



## HAMPSTEAD NEIGHBOURHOOD FORUM

Henry Yeung  
Camden Planning Solutions Team

18 December 2024

Re: 31 Willoughby Road, Ref. 2024/5203/P

Dear Mr Yeung,

The Hampstead Neighbourhood Forum objects to the planning application for a basement development at 31 Willoughby Road on the following grounds:

1. Inadequate mitigation of reasons for previous refusal

The current application does not sufficiently address the reasons for refusal of the previous application, 2020/0927/P. Despite a reduction in the size of the proposed basement, the new proposal still poses unacceptable risks of surface water flooding and potential harm to adjacent heritage assets, particularly Willow Cottages.

2. Impact on heritage assets

The proposed basement development threatens to cause harm to nearby listed buildings and structures, specifically Willow Cottages and its retaining wall. This is contrary to:

- NPPF Section 16, which emphasizes the conservation and enhancement of the historic environment
- Camden Local Plan 2017 Policies A5 (Basements) and D2 (Heritage)
- Hampstead Neighbourhood Plan 2018 Policy BA2

The application fails to demonstrate how it would “conserve and enhance the significance of heritage assets and their settings” as required by these policies.

3. Flood risk and drainage issues

The Basement Impact Assessment (BIA) does not adequately address the potential increase in flood risk:

- The proposed basement may act as a dam to natural groundwater flow, potentially increasing flood risk to Willow Cottages
- The application lacks a comprehensive Flood Risk Assessment as is required by national guidance.

This contravenes Camden Local Plan Policies A5 (Basements) and CC3 (Water and Flooding)

4. Structural concerns

The BIA fails to account properly for the existing poor condition of the retaining wall behind Willow Cottages. The cumulative effect of additional strain on this already distressed structure has not been adequately assessed.

5. Design and sustainability issues

The basement layout raises concerns about habitability and sustainability, as rooms lack natural light and ventilation.

6. Public benefit

The proposal offers no discernible public benefit to outweigh the potential harm to heritage assets, as required by NPPF Section 16.

In conclusion, this application fails to address the previous reasons for refusal and continues to pose unacceptable risks to heritage assets and local hydrology. It contravenes multiple local and national planning policies. We urge Camden to refuse on these grounds.

Yours sincerely,

Alexander Nicoll  
Chair, Hampstead Neighbourhood Forum