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The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

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Dear Mr Hodgson,

**Full Planning Application at 194 Goldhurst Terrace  
Response to Public Consultation Comments  
Application Reference: 2024/0012/P**

On behalf of the Applicant, 194 Goldhurst Terrace (Cowell) Limited, we write to provide a response to comments raised by local residents in relation to the proposed development at 194 Goldhurst Terrace (LPA Ref: 2024/0012/P). We understand that the Council has received 18no. representations from the local community, including one from CRASH (the Combined Residents' Associations of South Hampstead). The comments received can be broadly categorised under the following topic areas:

- Basement Impact;
- Flood Risk and Drainage;
- Design and Conservation;
- Perceived Overdevelopment;
- Impact on Neighbouring Amenity;
- Noise Impact;
- Impact on Trees and Nature Conservation; and
- Transport

Having considered the comments made, we provide our response to the issues raised below.

**Basement Impact**

A number of representations raise comments in relation the impact of the proposed basement on the surrounding area. The principle of providing a basement as part of the proposals was discussed, and agreed in principle with the Councils Planning Officers, during pre-application discussions, subject to the completion of a Basement Impact Assessment (BIA).

The design was developed to minimise the impact of the basement by:

- minimising excavation by proposing a 'half' basement with the ground floor level of the property raised;
- reducing the lightwells to the minimum size necessary for access and light and by bounding these with soft landscaping; and
- retaining all but one of the trees along the site building so that the building will remain largely screened from the Street.

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The proposals have been amended since submission to: reduce the size of the lightwells and provide further details of the planting surrounding the lightwells; remove the rear lightwell serving the flats, and relocating the lightwell serving the house from the front to a more discrete location. These amendments positively respond to the comments of the Councils conservation officer and takes account of detailed engagement with the Councils advisor, Campbell Reith, in respect of the BIA. The proposed basement will therefore not have an adverse impact on the character of the building or conservation area.

The application is supported by a Basement Impact Assessment (BIA). Suitably qualified experts have prepared the assessment, and it demonstrates that the proposal will not cause harm to neighbouring properties; and to the structural, ground, or water conditions of the area in accordance with Local Plan Policy A5 and the Basements CPG. The assessment has been audited by the Councils independent advisors, Campbell Reith, with further information having been submitted to respond to the comments arising from the auditing process. The Audit reviewed the BIA for potential impact on land stability and local ground and surface water conditions arising from basement development in accordance with LBC's policies and technical procedures. Campbell Reith have completed their review of the submitted information and have confirmed that with the inclusion of mitigation measures the proposed basement will not adversely impact the hydrogeology, hydrology or flooding of the area; it will also not have a significant impact on the land stability of the area. The Audit confirms that Campbell Reith are content with the proposals and that they comply with the requirements of the Basement CPG.

In relation to comments made in respect of the proposed basement flat, it is noted that a site-specific flood risk assessment has been undertaken. This has concluded that the development is at low risk from flooding from tidal, fluvial, surface water and reservoir flooding. Flood mitigation and resilience measures have been proposed to ensure that there is no risk to life and the to ensure that the building will not be adversely impacted by the risk of flooding from the combined sewer during extreme storm events.

It is also noted that the Applicant will prepare a Construction Management Plan prior to works commencing and this will be submitted to the Council for approval. We note that this has been requested by local residents in their representations and we can confirm that the Applicant will accept this being secured by planning condition, or obligation. The implementation of the Management Plan will ensure that the impacts arising from the excavation, demolition and construction works are mitigated as far as possible to minimise impacts on neighbours and the local environment.

### **Flood Risk and Drainage**

The Applicant has submitted a Flood Risk Assessment and Sustainable Urban Drainage Strategy in support of the planning application. As noted above, this concludes that the Site is at a low risk from flooding from tidal, fluvial, surface water, and reservoir flooding. Flood mitigation and resilience measures have been proposed to ensure that there is no risk to life and the to ensure that the building will not be adversely impacted by the risk of flooding from the combined sewer during extreme storm events. The assessment also concludes that the proposal will not impact on any known flood flow route or storage area. It also proposes a sustainable urban drainage strategy which will reduce surface water runoff from the Site by 97.4% compared to the current Site. This will be achieved through the implementation of rainwater harvesting tanks, blue roofs, attenuation tanks and permeable paving. As such there will not be a reduction in permeable surfaces on Site, and there will be a reduction in surface water run-off from the Site.

The proposals are therefore considered to be compliant with national, London and local planning policy and guidance in relation to flood risk and drainage considerations.

### **Perceived Overdevelopment**

Concerns have been raised about the scale and density of the proposed development and the impact of the proposal on the character of the area, and on infrastructure. Some comments incorrectly suggest that the proposals are for 48 flats, which is a misunderstanding of the proposals.

The proposals will not result in the overdevelopment of the Site. In accordance with the Local Plan, there is a requirement to maximise housing supply and to make efficient use of Sites. The Site is sustainably located close to town centres with access to good walking, cycling and public transport infrastructure. The intensification of the Site is therefore wholly acceptable, and this was recognised by the in-principle support given by the Council during pre-application discussions. The proposals also do not give rise to any symptoms of overdevelopment. The proposed siting, scale and design of the side extension and new house is acceptable and does not give rise to harm to the character of the area or conservation area; neither does it give rise to unacceptable amenity impacts. Further all homes have been designed to provide good quality accommodation. As such, the proposals do not comprise of overdevelopment.

### **Design and Conservation**

Comments have been raised in relation to the design of the proposals and the impact of this on the South Hampstead Conservation Area. A Heritage Impact Assessment has been carried out and this was submitted in support of the planning application. This concluded:

*“The proposals have evolved following detailed conversations with Camden Council. They provide the opportunity to remove insensitive additions to the building whilst optimising its development potential through the addition of both high quality contemporary additions and traditionally designed extensions. The proposals would ensure the significance of the non-designated heritage asset and the wider conservation area would be preserved. Therefore we see no heritage reason why the council should not support the proposals.”*

In response to the comments raised, we would also note the following:

- The application proposals have been carefully developed following a detailed contextual analysis that was carried out by the architects and project team, and having regard to detailed feedback received from the Councils Planning and Conservation Officers during pre-application engagement. Two pre-application meetings were held with the Council, and the application proposals were positively developed to respond to the comments raised by Officers. The elevation design has been further refined following submission to address resident and Conservation Officer comments, to re-align the levels of the proposed extension with the host building. This has resulted in an improved design solution.
- As discussed above, the proposed lightwells have been minimised to the minimum size necessary for access and light, and soft landscaped boundaries have been proposed to ensure that there will not be an unacceptable impact arising from the provision of these.
- The metal railings on the two staircases are required to ensure the safety for the occupants of two flats who are provided with direct access to the communal garden. We consider that these are not visually obtrusive and note that the Councils Conservation Officer has not raised any concerns in relation to these.

We note that Councils Conservation Officer has also confirmed that the revisions made to the proposals following submission are acceptable.

### **Impact on Neighbouring Amenity**

There have been a number of comments from neighbours on the potential for amenity impacts. Whilst the relationship created by the proposals is not unusual for an urban neighbourhood such as this, to address the perceived overlooking impacts design measures have been embedded into the design, including obscure glazing, windows with reduced opening, and boundary treatments. It is also noted that a Daylight and

Sunlight Assessment was submitted with the application to assess the impact of the proposals on neighbouring properties; this concluded that the development is acceptable in daylight, sunlight and overshadowing terms.

In relation to the northern boundary and the proposals relationship with no.196 it is proposed to install a 0.6m trellis on top of the existing boundary wall to mitigate potential overlooking from ground floor windows. On the upper floors, the nearest bedroom windows and bathroom windows will be obscured on the lower sash windows. With regards to the proposed relationship with no. 192, the side extension will be over 8.2m away from the boundary wall. The existing boundary wall and levels of the adjacent amenity areas will limit potential for overlooking. The ground level (roof) terrace for the new house is set away from the boundary, and the patio below is at a lower level. A screen can also be installed at the nearest edge of the roof terrace should this be necessary.

### **Noise Impact**

Comments have been raised regarding potential noise impact from the future occupants of the house and flats, and also in relation to noise from construction works. The construction works will be temporary and associated noise impacts will be managed via the Construction Management Plan (discussed above). This will include measures to minimise noise impacts such as controls on construction hours, plant, construction vehicles etc...

In relation to noise following completion, the Site will remain in residential use; therefore, it is unlikely to give rise to adverse noise impacts.

### **Impact on Trees and Nature Conservation**

Comments have been raised in relation to the impact the proposed development will have on the root protection areas of trees within the demise of no.196 Goldhurst Terrace. The Applicants Arboricultural consultant, GHA Trees, has advised that the trees and hedges in the front and rear garden of 196 Goldhurst Terrace will not be affected by the proposals. In relation to the laurel hedge in the rear garden of no. 196, the proposed side extension is set further away from the hedge in comparison to the existing side annex so there will not be an impact.

In relation to comments about potential impacts on wildlife habitats, the Applicant has undertaken a Preliminary Ecological Appraisal and Preliminary Roost Assessment, and this was submitted with the planning application. A Bat Survey has also been carried out and this identified that the buildings at 194 Goldhurst Terrace do not currently support bat roosts and therefore there is not anticipated impact on the proposed development on bats. With the recommended mitigation implemented, these conclude that there is potential for the ecological value of the Site to be elevated through a number of biodiversity enhancements including planting of native trees and shrubs, and the integration of bird and bat boxes. These features will greatly improve the ecological value of the new development, and address local and national planning policy and legislation. As such, the proposals will not give rise to adverse impacts on wildlife habitats, but instead has potential to deliver net gains.

### **Transport**

Concerns have also been raised about the potential for the proposals to cause traffic congestion and parking issues. As noted above, the Site is sustainably located close to good walking, cycling and public transport connections. The proposals since submission have been amended to remove the car parking spaces from the front of the house. Future residents will not be able to apply for parking permits to park on-street, and residents will be provided with cycle parking spaces to encourage cycling. The proposal is therefore not expected to give rise to any traffic congestion or parking issues in the locality.

## Conclusion

We have considered the comments received from the local community on the application proposals, and note that as a result and taking account of the Conservation Officers comments, improvements have been made to the design of the proposals. The revised proposals adopt a respectful design approach having regard to the sites location within the South Hampstead Conservation Area and will not give rise to adverse impacts on the character of the area or to neighbouring amenity. The proposed scheme will optimise the housing potential of the site and deliver an uplift in housing in a sustainable location in accordance with national, regional and local planning policy objectives. Detailed technical input has fed into the proposals, and assessments have been appropriately carried out in relation to a suite of technical considerations including in relation to (inter alia): basement impact, flood risk, drainage, daylight and sunlight, arboriculture, ecology etc... These have been submitted with the application, with further information provided where necessary following engagement with the Councils advisors and technical officer; these therefore demonstrate the acceptability of the proposals.

We trust that this response addresses the comments made within the representations received by the Council. Should Officers have any queries about any of the points raised above, the Applicant team will continue to work positively with Officers to provide additional information and clarifications where necessary.

Yours sincerely,

A handwritten signature in black ink, appearing to read "OFrost".

Olivia Frost  
Planner