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Date: 24/03/2022
Our ref: 2021/5214/PRE
Contact: Sofie Fieldsend
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Dear Faye Wright,

Re: 14 A Hampstead Hill Gardens,

www.camden.gov.uk/planning

1. Proposal

Demolition of existing garages and erection of a two storey (plus basement and loft) dwelling house and associated works and landscaping.

2. Site description

The site is located on Hampstead Hill Gardens which loops between Rossllyn Hill and Pond Street; the site is north east facing. The street is comprised of properties with a variety of design styles as it loops around, including pairs of Georgian-style villas, Arts and Crafts housing, and modern infills.

The site is located within sub area 3 of the Hampstead Conservation Area and sited between buildings which are considered to make a positive contribution to the Conservation Area (Nos.10-20). The buildings on the opposite side of Hampstead Hill Gardens (Nos.13-33) are also considered to make a positive contribution to the Conservation Area. There are some listed buildings within Hampstead Hill Gardens (Nos.1-4 consecutive) to the west of the application site but not in its immediate context.

Beneath the site and dissecting the road underground is the LNWR tunnel.

3. Relevant planning history

2019/6399/PRE –Creation of a new build dwelling to replace two existing garages.

2021/1564/P -Demolition of existing garages and erection of a three storey (plus basement) dwelling house and associated works and landscaping - **Pending decision**

4. Relevant policies and guidance

- National Planning Policy Framework (2021)
- London Plan (2021)
- **Camden Local Plan (2017)**
 - 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 C1 Health and wellbeing
 - Policy C5 safety and security

Policy C6 Access for all
 Policy A1 Managing the impact of development
 Policy A2 Open Space
 Policy A3 Biodiversity
 Policy A4 Noise and vibration
 Policy A5 Basements
 Policy D1 Design
 Policy D2 Heritage
 Policy CC1 Climate change mitigation
 Policy CC2 Adapting to climate change
 Policy CC3 Water and flooding
 Policy CC4 Air quality
 Policy CC5 Waste
 Policy T1 Prioritising walking, cycling and public transport
 Policy T2 Parking and car-free development
 Policy T3 Transport Infrastructure
 Policy T4 Sustainable movement of goods and materials
 Policy DM1 Delivery and monitoring

- **Supplementary Guidance**

- CPG Design (2021)
- CPG Home improvements (2021)
- CPG Housing (2021)
- CPG Amenity (2021)
- CPG Transport (2021)
- CPG Energy efficiency and adaption (2021)
- CPG Air Quality (2021)
- CPG Developer contributions (2019)
- CPG Access for all (2019)

- **Hampstead Conservation Area Statement (2001)**

- **Hampstead Neighbourhood Plan (2018)**

- Policy DH1 Design
- Policy DH2 Conservation areas and listed buildings
- Policy NE2: Trees
- Policy NE4: Supporting biodiversity
- Policy BA1: Basement Impact Assessments
- Policy BA2: Basement Construction Plans
- Policy BA3: Construction Management Plans
- Policy TT4: Cycle and car ownership

5. Assessment

The proposals at this stage are to establish the principles of development and as such the response will focus on the following areas:

- Principle of development of site
- Design
- Impact on neighbour amenity
- Basement

- Flood risk
- Transport
- Other material planning considerations

6. Principle of development of the site

As existing the site contains 2 garages. It provides a generous gap in the streetscene; however this isn't identified within the Conservation Area or Neighbourhood Plan to be of significance. It is considered that development on the site could be considered acceptable, subject to the development being of a high standard that would not compromise the character and appearance of the surrounding streetscene.

In terms of land use, residential use is the priority land use of the Borough and, given this is a residential area, there would be no objections to a proposed residential use on the site.

7. Design

In accordance with Policy G1, the Council supports growth by securing high quality development and promoting the most efficient use of land. The policy goes on to list how it will achieve this. Coupled with this, Policy D1 seeks to achieve the highest standard of design in all developments. It is expected that development will be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and 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 and listed buildings. Policies DH1 and DH2 of the Neighbourhood Plan align with policies D1 and D2 of the Local Plan in seeking high quality design and need to be given equal weight as the Local Plan in the assessment of the application.

It is important to note that the Conservation Area Statement (CAS) notes in regard to Hampstead Hill Gardens that there are a few small modern houses and flats that have been added in recent years, which, although marked in contrast to the older villas, do not detract from the character of the area. It is noted within the CAS that the character of the area is that of larger detached and semi-detached homes.

While this pre-app response will focus on the revised scheme as discussed at the meeting, the original design presented two options for a two storey building and a two and a half storey building. General feedback on this original option is summarised as following:

- Roof: Roof form needs reworked, both options don't sit comfortably on the building. Perhaps a more unique or innovative option is required. All the properties in the street have an interesting and complimentary roof form. Roof should be a subservient addition, which could be achieved by stepping it back. Stepping it back away from the street as seen in the other buildings on the street would be more appropriate. Currently reads as a flat gable which might be incongruous in this context.
- Front façade and materials: In terms of a material palette it should not necessarily match either neighbouring properties which are stucco-faced semi-detached villas and arts and crafts styles respectively, but should be intended at the start of the design to influence it rather than an end thought. However, a red palette would likely be the most appropriate for the site. It should take influence from the street scene but it is not entirely necessary to copy it. Front elevation is lacking interesting detail which is a key

characteristic of other properties found along the street. Need for more interest on the front, this could be through banding or other decorative features or a mild/slight set back.

- Fenestration: Concerns about the overly large window at ground floor which does not contribute to the street or form a relationship with its neighbours. Can siting/scale/detailed design be revisited? Please also provide a bay study.
- Lightwell: Treatment/finish of this should be explored.
- Rear elevation: As with the front the window proportions and variety of opening methods form appear disjointed and should be revisited. The rear window at roof level is oversized in relation to the roof slope and should be reduced.
- Precedents: It might be beneficial to explore some recently approved gap site dwellings within similar parts of London and see what approach they have taken to address a constrained site.

The revised scheme only provides a front elevation, floor plans and an angled 3D image for assessment. Based on this limited information the following design advice is provided:

- Massing: The proposed development would be 2 storeys in height plus a basement and loft level. The building has the appearance of a two storey building and would be most appropriate in this location as that matches the eaves of No.12 and it should not be taller than this neighbour. The revised scheme largely complies with this at the front. The recessed entrance is welcomed and provides some relief while helping link it to the character of the street.
- Roof: The Council would require more information about the design rationale of the roof and why the flat element along the ridge is required and how it would not result in harmful lightspill. It may be better to have it stop at a simple point instead. However, the set back now included at roof level is welcomed. It is considered that there may be potential for a proportionately-sized front window. Also you are encouraged to think about its buildability and how the guttering would work; you are encouraged to incorporate this into the design rather than just attaching guttering as an afterthought.
- Side dormer: no elevations, sections or detail has been provided; however there does appear to be a side dormer window over the bathroom at loft level. Without this information the Council cannot comment if this element would be appropriate or not. However, it is noted that the side elevation of the neighbouring property contains quite a few windows and therefore a dormer window might not be acceptable if it harms their outlook, privacy or light or creates a sense of enclosure.
- Fenestration: While the proposed fenestration is an improvement from the original design, there are still concerns about their proportions and the Council would be unlikely to support the large use of 'solid' metal panels on the front elevation as they would detract from the host property, streetscene and CA. It is unclear what material the front door would be, but the Council would encourage a timber door with detailing rather than a metal one.
- Front landscaping: you are encouraged to explore more soft landscaping to the front of the lightwell to further soften its appearance and improve the biodiversity of the site
- Material palette: Excluding the use of the metal panels, the material palette would likely be appropriate in this context.

- Footprint: The ground floor footprint is likely acceptable in scale as it respects the existing front and rear building lines; however the basement is still considered to be oversized and should be reduced to maintain more of the soft landscaped garden. Without a daylight and sunlight report assessing the building's impact on loss to the neighbouring properties, the Council cannot assess if the depth of the upper levels would cause harm to their amenity and this information is required to determine if set backs are required.
- Greening: You are encouraged to incorporate green roofs and walls were possible into the building.

You are advised to liaise with both the local Conservation Area Advisory Committee and the Neighbourhood Forum on the proposal before submitting an application for planning permission.

8. Impact on neighbour amenity

Policy A1 seeks to ensure that the amenity of neighbours is protected in regard to levels of light, outlook, privacy together with issues of noise, vibration and construction management. Please note construction management is address below in the transport section.

There are windows present on the side elevations of both neighbouring properties; Nos.12 and 14.

As outlined in the previous pre-app you would be required to provide a daylight and sunlight assessment to demonstrate that the new dwelling would not have a harmful impact on their light. In terms of outlook again it would depend what these windows serve; however if they were to serve habitable rooms there would be a concern in terms of the outlook that would be harmed as a result of the development.

As mentioned above there appears to be a proposed side dormer window facing No.14; further information on its scale, siting and detailed design is needed to assess if it is harmful.

At this stage there is concern in regard to the impact on the neighbouring windows within the flank elevation of the two direct neighbours. Further information is required detailing the layouts of these neighbouring buildings before officers can support the proposals on amenity grounds.

9. Basement

Policy A5 of the Local Plan and policies BA1, BA2 and BA3 of the Hampstead Neighbourhood Plan are relevant. Basement advice was covered in the previous pre-app and you are encouraged to review this.

However, in regards to the basement criteria in Policy A5, Basement development should:

- a) not comprise more than one storey;
- b) not be built under an existing basement;
- c) not exceed 50% of each garden within the property;
- d) be less than 1.5 times the footprint of the host building in area;
- e) extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;

- f) not extend into or underneath the garden further than 50% of the depth of the garden;
- g) be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- h) avoid the loss of garden space or trees of townscape or amenity value

As outlined in the design section above, the basement level does result in the loss of garden space (point h) and the CAS outlines that rear gardens and backlands contribute to the townscape of the Conservation Area and provide a significant amenity to residents and a habitat for wildlife. It is advised that the basement is reduced in depth.

10. Flood Risk

Policy CC3 'Water and flooding' seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. We will require development to:

- a. incorporate water efficiency measures;
- b. avoid harm to the water environment and improve water quality;
- c. consider the impact of development in areas at risk of flooding (including drainage);
- d. incorporate flood resilient measures in areas prone to flooding;
- e. utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
- f. not locate vulnerable development in flood-prone areas.

It is acknowledged that the street experienced flooding in July 2021, therefore the Council would consider this road to be a historically flooded street. A flood risk assessment including mitigation measures if required should be submitted assessment. A drainage report would also be required.

The Hampstead Neighbourhood Plan Policy BA1 sets out that BIAs should consider the following in regards to flooding:

- CPG – Basements and the Camden Geological, Hydrogeological and Hydrological Study (paragraphs 285-294) should be studied whenever hydrological borehole measurements are to be carried out. Soil samples, including those near boundaries with neighbours must be taken to a depth below the footing of the proposed base of the basement. The boreholes measurements may need to be conducted in periods of contrasting rainfall and over a period of several months covering wet and dry seasons.
- In some cases, when boreholes measurements show a groundwater risk, an automatic log water measurements recorder may need to be left activated in the boreholes over a sustained period of contrasting rain cycles to demonstrate local groundwater and water table levels and the local extent of groundwater surges during and immediately following storms.
- An assessment of current ground and geology conditions, topography and groundwater levels. This should include details of the structure and foundations of the existing building and neighbouring properties
- If flooding and ground reports of both the applicant's and the neighbouring properties are required, both the Landmark Information Group and the Conveyancing Data Services can provide such reports.
- The location and distance of the property from areas identified as at risk of flooding as shown in the Strategic Flood Risk Assessment prepared for Camden by URS in July 2014.
- Clarity over geology and groundwater conditions can sometimes best be explained through comprehensive cross sections, reports and graphs.

- Hydrological modelling to show whether it will be possible through the inclusion of drainage systems to prevent any significant harm from changes to groundwater levels or flow. Hydrological modelling only needs to be done if it cannot be demonstrated through screening and scoping that there is no risk.
- In order to protect against sewer flooding, Thames Water recommends the installation of a positive pumping device. This should be installed in each new basement development unless a strong case for alternative measures can be made.

11. Transport

Car parking

As existing, the site has 2 garages on it. Policy T2's objective is to limit the availability of car parking and requires all development in the borough to be car-free. The Council would not support the provision of on-site parking, and the development does not appear to provide one which is acceptable.

Cycle parking

The Hampstead Neighbourhood Plan (Policy TT4) requires all residential developments with three or more bedrooms to include in their design (and within the curtilage of the building) at least three cycle parking spaces for long-stay use. Cycle parking for two spaces is shown in the front garden and it is considered that one extra space could easily be accommodated in this location.

The cycle parking doesn't appear to be covered or secured and no further detail has been provided. These should be covered and secured and provided with level access. Please refer to the Transport CPG for further guidance on the style of cycle parking the Council considers acceptable.

Construction Management

Given the scale of the development, its siting within a Conservation Area and a residential area and the excavation of a basement, it is likely that a draft Construction Management Plan (CMP) will be required. Further information can be found on the Council's website [here](#). Policy BA3 of the Hampstead Neighbourhood Plan notes that proposals for basements need to be accompanied by a CMP.

A CMP would be secured via a Section 106 legal agreement, there would also be an associated monitoring fee and bond. Further details of which can be found [here](#).

An Approval in Principle (AIP) would also likely be required for the basement.

12. Waste

Policy CC5 notes that developments should include facilities for the storage and collection of waste and recycling. Any bin store located to the front area of the site should be designed in at application stage. Further design can be found in CPG Design.

13. Biodiversity

No tree information is provided. You are advised to review the advice provided in the previous pre-app as this would remain the same. Policy NE3 of the Hampstead Neighbourhood Plan

notes that the rear gardens of properties on Hampstead Hill Gardens are designated biodiversity corridors, however the application site is not within this identified area. At the application site, the majority of the portion of the site that would contain the new dwelling is currently hardstanding. It is important to note that, as this is area is a designated biodiversity corridor, the development would be expected to include measures to protect and enhance the biodiversity value of the site. As noted in policy NE3 of the Neighbourhood Plan proposals should establish the quality of the existing biodiversity through relevant ecological appraisal and species survey; this is also supported by Policy A3 of the Local Plan.

In terms of tree removal, the Council seeks to resist the loss of trees and vegetation of significant amenity, historical, cultural or ecological value. If any trees are to be removed, this would need to be supported by an Arboricultural report which assesses the category of the tree. Furthermore any trees in close proximity to the site will need to be protected during construction.

14. Access

Policy C6 notes the Council will expect all buildings to meet the highest practicable standards of accessible and inclusive design to be used safely, easily and with dignity by all. The building currently provides a set of 3 steps, a cue taken from the neighbouring villa. The building should be provided with level access unless there is a robust justification for it not to be. If this is not possible these steps should be ambulant at the least to enable ease of access to the property; however the Council's preference would be for level access.

A platform lift is shown on the ground floor plan, but it is not shown on the elevations nor have further details been provided how this will operate or appear visually. In addition the lift does not seem to have access to the front door. Level access could possibly be achieved through a side entrance door and you are encouraged to explore this instead of having an outdoor lift.

15. Sustainability and Energy

Local Plan policy CC1 requires all developments to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage. Policies CC2 and CC3 are also relevant with regards to sustainability and climate change. You are encouraged to think about introducing sustainability measures such as a green roof, PV panels, sustainable materials and water-saving fittings within the development. This should be included in a design and access statement or sustainability statement.

16. Conclusion and next steps

Further thought should be given to the roof and fenestration on the new dwelling in line with the advice in the design section. The basement should be reduced in depth to retain more soft landscaping in the rear garden. You are also encouraged to introduce soft landscaping to the front to improve biodiversity and provide screening to the lightwell. A daylight and sunlight study is required to determine the final mass of the building and you should provide details of the room that the side windows at No.12 and 14 serve to understand the building's impact on their outlook and light. Along with a BIA, a flood risk assessment and drainage report would be expected as the development includes a basement and is located in a historically flooded street. The new dwelling should provide a minimum of 3 secure and covered cycle spaces, it would be car-free and the Council would also secure a CMP, monitoring fee, bond and AIP.

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full planning permission
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Sunlight/daylight report
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received. As noted above, you are advised to contact the local Conservation Area Advisory Committee and Neighbourhood Forum ahead of submitting any application to engage their thoughts on the proposal.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Sofie Fieldsend on the number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Sofie Fieldsend

Senior Planning Officer
Planning Solutions Team