooding impacts on the self-contained home. The number of new homes was subsequently reduced from six to five. Minor revisions to the material details and fenestration arrangement were also received.

3. RELEVANT HISTORY

The Site

3.1 **2007/1042/P** – Erection of an extension on top of existing garage to create a habitable room to single family dwelling house (C3). **Refused 15/05/2007**

> The application was refused mainly due to the proposed first floor extension enclosing a gap at first floor level between the subject building and neighbouring First House, which was identified as important to the character of the Conservation Area. The current proposal retains the gap from first floor upwards.

3.2 **2010/4432/P** – Erection of rear extension at ground floor level and conversion of garage plus associated elevational alterations to provide additional habitable accommodation to existing single dwelling house (Class C3). **Granted 11/10/2010**

4. CONSULTATION

Statutory Consultees

<u>Dartmouth Park Neighbourhood Forum</u>

4.1 Objection covering the following issue(s):

- The proposal is harmful to the setting of the neighbourhood, due to the proposed building's size and bulk. It is an intrusion of an out of scale building into the street scene.
- Impact on neighbours, particularly to the south and west.
- Breaks the existing swathe of back gardens.
- Height of the building is too high.
- The architecture is wholly discordant.
- The proposal does nothing to increase the availability of affordable housing on site.
- Does nothing to preserve and enhance the character and appearance of the conservation area.
- Concerns over the Design Review Panel process.

Councillors or MPs

Cllr Anna Wright

4.2 Comments covering the following issue(s):

- Concerns regarding the height, bulk, and design of the new building.
- Impacts on neighbouring amenity, particularly residents of Chetwynd Villas.
- Concerns over construction impacts.

Cllr Camron Aref-Adib

4.3 Comments covering the following issue(s):

- Request for the consultation period to be extended.

Cllr Lorna Russell

4.4 Objection covering the following issue(s):

- Concerns over the design and scale and suitability for the Conservation Area.
- Overdevelopment and impact on neighbours.
- Environmental and infrastructure concerns.
- Absence of affordable housing.

Local groups

Dartmouth Park CAAC

4.5 Objection covering the following issue(s):

- Proposal is harmful to the setting of the Conservation Area due to its size and bulk and is out of scale into the street scene.
- Amenity impacts to neighbouring occupiers.
- Biodiversity impacts.

- Height of the new building too tall.
- Architecture is wholly discordant.
- Proposal does nothing to increase the availability of affordable housing.
- The proposal does nothing to preserve and enhance the character or appearance of the Conservation Area.
- Concerns regarding the Design Review Panel process.

Officer response:

- *The design of the proposal and impact on Conservation Area is discussed in Section 12, including Design Review Panel.*
- *Amenity impacts to neighbouring occupiers is discussed in Section 11.*
- *Affordable housing requirements are discussed in Section 8.*

Adjoining occupiers

4.6 Two site notices were displayed, one at the front of the subject site and one in front of Chetwynd Villas. The notices were displayed on 2nd April 2025 until 26th April 2025, and the application was advertised in the local paper on 10th April 2025 (expiring 4th May 2025).

4.7 Following revisions to the scheme to omit the basement (resulting in a change to the development description), the application was readvertised with site notices displayed on 20th August 2025 until 13th September 2025 and advertised in the local paper on 21st August 2025 (expiring 14th September 2025).

4.8 Objections were received from at least 205 local households. Letters of support were received from 3 local households. The objections received by the Council are published on the Council's website. The key issued raised are summarised as follows:

Housing Mix

- Lack of family sized housing.

Officer response:

- *The proposals comprise a mix of one-, two- and three-bedroom units that will contribute to meeting the identified housing needs of community as set out in the Local Plan.*

Design and visual impact on the street scene and Conservation Area

- The height of the building dominates the street scene and does not comply with Policy D2.
- The proposals would result in a harmful impact upon the Conservation Area.

- The proposal would establish a precedent for other development of a greater scale to come forward.
- The design and fenestration of the proposals is unacceptable.
- The proposals project northwards beyond the face of the existing buildings.
- Description of neighbouring building heights is incorrect.

Officer response:

- *The proposals have been fully design led and follow a lengthy and constructive pre-application process with the Council, including two Design Review Panel (DRP) meetings.*
- *As shown on the building height context plan page 17 of the Design and Access Statement (DAS) Addendum, the proposals are of a similar building height to the majority of buildings within the street scene. The proposed development follows the rhythm of alternating building heights on the street and is supported in height and massing terms.*
- *The top floor is set back to reduce visual impact while an arched roofline has been proposed to soften the appearance of the building, as per the Design Review Panel and Pre-Application feedback. Refer to pages 26 - 28 of the Design and Access Statement for Building Height studies and page 4 for Design Review Panel comments and pages 17 of the DAS addendum.*
- *The proposals would result in a very low level of less than substantial harm to the character and appearance of the Conservation Area (as a designated heritage asset). The proposed materiality is considered appropriate for the context.*
- *The surrounding listed buildings have been considered as part of this application; however, the building, as a result of its location and proximity to the listed buildings does not cause harm to their setting.*
- *As shown on the building height context plan page 27 of the DAS and 17 of the DAS addenda, the proposed property is of the same building height as the majority of buildings within the street scene. The proposed development is considered to follow the alternating rhythm of the street.*
- *Design principles have been informed by the surrounding characteristics of Dartmouth Park Conservation Area and Dartmouth West sub-area. This includes but is not limited to, recessed white entrance porches, architraves and well-proportioned windows.*
- *The proposed building has been carefully positioned to optimise the site while respecting the amenity of neighbouring properties. Although the footprint projects modestly northwards beyond the existing building line, this approach is a considered design response that allows for meaningful internal layouts and private amenity space, while maintaining generous separation distances from adjacent properties. The building is set back from both the southern and western boundaries and features articulated*

massing and stepped upper floors to reduce its visual impact. There are no primary windows on the south or west elevations that would compromise neighbour privacy.

- *The taller neighbouring buildings consist of the ground, first, and second floor, a roof and a lower ground floor which is visible above ground, making 5 storeys in total.*

Design Review Panel (DRP)

- The proposals do not fully address advice issued within the DRP response.
- Questions as to why the Chair Review DRP was pursued, not the Full Review.

Officer response:

- *Whilst the DRP suggested making the ground floor arches taller as they appear compressed, the ground floor arches cannot be positioned taller as this would collide with the first-floor slab. However, the design of the white stone architraves has been carefully adjusted to include more stepped articulation so that they appear more elongated and more in line with the ground floor openings of the neighbouring buildings.*
- *A Chair Review was selected as the most appropriate form of assessment for the second round of DRP review, in accordance with the Camden Design Review Panel Terms of Reference. These guidelines recommend Chair Reviews for proposals with a more localised impact, whereas Full Reviews are reserved for schemes of 'significant impact' that would benefit from a broader range of panel expertise.*
- *Given the modest scale and impacts of the proposal, the Chair Review was considered (in conjunction with Council Officers) to be both proportionate and suitably tailored to the nature of the scheme.*

Overdevelopment

- The proposals represent an overdevelopment of the site.

Officer response:

- *The proposed development does not constitute overdevelopment but instead reflects an appropriate and carefully considered density for this well-connected, underutilised site.*
- *In line with London Plan Policies D3 and H2, and Camden Local Plan Policy H1, the scheme optimises site capacity through a design-led approach that responds sensitively to the surrounding context.*
- *The building's scale and massing are mitigated through setbacks and material articulation, and it delivers five high-quality, policy-compliant residential units, all with private amenity space, in a location with excellent public transport accessibility (PTAL 4). The proposal makes efficient use*

of brownfield land while maintaining a strong relationship with neighbouring properties and the wider street scene.

Loss of existing building

- The loss of the existing building would cause harm to the Conservation Area.

Officer response:

- *The existing building does not make a positive contribution to the Conservation Area, and demolition of the existing building is therefore not objected to in heritage terms.*

Basement impacts

- The proposed basement would cause issues for neighbouring properties.
- The proposals would result in increased flooding and drainage impacts.

Officer response:

- *The proposed basement was omitted as part of the revised proposals submitted in August 2025.*

Daylight and Sunlight impacts

- The proposals would have harmful daylight and sunlight and shadowing impacts upon neighbouring properties.

Officer response:

- *The submitted Daylight and Sunlight Assessment has assessed the impact of the proposed development on the daylight and sunlight to surrounding properties. The assessment found that the proposals fully comply with BRE guidelines in terms of daylight and sunlight impacts to properties along Chetwynd Road and First House, and the overshadowing of the neighbouring amenity areas will be negligible and compliant with the BRE guidelines.*

Privacy and Outlook impacts

- The proposals would lead to unacceptable levels of overlooking for neighbouring properties, particularly 1-5 Chetwynd Villas.
- The proposals would be overbearing to neighbours, particularly 1-5 Chetwynd Villas, due to decreased separation distances.
- Back-to-back separation distance to Chetwynd Villas does not meet the 18m guidance within the Amenity (SPD).
- The proposals would result in overlooking to the gardens on Grove Terrace.

Officer response:

- *The rear elevation has been carefully designed to minimise any potential overlooking towards Chetwynd Villas. Rear-facing windows are limited in number and serve mainly secondary rooms. Bathrooms will have obscure glazing, and the orientation and depth of window reveals limit sightlines towards neighbouring gardens. There are no balconies or terraces on the rear elevation, ensuring that private outdoor spaces do not create overlooking opportunities. Combined with the rear setback (2m) and existing boundary vegetation, these measures provide effective protection of privacy for neighbouring occupiers.*
- *The proposals have been designed to avoid an overbearing impact on neighbours at 1–5 Chetwynd Villas. Although the separation to the rear boundary has slightly reduced from existing, the building remains set back from neighbouring gardens and is comparable in height to surrounding properties (including neighbouring villas). The rear elevation is articulated with setbacks at upper levels, helping to reduce visual bulk, and there are no rear-facing balconies. Existing boundary planting is also retained to soften views and maintain a sense of space for neighbouring residents.*
- *At the rear where visual impact and amenity is most sensitive, the massing steps away from the boundary by 2.2m to retain a distance of approximately 17m from properties on Chetwynd Road. The rear façade has been articulated to reduce bulk, and the roof level has been set back. Angled windows are proposed to reduce the sense of overlooking and protects the amenity of the neighbouring property in line with the amenity SPD. As the SPD is guidance rather than policy, and given the site constraints, a reduction below the recommended 18 metres is considered acceptable. Paragraph 2.6 of the SPD expressly allows for such reductions where the historic character of the immediate area includes buildings located less than 18 metres apart.*
- *A substantial separation distance of approximately 20 metres is maintained between the proposed development and the gardens of Grove Terrace, with this buffer further reinforced by mature tree planting along the western boundary of 1 Grove Terrace.*

Private amenity space

- Proposals would not provide adequate private amenity space.
- The use of balconies is incongruous of the surrounds.

Officer response:

- *The proposals provide policy compliant levels of private amenity space in line with London Plan Policy D6.*
- *The proposed balconies are carefully integrated into the building's design and do not appear out of place in the surrounding context. Their recessed*

form and slim profiles ensure they sit within the façade, avoiding visual dominance.

Lack of in-site affordable housing

- The proposals do not provide for on-site affordable housing.

Officer response:

- *The development economics of the scheme is set out within the Financial Viability Assessment prepared by the Roscoe Group, which outlines that the proposed scheme will follow the Viability Tested Route, due to viability challenges. It has been confirmed within BPS's external viability review for the original and amended scheme (2nd May and 3rd September 2025 respectively), that the scheme cannot viably contribute towards affordable housing. However, a late-stage review mechanism will be required by means of the S.106 agreement to consider whether a deferred affordable housing contribution is required.*

Quality of accommodation for basement unit

- The basement unit would have inadequate levels of amenity, due to internal daylight and sunlight levels.

Officer response:

- *The proposed basement was omitted as part of the revised proposals submitted in August 2025.*

Noise and disturbance

- Concerns of noise related to Air Source Heat Pumps.

Officer response:

- *A Plant Noise Assessment dated July 2025 has been prepared by ALN Acoustic Design, which outlines that it will be feasible to achieve plant noise levels significantly below the background noise level and therefore avoid causing any significant impact at the neighbouring residential properties. Noise levels will be controlled by condition.*

Access and parking

- The proposed scheme would lead to unacceptable traffic generation, and increased parking pressures.

Officer response:

- *The applicant will enter into a legal agreement to preclude future occupants from obtaining on-street car parking permits, in line with the Council's car-free policy.*

Construction impacts

- Concerns around noise pollution associated with construction stage of project.

Officer response:

- *Impacts from construction will be mitigated through the use of a Construction Management Plan, secured by means of the S.106 Agreement.*

Lack of community engagement

- The applicant has not engaged in suitable levels of community engagement.

Officer response:

- *The applicant team engaged in proportionate community engagement for a scheme of this scale prior to the submission of the application. This included a consultation with residents late in 2024, proactive engagement with Ward Councillors and outreach to the DPNF.*
- *Following the submission of the planning application, the applicant team met with local residents on 25/04/2025 to take feedback, and answer questions on the scheme.*

Ecology and Trees

- The proposals will have unacceptable biodiversity impacts.
- Harm to trees along boundary fronting No 3 and No 5 Chetwynd Villas.

Officer response:

- *The site as it exists is largely covered with hardstanding and therefore is considered to be of low ecological value and does not trigger the legal requirement for a Biodiversity Gain Plan.*
- *The proposals have been designed to enhance local biodiversity, through the incorporation of extensive green roofs, which support urban ecology and provide habitat opportunities for insects and birds. These green spaces, along with new planting, contribute to biodiversity enhancements, in line with the London Plan Policy G6 and Camden's sustainability objectives.*

- *In respect of tree impacts, there are no on-site trees. The proposals maintain a 2m distance to the rear boundary, ensuring that all construction works, and excavation will be set back from root protection zones. Tree protection will be controlled via condition.*

Classification as a brownfield site

- The site does not constitute brownfield land.

Officer response:

- *The site constitutes brownfield land in line with the National Planning Policy Framework (NPPF) definition.*

Environmental impacts

- The proposal results in the unsustainable demolition of an existing building.
- The proposals would have harmful environmental impacts, due to the demolition of the existing building, and energy performance of the new building.

Officer response:

- *A development options appraisal (dated July 2025) has been provided which is commensurate to the scale of the development. The document demonstrates that refurbishing or extending the existing house would require disproportionate structural intervention while delivering limited additional housing and failing to meet modern standards for accessibility, amenity, and energy efficiency; by contrast, a full redevelopment approach that reclaims and reuses materials allows the site to be used more effectively, delivering a greater number of higher-quality homes with improved accessibility and a lower whole-life carbon impact, and is therefore concluded to be the most sustainable and policy-compliant option.*
- *As set out within the submitted energy and sustainability statement, the proposals achieve carbon savings from renewables > 20%; in line with policy requirements, with also a >19% CO2 reduction below Part L Building Regulations. The submitted Condition and Feasibility Study, Whole Life Carbon Assessment outlines that the proposed scheme would be responsible for approximately 46% less carbon emissions per square metre over its lifetime relative to the theoretical refurbishment of the existing building.*

Increased pressure on local infrastructure

- Increased pressure on local infrastructure, through additional residents.

Officer response:

- *The modest scale of the proposed development—comprising just five residential units—is not expected to place significant pressure on local infrastructure. The site benefits from excellent public transport access (PTAL 4), supporting sustainable travel choices and reducing car dependency. In accordance with Camden policy, the scheme will be car-free and contribute through the Community Infrastructure Levy (CIL), helping to fund local improvements to services and amenities.*

Minimal changes between the original and revised proposals

- The revised scheme does not fundamentally address neighbour's original concerns.

Officer response:

- *The proposals were amended to address the Council's statutory comments relating to flood risk and drainage. The revised proposals submitted in August 2025 reflected the following key changes: omission of basement, reduction in units and changes to housing mix, frontage improvement to improve visual continuity, refinement of the rear elevation window treatment and inclusion of obscure and angled glazing to bathrooms, revisions to cycle parking location, and submission of updated architectural drawings and visuals.*

5. POLICY

National and regional policy and guidance

National Planning Policy Framework 2024 (NPPF)
Draft National Planning Policy Framework 2025
National Planning Practice Guidance (NPPG)

London Plan 2021 (LP)

London Plan Guidance (LPG)

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth
Policy H1 Maximising housing supply
Policy H4 Maximising the supply of affordable housing
Policy H6 Housing choice and mix
Policy H7 Large and small homes
Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy A4 Noise and vibration

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
Policy DM1 Delivery and monitoring

Dartmouth Park Neighbourhood Plan (2020)
DC2 Heritage Assets
DC3 Requirement for good design
H1 Meeting housing need
H2 Affordable housing
H3 Accessible housing
ES3 Biodiversity
ES4 Energy Efficiency
TS2 Cycling improvements
TS3 Traffic reduction

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):
Amenity - January 2021
Biodiversity CPG - March 2018
Design - January 2021
Developer Contribution CPG - March 2019
Energy efficiency and adaptation - January 2021
Housing - January 2021
Transport - January 2021
Trees CPG - March 2019
Water and flooding CPG - March 2019

Other Guidance:
Planning Statement – Intermediate Housing Strategy and First Homes (2022)
Dartmouth Park Conservation Area Appraisal and Management Strategy 2009

Proposed Submission Draft Camden Local Plan (DCLP)

The Proposed Submission Draft Camden Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan will now be examined by a Planning Inspector.

Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.

The Proposed Submission Draft Local Plan (DCLP) is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

6. ASSESSMENT

6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	**LAND USE**
8	**AFFORDABLE HOUSING & VIABILITY**
9	**HOUSING MIX**
10	**QUALITY OF HOUSING**
11	**AMENITY**
12	**DESIGN & HERITAGE**
13	**WASTE & RECYCLING**
14	**SUSTAINABILITY & ENERGY**
15	**FLOODING**
16	**TRANSPORT**
17	**BIODIVERSITY NET GAIN**
18	**COMMUNITY INFRASTRUCTURE LEVY (CIL)**
19	**CONCLUSION**
20	**RECOMMENDATION**
21	**LEGAL COMMENTS**
22	**CONDITIONS**
23	**INFORMATIVES**

7. LAND USE

Proposed New Housing

7.1 Self-contained housing is regarded as the priority land use of the Camden Local Plan and Policy H1 states that the Council will make housing its top priority when considering the potential of land to deliver more homes than existing. As such, the erection of a new residential building to provide new self-contained residential dwellings in a highly sustainable and existing residential neighbourhood is compliant with policy H1.

7.2 The Housing Delivery Test (HDT) is an annual measurement of housing completions introduced by the government. It measures net additional dwellings provided against the homes required over the last 3 years. The government's most recently published figure is for December 2025, when the government's measurement for Camden was 53% - which means that Camden's development plan policies are treated as being out-of-date in relation to housing proposals, the presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and there is a need to place significant weight on the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole. The draft 2025 NPPF also favours sustainable development that makes better use of land in sustainable locations and also places significant weight on the provision of housing in decision making.

7.3 London Plan Policy H1 and Table 4.1, set a 10-year housing target for Camden of 10,380 additional homes from 2019/20 to 2028/29, so 1038 a year.

7.4 The proposed uplift of 4 new dwellings (5 total) within a sustainable and existing residential location would contribute towards the strategic objectives of the CLP and contribute to the borough’s housing, which must be given significant weight. The proposed development would make more efficient use of land to deliver much needed housing which is supported by national, regional and local planning policies.

8. AFFORDABLE HOUSING AND VIABILITY

Affordable housing requirements

8.1 Camden Local Plan policy H4 and the Housing CPG seek provision of affordable housing. Where the uplift in residential floorspace has the capacity for 10 or more new homes (assuming 100sqm per home on average), the council expects affordable housing to be provided on site, subject to viability. Where the capacity is for fewer than 10 homes (less than 950sqm when

rounded) then the policy accepts a payment instead of on-site affordable housing.

8.2 The existing dwelling has a GIA of 151sqm, while the proposed new homes provide a total GIA of 448sqm, resulting in a residential uplift of 297sqm GIA.

8.3 As the proposed development would provide 297sqm of residential uplift (capacity for three homes) the Council will accept a payment-in-lieu (PIL) of affordable housing. Given the proposed residential uplift of 297sqm, the sliding scale in Policy H4 (d) applies, starting at 2% for one home and increasing by 2% for each home added to capacity. The additional residential area would have a home capacity of three homes which equates to a target of 6% affordable housing on the sliding scale.

8.4 Applying the payment in lieu of £5,000 per sqm set out in Housing CPG, the total payment under the policy target would be £89,100.

Additional residential floorspace (GIA sqm)	Capacity (rounded floorspace addition/100sqm)	Additional housing % target	Affordable housing floorspace target	Payment in lieu required
297sqm	Three new homes	6%	6% x 297 = 17.82	17.82 x £5,000 = £89,100

8.5 Whilst Officers explored options for a PIL, the policy makes clear, as does the NPPF, that an affordable housing PIL should be dependent on the viability of a scheme. In this case, the applicant has demonstrated that it is not financially viable to provide an affordable housing PIL.

Viability

8.6 The following sets out a summary of the viability position, as advised by BPS who are the Council's independent viability consultants.

Viability summary	BPS Values
Affordable housing floorspace (%)	0%
Benchmark Land Value (BLV)	£1,700,000
Gross development value (GDV)	£ 4,296,000
Construction Costs	£1,865,391 (inc. contingency)
CIL and planning obligations	£251,793
Other costs total (fees, disposal, finance)	£715,355

Developer profit – private (% of GDV)	17.50%
Developer profit – affordable (% of GDV)	N/A
Developer profit – commercial (% of GDV)	N/A
Surplus for affordable housing	- £988,339 (deficit)

Table 2 - Financial viability summary

8.7 There are still several points of disagreement, although not key differences, between BPS and the applicant's viability consultant. However, BPS have advised that based on their assumptions the scheme would still result in a notable deficit as detailed above, meaning it cannot be expected to contribute to affordable housing provision.

8.8 BPS have advised that in positions such as these, a late-stage viability review should be secured. This Council will seek a further assessment of the viability of the scheme, a late-stage review mechanism will be secured by S.106 Agreement to consider whether a deferred affordable housing contribution is required.

8.9 The payment of a deferred affordable housing contribution (DAHC) is not certain, and the ability to secure it will depend on viability improving, for example, because construction costs fall, or development values increase. If the viability improves when real inputs (like the actual costs and values of the scheme) are used, and a surplus is then identified, 60% of that surplus will be paid to the council, with 40% retained by the developer as an incentive to improve the viability, in line with the Housing CPG.

9. HOUSING MIX

9.1 Policy H7 seeks a mix of large and small homes in each development (where large homes are defined as those with 3 bedrooms or more) and expects developments to contribute to the priorities set out in the Dwelling Size Priorities Table.

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

Table 3 - Dwelling Size Priorities (Local Plan Table 1)

9.2 The CLP priorities table above shows the higher priorities for market homes are for 2- and 3-bed homes. The market home mix is set out in the table below, showing a balanced mix that contributes to the LP priorities.

Home size	Number proposed	Proportion of homes
1-bed	1	20%
2-bed	3	60%
3-bed	1	20%
Total	**5**	**100%**

Table 4 - Dwelling mix summary for market homes

9.3 Overall, the scheme provides a balanced mix of homes, suitable to the location and making a contribution to the identified needs in the development plan, in accordance with CLP policy H7.

10. QUALITY OF PROPOSED HOUSING

10.1 CLP policy H6 is about housing choice and mix, and it aims to minimise social polarisation and create mixed, inclusive, and sustainable communities, by seeking high quality accessible homes and a variety of housing suitable for Camden's existing and future households.

10.2 In line with LP policy D6 and CLP policies H6 and D1, housing should be high quality and provide adequately sized homes and rooms and maximise the provision of dual aspect dwellings. CLP policy A2 encourages opportunities to provide private amenity space which is reflected in a requirement to provide amenity space in LP policy D6. CLP policy A1 seeks to protect the amenity of occupiers in relation to several factors, including privacy, outlook, light, and noise. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise sensitive development.

10.3 LP policy D5 says development should provide the highest standard of accessible and inclusive design, which allows them to be to be used safely, easily and with dignity by all, also reflected in CLP policies D1, H6, and C6.

Design and layout

10.4 Part of the design-led approach to delivering effective high-density housing is about ensuring the development does not compromise the size and layouts of units, ensuring high quality homes across the scheme. CLP policy H6 confirms that new residential development should conform to the Nationally Described Space Standards, and this is reflected in LP policy D6 which sets the same minimum space standards in Table 3.1 of the London Plan 2021. The relevant excerpt from the table is reproduced below.

Type of dwelling		Minimum gross internal floor areas⁺ and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5

Table 5 - Minimum internal space standards (London Plan Table 3.1, Policy D6)

10.5 All of the new homes in the scheme meet or exceed the minimum standards. The new homes would have good floor to ceiling heights and good room sizes. They are well laid out with simple and rational plan forms. All homes feature private balconies, terraces, or gardens.

10.6 CLP policy A2 states developments should seek opportunities for providing private amenity space, and LP policy D6 says that 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. All of the balconies and terraces meet the minimum space requirements and ensure a good depth and width in line with LP policy requirements.

10.7 The 5 new homes have their own secure front doors, with external access for the ground floor unit and the rest served by a residential core with one staircase and one lift. The main entrance, located along the side elevation, provides access to a secure lobby. Immediately next to the entrance is the cycle and refuse stores.

10.8 LP policy D6 says the number of dual aspect homes should be optimised. The policy does however support a design-led approach where single aspect homes are considered a more appropriate design solution to meet the requirements of Policy D3 - Optimising site capacity through the design-led approach. It can be acceptable where it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

10.9 All 5 of the proposed homes are dual or triple aspect, and are considered to receive adequate passive ventilation, daylight/sunlight, privacy, and avoid overheating.

10.10 Overall, the proposed homes and amenity space comply with policy and would result in a high-quality development and provision for future occupiers.

Noise and vibration

10.11 At ground floor level, new plant facilities (Air Source Heat Pumps - ASHPs) are proposed to serve each of the new homes. A Noise Impact Assessment was submitted indicating that, with the provision of mitigation measures such as anti-vibration isolators to be secured by Condition 17, the noise emitted from the units would be within the requirements of Policy A4. The proposals have been reviewed by the Council's Environmental Health Officer who deem them to be acceptable.

10.12 Noise emitted from plant facilities at ground floor level would be controlled in terms of noise levels, secured by Condition 16.

10.13 The dwellings will be constructed to a high standard that would ensure that the occupiers are not unduly impacted by noise from inside the block, or outside the building, in accordance with the development plan.

Daylight and sunlight

Methodology

10.14 The internal daylight/sunlight report applies the relevant BRE guidelines to the proposed units. The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 ‘Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice’ (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to make a balanced judgement.

10.15 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site if the resulting scheme would provide acceptable living standards.

10.16 Given the floor plans and layouts of the new homes, each would be provided with multiple windows and from different perspectives. Based on the proposed floor plans and number of windows, officers are satisfied that the accommodation would have good outlook and provide a good level of daylight/sunlight as demonstrated in the submitted internal Daylight/Sunlight Assessment.

Accessible homes

10.17 The flats have been designed to a high standard of accessible and inclusive design, and CLP policy H6 requires 90% of new-build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of

new build homes to comply with M4(3) (wheelchair units). The new building provides level access to all 5 new homes.

10.18 The proposed homes have been designed to accommodate 10% as M4(3) of the Building Regulations, with the remaining 90% meeting M4(2). The M4(3) standard refers collectively to "Wheelchair User Dwellings". This includes Wheelchair Adaptable Dwellings under M4(3)(2)(a) (ones which can be easily adapted for a wheelchair user), and Wheelchair Accessible Dwellings under M4(3)(2)(b) (ones which are fully adapted for a wheelchair user when constructed.

10.19 A condition would be attached to secure the provision of the accessible and wheelchair dwellings (Condition 21).

Conclusion

10.20 The proposed homes are considered acceptable in terms of aspect, outlook, noise, light, and amenity space and would provide an acceptable level of amenity. They would provide accessible homes for all, including provision of wheelchair units, allowing the buildings to house an inclusive community that can use them safely, easily and with dignity.

11. IMPACT ON NEIGHBOURING AMENITY

11.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works is also relevant but dealt with in the ‘Transport’ section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

Daylight and sunlight

11.2 A Daylight and Sunlight Report has been submitted as part of the application which details any impacts upon neighbouring properties.

11.3 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 ‘Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice’ (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.

11.4 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

11.5 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:

- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
- *The BRE considers daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
- **No Sky Line (NSL)**, also known as **Daylight Distribution (DD)** – The daylight penetration into a room. It measures the area at desk level ("a working plane") inside a room that will have a direct view of the sky.
- *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
- **Annual Probable Sunlight Hours (APSH) -** The amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
- *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.*
- **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
- *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.*

Assessment

11.6 The analysis carried out an assessment for the properties within close proximity to the site and who would be impacted, including:

- First House, Dartmouth Park Road
- 1 Dartmouth Park Road
- 1A – 5 Chetwynd Villas
- 1 Chetwynd Road

Figure 2 – Neighbouring properties assessed in the Daylight/Sunlight Assessment

11.7 A detailed 3D computer model of the existing site, the proposed development, and all the surrounding buildings was created. The model was analysed using proprietary software to calculate the various measures of daylight and sunlight. Existing light levels were then compared with the corresponding levels with the proposed development in place. The resulting levels and their reductions were then compared to the relevant BRE report guidelines.

11.8 The figures from the assessment confirm that all windows comply with BRE guidelines in terms of VSC, NSL, and ASPH. There are mostly very minimal losses for all measurements, therefore the daylight/sunlight impact of the proposed development is acceptable. Further detail on the impacts for each property is outlined below.

<u>First House, Dartmouth Park Road</u>

11.9 This residential property is located adjacent to the subject site and will experience minimal VSC reductions to all of its principal windows, complaint with the BRE guidelines.

11.10 One secondary flank wall window (W1/40), located close to the site boundary, will experience a high proportional VSC reduction. However, the VSC to this window is low in the existing situation due to its constrained location, and therefore even a modest actual reduction, will result in an unusually large proportional reduction. It should be noted that this window serves a very well-lit multi-aspect, double height space that will not be materially impacted by the proposed development. In relation to sunlight, this

property will experience minimal reductions and will retain very high levels of sunlight, over double the suggested BRE minimums.

Nos. 1-5 Chetwynd Villas

11.11 These residential properties are located to the south of the subject site and will experience minimal daylight (VSC and NSL) reductions. The highest proportional VSC reduction is less than 11%, which fully complies with BRE guidelines.

No. 1 Chetwynd Road

11.12 This residential property is located to the south-east of the site and will experience minimal daylight (VSC and NSL) reductions. The highest proportional VSC reduction is less than 9% and the NSL reduction is negligible, which fully complies with the BRE guidelines.

Outlook and Enclosure

11.13 Due to the siting of the proposed new building and taking into consideration the separation distances from neighbouring properties (including those at Chetwynd Villas), it is not anticipated that the proposals will have a demonstrable impact on any neighbouring occupier with regards to loss of outlook or sense of enclosure.

Privacy and Overlooking

11.14 The proposal incudes new windows on four elevations, as well as private balconies on the front elevation. The proposed windows, specifically at the rear of the new building, are considered to be sufficiently set back from neighbouring properties at Chetwynd Villas to minimise privacy impacts to those occupiers. The new building has been specifically designed to minimise overlooking to the Chetwynd Villas properties, including locating bedrooms and bathrooms at the rear. The use of bedrooms is considered limited to specific times of the day compared to main living areas or kitchens, thus limiting the opportunities for overlooking. The bathroom windows will also be obscure glazed, to further limit opportunities for overlooking. The side windows serving the main stair core will also be obscure glazed to limit overlooking opportunities to neighbouring First House. All obscure glazed windows will be secured by Condition 15.

11.15 The Amenity CPG (2021) sets out the parameters of what can be considered harmful and what would not be in terms of overlooking and privacy. In terms of separation between buildings, paragraph 2.4 states that a minimum of 18m between the windows of habitable rooms in existing properties directly facing the proposed development should be sought. The properties to the south of the site at Chetwynd Villas are between 17.3m and 21.4m in distance from windows as shown in the diagram below.

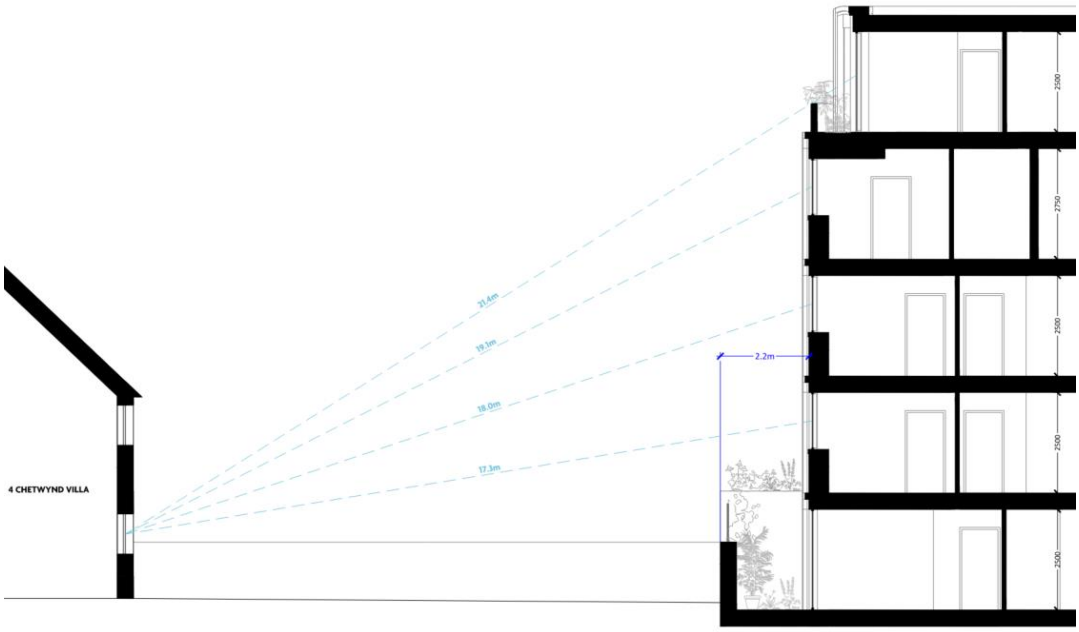


Figure 3 – Separation distances between rear elevation of Chetwynd Villas and the proposed building.

11.16 Paragraph 2.6 of the Amenity CGP states that there may also be instances where the historic character of the immediate area is composed of buildings positioned less than 18m apart and it will be appropriate to reflect this in the design of development schemes. In addition, it is suggested in the SPD that angling of the building could be a mitigation measure as it is less likely people will be able to see directly into neighbouring habitable rooms. All windows on the rear elevation are angled inwards to avoid direct view into the neighbours' window, as such, overlooking is minimised.

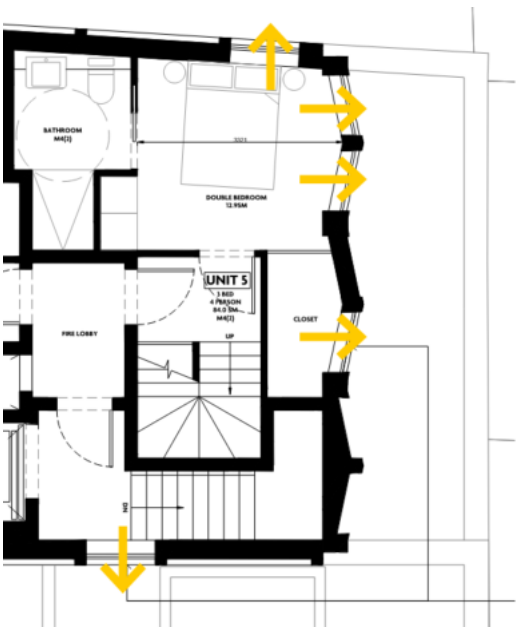


Figure 4 - Proposed third floor plan showing angled rear elevation windows.

11.17 Overall, given the employment of the mitigation measures described above, the development would not result in a significant harmful impact in terms of overlooking or loss of privacy to neighbouring occupiers.

Noise and Vibration

11.18 New plant facilities (ASHPs) are proposed to serve each of the new units, located within an enclosure at ground floor level. A Noise Impact Assessment was submitted indicating that, with the provision of mitigation measures such as acoustic enclosures, the noise emitted from the units would be within the requirements of Policy A4. The proposals have been reviewed by the Council's Environmental Health Officer who deem them to be acceptable.

11.19 Noise levels from the proposed plant facility would be controlled by Conditions 16, including a requirement for anti-vibration mounts secured by Condition 17. These conditions are included to ensure any noise and vibration from the proposed plant facility would not unduly impact on the amenity of neighbouring occupiers.

12. DESIGN & HERITAGE

Policy Context

12.1 The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance, and character of the area. The Council welcomes high quality contemporary design which responds to its context. Camden's Local Plan Document is supported by Supplementary Planning Guidance CPG (Design).

12.2 Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. To comply with Policy D2, extensions to properties within conservation areas should integrate with and enhance the host building and not be dominant or obtrusive. Similarly, new buildings within Conservation Areas are expected to contribute positively to their respective distinctive character, resulting in new buildings which preserve or enhance their special character. This includes the preservation of trees and garden spaces which contribute to the character and appearance of the Conservation Area.

12.3 Camden's Design CPG emphasises Camden's commitment to design excellence and expects development schemes to consider: the context of a development and its surrounding area; the design of the building itself; the use and function of buildings; using good quality sustainable materials; creating well connected public spaces and good quality public realm;

opportunities for promoting health and well-being; and opportunities for improving the character and quality of an area.

12.4 Para 130 of the NPPF (2025) states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances local planning authorities should refuse applications which they consider fail to make efficient use of land.

12.5 Para 73(b) of the NPPF (2025) that that small and medium sized sites make an important contribution to meeting the housing requirement of an area. To promote the development of a good mixes of sites, the LPA should support small sites to come forward for development of housing.

12.6 To create successful high-density, mixed-use places that make the best use of land, Policy GG2.C (London Plan 2021) states that those involved in planning and development must *"proactively explore the potential to intensify the use of land to support additional homes…"* and Policy H2 states that boroughs should proactively support well-designed new homes on small sites.

12.7 London Plan Policy D3.C states that incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way. Policy GG2.D goes on to state that planning must apply *"a design-led approach to determine the optimum development of capacity of sites".*

12.8 Para 3.1.7 (London Plan 2021) states that *"change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued."*

12.9 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that where the development is in a conservation area, special regard must be given to preserving or enhancing the character and appearance of that conservation area.

12.10 Any harm arising should be mitigated as far as possible, for example, through the design and approach of the scheme. Considerable weight and important must be given to any harm to designated heritage assets, and any harm

identified should be outweighed in the balance by considerable public benefits.

12.11 Paragraph 215 of the NPPF states: *215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

12.12 There are also non-designated heritage assets in the surrounding area and these most notably included building that make a positive contribution to Conservation Areas.

12.13 Any harm to non-designated heritage assets is a matter of planning balance as set out in paragraph 216 of the NPPF: *216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

12.14 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision making. The design and heritage policies in CLP policy D2 and LP policy HC1 also note the importance of character and appearance, and so officers have given great weight to these considerations. The development plan focuses on the potential impact of new development on the built environment. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets.

Dartmouth Park Conservation Area: Significance

12.15 The site is located within the Dartmouth Park Conservation Area, which has a variety and complexity that charts the history of domestic architecture from the late 18th century to the present day. Late 18th century terraces contrast with contemporary housing estates; tiny cottages, large mansion blocks and Victorian villas, all exist together in Dartmouth Park. Larger detached houses with gardens are concentrated in the heart of the estate and closer developments with smaller houses and terraces are further south and north.

12.16 In the 1860s the land behind Grove Terrace was developed to create Dartmouth Park Road and provide good quality houses set within spacious gardens that included landscaped layouts and street trees to give a semi-rural appearance. Properties are mainly handsome three-storey semi-detached villas with semi-basements, and front gardens enclosed behind low garden walls or railings. Buildings are constructed from stock brick with applied decorative details including stringcourses, eaves brackets, moulded window cases and stuccoed quoins picked out in white.

12.17 The existing building occupying the site is a two-storey detached single family dwelling built in the 1920s-30s. The house is constructed from dark red brick with a hipped roof clad in clay tiles. Windows are a mixture of aluminium and Crittall casements. The house has a generally pleasing aesthetic, but its appearance does not respond to the architectural characteristics of neighbouring buildings, it is for this reason that it has not been identified as making a positive contribution to the character and appearance of the wider Conservation Area.

Design Review Panel

12.18 The proposals were reviewed by the Design Review Panel (DRP) during the pre-application process on 15th September 2023 (Full panel review) and again on 12th April 2024 (Chair's review) following revisions to the scheme.

12.19 In the summary for the first DRP, the panel considered there was potential for a high-quality contemporary development on the site but advised that the proposal presented was too tall for the context. The building proposed looked like a mini tower rather than a house and was a storey higher than would appear comfortable in the Conservation Area setting. The comments went on to say that while the architecture of the top storey could be rethought to reduce the impression of height, the building may need to be lowered to fit into its setting. The panel was also unconvinced that the basement would provide good quality living space, or that the extra embodied carbon that it requires can be justified. The panel suggested an architectural approach should be developed that reflects the scale and verticality of surrounding buildings. Materials should be reconsidered to identify options that can provide more texture. More thinking is needed on how overlooking impacts can be mitigated for gardens to the rear of the property while still providing good quality bedrooms.

Figure 5 - Design iteration submitted to the DRP in September 2023.

12.20 Following further pre-application discussions with officers, the proposal was significantly amended to incorporate the DRP suggestions and subsequently refined the scheme to the current proposal. The amended proposal was presented to the DRP in April 2024.

12.21 Following the second DRP, the panel considered the proposals to have progressed in a positive direction since the previous review. The panel gave their support the scheme in principle but requested further refinements to ensure a high-quality building that is appropriate for the Conservation Area. While the proposed height can be justified as part of the scale change along the south side of Dartmouth Park Road, the panel asked that more recessive materials are tested for the set-back upper storey, to reduce the impression of height in views from the east.

12.22 The panel thought that the architecture is inventive, enjoyable, potentially exciting and more strongly related to the surrounding context. However, they advised that the design would benefit from some simplification to achieve a calmer effect. Stronger horizontal elements could reduce the impression of scale and connect the building to the proportions of the buildings on either side. The ground floor arches seem out of place in relation to neighbouring houses, and should be reworked, potentially becoming taller. The panel suggests using a single material for the front elevation to drive a more coherent and elegant architectural language.

12.23 In response to the Panel's comments following the second DRP review, the proposal was refined to omit the dark brick at roof level and switch the materiality to light brick and stone, thus creating a cohesive material language across the building and make the top floor more recessive. In response to the comments on including more horizontality, the front balconies have been expressed in a white stone which forms more of a connection with the stuccoed window openings of the surrounding Victorian villas. Decorative metal balustrades blending from a more solid appearance to more perforate, provide an additional layer of horizontal solidity making the window proportions more contextual and reducing the dominance of the vertical elements.

Scale and Massing

12.24 The proposed development is for a single building comprising five homes across five floors, which can be read as ground plus three storeys with a fourth floor set back roof storey. Because of its local and historical relevance, this simple and considered building typology offers good quality accommodation and is deemed to be an appropriate design response to the site.

12.25 To the north and east of the site, along Dartmouth Park Road, villa pairs alternate between 4 and 5 storeys. These contribute to the streetscape through providing a sense of enclosure to this wide street. Lamorna and its western neighbour are outliers as 2 storey buildings within this context.

Figure 6 - Existing street scene viewed southwest along Dartmouth Park Road

12.26 A rhythm of two different building heights can be observed along the Victorian properties on Dartmouth Park Road. The taller buildings are approximately 15.7m tall while the shorter buildings are 12.7m tall. The proposed building is 15m tall and follows the rhythm of alternating building heights on the street. The proposal introduces a street-facing mid-rise building that responds positively to this context. As such the height of the proposed building is considered appropriate within the established existing scale of the street. The proposal will occupy the majority of the plot but owing to the spacings between the buildings the rhythm of the street is maintained.

Figure 7 - Proposed buiding in relation to existing building heights.

12.27 The proposal represents an increase in height and massing, with the building occupying the majority of the plot. This reduces the visibility of Chetwynd Villas; however, the height of the proposed building is generally in keeping with other buildings on the street. The building height study included in the submitted documents (see figure 7) demonstrates that the rhythm of the street in terms of height is maintained with the proposals.

12.28 In response to concerns around the dominance of the top storey and to help the building sit more comfortably in its context, an arched roofline has been proposed to soften the appearance of the top floor. A significant setback has

been introduced to ensure the top floor reads as a more recessive roof form and will reduce the perceived height of the building as experienced at street level.

12.29 Thought has been given to the way the building relates to its near neighbours as well as how it fits within the context of the wider area. A single storey element housing a bin and bike store meets the western boundary adjacent to First House. Above this the building is set back 2.5m from the boundary. This replicates the way the current building addresses the site boundary with First House, stepping away at upper levels to provide a gap between the buildings, as is present in the current condition.

12.30 At the rear where visual impact and amenity is most sensitive, the massing steps away from the boundary by 2.2m to retain a distance of 17m from properties on Chetwynd Road. The rear façade has been articulated to reduce bulk, and the roof level has been set back. Angled windows to reduce the sense of overlooking and use of obscure glazing protects the amenity of the neighbouring property in line with guidance in the CPG Amenity SPD.

12.31 The front building line is set back to provide a landscaped front garden and continues the consistent street frontage provided by the neighbouring villas to maintain a good sense of enclosure.

Layout

12.32 The building is orientated towards the street and presents a strong and legible entrance. The ground floor flat is accessed via a landscaped garden. Access to the upper flats is on the western side of the site, via a single storey structure that houses bins, bikes, and an entrance into the circulation core.

12.33 At ground floor level the footprint extends to the rear boundary of the site, making an efficient use of the site. The body of the building takes a regular rectangular form in plan, with a portion cut out to the southwest of the site; here it steps in to follow the rear building line of the villas to the south and diverts the mass of the rear of the building away from the neighbouring property.

12.34 Flats are arranged as one per floor with an upper maisonette across the third/fourth floors. All flats are dual aspect with access to external space: there are balconies within the street-facing bay features, and terraces providing amenity space to the ground, and fourth floor levels. Accommodation is generous, with logical and spacious internal layouts.

Detailed Design and Materiality

12.35 The Dartmouth Park Road elevation features a set of three bays, generous window proportions and strong parapet, interpreting common architectural features found in the nearby Victorian villas. The materiality includes stock bricks, white GRC, metal balconies, and is generally considered to

compliment the Conservation Area. The image below demonstrates that, with the correctly chosen brick, the proposed building, in terms of materials would harmonise with the existing buildings.

Figure 8 - Proposed front elevation in relation to neighbouring buildings.

12.36 The building has been designed with attention to composition and detail across all elevations. To the rear, relief is created through inset stone panels. Windows are angled and glazing is obscured to protect the amenity of the residents of Chetwynd Villas. The gable elevations have been carefully designed featuring relief in the brickwork resulting in a softening of these flank walls creating visual interest from the street.

12.37 Light/buff textured handmade brick is proposed is proposed as the primary material, which is deemed appropriate due to its robustness and contextual response, and is suitable for this residential typology. Angled bays and ground floor arches will be in stone, which reference the white stucco features found on the neighbouring Victorian villas. Metalwork is used to create balconies at second and third floor levels. The proposed materials, therefore, would harmonise with the character of the wider Conservation Area and neighbouring buildings.

12.38 Earlier iterations of the design used a dark brick at roof level to echo the slate of the neighbouring buildings. DRP feedback suggested this made the top storey too dominant. The proposal was subsequently amended, and a light brick and stone employed at the top storey to create a cohesive material language across the building and make the top floor appear more recessive.

12.39 The DRP considered that introducing more horizontal elements could help to relate the proposal better to the scale of the neighbouring buildings. As such, balconies have been expressed in a white stone which forms more of a connection with the stuccoed window openings of the villas. Decorative metal balustrades blending from a more solid appearance to more perforated, provide an additional layer of horizontal solidity making the window proportions more contextual and reducing the dominance of the vertical elements.

12.40 The proposed materials are sustainable, proposed to be locally sourced, and can be re-used. They respond contextually to the established palette in the area and are welcomed in this proposal. Material details and those of the window reveals and arched openings will be secured by Condition 5 to ensure the highest quality building is delivered.

Dartmouth Park Conservation Area Impact: less than substantial harm

12.41 Since the original submission the design of the building has been altered in order to minimise the harm in line the NPPF. The basement has been removed along with the associated lightwell, resulting in an improved ground floor. There is now a landscaped garden to the front with a low boundary wall that responds well to the existing historic context.

12.42 The floor heights and proportions fail to pick up the floor heights of the adjacent semi-detached villas and do not follow the traditional hierarchy of floors principles, with windows decreasing in size as the building increases in height. This results in the first floor appearing truncated. Moreover, the large arched openings to the ground floor introduce a detail not found within the wider Conservation Area.

12.43 The projecting bays reference Victorian bay windows; however, while it is recognised that bay windows are a feature of the Conservation Area, they are not a feature of this part of Dartmouth Park Road. Where bays are present, they tend to have right angled corners rather than obtuse angles. As a result, the proposed bays introduce a geometry that it not a characteristic feature within this part of the Conservation Area.

12.44 Overall, the proposed architectural approach detracts from the adjacent ordered and classically proportioned villas. This results in less than substantial harm at the very low end of the scale.

12.45 Considerable weight and important should be given to that harm, and it should be outweighed in the balance by considerable public benefits in line with paragraph 215 of the NPPF (outlined above), including the provision of five homes on the site.

Impact on nearby Listed Buildings

12.46 An assessment of the impact of the proposed development on nearby Listed Buildings is outlined below. These include Grade II listed Grove End House and Grade II listed 1-5 Grove Terrace, located to the west of the subject site.

Grove End House (Grade II listed): Preserve

12.47 The building likely dates from 1701 and is first depicted by James Frederick King, known as Kings Panorama. In the early 19th century, the building was heavily altered or the façade completely rebuilt. During the late C19th and early C20th a third storey was added by building up the front façade and

adapting the roof to provide attic accommodation. The significance of the building is derived from the front elevation and layers of development over the last 300 years which add to its special interest.

12.48 The original setting has undergone considerable change including open fields being built on with 19th century housing and latterly 20th century infill. The proposed development is not visible from the front elevation. The proposed development will be visible from the upper storey windows but owing to the level of change within the setting it does not cause harm to the special interest or setting of the listed building.

Nos.1-5 Grove Terrace (Grade II listed): Preserve

12.49 The terrace of 5 houses date to the early 19th century. It is constructed of yellow stock brick with rusticated stucco ground floors and are four storeys with basements. The significance of buildings is due to the consistency of the group and their well-preserved nature.

12.50 The proposed development is on the opposite side of the road to the northwest of the subject site. Owing to the separation distance it will not compete with the architecture or group value of the listed terrace. The proposal preserves both the special interest and setting of these listed buildings.

Summary

12.51 Overall, the design of the building shows ingenuity in how to intensify residential development within an established residential context, through thoughtful analysis and understanding of the surrounding character. The interpretation of an historic and local building typology providing high quality accommodation, while the composition and detailing have been well considered, demonstrates a high-quality example of how to positively and sensitively plan for growth in an established residential area.

13. WASTE & RECYCLING

13.1 The scheme would provide adequate provision for storage of waste and recycling, as required by CLP policy CC5. There is an external residential refuse and recycling store facility located next to the main building entrance at ground floor level. The walking route between the building's entrance is step free and close to the highway.

13.2 The waste and recycling storage facilities for the two buildings will provide sufficient space for the required number of refuse and recycling bins, as per the Design CPG and the Council's technical guidance. Condition 10 has been attached to ensure that the bin store is installed prior to occupation of the homes.

14. SUSTAINABILITY AND ENERGY

14.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

14.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, 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.

Redevelopment strategy

14.3 The GLA's Circular Economy Statement LPG sets out a design approach for existing buildings and includes a decision tree to inform the design process from the outset. The stages are retain and retrofit; partial retention and refurbishment' disassemble and reuse; and demolish and recycle. Policy CC1 of the Camden Local Plan requires all development proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building (part e) and optimise resource efficiency (part f).

14.4 Policy CC1 seeks to respond to the significant proportion of waste and carbon generated through the demolition and construction of buildings. Maximising reuse has high potential for reducing upfront embodied carbon, which is needed to achieve short-term climate goals, such as reducing emissions by 2030 and 2050. The policy approach is supported by the NPPF (paragraph 161), the National Design Guide, and the London Plan (Policy D3) and London Plan Guidance Circular Economy 2.4.2. To follow the approach set out in Figure 3 (London Plan Policy D3 Figure 3.2), retaining existing built structures totally or partially should be prioritised before considering substantial demolition, as this is typically the lowest carbon option.

14.5 Feasibility studies were undertaken to explore whether full retention and refurbishment of the existing building was feasible and could deliver the development objectives. A report entitled 'Condition and Feasibility Study, with Whole Life Carbon Assessment' was submitted with the application that looked at the potential for reuse of the existing building, its opportunities and limitations, together with its condition. Consideration of development options which retain the whole or part of the existing building has been made – refit, refurbish, substantial refurbish and extension, and reclaim and recycle.

14.6 The refit option retains the existing structure as is, includes minor works, and the replacement of building services such as heating and insulation, to continue occupation of the building. This option was discounted as it would

not allow for the creation of additional homes given the constraints of the existing floorplan and building footprint, resulting in the optimal site capacity not being met.

14.7 The refurbish option seeks to significantly improve the service life of the existing building and provides an opportunity to retrofit the building to reduce carbon emissions and include sustainable adaptation measures. This option was explored but ultimately discounted as it was considered difficult to reconfigure and refurbish the existing building to provide additional dwellings while also balancing the optimum site capacity and viability.

14.8 The substantial refurbishment and extension option includes the above but takes into consideration the need to optimise site capacity and alter the existing building to meet future needs. This may involve significant changes to the façade (façade replacement) but should seek to retain as much of the existing building as possible reducing the need to use new materials and reduce the loss of embodied carbon in the existing structure. This option was explored and could offer the potential for one additional studio dwelling thus reducing the new build elements and reduced embodied carbon impacts. The extension would be built in line with new Building Regulation criteria and thus the spaces should be highly efficient in terms of operational energy requirements. Nevertheless, although the energy performance of the existing residential units will also be improved though the refurbishment, operational emissions in these spaces will not be as low as a new build development given limitations associated with improving fabric efficiency of an existing building.

14.9 However, the substantial refurbishment and extension option would not fully optimise the site's potential in line with LP policy D3, which seeks to make the best use of land. There are physical and structural limitations of the site with regards to how far the building could be extended before the scheme is ultimately left with essentially a new building, but still providing slightly less good quality homes, diminishing the overall benefit of this approach. Additionally, it may be challenging to deliver new properties that meet all technical standards, such as private amenity space, refuse and cycle storage, and accessibility requirements. In order to subdivide the building into multiple self-contained dwellings, significant structural replacement would be required. Given the above, a substantial refurbishment and extension option is not considered a viable proposal for the site.

14.10 It is recognised that these limitations outlined above are not insurmountable and there will be cases where a building has similar features and a full retention and retrofit options is the best-case scenario. However, in this case, the proposal seeks development on the site to increase site capacity and provide new self-contained housing. Full retention of the existing building would not allow the site to realise its full potential.

14.11 To ensure greater resource efficiency through recycling and reuse of materials, Condition 3 has been attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use is attached in line with policy S12 of the London Plan.

Whole Life Carbon

14.12 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life.

14.13 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).

14.14 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are "regulated emissions" and so are considered separately and in detail in relation to the zero-carbon target (see the "Energy and carbon reductions" section below).

14.15 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).

14.16 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again at the end of its life (when it decomposes), so it is included in the total A-C-Modules.

14.17 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent ($kgCO_2e/m^2$ GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The table below shows how the development performs against the benchmarks, as well as the aspirational targets.

Modules	Min benchmark RESIDENTIAL ($kgCO_2e/m^2$ GIA)	Aspirational Benchmark for RESIDENTIAL ($kgCO_2e/m^2$ GIA)	Proposal ($kgCO_2e/m^2$ GIA)
A1-A5	<850	<500	780
B-C (excl B6 & B7)	<350	<300	448
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1,135

Table 6 - Summary of Whole-Life Carbon results for the residential development

14.18 In this case, the development generally meets the benchmarks as shown above, although does not quite meet the minimum benchmark for B-C. This is mainly down to lack of reasonable information at early design stages, including unknowns in terms of specific materials and quantities. The proposal does not surpass the aspirational benchmarks but further work through the energy and sustainability plans (secured by S.106 Agreement) can help bring it closer to those minimum and aspirational targets, as well as confirmation at a later stage when materials and quantities are confirmed. A Condition 11 is attached to make sure a post construction assessment of WLC is completed and provided for monitoring and compliance.

Energy and Carbon Summary

14.19 To minimise operational carbon, development should follow the energy hierarchy in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2). The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

14.20 Paragraph 8.8 of the Local Plan requires all new residential development (of 1 – 9 dwellings) to meet a 19% reduction in carbon dioxide, below Part L of the 2013 Building Regulations. Reductions are measured against a baseline, the requirement set out in the Building Regulations.

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	11%
Be green stage (renewables): CLP policy CC1	20%	71%
Total carbon reduction: LP policy SI2 and LP CC1	35%	82%

Table 7 - Carbon saving targets and the scheme results

14.21 In this case, the development far exceeds the policy target of 19% reductions, achieving an excellent overall on-site reduction of 82% below Part L requirements, as shown in the table below.

14.22 In terms of Be Clean, Combined Heat and Power (CHP) and connection to district heat networks are unsuitable due to the location of the scheme.

14.23 In terms of Be Green, space heating will be provided via a central high-efficiency Air-Source Heat Pump system. Condition 14 has been included to require that the air-source heat pump not be used for air conditioning, as active cooling is discouraged. PV panels will also be included on the roof, the details of which will be secured by Condition 8.

14.24 In terms of Be Lean, the use of water-efficient fittings and decreased hot water temperatures will minimise the energy use associated with Domestic Hot Water (DHW). The proposal uses high-efficiency Mechanical Ventilation with Heat Recovery (MVHR). The system will have a summer bypass to support nighttime free cooling of thermal mass. Low-energy fixed lighting, generally comprising high-efficiency LED fittings, will be installed throughout the property. All building services systems will comply with and exceed the efficiency requirements outlined in the Building Service Compliance Guide.

14.25 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by S.106 Agreement which includes monitoring, in compliance with the development plan.

Climate change adaption and sustainable design

14.26 The proposal includes sustainable drainage and biodiverse, blue, or green roofs. Active cooling is not proposed, and the proposal uses passive measures such as deep window reveals, high-performance glass, and aspects to avoid or minimise active cooling (air conditioning) in line with policy CC2.

14.27 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.

14.28 In this case, the development incorporates SUDS measures given the flooding concerns on the site (see next section). Furthermore, the proposal also includes the provision of a green roof integrated with the PV solar panels, which would enhance the biodiversity of the site and reduce water runoff. Details of this system will be secured by Condition 12. Condition 22 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in the ‘Flood risk and drainage’ section of this report.

15. FLOODING

15.1 The subject site is located on a previously flooded street and in a Local Flood Risk Zone but is for a minor development with no basement. A green roof is proposed with rainwater harvesting and an attenuation tank which would help to reduce run off in this area of high flood risk. The runoff for a 1 in 100-year storm would be reduced from a current rate of 10.6l/s to 2l/s. Condition 12 has been included to ensure the proposed sustainable drainage system is installed and maintained in accordance with the approved plans.

16. TRANSPORT

16.1 The subject site has a PTAL score of 4 which indicates that it has a good level of accessibility by public transport – 482m from Gospel Oak Overground Station, 804m from Tufnell Park Underground Station, and 965m from Kentish Town Underground Station. Local bus stops are also located close to the site at the junction of Dartmouth Park Road and Highgate Road.

16.2 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.

16.3 In line with Policy T1 of the Local Plan, the Council expects cycle parking at developments to be provided in accordance with the standards set out in the London Plan. The London Plan requires 1 space for a 1 bed/studio, 1.5 spaces for a 2bed, and 2 spaces for all other dwellings for long stay – resulting in a total residential requirement of 8 spaces.

16.4 The submitted plans show the provision of a 10-space long-stay cycle store (in the form of five two-tier cycle racks) at ground floor level accessed from the side entrance to the building. Two short-stay visitor cycle parking spaces are also provided at the entrance to the site. This is considered acceptable and would be secured by Condition 13.

16.5 In accordance with CLP Policy T2, all five home will be secured as on-street Residents parking permit (car free) by means of a S.106 Agreement. This will prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport.

16.6 Given the sensitive residential location of the site and extent of demolition and construction works proposed, it is recommended that a Construction Management Plan and associated Implementation Support Contribution of £4,194 and Impact Bond of £8,000 be secured by means of the S.106

Agreement. This will help ensure that the proposed development is carried out without unduly impacting neighbouring amenity, or the safe and efficient operation of the local highway network, in line with policy A1.

16.7 The applicant would be financially responsible for any works relating to changes or repairs to the highway. The Council therefore seeks to secure a highways contribution to make any changes or repairs to the public highway in the direct vicinity of the development. This will be secured by S.106 agreement if planning permission is granted. The redevelopment of the site is also likely to lead to damage to the adjacent footway on Dartmouth Park Road. It is therefore suggested that a highway contribution of £12,000 be secured by means of the S.106 Agreement if planning permission is granted.

16.8 Overall, the proposal complies with Camden's Transport policies, securing sufficient cycle parking, providing car free development, and ensuring the development's impacts and construction are managed correctly.

17. BIODIVERSITY NET GAIN

17.1 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).

17.2 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.

17.3 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits.

17.4 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP because it is below the *de minimis* threshold. This is because it does not impact an onsite priority habitat and impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat.

18. COMMUNITY INFRASTRUCTURE LEVY (CIL)

18.1 The CIL applies to all proposals which add 100m2 of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m2) multiplied by the rate in the CIL charging schedule. The total payable CIL amount has been calculated at £257,863.47, which includes a MCIL payable amount of £28,800.00 and CCIL payable amount of £229,063.47.

19. CONCLUSION

19.1 The scheme is a creative and innovative proposal which aims to make more efficient use of land, providing much needed homes in a highly sustainable location that would comfortably integrate within and contribute to the vitality of the area. The demolition of the existing building has been justified in sustainability terms, as its removal and erection of a new building on the site offers the greatest potential to deliver additional high-quality homes.

19.2 The proposal has been carefully designed to minimise impact on neighbouring residential amenity including impacts on daylight/sunlight, outlook, and privacy, including maintaining sufficient separation distances, locating terraces to the front elevation, and utilising obscure glazed windows on sensitive elevations.

19.3 The design and material palette is high-quality; however, officers have identified less than substantial harm (very low end) to the Dartmouth Park Conservation Area due to the proposed architectural approach detracting from the adjacent ordered and classically proportioned villas. The massing and scale of the proposed building is considered appropriate within the site's context.

19.4 This harm should be given considerable weight and importance in decision making. However, the level and nature of the harm have been carefully considered and viewed in the context of the fact that the development comes with increased density which would deliver five homes, four of which would be suitable for families for which there is a great need. Given the council's current housing delivery position, significant weight should be given to the housing delivery.

19.5 As well as supporting the environmental improvements through car-free development, the proposal also exceeds key energy and carbon reduction targets through sustainable development. The scheme provides residential growth in an area with good walkability and access to public transport services.

19.6 The scheme complies with the development plan as a whole and is recommended for approval.

Public benefits

19.7 Harm has been identified to heritage assets, but that harm is on the very low end of less than substantial. Considerable weight and importance must be given to that harm and there are a number of public benefits that outweigh that harm.

- Provision of 5 new homes on the site (an uplift of 4), including larger family sized homes, while supporting sustainable modes of transport through car free development.
- Significantly exceeding energy and carbon reduction targets through a highly sustainable development.
- Contributions towards the provision of local infrastructure and facilities through CIL.

20. RECOMMENDATION

20.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- Construction management plan (CMP)
- CMP implementation support contribution of £4,194
- CMP Impact Bond of £8,000
- Highways Contribution £12,000
- Car free
- Viability review - Deferred Affordable Housing Contribution
- Energy and Sustainability Plan

21. LEGAL COMMENTS

21.1 Members are referred to the note from the Legal Division at the start of the agenda.

22. CONDITIONS

Standard conditions

1 Time Limit

The development hereby permitted must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 Approved Drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

A001 P1, A100 P1, A101 P1, A102 P1, A103 P1, A104 P1, A110 P2, A112 P2, A113 P2, A114 P2, A115 P2, A116 P2, A117 P2, A200 P1, A201 P1, A202 P1, A203 P1, A210 P2, A211 P2, A212 P2, A213 P2, A300 P1, A310 P2, Location Plan

Covering Letter (prepared by Maddox Planning, dated 11/08/2025), Design and Access Statement Addendum (prepared by Bureau de Change, dated August 2025), Heritage Statement (prepared by HCUK, dated July 2025), Planning Statement (prepared by Maddox Planning), Daylight and Sunlight Report V4 (prepared by Point2, dated July 2025), Flood Risk Assessment Rev 01 (prepared by Aegaea, dated 25/07/2025), Surface Water Drainage Strategy Rev 02 (prepared by Aegaea, dated 25/07/2025), London Sustainable Drainage Proforma, Sustainability & Energy Statement V2 (prepared by Ensphere, dated December 2025), Development Options Appraisal (prepared by Bureau de Change, dated July 2025), Condition and Feasibility Study with Whole Life Carbon Assessment V3 (prepared by Ensphere, dated December 2025), Whole Life Carbon – Assessment Excel Template, ASHP Data Sheet (Mitsubishi Ecodan R32), Plant Noise Assessment Rev D (prepared by ALN, dated 03/07/2025), Addendum Financial Viability Assessment Report (prepared by Roscoe Group, dated July 2025), Financial Viability Assessment Audit – Addendum Report 2 (prepared by BPS, dated 03/09/2025)

Reason: For the avoidance of doubt and in the interest of proper planning.

Pre-start conditions (any works)

3 Construction and Demolition Waste

Prior to commencement of development, a waste management plan shall be submitted demonstrating how 95% of construction and demolition waste will be reused/recycled/recovered and 95% of excavation waste used for beneficial purposes. A minimum of 20% of the total value of materials should derive from recycled and reused content. The plan shall thereafter be delivered in accordance with the approved details.

Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the London Plan 2021.

4 Tree Protection Measures

Prior to the commencement of any works on site, details demonstrating how trees to be retained shall be protected during construction work shall be submitted to and approved by the local planning authority in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.

Pre-start conditions (other than demolition or site clearance)

5 Detailed Design Drawings and Samples

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance), detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

a) Detailed drawings including plans, coloured elevations and sections of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;

b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and

c) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.

d) Detailed drawings of the boundary walls at a scale of 1:20 and manufacturer’s specifications details on the proposed brick and samples of those materials to be provided.

e) Details of integrated bird and bat boxes, and insect habitats.

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1, D2, and A3 of the Camden Local Plan 2017.

6 Landscaping

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance), no development shall take place until full details of hard and soft landscaping and means of enclosure of all

un-built, open areas have been submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017.

Prior to above ground works

7 Green Roof Details

Prior to commencement of above ground works, full details of the living roofs in the areas indicated on the approved roof plan shall be submitted to and approved in writing by the local planning authority. The details shall include:

a) a detailed scheme of maintenance
b) sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used
c) full details of planting species and density.

The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

8 PV Panel Details

Prior to commencement of above ground works, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.

9 ASHP Details

Prior to commencement of above ground works, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more) and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall

be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.

Prior to occupation or use

10 Waste and Refuse Storage

The refuse and recycling facility as approved shall be provided prior to the first occupation of any of the new homes and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

11 Whole Life Carbon Assessment

You must apply to the LPA for approval of an updated version of the Whole Life Carbon Assessment hereby approved at each of the following stages of development:

(a) Prior to commencement of any work on site including all works of deconstruction and demolition.

(b) Prior to commencement of any construction works.

Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 780kgCO2e/m2 and/or Whole Life Carbon (A1-C4) above 1,135kgCO2e/m2, which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. You must not commence any work on site and/or construction works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

Reason: To ensure the development minimises carbon emissions throughout its whole life cycle and optimises resource efficiency in accordance with Policy SI2 in the London Plan 2021 and Policy CC1 of the Camden Local Plan.

12 SUDS

The sustainable drainage system as approved (Surface Water Drainage Strategy v2 by Aegaea 25.7.25) shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water and to achieve a discharge rate of no more than 2l/s . The system shall include rainwater harvesting with 6m3 capacity, an attenuation tank with 8m3 capacity and 110m2 green roof, as stated

in the approved drawings and shall thereafter retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.

13 Cycle Parking

Prior to first occupation of the development, the approved long-stay cycle parking facility comprising a cycle storage room with 5no. two tier racks for 10x bicycles as well as short-stay cycle parking facility comprising 1no. Sheffield stand for 2x bicycles, shall be provided and shall thereafter be permanently maintained and retained as such.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

14 ASHPs – Active Cooling

Prior to first use of the air source heat pumps hereby approved to serve the residential dwellings, the active cooling function shall be disabled on the factory setting and the air source heat pumps shall be used for the purposes of heating only.

Reason: To ensure the proposal is energy efficient and sustainable in accordance with policy CC2 of the London Borough of Camden Local Plan 2017.

15 Obscure Glazed Windows

Prior to occupation of the development hereby permitted, the windows to the rear and side elevation, as indicated on the approved drawings, has be fitted with obscure glass and permanently retained and maintained thereafter.

Reason: To prevent unreasonable overlooking or neighbouring premises in accordance with policy A1 of the Camden Local Plan 2017.

Compliance conditions

16 Plant Noise Limits

The external noise level emitted from plant, machinery or equipment at the development, with any specified noise mitigation hereby approved, shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

17 Plant Anti-vibration Isolators

Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

18 Controlling use – residential only for permanent accommodation

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 2020, or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the residential flats hereby permitted shall only be used for permanent residential accommodation, and not for temporary sleeping accommodation (tenancies of fewer than 90 days) or for any other purposes whatsoever.

Reason: To protect the permanent residential accommodation in the borough in accordance with Policies H1 and H3 of the London Borough of Camden Local Plan 2017.

19 No additional external fixtures

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the building, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.

20 Roof Terraces

No flat roofs within the development shall be used as terraces/amenity spaces unless marked as such on the approved plans, without the prior approval in writing of the Local Planning Authority.

Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy A1 of the Camden Local Plan.

Building regulations (imposed optional requirements)

21 Wheelchair and accessible homes (building control optional requirements)

The Unit 1 shown labelled on the approved floorplans shall be constructed as Wheelchair Adaptable Dwellings to comply with Part M4(3) of the Building Regulations.

All other dwellings hereby permitted shall be constructed to comply with Part M4(2) of the Building Regulations.

Reason: To secure appropriate access for disabled people, older people, and others with mobility constraints, in accordance with policies H6 and C6 of the Camden Local Plan 2017.

22 Water use (building control optional requirements)

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, with an additional 5 litres/person/day for external water use.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

23. INFORMATIVES

1	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
2	Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00- and 18.00-hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
3	This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.
4	You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at https://www.camden.gov.uk/about-construction-managementplans. No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.

5	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, tree protection, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from TfL (on Finchley Road) and/or the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. No licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
6	All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden,gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444) Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.
7	Note that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Team, 5 Pancras Square, London, N1C 4AG (Tel. No. 020 7974 4444) or by email to: planningobligations@camden.gov.uk
8	You are reminded that this decision only grants permission for permanent residential accommodation (Class C3). Any alternative use of the residential units for temporary accommodation, i.e. for periods of less than 90 days for tourist or short term lets etc, would constitute a breach of condition and would require a further grant of planning permission.
9	Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
10	If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at www.thameswater.co.uk/buildingwater
11	Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to their website:

	www.thameswater.co.uk/developers/largerscale-developments/planning-your-development/working-near-our-pipes
12	Biodiversity Net Gain (BNG) Informative (1/3): The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless: (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements. Based on the information provided, this permission will not require approval of a BGP before development is begun because it is below the de minimis threshold.
13	Biodiversity Net Gain (BNG) Informative (2/3): ++ Summary of transitional arrangements and exemptions for biodiversity gain condition The following are provided for information and may not apply to this permission: 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because of one or more of the reasons below: - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High

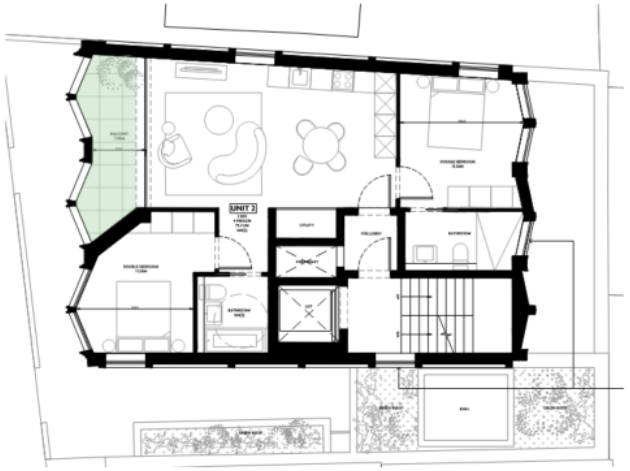
	Speed 2).
14	Biodiversity Net Gain (BNG) Informative (3/3): + Irreplaceable habitat: If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits. ++ The effect of section 73(2D) of the Town and Country Planning Act 1990 If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP. ++ Phased development In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.


DARTMOUTH PARK ROAD
CHETWYND ROAD
Chetwynd Villas
GROVE END
Lamorna
First House
Lynton Villa
Grove End House
1 to 5
Highgate Road Chapel
1 to 15 Grove View Apartments
Posts
Posts
51.0m
47.8m
25.0m
50.0m
N

Aerial view of the site

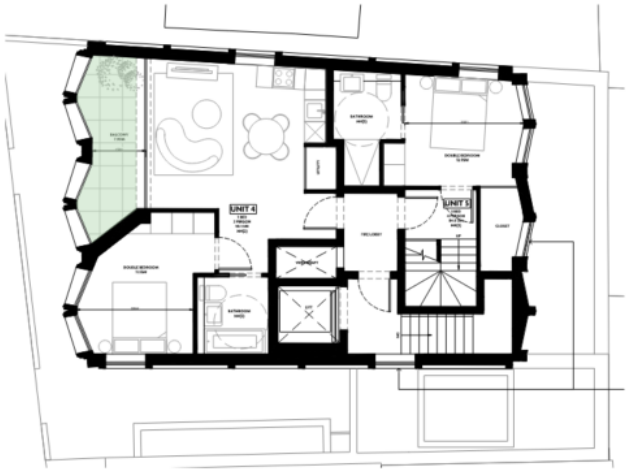
Proposed Rear Elevation

Ground Floor
Unit 1: 13.7sqm

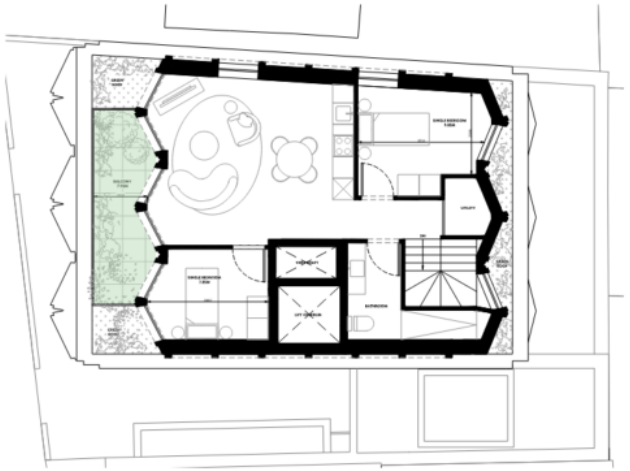


First Floor
Unit 2: 7.9sqm

Second Floor
Unit 3: 7.9sqm



Third Floor
Unit 4: 7.9sqm



Fourth Floor
Unit 5: 7.9sqm

Private Outdoor Amenity Space

Lamorna, Dartmouth Park Road, London, NW5 1SU

Addendum Report 2

Prepared on behalf of the London Borough of Camden

Issued: 3rd September 2025

Planning Reference: 2025/1375/P

BPS Chartered Surveyors

215a High Street, Dorking RH4 1RU
www.bps-surveyors.co.uk

Contents

1.0 Introduction

1.1 BPS Chartered Surveyors have been instructed by the London Borough of Camden ('the Council') to provide a review and analysis in response to the Roscoe Group ('RG') Addendum dated July 2025, prepared on behalf of HGG London Limited ('the Applicant') in connection with the redevelopment of the above site.

1.2 The following reports have been previously issued in relation to this site:

- RG's Financial Viability Assessment ('FVA') dated October 2024
- BPS' FVA review issued on 2nd May 2025
- RG's Addendum dated May 2025
- BPS' response dated 5th June 2025

1.3 This addendum should therefore be read in conjunction with the above reports.

1.4 We concluded in our previous report that the proposals produced a deficit of -£853,684 and, on this basis, no affordable housing contribution could viably be provided.

1.5 RG's Addendum has now been issued in connection with the change of design to the proposed scheme. We understand that the proposals have been revised to omit the basement level, in order to mitigate the perceived flood risk. The proposed scheme would now comprise a three-bedroom duplex and a two-bedroom apartment at ground level, resulting in a reduction to the total number of units in the scheme to five.

1.6 Having considered RG's latest comments, the following table summarises our ***current*** respective positions:

Input	RG May 2025	BPS June 2025	RG July 2025	BPS Sept 2025	Comments
Income					
Open Market Sales	£4,482,000 (£9,698psm/ £901psf)	£5,238,000 (£11,334psm/ £1,053psf)	£4,006,000 (£11,528psm/ £1,071psf)	£4,296,000 (£12,367psm /£1,149psf)	Disagreed
Expenditure					
EUV	£1,700,000	£1,700,000	£1,700,000	£1,700,000	Agreed
Landowner Premium	0%	0%	0%	0%	Agreed
Benchmark Land Value	£1,700,000	£1,700,000	£1,700,000	£1,700,000	Agreed
Build Costs (inc. contingency)	£2,396,160	£2,396,160	£1,966,929	£1,865,391	Disagreed
Contingency	5%	5%	5%	5%	Agreed
Professional Fees	10%	10%	10%	10%	Agreed

OMS Marketing, Legal & Agent Fees	2.5%	2.5%	2.5%	2.5%	Agreed
CIL	£322,026	£322,026	£251,793	£251,793	Ambiguous - We require confirmation from the Council on this input.
Finance	7.5%	7.5%	7.5%	7.5%	Agreed
OMS Profit (on GDV)	17.50%	17.50%	17.50%	17.50%	Agreed
Development Timeframes					
Pre-construction Period	6-months	6-months	6-months	6-months	Agreed
Construction Period	10-months	10-months	10-months	10-months	Agreed
Pre-Sales	40%	40%	40%	40%	Agreed
Sales Period	2-months	2-months	2-months	2-months	Agreed
Viability Position	-£1.28m	-£853,684	-£1.12m	-£988,339	Disagreed
Actual Profit (on GDV)	-8%	1.3%	-15.8%	-5.5%	Disagreed

1.7 Our updated conclusions are as follows:

- Having reviewed RG's submission, we have disagreed with their GDV and build costs. Details are outlined in the following sections of our report.
- Nevertheless, we conclude the scheme to be in a deficit position of -£988,339 and, on this basis, the scheme cannot viably contribute towards affordable housing.
- We consider there to be limited comparables of other developments of a similar specification and boutique character of the proposed scheme. The available evidence is of inferior schemes and as such there is ambiguity over the achievable values for this development. Whilst we expect it to achieve a premium above these comparables we have cautiously priced the scheme to be more in keeping with the inferior evidence, noting this is the only evidence available at this stage. As a result of this ambiguity, we recommend that the scheme is subject to review mechanisms in order that the viability is monitored over the life of the development.
- We also note that our respective assessments result in the scheme generating a net loss (i.e. no profit return to the developer and an actual financial loss). We question why the Applicant would pursue a loss making development. RG should demonstrate how this scheme is deemed commercially deliverable.

1.8 It can be seen that the viability position of the proposed scheme has worsened as a result of a reduction in the number of units.

1.9 This Addendum provides a response to RG's latest report as requested by the Council.

2.0 FVA Checklist

2.1 On the 10th April 2025 we sent RG a request to provide the following information to assist with our review of the FVA. A further request for information was made in previous report. The table below summarises the documentation received at the date of this submission.

Existing Site	
Land ownership plan	Downloaded.
Measurements of the Existing Site / Buildings	Downloaded.
Floor plans	Downloaded.
Detailed Description of the existing site	Downloaded.
A schedule of condition	Outline provided
External Photographs of the Existing Site / Buildings	Downloaded.
Internal Photographs of the Existing Site / Buildings	Received
Recent transactional evidence to support their BLV assumptions	Downloaded.
Proposed Development	
Application plans	Downloaded.
Accommodation schedule	Downloaded.
Measurements for the proposed scheme (GIA/ NIA)	Downloaded.
Design and Access statement	Received Updated
Planning Statement	Downloaded.
Detailed design specification	Outline provided
Recent transactional evidence to support their GDV assumptions	Downloaded.
Modelling used to generate values (Residential)	Downloaded.
Construction	
A detailed cost plan	Downloaded.
Live Excel copy of cost plan	Received.
Development programme	Outline provided
Appraisals	
Copy of the live Argus appraisal	Received.

3.0 Summary of RG's Response Dated July 2025

3.1 We have previously reached the agreement on a number of inputs, with the exception of the private residential GDV.

3.2 RG have maintained the majority of their assumptions from their earlier reports, with the exception of the following, which are directly impacted by the reduction in the number of units now proposed:

- Gross Development Value
- Build Costs
- CIL

3.3 We consider the salient points of RG's report below.

4.0 Gross Development Value

RG May 2025	BPS June 2025	RG July 2025	Overall
£4,482,000 (£9,698psm/ £901psf)	£5,238,000 (£11,334psm/ £1,053psf)	£4,006,000 (£11,528psm/ 1,071psf)	Disagreed

4.1 We have previously adopted the following GDV in our assessment:

BPS Previous Assessment					
Unit no	Beds	Size (sf)	Amenity	BPS' Value	BPS' £psf
Unit 1	3	1259	Private Terrace	£1,335,000	£1,060
Unit 2	1	665	Balcony	£707,000	£1,063
Unit 3	2	809	Balcony	£850,000	£1,051
Unit 4	2	809	Balcony	£850,000	£1,051
Unit 5	1	547	Balcony	£596,000	£1,090
Unit 6	2	883	Balcony	£900,000	£1,019
Total	6	829		£5,238,000	£1,053

4.2 We understand the revised scheme will comprise a total of 5 flats, with the values assumed by RG as follows:

RG Current Assessment					
Unit no	Beds	Size (sf)	Amenity	RG' Value	RG' £psf
Unit 1	2	678	Private Terrace	£710,000	£1,047
Unit 2	2	809	Balcony	£850,000	£1,051
Unit 3	2	809	Balcony	£850,000	£1,051
Unit 4	1	539	Balcony	£596,000	£1,090
Unit 5	3 (Duplex)	904	Balcony	£1,000,000	£1,106
Total	5	748		£4,006,000	£1,071

4.3 We note that in their assessment, RG have now assumed a lower value for the 3-bedroom flat on account of it being located on the top (4th) level of the building and in their view this would not be desirable for families. No justification or evidence has been provided to support this opinion. We note that generally, duplex units located on the upper floors typically achieve higher values on account of better views and more privacy and less noise from the street level

or flats above . On this basis, we consider RG's statement to be unjustified and somewhat irrelevant. .

4.4 We note that although RG's value on a £psf basis broadly aligns with our previous assumption, a different unit mix is now being proposed with a smaller average unit size overall. We have therefore sought to verify the reasonableness of RG's assumptions in light of previously provided evidence base. We have also conducted additional search into more recent transactions to identify any movements in values since our most recent assessment.

4.5 Overall, we maintain the view that the values of the large 2-bedroom units and 1-bedroom units (Units 2, 3 & 4) adopted by RG are appropriate and align with our previous assessment.

4.6 However, the value now attributed to the small two-bedroom flat (Unit 1) is lower on a £psf basis in comparison to larger units which we would not expect given that the £psf is typically higher for smaller units. In addition, the unit benefits from larger private amenity space (13sqm) in comparison to other 2-bedroom flats (7sqm) and it is unclear how RG have taken this into account.

4.7 In our previous reports, we considered Highgate Central to be a good comparable, given it is new build and in close proximity to the subject site. The two-bedroom units in this development measure c. 755 sq ft on average and are advertised at c. £850,000 (£1,123 psf). In our most recent Addendum (May 2025), we explained that the proposed scheme would be superior to Highgate Central, given its location and boutique character. It is clear that Highgate Central units on average, are larger than Unit 1 of the proposed scheme. Therefore, we are of the view that Unit 1 would achieve a higher value on a £psf basis.

4.8 We also note that the second-hand, two-bedroom property at Chetwynd Road, located within a 3-minute walk of the subject site, is currently on the market for £800,000 (£1,240 psf). The property is broadly similar in size to the subject and also benefits from a large private terrace. In addition, it has been recently refurbished:

4.9 We are of the view that the proposed scheme would be of a superior condition to the Chetwynd Road property. Noting, however, that caution needs to be taken as the asking price could be subject to a discount via negotiation.

4.10 On this basis, we are of the view that the value attributed by RG to Unit 1 has been understated.

4.11 Moreover, we previously referred to 17b Lauriel Road, which is a second-hand, 3-bedroom flat located within a 3-minute walk of the subject site. The property was sold for £1,335,000 (£1,092 psf) and comprises 1,222 sq ft. This is larger than the proposed unit; however, it needs to be noted that it is not new build, which is clear from the photos below:

4.12 RG's pricing reflects only a marginal, 1.2%, increase on a £psf basis in comparison to the second-hand, dated flat, which we do not consider reasonable. We are of the view RG's pricing does not appropriately reflect the new build premium and improved quality of proposed accommodation.

4.13 Having searched further comparable evidence, we have identified the 3-bedroom, 2-bathroom property at Flat 2, 44 Dartmouth Park Road, London, NW5 1SN, located within a 2-minute walk of the site. The property was sold in September 2024 and achieved £1,320,000 (£1,238 psf). The property also comprises a slightly larger floor area (1,065 sqft) than the subject 3-bedroom; however, it is clear that it achieved a higher value on a £psf basis than the RG's value for the proposed unit.

4.14 We have not been able to obtain photos of the comparable; however, we understand from Housemetrics database that the EPC was issued for the property in 2019 due to the property being newly developed. In addition, we understand the planning application was granted for the conversion of the existing building to create new dwellings. On this basis, although the property is clearly not a new build, we assume it to be in a modern condition, given it has been developed relatively recently.

4.15 Given the above reasons, we are of the view that the value of the 3-bedroom property adopted by RG has been understated.

4.16 We are of the view that the 3-bedroom duplex property would likely achieve at least £1,200,000 (£1,327 psf). Our assessment reflects a reduction to the capital value achieved at Flat 2, 44 Dartmouth Park Road.

4.17 Our revised values are summarised below:

Current Assessment								
Unit no	Beds	Size (sf)	Amenity	RG' Value	RG' £psf	BPS' Value	BPS' £psf	Position
Unit 1	2	678	Private Terrace	£710,000	£1,047	£800,000	£1,180	Disagreed
Unit 2	2	809	Balcony	£850,000	£1,051	£850,000	£1,051	Agreed
Unit 3	2	809	Balcony	£850,000	£1,051	£850,000	£1,051	Agreed
Unit 4	1	539	Balcony	£596,000	£1,090	£596,000	£1,106	Agreed
Unit 5	3 (Duplex)	904	Balcony	£1,000,000	£1,106	£1,200,000	£1,327	Disagreed
Total	5	748		£4,006,000	£1,071	£4,296,000	£1,149	

4.18 Our assessment reflects an increase in the proposed scheme GDV by £290,000 (c. 7%) in comparison to RG's figures.

4.19 Given the lack of directly comparable evidence we consider it essential that this scheme is subject to review mechanisms.

5.0 Build Cost

RG May 2025	BPS June 2025	RG July 2025	Overall
£2,396,160	£2,396,160	£1,966,929	Disagreed

5.1 In the light of changes to the design, RG have submitted new cost informaiton which shows an decrease in the total build costs from £2,396,160 to £1,966,929.

5.2 Our Cost Consultants, Concord Consulting Ltd ('CCL'), have analysed the build cost plan for the proposed scheme prepared by PSP Consultants, dated October 2024, and conclude that:

"The benchmark analysis shows that the original rate received of £4,054/m2, which sits between the upper quartile and the highest costs. Once CCL have adjusted and adjusted/removed costs for benchmarking purposes, the comparable rate is £3,740/m2, which is still between the upper quartile and highest cost; however, this is due to the location and constraints of the site, which is deriving this higher rate.

"Adjustments have been made to the Base Costs as 3.2.14 and summarised in figure 2."

"Based on the below figure of £1,865,391 divided by the GIA reported of 421m2; the out-turn cost equates to an all-in rate of 4,430/m2 or £411/ft2."

5.3 CCL's resulting construction costs of £1,865,391 (inc. contingency), reflects a reduction of c. £101,538 (5%) on the Applicant's figure. On this basis, we have adopted the CCL's cost in our appraisal.

5.4 CCL's full cost report can be found at Appendix 1.

6.0 CIL

RG May 2025	BPS June 2025	RG July 2025	Overall
£322,026	£322,026	£251,793	Ambiguous - We require confirmation from the Council on this input.

6.1 In their current assessment, RG have reduced their CIL allowance from £322,026 to £251,793. We have adopted RG's figure in our assessment; however, we request that the Council verify this amount.

7.0 Benchmark Land Value

RG May 2025	BPS June 2025	RG July 2025	Overall
£1,700,000	£1,700,000	£1,700,000	Agreed

7.1 The existing site comprises a 1,624 sqft (151 sqm) four-bedroom detached house, built in the early 1900s. We have previously agreed at EUV of £1,7000,000 with RG. Given that the EUV reflects the Market Value of the site, no additional Landowner's Premium was adopted.

7.2 We have checked the recent market transactions to determine whether there was any movement in values since our last assessment. Having searched transactions located within 1 mile of the site, we have not identified any relevant, recent transactions that would change our previously adopted figure.

7.3 On this basis, we maintain our previous assessment to be appropriate.

8.0 Development Timescales

Timeframes	RG May 2025	BPS June 2025	RG July 2025	Overall
Pre-Construction	6- months	6- months	6- months	Agreed
Construction	10- months	10- months	10- months	Agreed
Off-Plan Sales	40%	40%	40%	Agreed
Sales Period	2- months	2- month	2- month	Agreed

8.1 Our Cost Consultant has reviewed the proposed construction programme with reference to the BCIS duration indicator and revised proposed cost assessment and concludes that 32 weeks (8 months) is an appropriate timeframe for the proposed scale of works. We have sensitivity tested our respective assumptions and found that the reduction to the construction period results in a marginal change to the overall viability position. On this basis, we have adopted RG's assumptions on a without prejudice basis.

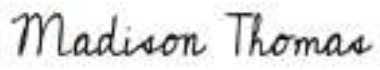
8.2 We have previously agreed with RG on a 40% off-plan sales period and a 2-month post-completion sales period, which reflected the sales frequency of 1-2 units per month. We do not consider that the changes to the scheme and the reduction of the scheme by 1 unit would affect our previously adopted sales programme. On this basis, we maintain our previous inputs.

9.0 Author Sign Off

9.1 This report is provided for the stated purpose and for the sole use of the named clients. This report may not, without written consent, be used or relied upon by any third party.

9.2 The author(s) of this report confirm that there are no conflicts of interest and measures have been put in place to prevent the risk of the potential for a conflict of interest. In accordance with the RICS Professional Statement *Financial Viability in Planning: Conduct and Reporting* September 2019, this report has been prepared objectively, impartially, and with reference to all appropriate sources of information. In preparing this report, no performance-related or contingent fees have been agreed.

9.3 The following persons have been involved in the production of this report:



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BPS Chartered Surveyors

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For and on behalf of
BPS Chartered Surveyors

September 2025

Appendix 1: Build Cost Report

Cost Plan
Analysis Report

On

Lamorna Dartmouth Park

For

BPS

Prepared by
Concord Consult Limited,
The Mill,
Pury Hill,
Northampton, NN12 7LS

Tel: 01858 683220
Date: 28/08/2025

Ver: 02

Version	Date	Description	Created by	Verified By	Approved By
1	01/05/25	Cost Analysis Report	ACR	NH	ACR
2	29/08/25	Cost Analysis Report	ACR	JA	ACR
3	01/09/25	Cost Analysis Report	ACR	JA	ACR

Prepared by: Andrew Reynolds BSc (Hons) MRICS MCInstCES, AMICE, NECReg
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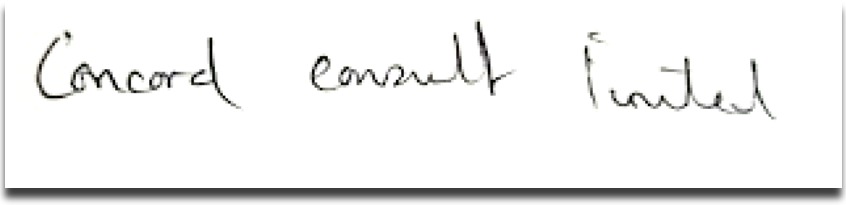
This document has been prepared and checked in accordance with the Concord Consult Limited Quality Assurance procedures and authorised for release.



Signed: .....

For and on behalf of Concord Consult Limited

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Contents

1 INTRODUCTION

1.1 Concord Consult Limited (hereafter, CCL) Cost Management Department were appointed to review PSP Elemental Cost Plan. The scheme comprises Demolition of an existing family dwelling and construction of a four-storey building providing five residential units.

1.2 The brief was to undertake a review of the construction costs within the estimate provided. The review *includes:*

- *Reviewing overall content, rates and prices.*
- *Comparing the overall pricing with benchmark data.*
- *Review of project durations.*
- *Identification of potential cost savings.*
- *Inflation Indices Review where appropriate:*
  a. *PSP Cost Plan Base Date July 2025*

1.3 A spot check review of the specific quantities and scope has been carried out by CCL but not a full re-measure.

1.4 CCL were provided with copies of the following *documents:*

- Design and Access Statement Addendum (revised scheme) Dated August 2025.
- Roscoe Group Chartered Surveyors Financial Viability Assessment Report Addendum (revised scheme) dated July 2025.
- PSP Cost Plan Dated June 2025.

1.5 A site visit has not been undertaken by CCL, and the exercise has been desktop based as our instruction and based upon information referred to within 1.4.

1.6 The Site is located on the south side of Dartmouth Park Road to the east of the junction with Highgate Road in the London Borough of Camden. 1.1.2. The site currently comprises a two-storey detached residential dwelling (Use Class C3) 1.1.3. The proposed scheme comprises the demolition of the existing family dwelling and construction of a new four-storey residential building comprising five self-contained residential dwellings.

2 REVIEW OF OVERALL CONTENT, RATES AND PRICES

2.1 The produced *PSP Estimate Base Date (3Q25)* is appraised within this report for representative pricing and due analysis against benchmark data.

2.2 The scheme comprises the demolition of the existing family dwelling and construction of a new four-storey residential building comprising five self-contained residential dwellings.

2.3 The level of design information provided is reasonably detailed on the planning application with exception to mechanical and electrical and structural designs; please note levels of specification have not been cross checked as part of the review, however, we have assumed a mid to high range specification as part of the review where detailed breakdown provided.

2.4 We have re-formatted the estimate data to enable an easy point of reference when benchmarking against BCIS average prices; ensuring the total cost and subsequent £/m2 and £/ft2 excludes enabling works, facilitating works, contingencies and abnormal costs to enable direct comparison with BCIS average prices. The £/m2 on this basis is £4,054/m2 which would appear high sitting between the upper quartile and highest cost as BCIS average price data:

- Median - £2,226
- Upper Quartile - £2,665
- Highest - £4,899

2.5 Please note that this report supersedes that issued 01.05.25 and reflects the latest appraisal and supporting information provided by the applicant, figures have been re-appraised on that basis within this updated Rev B report.

3 ANALYSIS OF FEASIBILITY ESTIMATE

3.1 Benchmark

3.1.1 CCL undertook arithmetical check was undertaken on the provided estimate. We identified that the allowance in the building services tab for 'Testing and Commissioning' at 2.5% of cost; equating to £6,715.75; did not carry through to the main summary, CCL have corrected this position as part of overall exercise.

3.1.2 CCL also identified was an inconsistency in the presentation of costs, with overhead and profit and risk priced singularly on base build costs; CCL corrected this position as part of the appraisal and main conclusion in accordance with RICS New Rules of Measurement 1.

3.1.3 A review has been undertaken on the Estimate for each building element; pertinent points post-review referenced within section 3.2.

3.2 Rate & Quantum Review

Conducted 3Q 2025

Note: All Rates have been appraised and reviewed at 3Q 2025 against pre-book data, tendered rates and live project data.

Note: If items rates are not individually commented on; it can be deemed CCL concur are reflective.

Substructure

3.2.1 We have adjusted the rate for the ground floor slab to £195/m2, at a quantity of 138m2 thus generating a potential saving of £9,798.

Upper Floors

3.2.2 We have adjusted the rates for timber upper floors to £130/m2 and insulation to £16/m2 respectively, at quantities of 363m2, thus generating a potential saving of £8,712.

Roof

3.2.3 We have adjusted the timber roof structure rate to £65/m2; at a quantity of 98m2, thus generating a potential saving of £8,330.

3.2.4 We have adjusted the single ply membrane rate to £42/m2; thus, generating a potential saving of £10,584.

3.2.5 We have adjusted the roof parapet rate to £115/m; thus, generating a potential saving of £3,250.

3.2.6 We have adjusted the balustrade / railing rate to £240m; at a quantity of 28m, thus generating a potential saving of £7,280.

Stairs & Ramps

3.2.7 We have adjusted the balustrade/ railing rate to staircases as (3.2.76); thus, generating a potential saving of £4,680.

External Walls

3.2.8 We would query the basis of the £15k lump sum allowance for RHW enclosure.

3.2.9 We have adjusted the brickwork rate to £220/m2, at a quantity of 750m2, thus generating a £33,750 saving.

Windows & External Doors

3.2.10 We have adjusted the window rate to £550/m2; at a quantity of 89m2, thus generating a potential saving of £22,250.

Services

3.2.11 We have adjusted the allowance for the lift to £35,000, thus generating a potential saving of £5,000.

3.2.12 As highlighted within 3.1.1 there was an arithmetical error with the testing and commissioning not being included within the main summary; thus, adding a cost of £6,715.75.

Preliminaries

3.2.13 We have removed the allowance for temporary services, thus generating a £10,000 saving. The site appears to be serviced currently and therefore is deemed not required. See main conclusion for this adjustment.

3.2.14 Figure 1 - Summary of Adjustments

	Element	Potential Savings (£)
	Lamorna	
3.2.1	Ground Floor Slab	£9,798
3.2.2	Upper Floors	£8,712
3.2.3	Timber Roof Structure	£8,330
3.2.4	Single Ply Membrane	£10,584
3.2.5	Roof Parapet	£3,250
3.2.6	Balustrade Railing (1)	£7,280
3.2.7	Balustrade Railing (2)	£4,680
3.2.8	QUERY – Basis of £15k Lump Sum Allowance	TBC
3.2.9	Brickwork	£33,750
3.2.10	Windows	£22,250
3.2.11	Lift	£5,000
3.2.12	Arithmetical Error '*Testing and Commissioning*'	-£6,715
	Sub-Total (Potential Savings to Base Cost)	**£106,919**

4 CONCLUSION

4.1 The benchmark analysis shows that the original rate received of £4,054/m2 which sits between the upper quartile and highest costs. Once CCL have adjusted and adjusted / removed costs for benchmarking purposes, the comparable rate is £3,740/m2 which is still between the upper quartile and highest cost; however, this is due to the location and constraints of the site, which is deriving this higher rate.

4.2 Adjustments have been made to the Base Costs as 3.2.14 and summarised in figure 2.

4.3 Based on the below figure of £1,865,391 divided by the GIA reported of 421m2; the out-turn cost equates to an all-in rate of 4,430/m2 or £411/ft2.

4.4 We would highlight that we have ran a BCIS duration calculator as per Appendix B for a contract value of £1,800,000; and the 90% confidence is an interval of 28 to 36 weeks; of which CCL would advise taking the mid-point of 32 Weeks (See Appendix B).

4.5 *Figure 2 – Final Position*

	Element	Potential Savings (£)
	Lamorna	
	Base Cost	£1,463,025
	Deductions	-£106,919
	Adjusted	**£1,356,106**
	Preliminaries (Reduced, see 3.2.13)	£296,511
	Overhead and profit (7.5%)	£123,946
	Professional Fees	Excluded
	Contingency	£88,828
	Adjusted Value	**£1,865,391**
	£/m2	***£4,430***
	£/ft2	***£411***

APPENDIX A

BCIS Average Prices

BCIS®

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 23-Aug-2025 07:20

Rebased to 3Q 2025 (403; forecast) and Camden (128; sample 53)

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
New build								
816. Flats (apartments)								
Generally (15)	2,381	1,247	1,968	2,239	2,702	8,041	721	
1-2 storey (15)	2,297	1,363	1,915	2,154	2,613	4,532	154	
3-5 storey (15)	2,349	1,247	1,956	2,226	2,665	4,899	484	
6 storey or above (15)	2,724	1,700	2,207	2,606	2,988	8,041	82	

APPENDIX B

BCIS Duration Calculator

BCIS®

Refurbishment, Construction

LAMORNA

The estimated construction duration from Start on Site to Construction Completion is 32 weeks
(this is an average for the project as described below).

The 90% confidence interval for this estimate is 28 to 36 weeks.

Individual projects will take more or less time than the average: the 90% prediction interval for individual projects is 15 to 62 weeks.

The estimate is based on the following project details:

Contract value: £1,800,000 at 2Q 2025 (401) prices and Camden (128; sample 53) level

Building function: Mixed housing and flats

Procurement: Traditional lump sum

Selection of contractor: Single stage tendering

Client organisation: Private

APPENDIX C

CCL Reconciliation

Appendix C - CCL Reconcilitaion (Lamorna)	*Lamorna [3Q 25]*			*CCL Adjusted*		
	GIA	4532	421		4532	421
	£	£/ft2	£/m2	£	£/ft2	£/m2
0 Facilitating Works	£ 30,000	£ 6.62	£ 71.26	£ 30,000.0	£ 6.62	£ 71.26
1 Substructure	£ 47,000	£ 10.37	£ 111.64	£ 37,202	£ 8.21	£ 88.37
2 Superstructure		£ -			£ -	
2A Frame		£ -	£ -		£ -	£ -
2B Upper Floors	£ 132,378	£ 29.21	£ 314.44	£ 123,666	£ 27.29	£ 293.74
2C Roof	£ 101,524	£ 22.40	£ 241.15	£ 72,080	£ 15.91	£ 171.21
2D Stairs & Ramps	£ 34,390	£ 7.59	£ 81.69	£ 29,710	£ 6.56	£ 70.57
2E External Walls	£ 292,748	£ 64.60	£ 695.36	£ 258,998	£ 57.15	£ 615.20
2F External Windows and Doors	£ 87,780	£ 19.37	£ 208.50	£ 65,530	£ 14.46	£ 155.65
2G Internal Walls and Partitions	£ 78,964	£ 17.43	£ 187.56	£ 78,964	£ 17.43	£ 187.56
2H Internal Doors	£ 22,000	£ 4.85	£ 52.26	£ 22,000	£ 4.85	£ 52.26
3 Finishes		£ -		£ -	£ -	£ -
3A Wall Finishes	£ 56,647	£ 12.50	£ 134.55	£ 56,647	£ 12.50	£ 134.55
3B Floor Finishes	£ 44,622	£ 9.85	£ 105.99	£ 44,622	£ 9.85	£ 105.99
3C Ceiling Finishes	£ 20,470	£ 4.52	£ 48.62	£ 20,470	£ 4.52	£ 48.62
4 Fittings and Furnishings	£ 77,060	£ 17.01	£ 183.04	£ 77,060	£ 17.01	£ 183.04
5 Services		**£ -**		£ -	**£ -**	**£ -**
5A Sanitary Appliances	£ 38,410	£ 8.48	£ 91.24	£ 38,410	£ 8.48	£ 91.24
5B Services Equipment	£ -	£ -	£ -	£ -	£ -	£ -
5C Disposal Installations	£ 10,425	£ 2.30	£ 24.76	£ 10,425	£ 2.30	£ 24.76
5D Water Installations	£ 93,532	£ 20.64	£ 222.17	£ 93,532	£ 20.64	£ 222.17
5E Heat Source	£ -	£ -	£ -	£ -	£ -	£ -
5F Space Heating and Air Conditioning	£ -	£ -	£ -	£ -	£ -	£ -
5G Ventilating Systems	£ -	£ -	£ -	£ -	£ -	£ -
5H Electrical Installations	£ 109,673	£ 24.20	£ 260.51	£ 109,673	£ 24.20	£ 260.51
5I Fuel Installations	£ -	£ -	£ -		£ -	£ -
5J Lift and Conveyor Installations	£ 55,000	£ 12.14	£ 130.64	£ 50,000	£ 11.03	£ 118.76
5K Fire and Lightning Protection	£ -	£ -	£ -		£ -	£ -
5L Communications and Security Installations	£ -	£ -	£ -		£ -	£ -
5M Special Installations	£ -	£ -	£ -		£ -	£ -
5N Builder's Work in Connection		£ -	£ -	£ 6,715	£ 1.48	£ 15.95
5O Management of the Commissioning of Services		£ -	£ -		£ -	£ -
Building Sub-total	***£ 1,332,623***	***£ 294.07***	***£ 3,165.38***	***£ 1,225,704***	***£ 270.48***	***£ 2,911.41***
6 External Works		***0***			***0***	***0***
6A Site Preparaion Works	5,000	£ 1.10	£ 11.88	£ 5,000	£ 1.10	£ 11.88
6B Roads, paths, pavings and surfacings	4,384	£ 0.97	£ 10.41	£ 4,384	£ 0.97	£ 10.41
6C Soft Landscapes, planting and irrigation	10,000	£ 2.21	£ 23.75	£ 10,000	£ 2.21	£ 23.75
6D Fencing, railings and walls	2,418	£ 0.53	£ 5.74	£ 2,418	£ 0.53	£ 5.74
6E Demolition and Work Outside the Site		£ -	£ -	£ -		
6F External fixtures	11,100	£ 2.45	£ 26.37	£ 11,100	£ 2.45	£ 26.37
6G External Drainage	45,000	£ 9.93	£ 106.89	£ 45,000	£ 9.93	£ 106.89
6H External Services	52,500	£ 11.59	£ 124.70	£ 52,500	£ 11.59	£ 124.70
6I Minor Building Works & Ancillary Buildings		£ -	£ -			
Building + Externals Sub-total	***1,463,025***	***£ 322.85***	***£ 3,475.12***	***£ 1,356,106***	***£ 299.26***	***£ 3,221.15***
7 Preliminaries [Detailed build-up on 52 Wks]	306,511	£ 67.64	£ 728.05	£ 296,511	£ 65.43	£ 704.30
8 OH&P [7.5%]	109,500	£ 24.16	£ 260.10	£ 123,946	£ 27.35	£ 294.41
9 Professional Fees	-	£ -	£ -		£ -	£ -
Total (Excl contingencies)	***1,879,036***	***£ 414.65***	***£ 4,463.27***	***£ 1,776,563***	***£ 392.04***	***£ 4,219.87***
10 Contingencies	87,788	£ 19.37	£ 208.52	£ 88,828	£ 19.60	£ 210.99
Total (Contingency)	***1,966,824***	***434.02***	***4,671.79***	***£ 1,865,391***	***411.64***	***4,430.86***

APPENDIX D

CCL Reconciliation (BCIS)

Appendix D - CCL Reconcilitaion (BCIS Lamorna)	*Lamorna [3Q 25]*			*CCL Adjusted*		
	GIA	**4532**	**421**		**4532**	**421**
	£	**£/ft2**	**£/m2**	**£**	**£/ft2**	**£/m2**
0 Facilitating Works		£ -	£ -		£ -	£ -
1 Substructure	£ 47,000	£ 10.37	£ 111.64	£ 37,202.00	£ 8.21	£ 88.37
2 Superstructure		£ -			£ -	
2A Frame		£ -	£ -		£ -	£ -
2B Upper Floors	£ 132,378	£ 29.21	£ 314.44	£ 123,666	£ 27.29	£ 293.74
2C Roof	£ 101,524	£ 22.40	£ 241.15	£ 72,080	£ 15.91	£ 171.21
2D Stairs & Ramps	£ 34,390	£ 7.59	£ 81.69	£ 29,710	£ 6.56	£ 70.57
2E External Walls	£ 292,748	£ 64.60	£ 695.36	£ 258,998	£ 57.15	£ 615.20
2F External Windows and Doors	£ 87,780	£ 19.37	£ 208.50	£ 65,530	£ 14.46	£ 155.65
2G Internal Walls and Partitions	£ 78,964	£ 17.43	£ 187.56	£ 78,964	£ 17.43	£ 187.56
2H Internal Doors	£ 22,000	£ 4.85	£ 52.26	£ 22,000	£ 4.85	£ 52.26
3 Finishes		£ -			£ -	
3A Wall Finishes	£ 56,647	£ 12.50	£ 134.55	£ 56,647	£ 12.50	£ 134.55
3B Floor Finishes	£ 44,622	£ 9.85	£ 105.99	£ 44,622	£ 9.85	£ 105.99
3C Ceiling Finishes	£ 20,470	£ 4.52	£ 48.62	£ 20,470	£ 4.52	£ 48.62
4 Fittings and Furnishings	£ 77,060	£ 17.01	£ 183.04	£ 77,060	£ 17.01	£ 183.04
5 Services		**£ -**		£ -	**£ -**	
5A Sanitary Appliances	£ 38,410	£ 8.48	£ 91.24	£ 38,410	£ 8.48	£ 91.24
5B Services Equipment	£ -	£ -	£ -	£ -	£ -	£ -
5C Disposal Installations	£ 10,425	£ 2.30	£ 24.76	£ 10,425	£ 2.30	£ 24.76
5D Water Installations	£ 93,532	£ 20.64	£ 222.17	£ 93,532	£ 20.64	£ 222.17
5E Heat Source	£ -	£ -	£ -	£ -	£ -	£ -
5F Space Heating and Air Conditioning	£ -	£ -	£ -	£ -	£ -	£ -
5G Ventilating Systems	£ -	£ -	£ -	£ -	£ -	£ -
5H Electrical Installations	£ 109,673	£ 24.20	£ 260.51	£ 109,673	£ 24.20	£ 260.51
5I Fuel Installations	£ -	£ -	£ -		£ -	£ -
5J Lift and Conveyor Installations	£ 55,000	£ 12.14	£ 130.64	£ 50,000	£ 11.03	£ 118.76
5K Fire and Lightning Protection	£ -	£ -	£ -		£ -	£ -
5L Communications and Security Installations	£ -	£ -	£ -		£ -	£ -
5M Special Installations	£ -	£ -	£ -		£ -	£ -
5N Builder's Work in Connection		£ -	£ -		£ -	£ -
5O Management of the Commissioning of Services		£ -	£ -		£ -	£ -
Building Sub-total	***£ 1,302,623***	***£ 287.45***	***£ 3,094.12***	***£ 1,188,989.00***	***£ 262.38***	***£ 2,824.20***
6 External Works		***0***			***0***	***0***
6A Site Preparaion Works		£ -	£ -		£ -	£ -
6B Roads, paths, pavings and surfacings		£ -	£ -		£ -	£ -
6C Soft Landscapes, planting and irrigation		£ -	£ -		£ -	£ -
6D Fencing, railings and walls		£ -	£ -		£ -	£ -
6E Demolition and Work Outside the Site		£ -	£ -		£ -	£ -
6F External fixtures		£ -	£ -		£ -	£ -
6G External Drainage		£ -	£ -		£ -	£ -
6H External Services		£ -	£ -		£ -	£ -
6I Minor Building Works & Ancillary Buildings		£ -	£ -		£ -	£ -
Building + Externals Sub-total	***1,302,623***	***£ 287.45***	***£ 3,094.12***	***£ 1,188,989.00***	***£ 262.38***	***£ 2,824.20***
7 Preliminaries [Detailed build-up on 52 Wks]	306,511	£ 67.64	£ 728.05	£ 296,511.00	£ 65.43	£ 704.30
8 OH&P [7.5%]	97,697	£ 21.56	£ 232.06	£ 89,174.18	£ 19.68	£ 211.82
9 Professional Fees	-	£ -	£ -		£ -	£ -
Total (Excl contingencies)	***1,706,831***	***£ 376.65***	***£ 4,054.23***	***£ 1,574,674.18***	***£ 347.49***	***£ 3,740.32***
10 Contingencies [6%]		£ -	£ -			
Total (Contingency)	***1,706,831***	***376.65***	***4,054.23***	***1,574,674.18***	***347.49***	***3,740.32***

Appendix 2: Argus Appraisal

Lamorna
Dartmouth Park
Revised- September 025

Development Appraisal
BPS Surveyors
02 September 2025

Lamorna
Dartmouth Park
Revised- September 025

Appraisal Summary for Phase 1

Currency in £

REVENUE					
Sales Valuation	**Units**	**ft²**	**Sales Rate ft²**	**Unit Price**	**Gross Sales**
Private Sale	5	3,739	1,148.97	859,200	4,296,000
NET REALISATION				**4,296,000**	
OUTLAY					
ACQUISITION COSTS					
BLV		1,700,000			
BLV			1,700,000		
				1,700,000	
Stamp Duty			117,750		
Effective Stamp Duty Rate		6.93%			
Agent Fee		1.50%	25,500		
				143,250	
CONSTRUCTION COSTS					
Construction	**ft²**	**Build Rate ft²**	**Cost**		
Private Sale	4,791	389.37	1,865,391		
CIL			251,793		
				2,117,184	
PROFESSIONAL FEES					
Other Professionals		10.00%	186,539		
				186,539	
MARKETING & LETTING					
Marketing		1.00%	42,960		
				42,960	
DISPOSAL FEES					
Sales Agent Fee		1.00%	42,960		
Sales Legal Fee		0.50%	21,480		
				64,440	
Additional Costs					
Profit on GDV		17.50%	751,800		
				751,800	
FINANCE					
Debit Rate 7.500%, Credit Rate 0.000% (Nominal)					
Land			192,127		
Construction			69,549		
Other			16,490		
Total Finance Cost				278,166	
TOTAL COSTS				**5,284,339**	
PROFIT					
				(988,339)	
Performance Measures					
Profit on Cost%		-18.70%			
Profit on GDV%		-23.01%			
Profit on NDV%		-23.01%			
IRR% (without Interest)		-18.57%			
Profit Erosion (finance rate 7.500)		N/A			

Lamorna
Dartmouth Park
Revised- September 025