

Application ref: 2022/3037/PRE
Contact: Ewan Campbell
Tel: +44 20 7974 5458
Email: Ewan.Campbell@camden.gov.uk
Date: 20/02/2023

Development Management
Regeneration and Planning
London Borough of Camden
old address

Phone: 020 7974 4444

planning@camden.gov.uk

www.planning@camden.gov.uk

Stuart Minty
SM Planning
Stuart@smplanning.com

Dear Sir/Madam

Pre-application Minor Development Pre-application Advice Issued

Address:

Frognal House
99 Frognal, London
NW3 6XR

Proposal: Demolition and removal of existing extension and a erect a two storey side/rear extension, new mansard roof extension, construction of basement, internal alterations, green roofs on garage and associated landscaping. Addendum – the inclusion of three additional units within the garden of the site.

Drawing Nos: Pre-application Existing Drawings (July 2022), Pre-application Existing Drawings (Revision 1 January 2023), Pre-application Proposed Drawings (July 2022), Pre-app Landscape Report (25/05/2022), Pre-application Statement (July 2022), Cover letter (14/07/202), Student Accommodation Addendum document (07/12/2022) Pre-application Addendum Note, Heritage Appraisal (June 2022), Heritage Appraisal Addendum (December 2022)

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
- Central London Area
- 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the main house (C3) and the other comprising of link and west wing building for student accommodation (Sui Generis) – Withdrawn*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 certificate 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 Burdle 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) 2021

The London Plan 2021

Camden Local Plan 2017

Policy A1 Managing the impact of development
 Policy A3 Biodiversity
 Policy A5 Basements
 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 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 CC5 Waste
 Policy DM1 Delivery and monitoring

Hampstead Neighbourhood Plan 2018

Policy DH1: Heritage
Policy DH2: Conservation areas and Listed Buildings
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
Energy efficiency and adaptation CPG 2021
Employment Sites and Business premises CPG 2021
Housing CPG
Transport CPG 2021
Water and Flooding CPG

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 Frognal Grove, a group of buildings designed by Henry Flitcroft, and also a driveway on the south side accessing 99a Frognal, a 20th century house on a backland site behind Frognal House. As such, Frognal House is visible in a number of views within this section of Hampstead Conservation Area, including in views north and south along Frognal, and from Mount Vernon in the east. The topography of the vicinity is quite hilly, with the land gradually rising up Frognal, 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 inquiry 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. Notwithstanding, my comments relate to the design and heritage impacts of the planned physical works on the affected heritage assets, and are made independently of the change of use issues.

ASSESSMENT

The principal planning considerations are the following:

1. Change of use Principle
2. Design and Heritage
3. Basement Considerations
4. Quality of Accommodation
5. Unit Mix
6. Neighbouring amenity
7. Transport
8. Energy and sustainability
9. Trees
10. Air quality
11. 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.

Policy H1 of the Local Plan aims to secure a sufficient supply of homes to meet the needs of existing and future households and will seek to exceed the target for additional homes in the borough by regarding self-contained housing as the priority land use of the Local Plan. This runs alongside policy G1 (Delivery and location for growth) which ensures development will use sites that come forward in an optimal fashion.

Notwithstanding the recent occupation by students, based on the planning history, the nature of the use, and the provisions of paragraphs 3.235, 3.236 and 3.266 in the Camden Local Plan 2017, the Local Plan policy most relevant to considering loss of the existing use appears to be Policy H10.

Under Policy H10, the Council seeks to retain housing with shared facilities where it is capable of meeting relevant standards. The Council would therefore support adaptation of the property to meet HMO standards and provide for continued use as shared accommodation for students or other suitable occupiers. Any proposals for the loss of these would be considered against Policy H10 clauses (g) and (h). Criterion (i) is not considered to be relevant in this case as it relates to conversion of existing social-rented housing in the circumstances explained in Local Plan paragraph 3.284.

In terms of the proposal, if the building was converted into a single dwelling house, the evidence available indicates that there would be a loss of 29 bedrooms in shared accommodation. Under London Plan 2021 monitoring arrangements (paragraph 4.1.9) and the Housing Delivery Test rulebook (paragraph 9), this would be equivalent to a loss of 12 (29 divided by 2.5) to 16 (29 divided 1.8) homes (depending on whether the Council concludes that the property should be treated as student housing or shared accommodation available to other groups). The addendum documents put forward provides an argument that the number would approximately 6.6 homes based on the number of rooms which meet current student housing standards. This position is not accepted as the true figure however given the Heritage considerations of the site, it is accepted by the Council that 12 to 16 homes on site would not be possible unless a significant harm was caused to the listed building.

The addendum proposal has provided 4 units (including the main dwelling house) which is welcomed. Whilst this involves a balance between heritage and land use issues as well as the amount of development being proposed on site, justification needs to be provided that a further additional unit(s) cannot be located on site and therefore provide more of an optimal use of the site.

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%. There is a possibility this could be provided on site and again, it needs to be looked at as a possibility.

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.

Finally, whilst this will be covered in other sections, it is important to mention that currently the overall scale and therefore GIA remain unacceptable for this site and mean that there will have to be a reduction in floor space, in particular in relation to the extension. On the whole there needs to be an appreciation of the site's area and the appropriateness of the uses proposed within it. The proposal should aim to have an overall acceptable balance of uplift in GIA and land use with heritage considerations as well as policy.

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. That said, alongside the construction of the house at 99a Frognal, the existing extension represents a phase of development found in the conservation area when large properties were extended or subdivided and their gardens divided up for smaller residential units or institutional uses. However, in its own right it is considered to make a neutral rather than a positive contribution to the conservation area.
- On this basis, the demolition of the extension may be acceptable subject to certain factors. Aside from conservation and design matters, it will be necessary first to meet sustainability requirements with regard to its construction and materials; as a starting point, it is likely that the retention and possible adaptation of the extension will need to be considered. Notwithstanding, in terms of design and heritage, there are likely to be some benefits arising from its demolition as its removal will give an opportunity to open up and reinstate the gardens of the historic house and recreate a major part of its setting on the north and west sides, as well as contributing to the setting of the neighbouring listed building. The benefits of any demolition works will also need to be read in conjunction with a landscaping scheme of the gardens, together with an assessment of any replacement development on the site

Replacement Extension

- On the proviso that the listed building is converted back to a single-family dwelling, a replacement extension is proposed which will provide above- and below-ground accommodation for the house. The extension will largely follow the line of the northern section of the existing extension, skirting the northern boundary of the site, with an irregular plan form consisting of a series of angled spaces. It will be slightly drawn away from the northern wall of the main house than the existing extension, allowing the house to read as the principal building on the site. Importantly, the proposed layout will also allow for the garden to be opened up again to create one flowing space leading from the house up the western slope to the boundary with 99a Frognal. With a number of setbacks on its northern side, it will have a more low-key relationship with the adjacent listed building on Frognal Grove.
- Above ground, the extension will manifest itself as a series of low-lying one- and two-storey angled forms integrated into the landscape, with the central section disguised under a green living flat roof which will merge with the existing garage roof: as such it is a contemporary interpretation of the garden pavilion concept, housing kitchen and dining facilities, together with living spaces and a cinema room, plus ancillary facilities including the existing garaging. This approach is considered to be a major improvement on the existing extension, and will generally read as contrasting and subservient to the main house. However, there is one projection at its south-western extremity containing a dining area, which projects further towards and closer to the western wall of the historic house than the existing arrangement. It is therefore recommended that this element is drawn back and recessed away from the house so as not encroach upon its setting.

- Below ground, it proposed to create one level of basement containing a swimming pool which will lie on a north-south axis. As this will be some distance from the main house, it is unlikely to impact on the structure and fabric of the property, and will not alter the existing hierarchy or spatial character of the house. However, a full basement impact assessment will be required covering not only the impacts of the basement on the existing terrain but also on the historic building, considering the house lies at the bottom of a hill which slopes down considerably from west to east.
- In relation to materials, the principles as outlined in the Planning Statement are considered sympathetic and of good quality. As stated above the contrasting styles, which is strongly reflected in the materials still provides a subtle subordination but also strength individually. Every effort use sustainable materials including Cross Laminated Timber (CLT) for the construction would be welcomed and should be aimed for.

Addendum Proposal

- Following the inclusion of additional housing on site, in accordance with Local Plan policy, the culminate development on site which includes the extension, mansard and housing, there is concern that this all results in a significant amount of development and ultimately overdevelopment of the site. Whilst the removal of the mansard is required in order for an acceptable scheme (see later comments), further reduction in scale is needed in order for the balance to be at an acceptable level.
- Moving forward, in accordance with the comments above for the ground floor extension, whilst the architectural language, materiality and design elements are generally welcome there needs to be appreciation that development in the form of additional residential units, will impact the scale and form of the extension and be reduced to account for this.

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 Frognal Grove coach house, also has a large flat roof. Both buildings which are situated on the west side of Frognal 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 Frognal, which mainly consist of two-storey buildings with pitched roofs including some with attic storeys.

- The Heritage Statement submitted as part of this inquiry outlines the history of the house including its roof form. The house formerly had a series of pitched roofs of varying forms at main roof level, which included a cupola, and which provided servants' accommodation. It is not clear how these roof forms evolved, but it is apparent from their ad hoc and informal nature that they were added over time and did not date from the same period. There is evidence from drawings and photos that these roof forms survived intact in the 1920s, and subsequently were removed in the 1930s when the house was remodelled with additions such as the north stair tower and a roof-top sun room (now demolished). It should be noted that the previous pitched roofs were not uniform or symmetrical in appearance, and very much read as subservient secondary elements, with the exception of the cupola which gave the house some landmark status. However, the highest and bulkiest section was a traditional mansard roof located on the west side abutting the garden, whereas on the east side there was a much lower pitch roof having a lesser impact on surrounding views from the street.
- In order to assess the merits of a new mansard roof extension to Frogmal House, it is necessary to consider both the historic evolution of the listed building and the townscape context today of the Hampstead Conservation Area. An assessment is required not only of the impact of such works on the host building but also on the surrounding conservation area, which in turn present differing sets of issues.
- 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. It would appear that the servants' rooms accommodated at roof level were generally small spaces with low floor-to-ceiling heights, maybe with the exception of the western range which had a taller mansard roof. For the last 90 years or so, the house's overall height has been reduced, having been finished with a large flat roof as described above, with only additional incidental height from the 1930s stair tower. Softened by the metal perimeter railings, the horizontal lines now make up the house's established roofline, as read with the flat roof of the former Frogmal Grove coach house next door. Indeed Frogmal House's flat roof has become a prominent feature in the streetscape, visible in views from the north, south and east. The house's three storeys sit comfortably in the townscape and do not jar with the modest building heights and scales on the opposite side of the street.
- It is proposed to construct a sizeable symmetrical mansard roof covering the majority of the building's footprint, with the exception of the southern canted bay which will serve as a roof terrace. The roof form will be noticeably taller and bulkier than earlier roofs as well as the existing 1930s stair tower and other minor accretions. The extension will accommodate living accommodation, largely of an open-plan nature, made up of a series of interlinked spaces including a large reception room, kitchen and bathroom, with access from a stair centrally placed on the north side. As such, sufficient height will be required to allow for floor-to-ceiling heights to meet current residential standards, resulting externally in an increased height, bulk, mass and scale than previously, with a near-flat roof covering the majority of the extension. There will be a central recess on the southern side with full-height glazed doors opening onto the roof terrace. The internal spaces will be lit by sliding sash dormer windows, whose sills will be at a higher level than the top of the brick roof parapet.

- Whilst it is apparent in listed building terms that historically there was a precedent for roof additions, the house has had a flat roof since the 1930s which, in conjunction with the contemporaneous stair tower, may be seen to be important elements of the house's evolution. Whilst the principle of altering the roofline is not completely ruled out in principle, great care needs to be taken in the design of any roof additions. Account needs to be taken of the survival of historic fabric, together with the form of the existing building envelope and significance of any later additions. Consideration needs to be made also of the design of the existing building envelope including its façade modelling and articulation, proportions, floor-to-ceiling heights, and fenestration pattern in terms of solid to void. As such, it is considered that in terms of its relationship with the host building, the currently proposed extension is too large by way of its additional height, bulk, mass, footprint and scale, presenting an inappropriate form as one large roof element with a sizeable recess on its southern side. As such, it will read as an overly-dominant addition, failing to be subordinate to the listed building, and potentially constituting over-development.
- It is also considered that the roof extension, due to its disproportionate additional height, bulk, mass, scale, inappropriate form, and prominent siting, will have a detrimental effect on the character and appearance of this part of the Hampstead Conservation Area. By introducing an overbearing element to the roofline of the existing house, it will have a negative impact in views up and down Frognal to the north and south, as well as from Mount Vernon in the east and from private views from properties to the north, west and south-west. The addition of such a dominant extension will imbalance the house's relationship with surrounding residential properties with moderate heights, including the former Frognal Grove coach house to the north, and a number of houses and cottages to the east on the opposite side of Frognal.

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 as 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.
- 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 to 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. Its boxy manifestation at roof level may be seen as its least successful attribute. As a significant element in the building's evolution, it is recommended that the staircase and full-height window are retained, in conjunction with the other planned alterations and improvements to the property
- The demolition of the 1970s extension provides an opportunity to improve the setting of the northern elevation of Frognal House, and allows for the potential reinstatement of historic features on the lower floors of this façade

Internal Alterations to Listed Building

- As stated above, these comments do not address change of use matters. However, in heritage terms the return of the listed building's original use as a single-family dwelling is considered to be sympathetic for several reasons, particularly in relation to building envelope, internal fabric, internal spaces, architectural hierarchy, room functions and building services. Notwithstanding, intended works to the house should also take into account its interesting social history and various uses through time.
- Having been in convent/educational use until recently, the house, which comprises three principal floors and a small basement on its north-east side, is generally in good condition. Internally, it contains a plethora of historic features, with many of its principal rooms and spaces retain their historic character. However, there are also a number of internal alterations which are somewhat out-of-keeping and may now be redundant.
- The principle of reinstating the majority of elements making up the original plan form on the three main levels of the house is to be welcomed. This can be achieved through the removal of non-original 20th-century internal partitions, fittings and fixtures, and out-of-date services. It can also be reinforced by the revealing of historic features such as decorative plasterwork, fireplaces, panelling, doors, staircases, flooring, and other joinery items, together with the sensitive reinstatement of decorative features such as panelled doors where they are missing.
- In its current form, the house contains a number of reception and communal areas in the larger ground-floor rooms, with the remainder of the house largely used as bedrooms and bathrooms, often in subdivided rooms. Kitchen and dining functions are currently housed in the northern wing of the 1960s extension. The intention is to continue this theme, with the principal rooms on the ground floor used as reception rooms, and large suites of bedroom and bathroom accommodation distributed across each level of the house. It is proposed to locate the main kitchen and dining area of the property in the new extension, although there will be some ancillary kitchen and utility spaces reintroduced into the main house.
- Although these design concepts are generally supported, a number of issues arise on principal floors which need to be addressed before the internal changes can be supported. Firstly, a number of new door openings in existing internal walls are proposed to link bedroom, bathroom and dressing room functions. Not only will such works involve structural interventions, but are likely to also entail the loss of historic fabric including wall panelling. Secondly, the introduction of new bathroom and kitchen facilities across each floor will require the careful consideration of the integration of service runs within the structure of the historic building so as to avoid the loss of fabric or structural integrity. At the current time, these facilities are limited to certain areas of the house as none of the existing bedrooms have ensuite facilities. Thirdly, the proposed plans show a large number of new fittings and fixtures, the designs of which should be sensitively integrated into the listed building in a reversible manner so as to avoid damage to historic fabric and so as not to conceal decorative features. Fourthly, inevitably the existing services of the house are outdated and require upgrading; however, where feasible existing services or service runs should be reused so as to minimise disturbance to the building fabric and structure. For instance, if historic radiators survive, efforts should be made to retain and upgrade them if at all possible.
- One area of contention is likely to be 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 making closer references to the design of the proposed extension than to the historic house which has a rectilinear character. If this element of the proposal is to be supported, a full survey as existing needs to be provided justifying the loss of historic fabric and spatial character at this principal level of the listed building.

- Another item to consider is the potential removal of the 1930s staircase on the north side of the house, which has already been mentioned in relation to its external manifestation as a tower with full-height glazing. As stated above, the staircase itself has a streamlined modernist stair balustrade which complements the glazed elements of the tower, and as a stair compartment reads separately from the rest of the house, which also benefits from an historic staircase with a barley twist balustrade contemporaneous with the original house.
- Of final consideration is the potential for thermally upgrading the listed building internally, through such measures as the installation of a layer of insulation between the external brick envelope of the house and internal timber panelling. Whilst the Council generally supports retro-fitting measures to improve thermal performance and energy efficiency, such works need to be fully detailed for a listed building to ensure its special interest is not harmed through the loss of historic fabric, compromise of decorative features or impacts on spatial quality. Although some sample sections have been provided in the pre-application submission, full details of all typical situations are required, together with methodologies detailing installation techniques and impacts on existing fabric. Likewise, full details of secondary glazing systems would need to be provided covering each window type and considering features such as working shutters, window boxes, etc, to ensure there are no negative impacts on the historic building. The introduction of light-touch measures such as the installation of roof insulation, overhauling and draught-proofing of sash windows and doors, the hanging of heavy curtains in winter, and the laying of carpets should also be explored. Overall the principle of an extension in this location is accepted however the design also needs to be better rationalised in relation to the host building; the rear elevation shows floor to ceiling glazing on the ground floor, glazed windows on the first and small brick windows on the second. Each of these three floors remains different in design and means it is read differently to the whole scheme.
- The significant amount of glazing is also of concern and should be reduced.

New Residential Block

- The block located to the eastern side of the site contains three units of residential accommodation.
- Whilst the number of units is discussed above, from meetings, the design was going to be driven by the ancillary stable buildings which were located when the site formed part of the wider area.
- Upon consultation with the Conservation officer, the direction is generally accepted however the addendum document only provides a rough site plan meaning that it will be hard to comment at this stage. You are advised to submit a further pre-application request prior to the submission of a formal planning application.
- Issues of access, amenity, outlook and quality of accommodation are all to be sorted out in the next design iteration.

3. Basement Considerations

Policy A5 of the Local Plan and policy BA1 and BA2 of the Hampstead Neighbourhood Plan (2018) state that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) Neighbouring properties;
- b) The structural, ground, or water conditions of the area;
- c) The character and amenity of the area;
- d) The architectural character of the building; and

e) The significance of heritage assets.

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- f. not comprise of more than one storey;
- g. not be built under an existing basement;
- h. not exceed 50% of each garden within the property;
- i. be less than 1.5 times the footprint of the host building in area;
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- k. not extend into or underneath the garden further than 50% of the depth of the garden;
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- m. avoid the loss of garden space or trees of townscape or amenity value.

In relation to the above the proposed basement meets all of these requirements. It is noted under section f 'not comprise of more than one storey' that where appropriate we will allow a proportion of the basement to be deeper to allow development of swimming pools. Allowance of this additional depth will only be appropriate where it does not harm the neighbouring properties or the structural, ground, or water conditions of the area, and where the additional depth is required for a swimming pool and it not being used for any other purposes.

The existing and proposed sections do not have a scale bar, but the total depth for the majority of the basement (excluding the swimming pool element) should not be more than 3-4 metres (the external dimensions).

The Council will require applicants to demonstrate that proposals for basements:

- n. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
- o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- p. avoid cumulative impacts;
- q. do not harm the amenity of neighbours;
- r. provide satisfactory landscaping, including adequate soil depth;
- s. do not harm the appearance or setting of the property or the established character of the surrounding area;
- t. protect important archaeological remains; and
- u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

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. Given this, you are advised to thoroughly examine the requirements of Policy A4 of the Local Plan and the Basement CPG prior to submission. The development would require a comprehensive and accurate Basement Impact Assessment to be submitted with the formal application demonstrating no significant harm to the application site, neighbouring sites or those surrounding. Please refer to the Basement CPG for details of what information the BIA must cover. Any basement should not propose more than a 1 on the Burland scale.

Independent verification of Basement Impact Assessments, funded by the applicant, is required. Please note that the Council's preferred provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charge a fixed fee dependant on the category of basement audit, outlined in appendix A of Camden's BIA audit service terms of reference. You are strongly encouraged to review the BIA guidance and reference documents on the Camden website (www.camden.gov.uk/basements).

4. Quality of Accommodation

Notwithstanding the points made in relation to the other issues, the main dwelling house and extension provide a high quality of accommodation for occupants, comfortably meet space standards and seemingly provide a good level of privacy of outlook.

Within the addendum proposal, this only provided an approximate location, scale and did not have any layout. These units should still have a high level of accommodation and there is a strong expectation that space standards are met, amenity space provided, contain a good level of privacy and outlook as well as having an appropriate access with cycle and waste storage.

5. 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 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 three 1 bedroom market flats which are listed as a low priority, as stated above, the potential of more units on site as well as size needs to be explored.

6. 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 the 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 block in the eastern part of the garden the building will be within close proximity to neighbouring boundaries with the Frognal Mansions to the south, Oak Hill Park mews buildings to the south west and 99a Frognal to the west. Issues of noise, privacy, outlook and daylight/sunlight are all relevant in this instance due to the land level changes, proximity to neighbouring properties and nature of the use. A full assessment will need to be undertaken to ensure these issues are mitigated against, including, potentially, a daylight/sunlight assessment.

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

7. 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 measures 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 reproviding 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.

8. 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 existing building. Whilst in Design and Heritage terms the demolition is considered acceptable there needs to be justification in sustainability terms as well.

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.

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.

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.

9. 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

10. 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.

11. 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 removal of 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 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.

<p>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.</p>
