

Date: 04/07/2024
Our reference: 2024/0742/PRE
Contact: Lauren Ford
Email: lauren.ford@camden.gov.uk

Dear Sir/Madam,

RE: 18 Platt's Lane, London, NW3 7NS

Thank you for submitting the above pre-application request. The proposal is for:

- Single storey basement excavation with swimming pool and alterations to the front/rear/side garden including the laying of hardstanding, installation of walk on roof lights/grill, an electric vehicle charging point and a timber refuse area.

1. Constraints

- Redington Frogna Conservation Area
- Redington and Frogna neighbourhood area and forum
- Historically flooded streets – Platt's Lane and Ferncroft Avenue
- Subterranean (groundwater) flow
- Surface water flow and flooding
- Slope stability

2. Site Description

The application site comprises a semi-detached, three storied property located on the corner of Platt's Lane and Ferncroft Avenue.

The site is within the Redington Frogna Conservation Area and the subject building is noted on the conservation area appraisal and Neighbourhood Plan as making a positive contribution to the conservation area. It is half of a symmetrical semi-detached pair, notable for its bay windows, pronounced tile roof with projecting eaves and use of red brick. It has architectural, townscape and historic significance.

The Redington Frogna Conservation Area is an area of sloping land to the west and south-west of the historic centre of Hampstead. Houses are predominantly large detached or semi detached with garden spaces, mature trees and dense vegetation forming the dominant features of the street scene in much of the area.

3. Proposal

The proposed works would involve:

- Basement excavation; and
- Alterations to the front/rear/side garden including the laying of hardstanding, installation of walk on roof lights/grill, an electric vehicle charging point and a refuse area.

It is noted that an application for 'erection of a single storey front extension and single storey rear infill extension. Replacement of the existing windows with double glazed casement windows' (2023/5413/P) is currently being processed/is waiting decision at the application site.

4. Relevant Policies and Guidance

National Planning Policy Framework (2023)

The London Plan (2021)

Camden Local Plan (2017)

A1 Managing the impact of development

A5 Basements

D1 Design

D2 Heritage

CC1 Climate change mitigation

CC2 Adapting to climate change

CC3 Water and flooding

Draft Camden Local Plan

The council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

Redington Froggnal Neighbourhood Plan 2020:

SD1 Refurbishment of existing building stock

SD2 Redington Froggnal Conservation Area

SD4 Sustainable development and Redington Froggnal character

SD5 Dwellings: Extensions and garden development

BGI2 Rear gardens and ecology

UD1 Underground development

UD2 Construction management plans

Camden Planning Guidance

CPG Home Improvements

CPG Design

CPG Basements

CPG Energy efficiency and adaptation (2021)

Redington / Froggnal Conservation Area Character Appraisal and Management Plan
– December 2022

5. Assessment

The planning considerations material to the determination of this application are as follows:

- Heritage and design
- Basements
- Flooding
- Amenity
- Sustainability
- Trees

6. Heritage and Design

The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within Policy D1 are relevant to the application: development should respect local context and character; comprise details and materials that are of high quality and complement the local character; and respond to natural features. Policy D2 'Heritage' states that in order to maintain the character of Camden's conservation areas, the Council will not permit development within conservation area that fails to preserve or enhance the character and appearance of that conservation area. This is also supported by policies SD2 and SD4 of the Redington Froggnal Neighbourhood Plan.

Basement

The Council has no objection in principle to the construction of a basement in terms of impact on the conservation area as it would be largely invisible. The detailed design would need to respect both the building and the sense of greenery which is an important aspect of the conservation area.

The overall footprint is approximately 40% larger than the existing ground floor footprint of the building and protrudes out much further into the open space of the site. The building should be retained, and details would need to be submitted as part of an application as to how this would be done during construction works.

Concern is raised regarding the footprint of the basement which could prevent the maintenance of greenery, which is an important feature of the conservation area. It would be expected that some degree of top soil is maintained above the basement to allow for vegetation.

Lightwell

Visible lightwells are not characteristic of the conservation area, therefore concern is raised regarding the lightwell proposed on the front elevation. Given the size and use of the basement, it will offer little in the way of useable nature light and should

therefore be removed. As the lightwell on the side elevation is small in size and not publicly visible, it is not of concern.

Front Boundary

The conservation area statement states the following: *The main kinds of harm to the character and appearance of the area are as follows:*

- *Front Garden Parking: Traditional front boundary treatments (walls and hedging) have been removed from some properties and front gardens paved with unsympathetic materials to create parking forecourts. The removal of hedging and its replacement with metal gates or railings creates hard urban frontages, causing considerable harm to the verdant character of the area.*
- *Boundary treatments: In addition to loss of front boundaries for parking, other front and side boundaries have had low walls, railings or hedges removed and replaced by higher timber fences or unsympathetic metal railings. Particular harm has been caused by concrete post and timber board fences to street frontages, which are at odds with the character of the area. In some properties, garages with large metal doors have been constructed near to or on the boundary of road frontages.*
- *Bins: in some parts of the area, bins are being stored in prominent locations, including on road frontages.*

The Council is not supportive of the proposed boundary wall. A 1.5m high brick wall is out of character with the conservation area. A lower brick wall with a hedge would be more appropriate. Further, the appropriate form of fencing is vertical boarding, as opposed to panels mounted between posts. While there are concerns surrounding the front boundary and lack of greenery in this area, including around the perimeter, it is acknowledged that planting in this area has been proposed through 2023/5413/P. Provided that application is granted and implemented, additional planting along the boundary would not be required through an additional future application.

The Council is not supportive of the proposed bin storage area which would be directly fronting the road. This should be moved to a more discrete location, such as behind the boundary wall. The proposed materials, which include timber are considered acceptable. Further, the Council's preference would be for a green roof on top of the bin storage area (details could be secured via condition if not submitted at application stage).

7. Basements

Policy A5 of the Local Plan sets the circumstances in which Council would permit basement development, specific criteria for basement development, and the matters that applicants are required to demonstrate for basements. This is supported by policy UD1 of the Neighbourhood Plan.

The information provided with the application confirms that the proposed development would not comply with matter 'I' of Policy A5 of the Local Plan which states *be set back from neighbouring property boundaries where it extends beyond the footprint of the host building*. Non-compliance with this matter could form a reason for refusal, therefore it is recommended that the scheme is amended at application stage to ensure this criteria is able to be met.

In addition, two bedrooms are proposed at basement level, one served by a small lightwell and the other not served at all. Concern is raised over the lack of natural light and the poor outlook on offer in these rooms, and the provision of bedrooms here should therefore be reconsidered.

There are also concerns regarding flood risk associated with the basement development, which are outlined in Section 8 below.

Policy A5 goes on to note that, in determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment (BIA) and, where appropriate, a Basement Construction Plan (BCP). The BIA would be independently reviewed by Campbell Reith, and the applicant would be required to cover the costs of this review.

Please refer to Camden Planning Guidance: Basements and Policy A5 of the Local Plan, for further information. Any basement should not propose more than a 1 on the Burland scale.

A construction management plan would also likely be required to support the basement development. This would however be confirmed at application stage, and secured via a s106 agreement.

8. Flooding

The site is identified as being within a historically flooded street (Platt's Lane and Ferncroft Avenue) and as per policy CC3, Council requires flood risk assessments for *all basement development on streets identified as being at flood risk or in an area where historic underground watercourses are known to have been present, or in areas where there is an elevated risk of groundwater flooding*. A site-specific flood risk assessment and drainage report would therefore be required to support an application for basement development.

Local Plan Policy A5 on basements states that Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding. The proposed development includes habitable rooms at basement level, which are contrary to policy A5, and would not be supported.

9. Amenity

Local Plan Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development

protects the quality of life of occupiers and neighbours by only granting permission for redevelopment that would not harm the amenity of neighbouring residents. This includes privacy, outlook, daylight, sunlight and noise. CPG Amenity provides specific guidance with regards to privacy and outlook.

Given the scale and nature of the proposal, and its location (whereby the majority of works are confined to basement level), it is not considered that the proposed development would result in any unacceptable amenity related effects.

10. Sustainability

The proposed electric vehicle charging station is supported, and is considered a positive addition from a sustainability perspective. This is supported by Policy SD3 of the Redington Frognaal Neighbourhood Plan, which encourages the use of electric vehicle charging points.

11. Trees

It is likely that an arboricultural assessment would be required to accompany an application. For example, the rooflights proposed on the southern façade of the property are in close proximity to TPO trees. Therefore, it is needed to ensure that these trees and their roots are protected by the proposed development.

12. Conclusion

The Council has a number of concerns surrounding the proposed development, however it is possible that these may be able to be overcome if changes are made to the proposed development to address these concerns.

If you are minded to submit a planning application, I would advise you to submit the following for a valid planning application:

- Completed form (full planning application)
- 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'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement (making specific reference to the conservation area)
- Basement impact assessment
- Site-specific Flood risk assessment
- Drainage Report
- Arboricultural assessment
- The appropriate fee

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice on or near the site. We would also place an advertisement in the local press. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or 1 objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers.

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 Council.

If you have any queries about the above letter please do not hesitate to contact me on Lauren.Ford@camden.gov.uk.

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

Yours sincerely,

Lauren Ford
Planning Officer