

London Borough of Camden
Planning Department
(submission via the planning portal)

17/04/2025

Dear Sir or Madam,

Re: P00901 – Flat 1, 18 Platts Lane, London NW3 7NS

On behalf of the applicant, please find enclosed a planning application for the following development at Flat 1, 18 Platts Lane, London NW3 7NS.

‘Construction of a basement extension with associated rooflight and lightwell; removal of existing communal bin store and construction of a new communal bin store in rear garden; proposed timber gate in rear garden (southern boundary) to match existing fence’

The application is accompanied by the following:

- Site location plan
- Planning, Design and Access Statement (this covering letter)
- Arboricultural Impact Assessment by Greenwood Environmental Ltd
- Basement Impact Assessment by LBHGEO Consulting Engineers
- Flood Risk Assessment and Sustainable Urban Drainage Systems (SuDS) Assessment prepared by Aegaea
- Site Topographical Survey by Icelabz
- Structural Drawings by Hirani Engineers
- Factual Site Investigation by CDS Group
- Existing elevations and ground floor plan
- Proposed elevations and ground and basement floor plan
- Proposed sections
- Proposed 3D plans
- Block Plan
- Payment of the Council’s planning application fee
- Completed planning application form
- Completed Community Infrastructure Levy (CIL) form

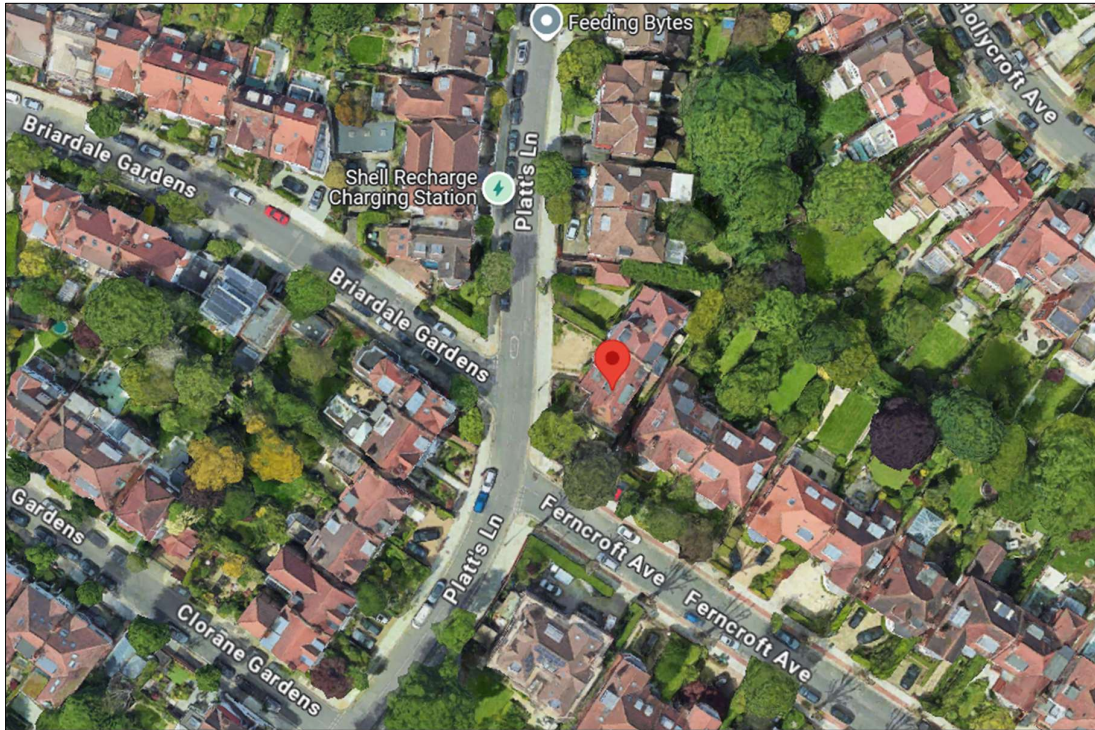
Site and Surroundings

The application site comprises a semi-detached three-storey property located on the east side of Platt's Lane at the junction with Ferncroft Avenue in the London Borough of Camden. The building has been converted into flats and the application site involves a ground floor flat, known as Flat 1. The building occupies a broadly square footprint on a roughly triangular shaped plot. It is brick built and has a slate pitched roof. It has a driveway to the front and a garden to the front and side. The building is accessible to vehicles and pedestrians via Platt's Lane to the west.

A site location plan, aerial photograph and a site photograph is provided below.



Site location plan



Aerial photograph (Source: Google maps)



Front elevation of dwellinghouse (Source: Google streetview)

In terms of its surroundings, the site is paired with a semi-detached residential property (20 Platt's Lane) to the north and lies adjacent to a further residential property to the east (2 Ferncroft Avenue). Further dwellinghouses on Ferncroft Road and Platt's Lane are located opposite the site to the south and west respectively.

The site is within the Redington Frogmal Conservation Area and is not listed. The closest listed buildings to the site comprise some properties to the south and therefore are not within the immediate vicinity.

Planning History

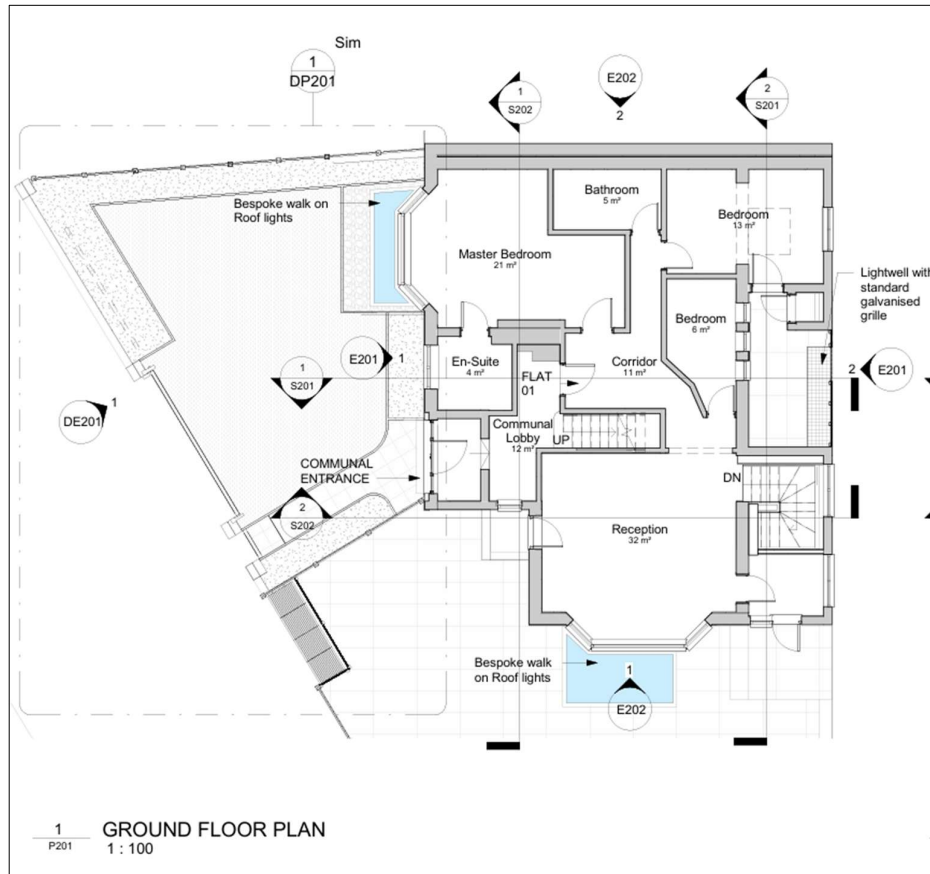
The site has the following relevant planning history according to the Council's website. The planning history includes other tree applications however these are not considered relevant to the determination of the current proposal.

- **2018/3995/INVALID** - Basement extension to create 1x2bed flat. Withdrawn. No public documents available.
- **2023/5413/P** - Erection of single storey rear extension, replacement of existing windows with double glazed casement windows, and changes to boundary treatment including landscaping. Approved 21 October 2024.
- **2024/5582/P** - Construction of a single storey front extension at ground floor level. Pending a decision.

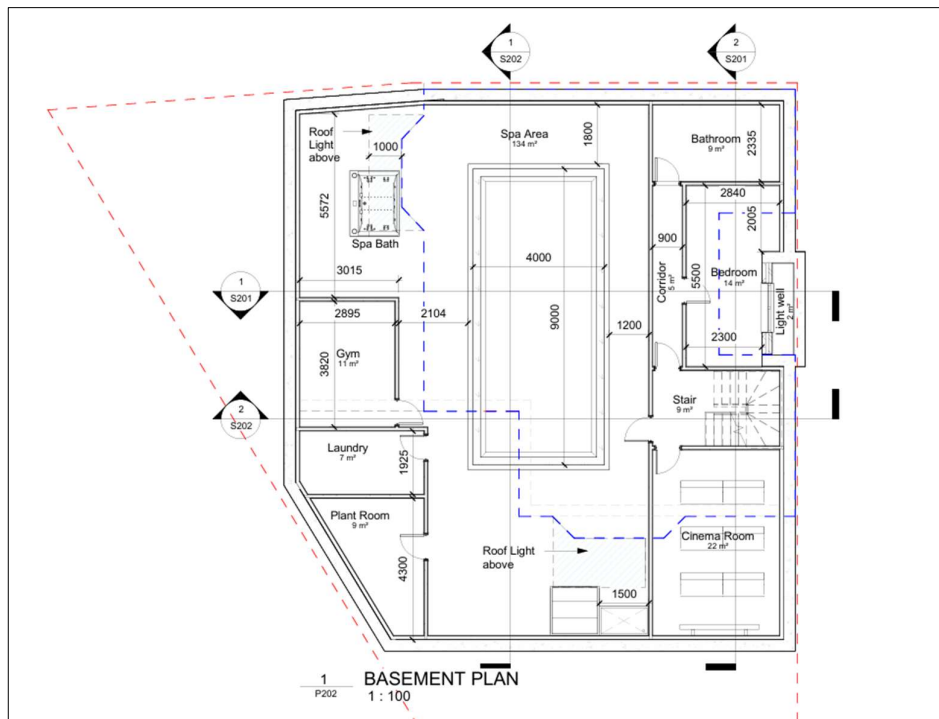
Pre-application advice

A pre-application advice request (reference 2024/0742/PRE) was submitted to the Council for the following development at the site, and the Council's written response was received on 2024/0742/PRE.

Single storey basement excavation with swimming pool and alterations to the front/rear/side garden including the laying of hardstanding, installation of walk on roof lights/grill, an electric vehicle charging point and a timber refuse area.



Pre-application submission: Proposed ground floor plan



Pre-application submission: Proposed basement plan

In summary, the Council's pre-application advice confirmed that:

- Heritage and design:
 - Basement: The Council has no objection in principle to the construction of a basement in terms of impact on the conservation area as it would be largely invisible. Concern is raised regarding the footprint of the basement which could prevent the maintenance of greenery, which is an important feature of the conservation area. The Council expects some degree of topsoil to be maintained above the basement to allow for vegetation.
 - Lightwells: Visible lightwells are not characteristic of the conservation area, therefore concern is raised regarding the lightwell proposed on the front elevation and should therefore be removed. As the lightwell on the side elevation is small and not publicly visible, it is not of concern.
 - Front Boundary: The Council is not supportive of the proposed 1.5m high front boundary brick wall due to it being considered out of character with the conservation area. The Council acknowledged that planting in this area has been proposed through 2023/5413/P and that provided that this application is granted and implemented, additional planting along the boundary would not be required through an additional future application. The Council was not supportive of the proposed bin storage area and requested that it be moved to a more discrete location, such as behind the boundary wall.
- Proposed basement:
 - The Council considered that the proposed development would not comply with matter 'I' of Policy A5 of the Local Plan which requires basements to be set back from neighbouring property boundaries where it extends beyond the footprint of the host building.
 - Two bedrooms are proposed at basement level, one served by a small lightwell and the other not served at all. Concern is raised over the lack of natural light and the poor outlook on offer in these rooms, and the provision of bedrooms here should therefore be reconsidered. However, the Council has subsequently confirmed by email that a bedroom in the basement with a lightwell is acceptable in principle.
 - The Council confirmed that a Basement Impact Assessment (BIA) would be required.
 - Any basement should not propose more than a 1 on the Burland scale.
 - A construction management plan would also likely be required to support the basement development. This would however be confirmed at application stage and secured via a s106 agreement.
- Flood risk:
 - The site is identified as being within a historically flooded street and as per policy CC3, a site-specific flood risk assessment and drainage report would therefore be required to support an application for basement development. The proposed development includes habitable rooms at basement level, which are contrary to policy A5, and would not be supported. However, the Council has subsequently confirmed by email that a bedroom in the basement with the lightwell is acceptable in principle.

- Amenity impact:
 - The Council confirmed that the proposed development would not result in any unacceptable amenity related effects given its scale and nature, and its location (as most works are confined to basement level)
- Trees:
 - The Council confirmed that it is likely that an Arboricultural Assessment would be required to accompany an application.

In response to the Council's pre-application advice received, the following changes have been made to the proposal in this application:

- The proposed front light well has been removed.
- At least 1m of topsoil is to be maintained above the basement to allow for planting to be maintained, as indicated in the section drawings.
- The proposed 1.5m high front boundary brick wall is removed from the application (and a hedge front boundary has separately been approved under application reference 2023/5413/P in October 2024).
- Proposed bin store relocated away from directly fronting the road to a more discrete location away from the front boundary.
- The proposed basement has been set back by 300mm from neighbouring property boundary walls to ensure that it complies with matter 'I' of Policy A5 of the Local Plan which requires basements to be set back from neighbouring property boundaries where it extends beyond the footprint of the host building.
- Whilst the Council raised concerns in its pre-application response over bedrooms at basement levels, it has subsequently agreed by email that a bedroom with a lightwell would be acceptable at basement level – therefore a bedroom is proposed at basement level.
- The planning application is accompanied by technical reports including a Basement Impact Assessment (BIA) and, a site-specific flood risk assessment and drainage report and an Arboricultural Assessment.
- The basement does not propose more than a 1 on the Burland scale, as confirmed in the accompanying BIA.

Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan consists of the London Plan (2021), the Camden Local Plan (2017) and the Redington Frognal Neighbourhood Plan (2021). The relevant policies in the Development Plan are set out below.

London Plan (2021)

- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design

- Policy D10 Basement development
- Policy HC1 Heritage conservation and growth

Camden Local Plan (2017)

- A1 Managing the impact of development
- A5 Basements
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding

Redington Froggnal Neighbourhood Plan (2021)

- SD1 Refurbishment of Existing Building Stock
- SD2 Redington Froggnal Conservation Area
- SD4 Redington Froggnal Character
- SD5 Dwellings: Extensions and Garden Development
- BGI2 Rear gardens and ecology
- UD1 Underground development
- UD2 Construction management plans

The following Supplementary Planning Documents (SPD) and guidance are also material considerations:

- National Planning Policy Framework (NPPF)
- National Planning Policy Guidance (NPPG)
- Camden Planning Guidance - Design (2019)
- Camden Planning Guidance - Amenity (2018)
- Camden Planning Guidance - Home Improvements (2021)
- Camden Planning Guidance – Basements (2021)
- Redington Froggnal Conservation Area Character Appraisal and Management Plan (December 2022)

Emerging Local Plan Policy

The Council is currently preparing a new Draft Camden Local Plan. The draft local plan is a material consideration and can be considered in the determination of planning applications however it has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated Summer 2026 according to the Council's latest Local Development Scheme which sets out the timescale for the adoption of the new Local Plan).

Planning Designations

According to the Council's adopted Policies Map (see map extract below), the site has the following designation:

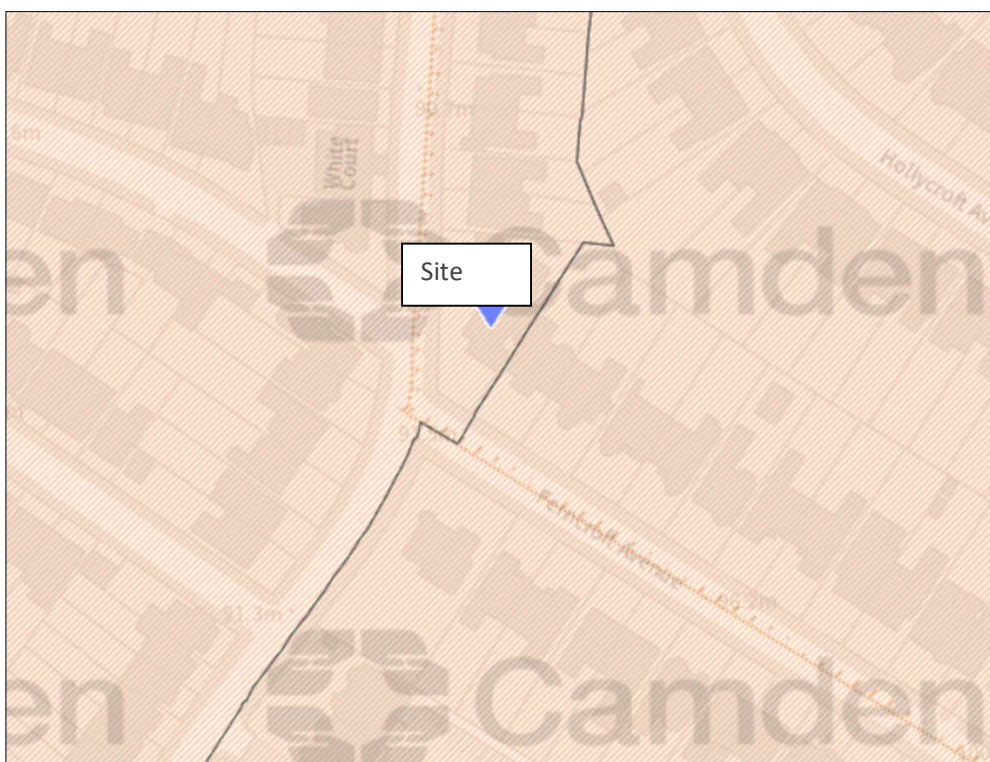
- Within the '**Redington Froggnal Conservation Area**'

According to the Council's Redington Frogmal Conservation Area Guidance, the building at the application site is a '**positive contributor**' to the Conservation Area.

The site is in Flood Zone 1 (area of low flood risk) according to the government's flood maps for planning.

The site is subject to a borough-wide Article 4 Direction which removes permitted development rights in respect of constructing basement developments.

The site is in an area covered by a Neighbourhood Plan (known as the Redington Frogmal Neighbourhood Plan made in 2021).



Extract from the Council's adopted Policies Map

The Development

The application seeks full planning permission for:

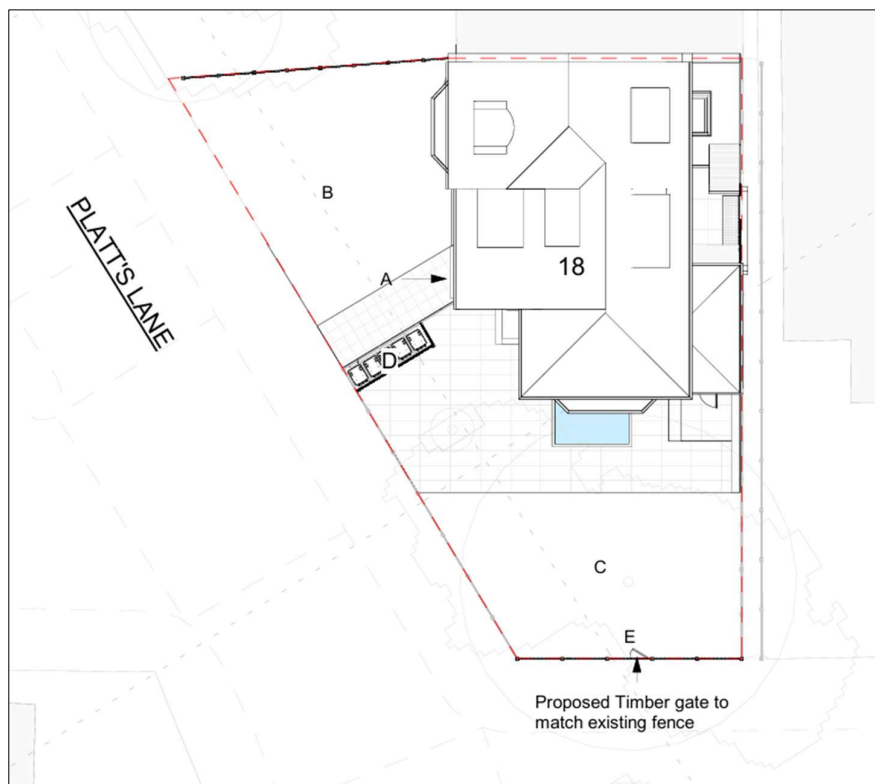
'Construction of a basement extension with associated rooflight and lightwell; removal of existing communal bin store and construction of a new communal bin store in rear garden; proposed timber gate in rear garden (southern boundary) to match existing fence'

This involves the construction of a single storey basement extension to the flat. The extension includes a spa area, swimming pool, gym, plant room, cinema room, laundry room, a bedroom, a bathroom and a

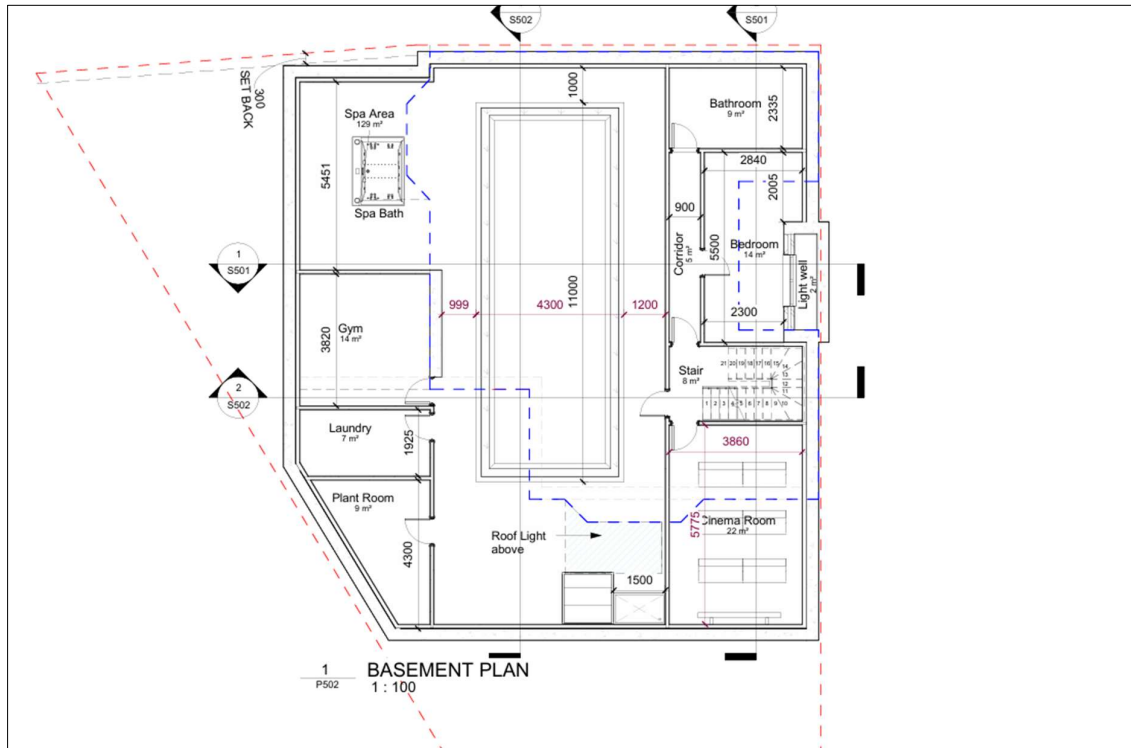
staircase. The extension will facilitate the creation of an enlarged existing flat and therefore will provide an improved standard of accommodation for existing and prospective occupants of the flat.

The proposed bin store discretely located away from the front boundary of the site.

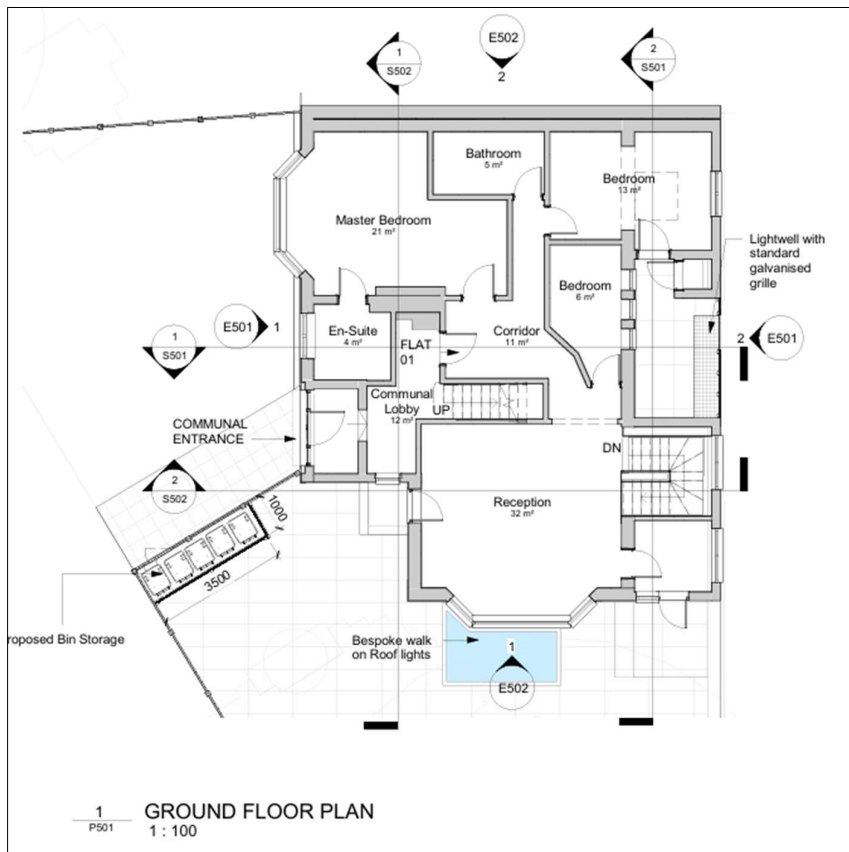
The proposed gate on the southern boundary matches the design and appearance of the existing fence and provides an additional pedestrian access into the rear garden.



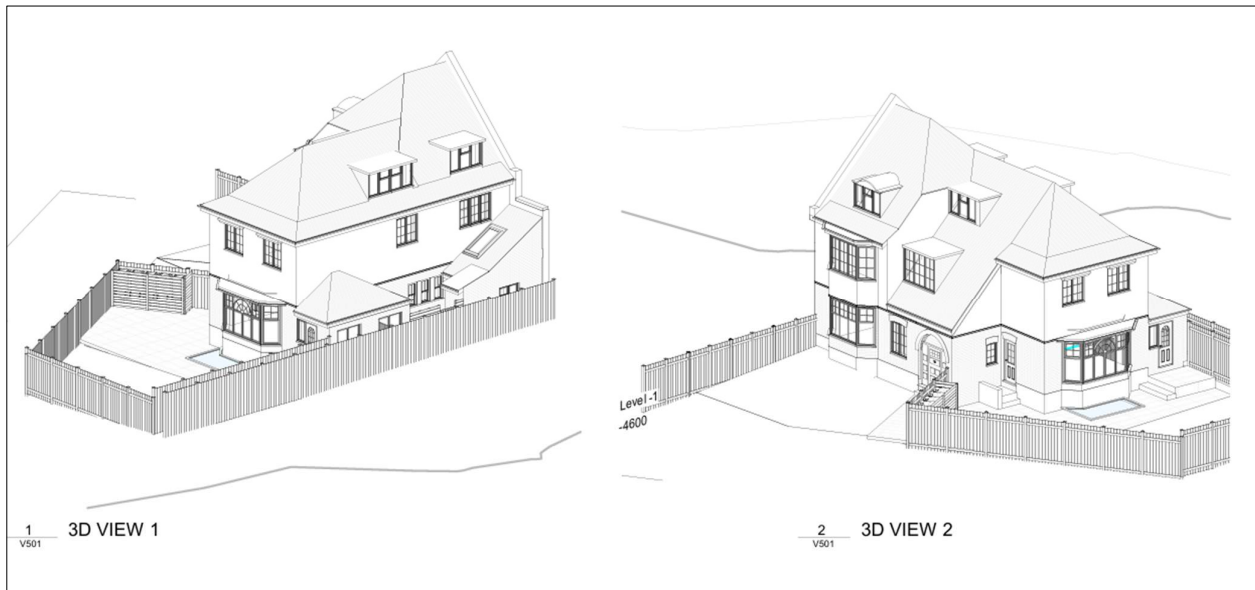
Proposed block plan



Proposed basement plan



Proposed ground floor plan



Proposed 3D views

Planning Assessment

1. Principle of development

Proposed basement extension

Camden Local Plan (2017) policy A5 requires a basement proposal to demonstrate that it would not cause harm to:

- a. neighbouring properties
- b. structural, ground, or water conditions of the area;
- c. the character and amenity of the area; the architectural character of the building; and
- d. the significance of heritage assets.

The policy also requires the submission of a Basement Impact Assessment (BIA) which is required to assess the scheme's impact on drainage, flooding, groundwater conditions and structural stability. The policy also requires basements to be subordinate to the host building and property, and not to exceed certain size requirements (as discussed in further detail below).

The policy also requires proposals to be accompanied by sufficient information to allow proper assessment of impacts, including how they will not cause cumulative erosion of garden space; and will not contribute to localised groundwater flooding.

Camden Planning Guidance (CPG) on Basements (2021) similarly sets out more detailed guidance on the Council's policy requirements in terms of basements, including basement size and design; trees, landscape and biodiversity and requirements of BIAs.

The proposed basement is acceptable in principle considering the requirements of policies A5, UD1 and guidance within the Basements CPG for the following reasons:

- The basement is a subordinate addition to the host property. Its external manifestation is limited to a roof light and a lightwell in the rear garden that are discretely positioned against the side and rear elevations of the building and hidden from public view. The proposed front lightwell in the pre-application submission which on a publicly visible building frontage has been removed in accordance with the Council's advice.
- The proposed basement meets the size requirements of policy A5, specifically:
 - It does not comprise of more than one storey and is not built under an existing basement.
 - It does not exceed 50% of each garden within the property.
 - It is less than 1.5 times the footprint of the host building in area.
 - It extends into the garden no further than 50% of the depth of the host building measured from the principal rear elevation.
 - It does not extend into or underneath the garden further than 50% of the depth of the garden.
 - It is set back from neighbouring property boundaries by 300mm where it extends beyond the footprint of the host building; this is an amendment to the proposed basement since the pre-application scheme.
 - It avoids the loss of garden space or trees of townscape or amenity value.
- The proposed basement is accompanied by a BIA which states:
 - With regards to hydrogeological impacts, the BIA confirms that no evidence of significant water-bearing sandier seems was recorded. The basement excavations may encounter some minor seepage but a contingency plan will be enforced should significant seepage be encountered at any point during the basement excavation. There is no evidence of a general groundwater table that could be disturbed or stopped by basement construction. There are no concerns regarding any potential cumulative effects of adjoining basement construction.
 - With regards to hydrological impacts, the Flood Risk Assessment and Sustainable Urban Drainage Systems (SuDS) Assessment prepared by Aegaea confirms that the site is not in an area at risk of surface water flooding or from other sources. There will be a need to maintain the present water discharge regime and to provide a SuDS designed to reduce discharge volumes and rates as per policy requirements.

- In terms of ground investigations, two rounds of ground investigation were previously undertaken at the neighbouring property No. 20 Platt's Lane to inform the impact assessment for a proposed basement scheme at the site. These comprised a total of 3 window sample boreholes and a hand dug trial pit. Two structural pits were also constructed to ascertain the configuration of the existing foundations. A site-specific ground investigation was undertaken at No. 18 Platt's Lane in January 2025 comprising 3 sample window boreholes constructed to a maximum depth of 6m below ground level.
- With regards to a ground movement assessment, the Camden Local Plan (June 2017) requires BIAs to demonstrate that the proposed basement scheme has a risk of damage to neighbouring properties no higher than Burland Scale 1 'Very Slight'. The BIA confirms that out of the structures assessed for ground movement, all would result in Burland Scale 0 'Negligible' or Burland Scale 1 'Very Slight'.
- With regards to effect on trees, the BIA confirms that the foundations of the proposed basement will be sufficiently deep to obviate the potential impact of trees on the basement structure.
- With regards to residual impacts, the BIA confirms that the proposal will have no unacceptable residual impacts on surrounding structures, infrastructure or the environment.

It should be noted that the application is also accompanied by drawings prepared by a Structural Engineer which modify the proposal set out in the BIA section 7 slightly to include piling.

The principle of a basement extension is acceptable, as confirmed by the Council's pre-application advice response. The basement is therefore compliant with relevant policies in the Camden Local Plan (2017), the Redington Frogna! Neighbourhood Plan (2021) and the Basement CPG (2021).

Principle of new gate and new bin store

The gate is a minor change to the southern boundary of the site. It is acceptable in principle. The proposed bin store has been relocated since the pre-application submission and is now more discretely located away from the front boundary. It is acceptable in principle.

2. Design and character considerations

The Camden Local Plan (2017), the Redington Frogna! Neighbourhood Plan (2021) and the NPPF requires development to achieve a high standard of design. Specifically, Camden Local Plan policy D1 requires development to respect local context and character, to preserve or enhance the historic

environment and heritage assets, to be sustainable in design and construction, be inclusive and accessible and be designed to minimise crime. Policy SD4 of the Neighbourhood Plan requires development to complement the distinctive character of the Redington Froggnal area in terms of its scale, massing and height. The proposals positively respond to the above planning policy requirements for the following reasons:

- Due to its subterranean nature, the proposed basement will not affect the design and appearance of the existing building and garden as it will be hidden from view. Its above ground manifestation is limited to a roof light and lightwell both of which are small, located up against the existing building to reduce visual impact and discretely positioned away from public view.
- Due to the presence of at least 1m of topsoil above the basement where it extends under the garden, it provides an opportunity for planting and for planting to be maintained, which will improve the visual amenity of the site and surroundings.
- The proposed gate is a minor amendment that will not materially affect the design and appearance of the property. It is the same material as the existing fence that it lies adjacent to.
- The proposed bin store is a minor amendment to the rear garden and due to its siting away from the property boundary, will not be highly visible from the public domain.

The site is therefore capable of accommodating the proposal without detrimentally affecting the visual amenity of the area and is therefore acceptable in terms of its impact on design and character.

3. Heritage impact

Policy D2 of the Camden Local Plan requires development to preserve and, where appropriate, enhance Camden's heritage assets and their settings, including conservation areas. The Council will not permit the loss of or substantial harm to a designated heritage asset, including Conservation Areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply

- the nature of the heritage asset prevents all reasonable uses of the site
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible
- and the harm or loss is outweighed by the benefit of bringing the site back into use

The policy states that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

With regard to Conservation Areas, the policy states that the Council will take account of Conservation Area Statements, appraisals and management strategies when assessing applications within

Conservation Areas. The Council will require development within Conservation Areas to preserve or, where possible, enhance the character or appearance of the area.

Policy SD2 of the Neighbourhood Plan similarly requires development to preserve or enhance the green garden suburb character and appearance of the Redington Frognal Conservation Area. This includes retention of buildings or features that contribute to that special interest, including gaps between buildings, trees, hedges and the open garden suburb character created by well-vegetated front, side and rear gardens.

The proposed basement extension, bin store and new gate are acceptable in terms of their impact on the Conservation Area due to:

- Due to its subterranean nature, the proposed basement will not affect the Conservation Area as it will not be visible above ground.
- The proposal maintains a sufficient level (at least 1 metre) of topsoil above the basement where it extends beyond the existing footprint of the building which will facilitate additional planting and allow for planting to be maintained in the Conservation Area and thus enhance its setting and appearance.
- Key architectural features of the building are being retained.
- The development will not affect any views in the Conservation Area
- The proposed modest size and discretely located lightwell and roof light will not be visible from public views in the Conservation Area and will not affect its character and appearance.
- The proposed gate and bin store are minor additions to the garden of the property that will not materially affect the significance of the Conservation Area. The bin store is set back from the Platt's Lane streetscene which reduces its visual impact.
- The development would not detract from the character and appearance of the street scene and area in a wider context.

4. Impact on Residential Amenity

Local Plan policies A1 and A4 and the Amenity Camden Planning Guidance are relevant with regards to the impact on the amenity of residential properties in the area and require consideration of the impact of the development on light, outlook, privacy, odour and noise. In essence, the Council will grant permission for development unless there is unacceptable harm for amenity. Similarly, policy SD4 of the Neighbourhood Plan requires to cause no significant detriment through loss of light or increased shading to neighbouring properties and gardens.

Due to its subterranean design, the proposed basement will not affect amenity in terms of loss of light, privacy, outlook or sense of enclosure. Similarly, the proposed bin store and new gate will not affect amenity due to their modest size and appropriate siting. In terms of noise and disturbance impact during the construction phase of development these can be controlled via a suitably worded planning condition to avoid any construction work taking place during anti-social hours.

5. Impact on Trees

Local Plan policy A3 seeks to protect and secure additional trees and vegetation. The policy resists the loss of trees and vegetation of significant amenity, historic, cultural or ecological value, and requires trees which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction. The application is accompanied by an Arboricultural Assessment which confirms that the proposal will not result in any detrimental impact on trees.

With regard to basement developments, Local Plan policy A5 requires basement proposals not to prejudice the ability of the garden to support trees where they are part of the character of the area, and to provide satisfactory landscaping, including adequate soil depth.

As confirmed in the Arboricultural Report, the proposed basement level incurs into the root protection of area (RPA) of two category B trees: T2 Maidenhair tree and T4 Monterey pine. There is also a minor incursion into the RPA of tree T3 London plane located on the adjacent public highway, however due to the difference in ground levels and barriers to root growth, it is predicted that the standard concentric circular RPA for this tree is not representative and therefore any potential impact from the proposed development on this tree is negligible.

To ensure that the impact to trees T2 Maidenhair tree and T4 Monterey pine is acceptable, the Arboricultural Report confirms that it will be necessary to design and employ a specialist excavation method which ensures that any disturbance to the RPA of these trees is kept to a minimum. Additionally, a safe construction method to support the retained soil and roots of the trees throughout the development and post development will be required, so as not to undermine the trees structural stability.

Other retained trees are at risk of indirect impact from damage to upper parts of trees from general construction activity and also soil degradation and/compaction, which can lead to root damage and death. To demonstrate how the trees can be adequately protected during the construction stages of the development, the following have been included in the appendix of the Arboricultural Report: Example Tree Protection Specifications; Preliminary Arboricultural Method Statement (AMS) & Draft Tree Protection Plan (TPP).

The Arboricultural Report confirms that the impact of the proposal is acceptable, providing the measures outlined in the report are implemented and secured by the provision of suitably worded planning conditions. The applicant would be willing to accept planning conditions to this effect.

6. Flood risk

The proposal is accompanied by a site-specific flood risk assessment which confirms that the site is at a low risk of flooding from all analysed sources. The Surface Water Drainage Strategy proposes a betterment compared to existing runoff rates. The development does not increase flood risk off site or to the wider area. it is proposed that the surface water runoff from the development is managed via

permeable paving (Type C). Surface water from the permeable paving unit is then to be conveyed, via a 100mm underdrain, to the existing drainage infrastructure onsite.

7. Access

Vehicular and pedestrian access to the site will remain as existing from the front entrance of the site from Platt's Lane. In addition, a new pedestrian access is provided via a proposed new gate on the south elevation. The proposal will therefore not result in any material impact on access arrangements to the site.

Conclusion

The proposals are acceptable in terms of the principle of development, design and character, heritage impact, impact on residential amenity, impact on food risk, and impact on trees. We therefore respectfully request that planning permission is granted.

Yours sincerely,



Kelly Anthony
Fuller Long Planning Consultants