Adam Greenhalgh
Camden Planning Solutions Team

25 June 2024

Re: Planning Reference 2024/0452/P, 28 Parliament Hill

Dear Mr Greenhalgh,

Number 28 Parliament Hill is within the South Hill Park Estate Conservation Area and the Hampstead Neighbourhood Plan area.

The Camden Local Plan Policy A5 (f) states that basement development should not comprise of more than one storey. The draft Camden Local Plan in Policy D6 (C) goes further and makes it clear that basement development should not be built under an existing basement.

The D&A statement calls the existing basement the lower ground floor. However, the Local Plan defines a basement as "a floor of a building which is partly or entirely below ground level". The proposed swimming pool development, therefore, would be contrary to both the current and draft Local Plans.

According to the Basement Impact Assessment Audit, the Basement Impact Assessment is inadequate and numerous issues are unresolved. For example, the depth of the existing underpinning has not been confirmed and the development poses an undefinable risk to 30 Parliament Hill and the conservation area.

The emerging, revised Hampstead Neighbourhood Plan, which has gone through a Health Check with a Planning Inspector as well as the Reg. 14 consultation, expects the use of sustainable and local materials and water efficiency measures through the following methods:

- a) Prioritising sustainable materials (e.g. reused, recycled, and sustainably managed) to minimise the carbon footprint associated with transportation and ensuring responsible sourcing practices.
- b) Major new build should include a whole-life carbon assessment.
- c) Maintaining, restoring, and where possible, increasing permeable surface areas. Applicants should slow water run-off, using a sustainable drainage system where appropriate, such as attenuation tanks.
- d) Aiming to exceed the Local Plan requirements to be water efficient by such measures as grey-water recycling, permeable paving, drought-resistant landscaping, and rainwater harvesting.

Furthermore, the policy states that developments that remove soil, as for foundations for extensions, basements, etc., should mitigate for loss of water absorption by use of attenuation tanks and/or removing hardstanding elsewhere on site.

The Plan as currently proposed is contrary to these policies.

For these reasons, we recommend that Camden refuse the application.

Sincerely,

Alex Nicoll Hampstead Neighbourhood Forum