



## ENGLISH HERITAGE

Charles Thuaire  
London Borough of Camden  
Environment Department  
Development Control Team  
Camden Town Hall  
Argyle Street,  
London WC1H 8ND

Our ref: LAG 06/341  
Your ref: 2012/3089/P  
Telephone: 020 7973 3215  
Fax: 020 7973 3792

8<sup>th</sup> August 2012

Dear Mr Thuaire,

TOWN AND COUNTRY PLANNING ACT 1990  
NATIONAL PLANNING POLICY FRAMEWORK 2012

Re: New End Nurses Home, 29 New End, NW3 1JD  
Application: 2012/3089/P

*Erection of a 7 storey block to provide 17 self contained residential units (Class C3), (comprising 2 x studio, 5 x 2 bedroom, 6 x 3 bedroom, and 4 x 4 bedroom units) with associated roof terraces, plus new vehicular access and basement parking for 17 cars, new pedestrian access, refuse store and substation on front boundary wall, green roofs, communal open space and landscaping, following demolition of existing nurses hostel (Sui Generis)*

### Recommendation for Archaeological Condition

Thank you for consulting me on the above application, which includes an archaeological desk based assessment prepared by Pre-Construct Archaeology. This letter repeats advice given in response to planning application reference 2011/4317/P, given on 10<sup>th</sup> November 2011.

The site lies in an area where archaeological remains may be anticipated. It lies just outside the medieval core of Hampstead, in an area that saw extensive development in the 18<sup>th</sup> century as the older village expanded to become a fashionable spa town. It should be noted, however, that Roman remains have also been found in the vicinity of the site, including a 2<sup>nd</sup> century burial on Well Walk. The assessment report concludes that there is potential for Roman and post-medieval remains to be present on the site, and as a large basement is proposed, any archaeological deposits will be removed during the course of construction.

In accordance with the recommendations given in the NPPF paragraphs 135 and 141, and in Camden LDF Policies CS14 and DP25, a record should be made of the heritage assets prior to development, in order to preserve and enhance understanding of the assets.

The archaeological position should be reserved by attaching a condition to any consent granted under this application. This condition might read:

1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001  
www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available





## ENGLISH HERITAGE

- Condition
- A) No development shall take place in each phase until the applicant has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority.
- B) No development or demolition shall take place in each phase other than in accordance with the Written Scheme of Investigation approved under Part (A).
- C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.
- Reason
- Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with recommendations given by the borough and in the NPPF.
- Informative
- The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed proposals in the form of an archaeological project design. The design should be in accordance with the appropriate English Heritage guidelines.

Should significant archaeological remains be encountered in the course of the initial field evaluation, an appropriate mitigation strategy, which may include archaeological excavation, is likely to be necessary.

Please note that this response relates solely to archaeological considerations.



Kim Stabler  
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20-11-12

Date: ~~07/08/2015~~  
Your ref: RPW/mw/DP233  
Our ref: 2012/3089/P  
Contact: Stuart Minty  
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Email: [stuart.minty@camden.gov.uk](mailto:stuart.minty@camden.gov.uk)

**Development Management  
Regeneration and Planning**  
Culture & environment directorate  
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Bob Woodman  
DP9  
100 Pall Mall  
London  
SW1Y 5NQ

Dear Bob

**Re: New End Nurses Home, 29 New End, London, NW3 1JD**

Thank you for your letter of 25<sup>th</sup> October in relation to the above site. Frances Wheat has asked me to respond on her behalf to the points raised within your letter, which principally relate to transport issues and observations provided as part of the current application.

In reviewing the background history, which stretches back five years, it has been noted that pre-application correspondence in 2007, under the old UDP policy context advised that any development on the site should be considered as 'car-free'. Following further discussions with the Transport Strategy service it was considered that the site fell just outside the car-free requirements under the UDP considerations and a basement access solution was then progressed. Whilst I appreciate you were not acting as the agent in relation to the 2007 pre-application discussions, it is useful to outline that the transport advice was that the basement access was deemed acceptable; however this would be subject to there being no net loss of on-street parking in New End. An application was submitted in 2008 (ref: 2008/0011/P) and subsequently withdrawn owing to a raft of officer concerns.

The applicant's Transport consultants contacted the Council again in 2009 to discuss the application and again it was advised that the *"principle of the access was ok, but as always would be subject to further statutory consultation/highways approval, even if planning permission were to be granted"*.

The current policy document now in place is the Local Development Framework (LDF). Within this, the current policy in relation to parking and car free / car-capped development (DP18 – Parking Standards and limiting the availability of car parking) is more robust than the UDP in this regard. The current car free and car-capped policy seeks to reduce the level of car use in the Borough and is no longer directly related to parking stress, as the policies seek to encourage car free lifestyles, promote sustainable ways of travelling and help to reduce the impact of traffic.

Following the adoption of the LDF, a further application was submitted for formal consultation under planning ref: 2011/4317/P. Transport Strategy again had concerns on the basis of the following policy grounds (DP18 and DP21) *"the required number of adequate cycle parking spaces cannot be determined and the new vehicle access arrangements will have a detrimental impact on*

*the on-street parking in the vicinity, limited details have been provided to identify alternative parking arrangements to mitigate the loss of on-street parking. Further swept path analysis has not been provided to satisfy that the proposed movements can be made and adequate visibility can be provided.*

Following the concerns provided by Transport Strategy, the applicant's consultants arranged a meeting to discuss the construction methodology as this was also raised as an area to be mitigated, due to the extent of the proposed excavation. This pre-app meeting was specific to construction methodology and did not cover the loss of on-street parking or any associated mitigation proposals.

The on-street parking configuration on New End has changed following the implementation of two minor schemes by the Council, which have evolved between the start of pre-app discussions and the current scheme. The first of these was in relation to highway safety improvements to incorporate a kerb build out to enable pedestrians to cross New End at Christchurch Passage. This scheme involved the loss of one existing on-street parking bay. The other minor scheme involved the introduction of a new on-street bus parking bay to enable a school bus to park on New End. Both of these schemes were introduced in 2011 and changed the on-street parking layout and availability along New End. The timing of these schemes also post dates the Transport comments made in 2008/2009. In considering the latest planning application these schemes have been taken into account within the context of the Transport comments.

The above information sets the general background to the latest planning application, however, your letter specifically identifies two areas of clarification, and these relate to the existing use and the validity of your transport consultants parking survey.

In relation to the existing use, our transport planners, unfortunately, do not consider this to hold sufficient weight, as it relates to a previous situation that may or may not have taken place. Although it is recognised that parking permits may have been applied for with the former use of the site as a Nurses Home, the level of on-street parking and the location of the former New End Hospital to the former Nurses Home is such that any on-street parking associated with the site would be considered as minimal.

In relation to the submitted parking survey, unfortunately there are sufficient errors contained within the parking survey to cast doubt on the validity of the results. It is further noted that the parking survey was only undertaken on one day. Where parking is considered to be impacted upon by a development it would have been expected for the survey to have been undertaken over at least two separate nights. The doubts that have been raised over the submitted parking survey are supported by a vehicular crossover application made at No. 26 Christchurch Hill, which was deemed unacceptable on the grounds of the loss of on-street parking. The applicant for 26 Christchurch Hill submitted a parking survey that included New End and this identified that this stretch of on-street parking was operating with an average overnight parking level of 96%. The Council's own parking data identifies the CPZ as operating at over 90% with 111 parking permits issued for every 100 parking bays. Therefore, consideration of all the available parking data from various sources provides sufficient weight that further reduction of the on-street parking provision would cause harm to the CPZ.

Having detailed the reasons why our transport planners find the proposals unacceptable, TPP, the applicants transport consultants have submitted two proposals which seek to mitigate the loss of the on-street parking spaces. The first idea, to convert pay and display parking bays to shared pay and display/resident parking bays would have an impact on the availability of pay and display parking bays; this would appear likely to be detrimental to local businesses. The second idea, to provide an electric vehicle charging point on street, does not address the loss of on-street parking bays; and is not therefore a relevant mitigation option.

I hope this helps to clarify our position and why the current proposals are currently not supported from a transport planning perspective. I also hope the above illustrates that the concerns raised now are not new issues being apparent from the start of the pre-application discussions going back as far as 2007.

These issues are being considered carefully and will be for the Development Management Service to consider, in the round, alongside other material planning considerations when making any recommendation on the application.

Yours sincerely,

Stuart Minty  
East Area Team Manager  
Development Management Service

RPW/mw/DP2333

25 October 2012

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Dear Frances

**29 New End, Reference No: 2012/3089/P**

We write in connection with the above planning application and hope that you can assist. We are not fully up to speed with the structure of the Transport Planning Department at the Council, could I therefore please ask you to pass this on to the relevant officer.

As you are aware, the discussions over this site have extended over a three year period. A number of highways officers have been involved, most recently Zoe Trower, who we last met a couple of months ago. Earlier advice was provided by Sam Longman. I am not sure if he is still at the Council, if so, perhaps you could seek his views?

We have recently received the Transport Planning observations which recommend refusal of the application on the basis of their view that one or two residents on-street parking bays would be lost due to the creation of the crossover. We have serious concerns about this. It certainly differs from the initial response we received from the Council in 2009 which was supportive of a crossover to serve a new basement car park at the site.

The Transport Planning observations seem to fail to address properly the policy tests in DP19 and DP21 which indicate that the Council will resist development that would

*"create a shortfall of ... residents car parking" or "add to on-street parking demand where on-street parking spaces cannot meet existing demand ..." or "harm on-street parking conditions"*

We attach a short paper by the transport consultant on the project, TTP, which deals with two key points.

- a. It challenges Transport Planning's attitude to the parking survey which was carried out in the area and which concluded that existing parking conditions are below stress levels.
- b. It questions Transport Planning's view that no on-street parking demand should be attributed to the existing use of the site.

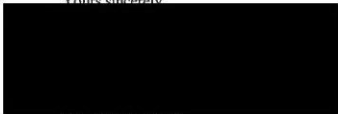


It is important that conclusions are drawn on both of the above points if the policy requirements are to be considered properly.

Finally the TTP document also deals with a further point which was raised in Transport Planning's observations (and which had never been raised previously) – namely the potential for replacement for any loss of on-street parking. A couple of ideas are put forward.

Given the amount of time and effort spent on the project to date, we would be grateful to have a response to the points noted by TTP. I should add that we certainly do not wish to cause any delay to the completion of the planning officer's report to Committee.

Yours sincerely



cc: S Minty, LB Camden  
C Thaire, LB Camden

## 29 New End

### Parking Stress

#### Background

- 1.1 The Council indicates that the entire Hampstead CPZ is subject to parking stress since 110 resident permits have been issued for every 100 bays. The Officer relies on this broad definition of parking stress to conclude that no change to existing residents parking bays can be acceptable.
- 1.2 Such an approach denies the importance of local parking surveys which are long established through good practice.

#### Parking Survey

- 1.3 The Council has raised a number of concerns about the parking survey. Our response to these comments is set out below:
  - Firstly, it is suggested that the figures for New End Square are not accurate. We have checked the figures for New End Square and consider that they are accurate.
  - Secondly, it is noted that 3 bays on New End have not been recorded. We have reviewed the survey information and concur that the 3 residents' bays opposite Carnegie House have not been recorded. Our view is that this is unlikely to significantly affect the results. For example, 19 residents' bays have been recorded, with between 14 to 16 bays occupied during the 4 "beats" (i.e. an occupancy rate ranging between 74% and 84%). Depending on whether or not the three bays opposite Carnegie House were occupied at the times at which the survey was undertaken, the occupancy rates would range between 64% (if none were occupied) to 86% (if all were occupied). **The 90% threshold would not be triggered.**
  - Thirdly, it is stated that "potentially 6 bays" were not recorded at all. No detail is provided and so it is not possible to confirm this or otherwise. However, even if we were to include a further 6 bays in our calculation and to assume that all 6 were occupied, the overall survey resident bay occupancy would peak at 89% at 20:00, with 15 bays unused and a further 4 dual purpose bays unused, **so the overall survey area would still remain below the 90% threshold.**
- 1.4 In summary, the independent parking survey has confirmed a maximum occupancy of on street resident bays of 84% which falls below the threshold definition for parking stress of 90%.



- 1.5 Our view is that the survey results can be relied upon.
- 1.6 The conclusion remains that parking stress is below 90% in the survey area and **there is no evidence that the loss of 1-2 permit parking spaces would cause any material harm**, given that numerous spaces remained empty during the survey period.

## Parking Demand

- 2.1 In considering the potential for harm to be caused to on-street parking conditions, an assessment is required of the demands that exist under current conditions, as well as under the development proposals. The Council has, in our view, failed to provide any assessment of demand arising from the existing use of the site as nurse's accommodation. Instead a view has been offered that any residents of the existing building might not have resident's permits, or if they do have permits then they might choose to park elsewhere in the CPZ (rather than New End).
- 2.2 In order to assist, we highlight below two potential methods to assess the demand arising from the existing use of the site:
  - Inquiries could, presumably, be made to ascertain the number of CA-H Zone resident permits issued over the period when the building was last in use. (Our own inquiries indicate that a number of former occupiers of the building were indeed resident permit holders.)
  - If a calculation of likely demand based on evidence of a similar land use is preferred, then the closest example we are aware of is Otto Schiff House (in Netherall Gardens). We are aware that Camden has recorded parking permits for the 23 units here at a ratio of 43%. Application of a similar ratio to the nurse's accommodation would suggest a demand for 34 resident permits.
- 2.3 Either of the above methods seems certain to conclude that the existing land use places a significant demand on on-street parking bays. By proposing a permit free development, the proposal would therefore offer a significant net benefit in terms of on-street parking demand. It is important that this is taken into account by the highway and planning authority.

### **Parking Amendment Options**

- 3.1 The parking adjacent to the proposed crossover is resident permit parking, which for Monday to Saturday 9am to 8pm only allows those with a permit to park in the bays. The Council's view is that between 1 and 2 spaces could be lost and raises the question whether there could be any replacement on these 1-2 spaces nearby.
- 3.2 Two potential options for replacement could be considered:
  - Pay at machine parking for 5/6 vehicles is also available in the area on Well Road, opposite New End Square, with controls in place from 9am to 6pm. With Camden's agreement, the applicant could fund the conversion of part or all of this pay at machine area into dual use pay at machine / permit operation or into permit only bays. This would result in a net addition to the number of resident bays. Existing dual use bays are provided nearby at the northern end of Well Road, close to the junction with East Heath Road.
  - Alternatively, the applicant would be willing to consider funding the delivery of electric vehicle charging points on New End or alternatively elsewhere in the CPZ. These could be made available for Camden residents and would also address the Council's policies in favour of green travel. The reduced size of parking bays for electric charging would result in a net addition to the number of bays.

