

Application ref: 2023/2120/PRE
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Stuart Minty
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Dear Allen,

Pre-application Medium Development Pre-application Advice Issued

Address:

Frognal House
99 Frognal, London
NW3 6XR

Proposal: Demolition and removal of existing extension and an erect a two storey side/rear extension, new mansard roof extension, internal alterations, green roofs on garage and associated landscaping. Follow up on previous pre-app 2022/3037/PRE (only mansard and additional housing assessed)

Site constraints:

- Article 4 Basements
- Hampstead Conservation Area
- Hampstead Neighbourhood Plan
- Historically Flooded Stress – Frognal Lane
- Local Risk Flood Zones – Frognal Lane
- Grade II Listed Building
- Underground Development – Bagshot Beds
- Underground development constraint – Slope Stability
- Underground development constraint - Slope Stability
- Underground development constraint – Subterranean (groundwater) flow

Relevant planning history:

2022/2859/P and 2022/2869/P - *Use of main house and extension as residential accommodation (C3) and separate planning unit and Use as two separate planning units; one comprising of the main house (C3) and the other comprising of link and west wing building for student accommodation (Sui Generis) – Withdrawn*

The certificates of lawfulness were submitted attempting to demonstrate that the building had been used as a single dwelling house and was a separate planning unit to the west wing extension.

Based on the evidence presented, in summary, on the balance of probability, smaller planning units have not been established under the Bundle case. This is because the two areas are not physically separate and distinct and whilst the purposes were somewhat different, it does not go insofar as to state that they were substantially different or unrelated.

The land appears to have been used for two purposes – mixed student accommodation and Convent, together with their ancillary uses. Based on the evidence available, and on the balance of probability these were the two different main activities (student accommodation) and Convent and existed as a composite use and not confined within separate and physically distinct areas of land.

This is significant as the proposals are ultimately for a single dwelling house and whilst this is not discussed due to the nature of the pre-app, in this report, it is important context.

Relevant policies and guidance

National Planning Policy Framework (NPPF) 2023

The London Plan 2021

Camden Local Plan 2017

Policy A1 Managing the impact of development

Policy A3 Biodiversity

Policy D1 Design

Policy D2 Heritage

Policy G1 Delivery and location of growth

Policy H1 Maximising housing supply

Policy H4 Maximising supply of affordable housing

Policy H6 Housing Choice and Mix

Policy H7 Large and Small Homes

Policy H10 Housing with shared facilities

Policy C1 Health and Wellbeing

Policy C6 Access for all

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

Hampstead Neighbourhood Plan 2018

Policy DH1: Heritage
Policy DH2: Conservation areas and Listed Buildings
Policy NE2: Trees
Policy NE4: Supporting Biodiversity
Policy TT4: Cycle and Car Ownership
Policy HC1: Housing Mix
Policy HC2: Community Facilities

Camden Planning Guidance

Amenity CPG 2021
Design CPG 2021
Developer Contributions CPG 2019
Energy efficiency and adaptation CPG 2021
Housing CPG 2021
Transport CPG 2021
Water and Flooding CPG 2019

Hampstead Conservation Area Appraisal and Management Strategy (2001)

Site and surroundings

The house was listed on 11 August 1950. The list description from 1999 reads:-

“Detached house, now a convent finishing school. c1740, partly refaced late C19; late C20 alterations. Brown brick with red brick dressings, moulded brick plinth and pilasters supporting a cornice at 2nd floor level. 3 storeys and basement. Single window entrance front and 3 window return to garden. C20 entrance with canopy. Gauged red brick segmental arches to flush framed sashes with exposed boxing. 1st floor sash above entrance, round-arched with a cast-iron guard. Garden front with central full height canted bay, ground and 1st floor windows altered to French windows, 1st floor with early C19 cast-iron balconies. Parapet with C20 plain cast-iron balustrade. INTERIOR: not inspected. HISTORICAL NOTE: following the Crimean War the house became the Sailors' Orphan Girls' Home and was the home of General de Gaulle and family in 1940-2. Converted to a finishing school 1968.”

The house stands close to the road, with a driveway adjacent to its eastern flank wall rising up to the grade II listed buildings at Frognaal Grove, a group of buildings designed by Henry Flitcroft, and also a driveway on the south side accessing 99a Frognaal, a 20th century house on a backland site behind Frognaal House. As such, Frognaal House is visible in a number of views within this section of Hampstead Conservation Area, including in views north and south along Frognaal, and from Mount Vernon in the east. The topography of the vicinity is quite hilly, with the land gradually rising up Frognaal, and also in the east and west, with the house itself being somewhat down in a dip, whilst its grounds to the rear are in most part on a higher level. Although the house itself appears substantial as seen from the street, and has a generous footprint, its outdoor space feels quite constrained, having been truncated to make way for the site of No 99a. The limited amount of green space is also partly due to the courtyard effect created by the 1970s L-shaped development to the north and west of the house which divides up the space in a north-south direction. The sense of amenity is also reduced because of the rise in land levels to the north and west of the house.

As the house is no longer used as a convent and/or residential accommodation for overseas female students and has recently been sold to a private purchaser, this pre-application enquiry has been made for the proposed demolition and removal of the existing extension and the erection of a two-storey side/rear extension, a new mansard roof extension, the construction of a basement, internal alterations, green roofs on the garage and associated landscaping. The planned works accompany a proposed change of use from *sui generis* to C3 dwelling house, for which at time-of-writing the two Certificate of Lawfulness applications have not been determined; however, for both applications there appears to be a lack of evidence regarding the existing uses on the site, especially with regard to whether the site contains one or two planning units, which is likely to influence both outcomes.

ASSESSMENT

The principal planning considerations are the following:

1. Change of use principle
2. Design and Heritage
3. Quality of Accommodation
4. Unit Mix
5. Neighbouring amenity
6. Transport
7. Energy and sustainability
8. Trees
9. Air quality
10. Community Infrastructure Levy

1. Change of Use principle

The principle of the development and changing the use of the convent to a residential site is considered acceptable providing that residential floor space is maintained on site.

Throughout this process the Council has been clear that additional housing will have to go on site considering the previous use and loss of housing. As explained previously this will be assessed against policy H10.

The previous proposal provided 4 units (including the main dwelling house) which was considered the acceptable amount for the site in relation to balancing with the heritage issues. Information has also been submitted justifying that more units cannot go on site which is accepted.

The NPPF, the London Plan and Policy H4 all expect affordable housing to be provided on-site wherever possible. Without prejudice to any decision the Council may make regarding the loss of shared homes and the potential for low cost housing to be provided, if affordable housing is sought, the requirement would be calculated on the basis of applying the affordable housing target to the entire floor space involved in the conversion to self-contained housing. The existing GIA appears to be approximately 1,221.4 sqm, which suggests that the affordable housing target would be 24%. Following an assessment on the ability to provide affordable housing on site, there would be a number of constraints including the impact on heritage asset, bespoke nature of units and low number of units on site. The Council's view therefore is that an Affordable Housing payment in lieu would be appropriate in this instance and, as stated, would be calculated using all of the floorspace which is converted. This encompasses the house and existing extension. The calculation therefore would include all of the proposed floor space multiplied by £5,000.

Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. Considering the heritage issues the principle of providing three 1 bedroom 2 person properties is acceptable. Following further meetings another option has been put forward which provides two 1 bedroom 1 person units and one 2 bedroom 3 person unit. This mix is also accepted.

2. Design and Heritage

Demolition of 1970s Extension

The existing two-storey brick-built flat-roofed extension which has an L-shaped configuration is not recognised as being associated with an eminent 20th century architect, although in its own right it is a relatively well-mannered building. However its siting, footprint and overall form do little for the setting of the grade II listed building or for the neighbouring grade II listed building to the north. The extension's positioning on the site carves up the garden space, as stated above, and results in a tightly constrained outdoor area between the main house and the west wing. Although only partially visible from the street, the extension detracts from the conservation area by impacting on the historic plot layout which is part of the urban grain of this part of Hampstead.

The principle, in terms of design and heritage, of demolishing the extension has been discussed extensively in previous pre-app reports. Overall this is accepted.

Following previous advice as set out above, the pre-app does not contain anything on this subject and there is no detail on the justification for the substantial demolition in terms of sustainability. This will need to be included within any full application and more information can be found within policy CC1 and our [Energy Efficiency and Adaption CPG](#).

Replacement Extension

The replacement extension has been commented on during pre-apps and various design iterations. Overall the principle of the extension, including the design and materiality is accepted; the replacement provides a high quality addition which reduces the impact and harm on the significance of the listed building.

The Council recognises that the addendum option for the mews houses is preferred which includes a 2 bedroom 3 person unit adjacent to the extension itself. This is still accepted as a principle but no design has been put forward to the Council. The design will need to be sensitive to the listed building.

Roof Extension to Listed Building

As existing, the listed building is topped by a large asphalt-covered flat roof bounded by metal railings, which is accessed from the 1930s stair tower situated on the north side of the house. Likewise, the neighbouring listed building to the north, the former Frogmal Grove coach house, also has a large flat roof. Both buildings which are situated on the west side of Frogmal comprise three storeys above ground level. To the south is The Heights, a 19th-century five-storey mansion block which reads as a separate large-scale entity in the townscape, as do the extensive former 19th century hospital buildings of Mount Vernon which rise up the hill to the north-east. Otherwise, the majority of buildings in the immediate vicinity are of a smaller scale, including on the east side of Frogmal, which mainly consist of two-storey buildings with pitched roofs including some with attic storeys.

Whilst there clearly is historic precedent for additions at roof level, the roof forms that existed most likely in the 18th century and for definite in the 19th and early 20th centuries were low-lying and of an informal ad hoc character rather than adhering to one large and uniform design.

The initial design proposed a sizeable asymmetrical design appearing to be inspired by the 'ad hoc' and 'informal nature' of how the building roof form had evolved over time. This approach was not accepted in the current design form appearing contrived and more of a pastiche rather than a natural addition. Officers were concerned that the asymmetric form with traditional materials would appear incongruous and poorly designed. The scale was also excessive and too much for the building. Within pre-app meetings officers recommended that a more traditional form should be used albeit at a small scale.

Discussion has continued in regards the acceptability of a mansard roof addition and several alternative options have been submitted to the Council. Moving forwards, we would not support the raising of the parapet of the main building. This would result in an unnecessary level of harm to historic fabric and would alter the historic external proportions of the property. Of the options submitted, the use of a tile roof and not slate is preferred. Whilst the proposals are moving in the right direction, there remains a concern over the visual bulk and impact. However, the additions still need to be reduced in height as to reduce their visual appearance.

Overall, of the options submitted, any of the proposed roof profiles may be successful but this would be dependent on the overall height and scale being reduced. Notwithstanding this, either options 2 and 3 may be more successful in relation to form, scale and appearance. These designs relate better to the period of the building and option 3, in particular, does go some way in reducing the bulk.

External Alterations to Listed Building

It appears from the submitted information that other than at roof level, only a limited number of alterations are proposed to the external envelope of the listed building, the majority of which is seen to be of high significance in heritage terms. Since the building has evolved historically over nearly three centuries, a number of alterations have been made which may be seen to contribute to its architecture in a positive manner. Such an example is the south entrance door in the 19th-century canted bay, which is a quite refined 1930s addition with a copper sheet canopy and Crittall-style doors with fine profiles; the retention of this feature is welcomed.

As with the previous design iteration, in conjunction with the erection of a mansard roof extension, it is proposed to demolish the 1930s tower which houses a contemporaneous streamlined staircase and a full-height metal framed glazed window on the north side of the house. The tower projects up to roof level to access the existing flat roof. Although this feature is a later alteration to the house, and adds an early 20th century layer to its evolution, its execution appears to be of a high quality which brings distinctiveness to the external appearance of the rear elevation of the house as seen from the north.

There are a number of options including just windows and also a timber oriel which follows the rhythm of the windows on this elevation. This option could work successfully providing the materials are of high quality and sympathetic to the building and elevation. Its boxy manifestation at roof level may be seen as its least successful attribute.

The demolition of the 1970s extension provides an opportunity to improve the setting of the northern elevation of Frogmal House, and allows for the potential reinstatement of historic features on the lower floors of this façade.

Internal Alterations to Listed Building

As previously stated, the building largely retains its historic floorplan and many historic features, however it has been altered overtime as a result of its previous use. As a result, the proposed internal alterations are generally supported.

A concern was previously raised over modifications to the historic panelling throughout the building and the impact this would have on the heritage significance of this designated asset. The applicant's team have undertaken considerable research as to the age and condition of the existing panelling and provided detailed section drawings as to how a layer of insulation between the external brick envelope of the house and internal timber panelling could be inserted sensitively. The Council generally supports retro-fitting measures to improve thermal performance and the details provided demonstrate that the building's special interest should not be harmed through the loss of historic fabric, compromise of decorative features or impacts on spatial quality. However, a methodology detailing the installation techniques and impacts on existing fabric will be required upon application.

Although the internal alterations are generally supported, there remains a concern in regards the alterations at first floor level which need to be addressed before the internal changes can be supported. The proposals include the creation of several new openings and cut off a section of the principle hallway in order to create a WC area. This is an unnecessary and harmful intervention that will distort the historic floorplan. The WC can be housed in the proposed master ensuite and dressing area, which was previously subdivided, thus ensuring the original proportions of this principle level can be maintained. This part of the proposals should be amended.

Concerns were raised in regards to the proposed internal ground-floor link between the new extension and the historic house, which takes the form of a contemporary corridor with angled forms. Whilst this is somewhat at odds with the rectilinear nature of the historic property, it is acknowledged that the current space is harmful to the significance of the building and the opportunity exists for enhancement in this space. Further details will be required of this element upon application.

Other elements of the proposed internal alterations are welcomed, such as the removal of the second floor staircase which obstructs a historic window. The removal of the 1930's staircase can be justified in the overall scheme and the benefits provided, but details will be required of the replacement staircase.

These comments should be read in conjunction with previous pre-application reports for the site.

New Residential units

First options

The original document shows numerous garden locations for the three mews houses however the south west corner is clearly preferred due to the proximity to the extension of the main house. These mews houses would run along the existing path and be split over two floors. Upon consultation with the Conservation officer, the direction is generally accepted and the location and scale are both appropriate and sympathetic. Being read in the context of the removal of the old extension and replacement with the new one, the mews houses are considered not to harm the heritage asset especially considering the site's history which contained ancillary buildings.

In terms of the design of the mews houses themselves, they appear utilitarian in nature and functional properties. This approach is supported and results in well-designed sympathetic buildings. The use of brick is accepted and the green roof does more to soften their appearance.

Addendum Option

Following the site visit and additional meeting where further locations were discussed, the garage area was looked into as a possibility to provide additional units that would not be contained within the garden. The addendum design proposes two 1bed 1person units in the garage undercroft space and an additional unit on top of part of the extension. This was later confirmed as a 2bedroom 3 person unit.

In relation to the garage units, the impact on heritage is much lower as these are contained within the garage space and behind the old garden. There will be a new garage-type door, green roof and roof lights but overall the visibility of new building on site is much reduced and the amount of external development which is publically and privately viewable is reduced therefore further limiting the impact of the setting of the listed building. With the third unit, this is proposed on top of the extension and adjacent to the rear elevation of the listed building. The design appears to reflect a modern take on a greenhouse and is made out of timber with some glazed, some obscure glazed panels. In terms of design and heritage, whilst this is higher than the existing extension in this location, the structure is set back 4.4m back and therefore reveals significantly more of the elevation of the existing building which is positive. The unit is only a 1 bedroom 1 person so the Council envisages the design will change considerable to incorporate the 2 bedroom 3 person as agreed. Issues of access, amenity, outlook and quality of accommodation are all to be discussed in section 3 below.

3. Quality of Accommodation

First Options

The mews houses all meet the national space standards for 1 bed 2 person units over two floors measuring (58sqm). Ceiling heights are acceptable and the proposed rooms are appropriately designed.

The units are single aspect, which is presumably down to not wanting overlooking onto the main building however use of opaque glazing or other detailed design measures could be used to overcome this perception and would help in providing dual aspect units. Notwithstanding this, subject to daylight, sunlight studies, there appears to be enough light for occupants and a good level of privacy. There is a bike store which is seemingly appropriate.

There is no amenity space for occupants of the houses which is disappointing given the verdant character of the site and the amount of space. This issue needs to be explored further.

In relation to access and fire safety, these were earmarked as major issues in the document pack. However there is a path that goes directly to the properties and whilst the incline may not be suitable for disabled occupants, as with the unit mix, flexibility can be taken by the Council considering the circumstances and site constraints. Furthermore with fire safety and waste collection, due to the location and distance from the road, these were also earmarked as problems. With regards to waste, this falls within part of the assessment of the standard of accommodation. Given the other elements are considered to be of a good standard, occupants having to move their waste longer than advised is considered to be ok. With fire safety, upon consultation with the building control officer, sprinklers can be installed in the properties to overcome any issues. Overall the quality of accommodation for these mews houses is of an acceptable standard.

Addendum Option

Within the addendum, the garage units meet space standards for 1 person 1 bedroom units with appropriate ceiling heights.

These units contain no open windows relying solely on roof lights and a small courtyard for daylight/sunlight. Enough of these means that the units may meet the required standard for daylight/sunlight but this needs to be tested. The courtyard also provides amenity space for both which is welcomed and there is seemingly a good level of privacy. One potential issue is the lack of outlook which needs to be explored further. The bin and bike store appear acceptable however it is noticed that the store also includes waste for 99 Frogmal. It is not clear whether this is for the new unit or 99 Frogmal itself but waste collection for the main house should be kept separate.

The 2 bedroom 3 person unit has not been designed yet however this would be located adjacent to the garage and where the previous unoriginal extension is located. The unit would have to demonstrate that it has a good level of outlook, daylight/sunlight and privacy as well as meeting space standards.

The relationship between this unit and the main house extension could result in a perceived increase in overlooking and so efforts should be made to mitigate this issue for both parties.

4. Unit Mix

Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and to reduce mismatches between housing needs and existing supply. The policy requires that all housing development, including conversion or extension of existing homes and non-residential properties contributes to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT) (see below); and includes a mix of large (3 or more bedrooms) and small homes.

Table 1: Dwelling Size Priorities

	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

The Council considers that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall. In terms of policy H7, the application would provide two 1 bedroom and one 2 bedroom market flats which are listed as a low priority, however considering the heritage issues and implications for trying to provide larger units on site, this unit mix is considered acceptable.

The new proposed units should be as accessible, functional and adaptable as possible and should aim to meet the requirements of Building Regulation M4 (2) in accordance with policy H6.

5. Neighbouring Amenity

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include visual privacy, outlook; sunlight, daylight, and overshadowing; artificial lighting levels; noise and vibration; odour, fumes, and dust; and impacts of the construction phase, including the use of Construction Management Plans.

The site itself is fairly stand alone in character and is of considerable scale to begin with. Because of this, the impact to neighbouring amenity in relation to the mansard is likely to be minimal and is also aided by the gradient in the ground level.

The new extension runs along the border of 105 Frognal approximately 40m in depth. At the closest point to the boundary the extension is 2.4m away and the furthest point is approximately 7.0m. Whilst the depth is significant, the extension, due to the ground level, will be set slightly lower than at no.105 which means that the impact is reduced. Furthermore, with the existing extension already in place and the large nature of the gardens, the impact to outlook, privacy, increased sense of enclosure, daylight/sunlight and overlooking is unlikely to be significantly impacted upon.

With the new residential units contained within the garage and part of the extension, the impact that these would have is limited. Furthermore due to the small nature of the units the impacts from noise would also be small.

Construction Management Plans are discussed in the 'Transport' section.

6. Transport

Policy T1 aims to promote sustainable transport by prioritising walking cycling and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities and finally improving links with public transport. All these measure are in place to ensure the Council meets their zero carbon targets.

Policy T2 limits the availability of parking in the borough and requires all new developments in the borough to be car-free. This will be done through not issuing parking permits, resisting development of boundary treatments and using legal agreements to secure these actions.

The applications site has a PTAL score of 2 which indicates that it has a satisfactory level of accessibility by public transport. The nearest station is Hampstead underground station, located to the east of the site.

In line with Policy T1 of the adopted Camden Local Plan, there is an expectation that cycle parking is going to be provided in accordance with the standards set out in the London Plan. For both the main dwelling house and other residential properties this seems to be easily accommodated on site.

Policy T2 of the Local Plan seeks to limit the availability of parking and require all new developments in the borough to be car free. Paragraph 10.20 states that *in redevelopment schemes, the Council will consider retaining or re-providing existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed. This is common where an existing dwelling or block is being extended or subdivided. It can also occur where a change of use brings a site or property into residential occupation. If a development is to have new occupiers, this should be car-free. Where redevelopment involves a town centre car park identified in Camden's Site Allocations Plan as supporting the functioning of the town centre, the Council will consider the retention of the existing parking provision or a lower level of provision on-site. Any new development on the existing car park should be car free in accordance with Policy T2.*

This is also clear within our transport CPG in paragraphs 5.11 and 5.12 which states that all new developments are to be car free and are secured through section 106 agreements.

After further consultation with the Council's transport colleagues any future application would be required to be car free.

Given the extent of alterations and construction works proposed, any future application should be subject to a Construction Management Plan and associated Implementation Support Contribution to be secured by means of the Section 106 Agreement. This will help ensure that the proposed development is carried out without unduly impacting the safe and efficient operation of the local highway network or neighbouring amenity, in line with Policy A1 of the Camden Local Plan

7. Energy and Sustainability

The Council requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The Council promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met, including zero carbon development; and expects all developments to optimise resource efficiency.

Policy CC1 requires all development to reduce carbon dioxide emissions by following the steps in the energy hierarchy; supports and encourages sensitive energy efficiency improvements to existing buildings; and expects all developments to optimise resource efficiency. The policy also supports the retention of buildings over substantial demolition, and where this does occur demonstration needs to be provided that it is not possible to retain and improve the existing building. Whilst in Design and Heritage terms the demolition is considered acceptable there needs to be justification in sustainability terms as well. All proposals for substantial demolition should be fully justified in terms of the optimisation of resources and energy use in comparison to the existing building. Where demolition cannot be avoided, we will expect developments to divert 85% of waste from landfills and either reuse materials on-site or salvage materials for reuse off-site.

Developments are also expected to implement the sustainable design principles as noted in policy CC2 by achieving a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Policy CC2 requires all development to adopt appropriate climate change adaptation measures such as:

- A. the protection of existing green spaces and promoting new appropriate green infrastructure.
- B. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- C. incorporating bio-diverse roofs, combination green and blue roofs, and green walls where appropriate; and
- D. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

No details of energy or sustainability measures have been provided as part of the pre-application documents.

Active cooling, especially for the residential areas will not be supported in any full application and should not be included in a proposal. The south elevation is to the front and contains limited glazing meaning the solar gain potential is limited anyway. Means of passively cooling the units using natural ventilation should be considered, especially in the garage units.

Retrofitting the building with more energy efficient measures to minimise energy consumption (draught-proofing, thermally efficient windows and insulation) should be considered and involved as part of any refurbishment works. A whole life carbon assessment should be complete following major demolition included in the proposal.

The Council will also seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures (policy CC3).

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site.

The application site is located in an area subject to underground development constraints, including slope stability, surface water flow and flooding and subterranean (groundwater) flow and is located in a flood risk area. Given this, there is significant concern regarding the principle of a basement in this location and you are advised to thoroughly examine the requirements of Policy A5 of the Local Plan and the Basement CPG prior to submission. Please refer to the Basement CPG for details of what information the BIA must cover.

Policies D1 and CC2 of the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. The inclusion of a green roof is therefore welcomed.

8. Trees

Upon consultation with the tree officer the proposal might potentially be acceptable from an arboricultural perspective. A successful application would be accompanied by an arboricultural report in line with the British Standard BS5837:2012 trees in relation to design, demolition and construction recommendations, including an arboricultural impact assessment, arboricultural method statement and tree protection plan. Details of landscaping including replacement planting to mitigate any trees to be removed with details of tree pits and maintenance schedules

9. Air Quality

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.

10. Community Infrastructure Levy

If the proposal was deemed acceptable it would be liable for both Mayoral and Camden CIL. This would be based on Mayor's CIL2 (MCIL2) and Camden's latest CIL charging schedule from 2020. Final payable contributions would be calculated (following any potential approval of the scheme) by the Council's CIL officers.

CONCLUSION

It is considered the principle of a scheme that includes the change of use, extension and additional units is accepted however the overall development, in particular the mansard and size of the extension, needs to reduce in order for the balance between land use and heritage considerations to be acceptable.

Given the sensitive nature of the site itself, it is recommended you begin early consultation and engagement with local resident groups, societies, neighbourhood forum and the CAAC to ensure local residents are consulted.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable, nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries about the above letter or the attached document, please do not hesitate to contact **Ewan Campbell**

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

It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete our online survey at the following website address: www.camden.gov.uk/dmfeedback. We will use the information you give us to help improve our services.