



**Date: 16/04/2024**  
**Our ref: 2023/4733/PRE**  
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Dear Fiona Duffy,

**Re: 12a Church Row, London, NW3 6UU**

I refer to your pre-planning application enquiry 2023/4733/PRE at the above address. Thank you for sending the documents detailing the proposed alterations to the property, as well as the site visit conducted on 01/12/2024.

### **1. Proposal**

The proposal involves the demolition of the existing dwellinghouse and the erection of a new dwellinghouse including extensions at ground level, basement, and to the roof. Various associated alterations and works are also proposed including relocating the existing garage to the front of the site, replacing the existing outbuilding, and general landscaping works.

### **2. Site description**

The application site is a detached neo-Georgian two-storey dwellinghouse, formerly known as Mulberry House. It was constructed around the 1950s/1960s and as such is not part of the original swathe of development in this part of Hampstead, but instead was constructed later within the former grounds of Frognaal Lodge. The building is located on the north side of Church Row, immediately adjacent to the intersection with Frognaal Gardens.

The site is located within the Hampstead Conservation Area and, while not itself listed, is in close proximity to the Grade I listed St John's Church and the Grade II listed 88-88A Frognaal. The site is not noted as a positive contributor to the conservation area in the Hampstead Conservation Area statement, however it is considered to be a positive contributor by the Council. Given the aforementioned statement is significantly outdated (published in 2001) and in line with the NPPG, the Council's conservation officers consider this site to make a positive contribution.

### **3. Relevant planning history**

Application site

**2008/4646/P** – Erection of a 2 storey side/rear extension to the dwellinghouse with car port at ground level as a replacement to the existing partially demolished carport. **Planning permission granted 16/12/2008.**

**PWX0202247** – The retention of a new garden shed as a replacement for an existing greenhouse and the creation of a hydrotherapy pool, including minor adjustments to the existing landscaping. **Planning permission granted 10/06/2002.**

**PWX0002915** – The extension of an existing garage towards the south, the erection of a first floor over the garage and alterations to the profile of the roof of an existing single storey rear extension, including the installation of three rooflights on that roof. **Planning permission granted 04/02/2002.**

**TP11306/19960** – The erection of a two-storey dwelling house and the formation of a new means of access to the highway at No.1, Frogna! Gardens, on land adjoining Church Row, Hampstead. **Permission granted 28/01/1956.**

**TP11306/26602** – The erection of a two-storey dwelling-house and the formation of a new means of access to the highway at No.1, Frogna! Gardens, on land adjoining Church Row, Hampstead, with facing materials as described in the applicants' letter of 18<sup>th</sup> April, 1955. **Permission granted 31/05/1955.**

#### Neighbouring properties – 18a Frogna! Gardens

**2020/5214/P** – Demolition of existing 3 storey dwellinghouse and replacement with 1 x 4 bed four storey single family dwellinghouse with basement excavation, landscaping and associated works (Use Class C3). **Planning permission granted subject to a Section 106 legal agreement 01/10/2021.**

#### **4. Relevant policies and guidance**

The National Planning Policy Framework 2023

The London Plan 2021

Camden Local Plan 2017

- **G1** Delivery and location of growth
- **A1** Managing the impact of development
- **A2** Open space
- **A3** Biodiversity
- **A4** Noise and vibration
- **A5** Basements
- **D1** Design
- **D2** Heritage
- **CC1** Climate change mitigation
- **CC2** Adapting to climate change
- **CC3** Water and flooding
- **T1** Prioritising walking, cycling, and public transport
- **T2** Parking and car-free development

- **T3** Transport infrastructure
- **T4** Sustainable movement of goods and materials
- **DM1** Delivery and monitoring

#### Camden Planning Guidance

- CPG Access for All (Mar 2019)
- CPG Amenity (Jan 2021)
- CPG Basements (Jan 2021)
- CPG Biodiversity (Mar 2018)
- CPG Design (Jan 2021)
- CPG Energy efficiency and adaptation (Jan 2021)
- CPG Home improvements (Jan 2021)
- CPG Student housing (Mar 2019)
- CPG Transport (Jan 2021)
- CPG Trees (Mar 2019)
- CPG Water and flooding (Mar 2019)

#### Hampstead Conservation Area Statement 2001

### **5. Assessment**

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

- Principle of demolition;
- Design and conservation
- Amenity
- Transport
- Energy and sustainability
- Trees and landscaping
- Basement considerations
- Community Infrastructure Levy

### **6. Principle of demolition**

Before assessing the rest of the planning considerations for this proposal, it should be noted that there are fundamental issues with the principle of demolition that forms the basis of this application. However, it is considered that much of the works are not contingent on the demolition taking place, so this advice still covers the works on the basis that they are able to take place without requiring total demolition of the existing dwellinghouse. The reasons as to why demolition would not be supported are detailed in sections 7 (Design and conservation) and 10 (Energy and sustainability) of this advice.

### **7. Design and conservation**

The Council's policies on design aim to achieve the highest standard of design in all developments. Policy D1 (Design) requires that development considers the local context,

setting, and character and for development to integrate with the form and scale of surrounding buildings. Policy D2 (Heritage) states that the Council will only permit development both within conservation areas and to listed buildings if it preserves or enhances the character and appearance of the heritage assets. This is supported by the Camden Planning Guidance (CPG) 'Design'.

The Hampstead Conservation Area Statement does not identify the existing building as making a positive contribution, and only states the following with regard to the application site: "*On the north side at the junction with Frognaal Gardens is Mulberry House, set back behind a high brick wall, the first floor windows and parapet are visible from the road*". This is the only specific reference to the plot throughout the statement. However, the Council's conservation officer has reviewed the site and determined that the existing building contributes positively to the character and appearance of the conservation area. Although the building is a modern development in the neo-Georgian style and not historic like some of the nearby properties, it is a good example of post-war neo-Georgian domestic architecture, with well-considered form and modelling. It is also well positioned in the site by being set back from the road and behind a historic brick wall (which is presumably a remnant of the former grounds of Frognaal Lodge). The existing building also relates well to buildings on adjacent and nearby plots, and respects the sensitive historic context in close proximity to St John's Church, which is Grade I listed.

The conservation area itself hosts many different architectural styles of building, and part of its character comes from the multitude of varying development – as the conservation area statement explains: "*the Conservation Area character is therefore derived from the wide range of areas within it*". Importantly though, the range of ages and styles extends throughout the conservation area, but individual plots typically have one coherent character, such as Victorian, 20<sup>th</sup> century, etc.

It should be noted that the Hampstead Conservation Area Statement dates from over twenty years ago, so conservation officers consider that, given the passing of time and in line with National Planning Policy Guidance, the existing house is now considered to make a positive contribution to the conservation area.

As a result of the building's positive contribution, it would not be acceptable to demolish the structure as currently proposed. While demolition may sometimes be supported in cases where the existing building makes a negative or neutral contribution, this would not be such a situation. Demolition would also not be supported on sustainability grounds, and this is discussed in section 10 of this advice.

Regardless of the Council's opposition to the principle of demolition, it may be achievable to incorporate the goals of the scheme whilst retaining the existing dwelling; the proposal is to rebuild the house mostly in facsimile, with the addition of a basement extension, roof extension, side extension, and various external alterations – and it may be possible to undertake these works whilst retaining the existing structure, and this should be explored.

As such, this pre-application advice will continue to assess the various elements of the proposed replacement building, on the basis that demolition would not be required to carry out these works.

#### Side extensions to west, north, and east

The addition of the side extension and additions to the west and north of the building would not substantially increase the footprint of the building, and would allow the house to still sit comfortably within the plot in appropriate positioning away from the road. The side extension (to the east side of the building) would not extend an unreasonable depth into the garden, and would be an appropriate height. As such, the proposed scale and bulk added by the extensions to the west, north, and east may be acceptable, and would not be considered to substantially alter the form of the building.

The ground and first floor additions would be constructed of contemporary brick with metal windows, with a glazed link – which would be located to the west between the arched section of the ground floor extension and the north extensions. It is also noted that the extensions would feature chamfered metal dormers, facing west (near the north boundary) and south (facing the main entrance). The use of such modern materials and design needs to be carefully considered; although the building is not historic, a key part of its contribution to the conservation area comes in its neo-Georgian style and vernacular. As noted earlier in this section of the advice, the conservation area may be varied in character and styles, but individual plots such as this often have a clear and distinct character and appearance. Whilst a modern extension is not opposed in principle, there should be a clear distinction between the neo-Georgian part of the building and any modern additions. The proposed visual features such as the chamfered windows and dormers should be part of a distinctly separate addition, rather than blur the line between the main building and the additions. Currently, the west elevation in particular does not manage this balance well enough. The articulation does not bring enough distinction between the main building and the extensions, and the ‘secondary’ extension (as established on p.25 of the pre-app document) reads as somewhere between the two, rather than a distinct extension. The glazed link serves to reinforce this confused relationship, rather than make a distinct separation, as it links two contemporary additions, neither of which match the neo-Georgian style of the host building.

A more successful design approach would avoid separating the building into many parts, but instead allow a clear distinction to be made between the contemporary style extension and the main building, so that the additions are subordinate and respectful of context. This is particularly important for the east elevation, where the tops of the extensions may have some level of public visibility, but also includes the south elevation, near the main entrance. At the main entrance, it is difficult to achieve a clear distinction between the extensions and main building – particularly due to the roofslopes integrating with the main house. This results in an uncomfortable fusion, and it would be better to consider extensions in this location that more closely match the existing building in materiality and

design. Whilst features such as arches could perhaps be justified, provided that they do not become overly dominant in appearance, the contemporary elements are more difficult to incorporate. It is key that any new design features ensure that they don't undermine the positive contribution that the building makes to the conservation area. In particular it is strongly recommended that the metal chamfered dormers are removed from the proposal, as these do not integrate well with the existing building. The green roofs to the flat roofs of the extensions would be supported.

### Roof extension

The proposal involves the erection of a roof extension that would introduce overhanging eaves and dormers to the east and west. The extension would not increase the height of the building, and although the eaves would change, the roofline would not appear altogether different. It is also noted that the existing roof layout lacks consistency and coherency, with a number of different levels and pitches. It appears that the proposal would offer the opportunity to simplify this by amending the design so that the roof is split into more clearly defined sections. Any changes to the roof would be clearly visible from the public realm, including along Church Row both to the east and west of the site and at the southern point of Frogal Gardens.

The principle of the roof extension and the increased massing is not opposed in principle, however the alteration to introduce overhanging eaves would not be supported. Although it is appreciated that neo-Georgian buildings often do have overhanging eaves, part of this specific building's distinctive neo-Georgian appearance is the higher parapet wall that the eaves sit behind. As such, the applicant would be strongly encouraged to maintain this, and consider revising the design so that further habitable space is added by increasing the massing to an appropriate degree, but while keeping the roof eaves behind the parapet.

The introduction of side dormers with tiled cheeks to match the roof would be able to be supported, subject to further details. It appears from the proposed design that these would include an appropriate level of glazing that would respect the fenestration hierarchy of the respective elevations. However, the depth of the dormers is quite large, as they appear to extend so that they are level with the side elevation of the main house. It would be recommended to reduce this depth slightly so that the dormers continue to be subordinate to the main roof. To be clear, this is not referring to the lower-level modern dormers, which are reviewed earlier in the report.

The rooflight to the flat part of the roof of the north-west addition (above 'Grandma's bedroom') is too large in scale and should be reduced so that it is subordinate.

### Basement extension

The basement extension would consist of effectively three rooms – a utility/store, a plant room, and a bathroom. The entrance to the basement would be located within the main

dwellinghouse, and as such would not advertise itself. In principle, there is no objection to the basement, particularly given the modest size. It is not considered that it would harm the contribution that the building makes to the conservation area, and as such would be acceptable, subject to further details. Section 12 of this advice gives more specific details with regards to basement considerations.

### Garage and outbuilding

The proposal involves the relocation of the garage (which is currently part of the main building) to the front (south) area of the site). The proposed structure would be reasonably modest in size and would include a green roof. The outbuilding to the east of the garden would also be replaced with a slightly enlarged version. Both garden buildings would feature green roofs and be clad with vertical timber slats.

The garden is large enough to accommodate both the proposed garden buildings, and the combined footprint would leave more than enough garden space (particularly considering the proposed removal of the swimming pool). The positioning to the edges of the garden would also be appropriate, and even though there may be some visibility from the public realm outside the site, this would be limited to the tops of the buildings, the visual impact of which would be softened by the inclusion of green roofs. The design of both buildings appears to be acceptable, though further details including detailed sections and elevations would need to be provided at application stage. It would also be a benefit to remove the garage from the main building, where it currently is an unwelcome and uncharacteristic addition that detracts from the appearance of the building.

It should be noted that the boundary wall appears to be historic, and likely originally associated with Frogmal Lodge. This will therefore need to be protected, so where the garden buildings appear to be built up to the edge of the boundary, details will need to be provided that demonstrate that the wall itself will not be harmed or negatively impacted by the development.

### Summary

To conclude, the demolition of the building would be resisted upon application due to the recognition of the building's positive contribution to the conservation area. However, it may be possible that the proposed works could be carried out without having to demolish and rebuild, so these elements have been assessed. Whilst the west, north, and east extensions may be acceptable in scale and massing, the design approach results in a confused and insubordinate addition. Although the wider conservation area is defined by its mixture of architectural styles from various different periods, individual sites are typically defined by one distinct building typology. In this instance, the plot is clearly characterised by a neo-Georgian vernacular, so any modern additions should be clearly separate and distinguishable from the main building. As such, revisions are needed to ensure that the extensions are either clearly distinct from or clearly integrate with the main

body of the building. The roof extension is acceptable in principle but should be revised to remove the overhanging eaves, and the basement is acceptable in design terms. The principle of the outbuildings is also acceptable, subject to further details.

## **8. Amenity**

Local Plan Policies A1 (Managing the impact of development) and A4 (Noise and vibration) seek to protect the amenity of Camden's residents by ensuring that the impact of development is fully considered; they aim to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. This includes loss of privacy through overlooking, loss of outlook, and implications on daylight, sunlight, and noise. CPG 'Amenity' provides specific guidance with regards to these factors.

It does not appear from the proposal that there would be any new opportunities for overlooking created. The new dormers to the roof would not result in any clear views into habitable spaces due to their positioning, and the location of the house within the plot and relative to neighbouring properties is such that there would be a significant distance to the nearest dwelling anyway. Any flat roofs that may be included in a future application would need to be secured by condition as not to be used for amenity space, if approved. This would prevent any negative impacts on the amenity of neighbouring residents, specifically with regards to overlooking and privacy.

It is difficult to comment extensively on amenity impacts, as this would be dependent on the revised design and the form this takes. Due to the works to the roof being fairly limited and not adding a significant amount of bulk, it would likely not be required to submit a daylight and sunlight assessment, however the applicant may choose to provide one anyway, especially given that this is fairly often an issue that generates objections.

The use of any outbuildings as incidental to the main property would need to be secured via a condition to ensure that the amenity of neighbouring occupiers is not adversely affected.

Please see section 12 of this advice letter, which deals with concerns surrounding impacts to amenity resulting from the basement.

## **9. Transport**

In line with Policy T2 (Parking and car-free development), Camden requires all new developments within the borough to be car-free, and will not support proposals that seek to introduce new on-site parking except in exceptional circumstances. If this proposal were to demolish and rebuild, the Council would look to secure a Section 106 legal agreement as part of any recommendation to approve so that future occupants of the replacement dwelling were prevented from being able to apply for on-street parking permits. The Council does provide clarity in CPG 'Transport' that returning occupiers may be allowed



re-provision of the parking available to them. As explained in para 5.12 of the guidance, “*A mechanism set out in the Section 106 agreement will require returning owner-occupiers to provide evidence that they intend to continue to occupy their home as their principal residence before any temporary relaxation of car-free status can take place. Such properties would be car-free to future occupiers who would be ineligible for on-street parking permits*”. An exemption could therefore be made in the wording of the legal agreement (if approved) so that the restriction does not apply whilst the existing returning resident remains at the property.

However, given that the demolition of the building would not be acceptable, this requirement would not be sought. If the existing building were being altered (but not demolished) no car-free agreement would be sought. The relocation of the garage would be acceptable given that it would not result in the addition of a new parking space, only the relocation of an existing one. It is considered that the level of landscaping could be increased slightly further if vehicle tracking was undertaken so that only the minimum required area of hardstanding could be provided. The provision of the Electric Vehicle Charging Point would be secured by condition in the event the application were recommended for approval.

Although no cycle parking is indicated in the submitted plans, it is considered that there is sufficient space within the proposed garage or in the forecourt area to accommodate cycles if required. The provision of such cycle storage would be supported in line with Policy T1 (Prioritising walking, cycling, and public transport) of the Local Plan.

Given the level of demolition, excavation, and construction proposed in this predominantly residential area, it would be necessary to secure a Construction Management Plan and associated Implementation Support Contribution of £4,194 and Impact Bond of £8,000 through a Section 106 legal agreement. This would help ensure that the proposed development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network, in line with Policy A1 of the Local Plan. Even if the demolition aspect of the scheme were removed, the basement excavation and works to the roof would mean that a Construction Management Plan would still be required. It would be useful for the applicant to provide a draft Construction Management Plan in support of the full application, with the final version to be submitted for approval prior to works commencing on site. A copy of the Council’s standard Construction Management Plan proforma can be found on the Camden website.

As the proposed demolition and construction works could lead to damage to the existing crossovers, a highways contribution for repaving the crossovers will be necessary. It would appear that the crossover to the southeast corner of the site will become redundant and so this will need to be removed and the footway reinstated over. The cost of these highway works will be confirmed at the application stage.

## **10. 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.

Policy CC1 (Climate change mitigation) requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy, supports and encourages sensitive energy efficiency improvements, and expects all developments to optimise resource efficiency. Additionally, all proposals that involve substantial demolition should demonstrate that it is not possible to retain and improve the existing building and should be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building. Policy CC2 (Adapting to climate change) requires all development to adopt appropriate climate change adaptation measures such as protecting existing green spaces, promoting new green infrastructure, not increasing and wherever possible reducing surface water runoff through increasing permeable surfaces, and the use of Sustainable Drainage Systems.

Generally, unless demonstrated to the Council's satisfaction that the existing building cannot be retained or improved upon, proposals for demolition should not proceed. Substantial demolition is a very carbon and energy intensive process and as such is only acceptable where it can be demonstrated that it is the only option. The failure to adequately justify this would constitute a reason for refusal. Instances where the Council may demonstrate flexibility would include if the building were part of a wider scheme that seeks to significantly alter site capacity or if there were significant structural issues with the existing building.

Neither of the potential reasons to exercise flexibility regarding the principle of demolition appear to be the case in this situation; there is no public benefit or intensification of the site and no structural concerns. The pre-application document and planning summary states that the existing building is not energy efficient and that a Whole-Life Carbon Assessment will be conducted to be submitted with a full application. This is not considered to be adequate, as prior to a Whole Life Carbon Assessment being provided, a Condition and Feasibility Study exploring options to fully refurbish, extend, and alter the existing structure would need to be provided, particularly because poor energy efficiency is something that can often be suitably remedied through a programme of retrofitting works.

Following discussions with the Council's Sustainability Officer, it is suggested that there is no reason for which the proposed works could not be undertaken alongside refurbishment and extension, rather than as part of a demolition project. It is also currently considered that justification for the demolition of the existing building may be very difficult to achieve, and options for full refurbishment are strongly encouraged.

No details are currently provided relating to the installation of ground source heat pumps or solar panels, although the pre-application document does mention them. Details of this would need to be provided but the use of renewables is in principle supported.

Notwithstanding the Council's position on demolition, all new residential development will also be required to submit an Energy Statement to demonstrate how carbon emission reductions would be achieved under the Energy Hierarchy. Active cooling, especially for residential units, is rarely supported and should not be included in the proposal, and buildings should be designed to reduce overheating from the outset.

Policy CC3 (Water and flooding) requires development not to increase flood risk and to reduce the risk of flooding where possible, through the incorporation of water efficiency

measures. Development must therefore be designed to be water efficient, such as 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 rainwater and grey water on-site. Residential developments will be expected to meet the requirement of 105 litres per person per day (including 5 litres for external water use).

It should also be noted that the site is partially within the Frognaal Local Flood Risk Zone, and as such is considered to be at high risk of flooding and an area of high risk of sewer surcharge. As a result of this, the Council would not be able to support the addition of self-contained flats, bedrooms, bathrooms, or kitchens at basement level. As such, the basement bathroom that is currently proposed would need to be removed from the proposal, as it currently would pose a risk from sewer surcharge. Any future application would also need to be supported by a Flood Risk Assessment, and Sustainable Urban Drainage Systems to meet greenfield run-off rates on the site would be required.

## **11. Trees and landscaping**

Policy A3 (Biodiversity) of the Local Plan aims to protect and seek to secure additional trees and vegetation, and states that the Council will support proposals that would improve the biodiversity value of sites, as well as expect trees and vegetation that are to be retained to be satisfactorily protected.

The proposal involves works that would in principle be supported; there is an overall reduction in hard surfacing and the infilling of the swimming pool, as well as the multiple green roofs, would provide an increase in biodiversity. It is also suggested that non-native planting will be replaced in favour of native and high quality planting, such as hawthorn and birch. Trees and vegetation make an important contribution to the character of the conservation area, and the removal and damage of any trees should be avoided where possible. Any demolition and construction works should also minimise the impact on trees, and the pre-planning tree report's mention of an Arboricultural Impact Assessment is encouraged. This would need to be submitted at application stage so that it can be reviewed by the Council's Trees and Landscaping Officer, as well as the Arboricultural Method Statement.

Appropriate replacement planting would be supported in principle, provided that the removal of trees and vegetation is acceptable. All paved surfaces should also be permeable and details of this should be provided alongside any full application. It would also be strongly recommended that the applicant explores the potential to introduce bird and bat boxes at the site.

## **12. Basement considerations**

Policy A5 (Basements) of the Local Plan states that the Council will only permit basements where it is demonstrated to its satisfaction that the proposal would not cause harm to neighbouring properties; the structural, ground, or water conditions of the area; the character and amenity of the area; the architectural character of the building; and the significance of heritage assets.

Policy A5 stipulates that the siting, location, scale, and design of basements must have minimal impact on, and be subordinate to, the host building and property. In accordance

with Policy A5, any proposed basement development at the site should comply with the following criteria:

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

In determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions, and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability.

The basement would need to comply with the above criteria in order to be deemed acceptable and a Basement Impact Assessment would need to be submitted with any future application. This would then need to be reviewed and independently verified by the Council's third-party engineering consultants, Campbell Reith, the cost of which would be incurred by the applicant. It would be strongly suggested that the applicant organises the independent review of the Basement Impact Assessment through Campbell Reith prior to the submission of an application, so that the application can be supported by the Basement Impact Assessment and a Final Audit Review.

In principle, a basement could be provided here if it meets the requirements of CPG 'Basements' and Policy A5. Externally, the proposed basement does not appear to be out of keeping with the rest of the street as it would remain at basement level and therefore not harm the character or appearance of the host dwelling or the conservation area. It does also appear from the submitted pre-application document that the basement would comply with the aforementioned criteria, but this would not be able to be confirmed except through the process detailed above.

### **13. Community Infrastructure Levy (CIL)**

If the proposal was deemed acceptable it would likely be liable for both Mayoral and Camden CIL. Due to the additions from the basement, the roof extension, and the various side extensions, there would likely be an increase in floorspace of at least 100sqm. Therefore, 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, should it be CIL liable.

### **14. Conclusion**

In conclusion, it is considered that the proposed demolition of the building would not be able to be supported, unless the applicant can fully demonstrate that there is a need for it and it can be justified. However, as noted in section 10 of this advice, that would likely be extremely difficult to provide, so the applicant is strongly recommended to consider alternative approaches such as full refurbishment. The design itself requires some revision in order to be acceptable, particularly with the relationship between the contemporary and the neo-Georgian aspects of the building, and the design of the proposed roof. It is recommended that the applicant seeks further pre-application advice relating to these specific elements of the proposal and their detailed design.

You are encouraged to submit amendments to try to address these concerns. Any further advice or feedback and/or meetings would require additional fees to be paid. Please check the Council's website for a list of fees associated with this type of proposal.

## 15. Planning application information

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

- Completed form – Full Planning Permission (if full demolition)
- Completed form – Householder Application (if no full demolition)
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement (including heritage statement)
- Basement Impact Assessment (independently audited by Campbell Reith)
- Arboricultural Assessment (including tree constraints plan, arboricultural impact assessment, and arboricultural method statement)
- Hard and soft landscaping plan
- Green roof plan and details (including sections at a scale of 1:20, a scheme of maintenance, and full details of planting species and density)
- Details of finishing materials
- Sustainability Statement
- Flood Risk Assessment and details of Sustainable Urban Drainage Systems
- Draft Construction Management Plan (see proforma at: [About Construction Management Plans - Camden Council](#))
- The appropriate fee – see: [A Guide to the Fees for Planning Applications in England \(planningportal.co.uk\)](#)
- Please see [supporting information for planning applications](#) for more information.

If full demolition proposed:

- Whole Life Carbon Assessment
- Condition and Feasibility Study

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

Although a proposal of this size would normally be determined under delegated powers, if more than 3 objections from neighbours or an 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. Given the substantial works proposed, it may be that this application is more contentious and generates more objections, so I would not consider it unreasonable to expect that this application may be required to be referred to Members' Briefing. For more details click [here](#).

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

If you have any queries about the above letter, please do not hesitate to contact Sam FitzPatrick through the email or number above.

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

Yours sincerely,

Sam FitzPatrick

Senior Planning Officer  
Planning Solutions Team