

PLANNING STATEMENT

IN SUPPORT OF PROPOSED DEVELOPMENT

at

41 FROGNAL, LONDON, NW3 6YD

April 2015

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APPENDIX 1: FORMAL PRE-APPLICATION RESPONSE FROM THE LB OF CAMDEN

1.0 INTRODUCTION

1.1 This statement has been prepared by DP9 Ltd (DP9) in support of a full planning application at 41 Frognaal, NW3 6YD on behalf of our client, Renough Limited.

1.2 The description of development for the application is as follows:

“Partial demolition, extension and full refurbishment of the existing house, retaining the existing front facade while adding a new single storey garage. Extensions to the rear, side and at roof level, as well as introducing a new lower ground level to provide a six bedroom detached family dwelling and a one bedroom duplex apartment.”

1.3 This statement provides a general description of the proposal and an evaluation of the development against relevant national, strategic and local planning policy guidance. This statement should be read and considered in conjunction with the plans, drawings and photographs submitted as part of the application.

1.4 In addition to this statement, the application is accompanied by the following documents for approval as part of the main submission:

- Planning Application Form and Certificates (April, 2015) prepared by DP9 Ltd;
- Site Location Plan scaled at 1:1250 at size A3 (April, 2015) prepared by KSR Architects;
- Existing and proposed planning drawings at size A3 (April, 2015), prepared by KSR Architects;

The remaining documents are in support of the above application:

- Cover letter (April, 2015) prepared by DP9 Ltd;
- CIL Additional Information Form (April, 2015) prepared by DP9 Ltd;
- Planning Statement prepared (April, 2015) by DP9 Ltd;
- Construction Management Plan Pro-Forma (April, 2015) prepared by Motion;
- Design and Access Statement (April, 2015) prepared by KSR Architects;
- Structural Engineering Report and Subterranean Construction Method Statement (April, 2015) prepared by Elliott Wood;
- Heritage Statement (April, 2015) prepared by KM Heritage;
- Sustainability and Energy Statement (April, 2015) prepared by Integration;
- Plant Noise Assessment (April, 2015) prepared by CSG Acoustics;
- Arboricultural Method Statement (April, 2015) prepared by Landmark Trees;
- Arboricultural Impact Assessment Report (April, 2015) prepared by Landmark Trees;
- Affordable Housing Statement (April, 2015) prepared by DS2;
- Basement Impact Assessment (April, 2015) prepared by GEA Limited; and
- Transport Statement (April, 2015) prepared by Motion.

1.5 A description of the site and surrounding area is provided within Section 2.0. A description of the development is provided at Section 3.0 and an evaluation of the development against key planning policy guidance in Section 4.0. Conclusions are contained within Section 5.0.

2.0 THE SITE AND SURROUNDING AREA

The Site and Existing Building

- 2.1 The site is situated in the Frognal and Fitzjohns Ward of the London Borough of Camden ('LBC'). The application relates to a property on the northern side of Frognal, set back from the road frontage. Number 41 is a two storey detached 1960's property, designed by Alexander Finner in the International Modernist style and arranged as a single family dwelling, comprising ground and first floor. The house is currently vacant and in poor condition.
- 2.2 The property is accessed from the west via the existing sweeping drive that brings you into the site and up to the forecourt. The topography slopes towards the road to the east and south, with the highest point at the north-west corner.
- 2.3 The site is within the Redington and Frognal Conservation Area and is considered to be unusually large unlike other properties along Frognal, with an overall site area of 0.32 ha. The building is not listed, however it is identified in the Audit as being a positive contributor to the conservation area and being of some heritage significance.
- 2.4 The property is considered essentially derivative in its style, lacking any notably distinctive features that would cause it to be of major interest, however in the context of its immediate neighbours to the north, the house is sympathetically designed using similar buff brick, being within a modern style.
- 2.5 41 Frognal sits quietly in its mature landscape setting, which is recognised as a defining feature of the conservation area and is an important contributor to its character. For this reason, it has been decided to work with the existing building

whilst undertaking a degree of extension and alteration, to provide a modern family home.

Surrounding Area

- 2.6 The surrounding area comprises a mixture of predominantly residential properties with varying building heights along Frognal to the east, Arkwright Road to the south, Lindfield Gardens to the west and Frognal Close to the north. University College School is immediately opposite the site, comprising a range of part one and part three storey buildings, set back behind a gated brick entrance. The proposed development is ideally located to deliver high quality residential accommodation within this part of the borough.
- 2.7 Frognal was largely developed during the late 19th and early 20th Centuries and includes a mixture of Victorian and Edwardian architecture and construction. During recent years there have been a number of replacement and infill dwellings constructed in Frognal, including pastiche and contemporary designs. This has resulted in an eclectic mix in the road increasing its diversity.
- 2.8 There are a number of statutory listed buildings within the vicinity of 41 Frognal, all listed at Grade II, including numbers 39 and 39A Frognal along the western boundary of the site. To the east is a relatively tightly knit enclave of six semi-detached houses set around a small cul-de-sac, with numbers 1 and 2 Frognal Close located immediately adjacent the site.

Accessibility

- 2.9 Pedestrian and vehicular access to the property is directly off Frognal, with footways provided either side. A zebra crossing facility is present approximately three metres north of the entrance to the property allowing for pedestrian passage

across Frognaal. These footways link to further pedestrian footways which provide links to Hampstead underground station, Finchley Road and Frognaal rail station and a range of local amenities including shops, banks, schools and bus stops.

- 2.10 A number of resident permit holder parking bays are also present on the western side of Frognaal to the south of the application site which falls within a Controlled Parking Zone (ref: CA-H).
- 2.11 To the north, Frognaal provides access towards Hampstead and Golders Green and to the south it provides access to the A41 and wider highway network.
- 2.12 The site is situated within an excellent location in terms of public transport accessibility with a PTAL rating of 5. The site is located within walking distance of Hampstead Underground Station to the northeast (650 metres) providing access to the Edgware branch of the Northern Line. Finchley Road and Frognaal rail station is also located to the north (400 metres) providing routes to Stratford, Clapham Junction and Richmond, in addition to the five bus routes within the immediate area (including nos. 13, 82, 113, 46 and 603).

Planning History

- 2.13 From a review of the Council's on-line planning register we note that there are a number of applications pertaining to the site, mostly in relation to the felling and pruning of works to trees with the front and rear part of the garden.
- 2.14 Planning permission was originally granted on the 24th August 1965 (LPA Ref: 846) for the erection of a detached dwelling house providing a total of seven bedrooms and four reception rooms on the ground floor. There are no other recent, relevant planning applications at the site.

Pre-Application Consultation

2.15 The development of this site has been the subject of extensive consultation with the London Borough of Camden including a pre-application meeting held on the 2nd February 2015 (formal minutes attached at **Appendix A**). The design has evolved as a result of the pre-application feedback from the London Borough of Camden, with the following amendments made:

- Stronger horizontality incorporated to all new windows along the front and rear facade.
- The glazed main staircase along the western approach now has vertical elements introduced in reference to the existing buildings features.
- The rear facade walls now have their horizontal banding emphasised.

2.16 In terms of the design of the building, no concerns were raised in respect of the footprint, height or general principle of development. Nor was any concern raised in respect of impact on neighbouring residents or matters in relation to parking and highways related issues. It is clear from the pre-application meeting report that Officers were satisfied with the details of the proposed extension itself.

2.17 In addition, consultation letters were issued to immediate neighbours along Frognaal (including the University College School), Frognaal Close and those to the rear of the property along Lindfield Gardens. Letters were also sent to the three Ward Councillors for Frognaal and Fitzjohns (including Cllr Baillie, Cllr Mennear and Cllr Spinella), as well as the following local neighbourhood groups:

- Hampstead Conservation Area Advisory Committee (CAAC).
- Hampstead Neighbourhood Forum.
- Redington Frognaal Conservation Neighbourhood Forum.

2.18 To date, no objections have been raised by local residents regarding the principle of development, with comments only received regarding further clarity on the general layout and internal arrangements of the proposed property.

3.0 THE DEVELOPMENT PROPOSALS

- 3.1 The development seeks partial demolition, extension and full refurbishment of the existing house, retaining the existing front facade while adding a new single storey garage. Extensions are also proposed to the rear, side and at roof level, as well as introducing a new lower ground level to provide a six bedroom detached family dwelling and a one bedroom duplex apartment.
- 3.2 The expansive nature of this site provides opportunity for sensitive refurbishment. The main façade is to be retained with the primary extension to the rear. The existing entrance wall provides a reference point for a new low level garage to the front of the building, which is set well back from the street edge. The existing entrance wall is incorporated into the new mass, creating an entrance forecourt and garage. The new single level basement is situated predominantly under the house and proposed garage, together with the creation of a separate one bedroom apartment.
- 3.3 Access arrangements remain as existing via the retained front access on to Frogmal itself.
- 3.4 The existing property has a floorspace of 385.1 sqm (GIA) split over two floors. The addition of the basement and extensions to the side, rear and at roof level will add a further 1,371.7 sqm (GIA) of additional floorspace to the property. This is further summarised below:

	Existing	Proposed	Uplift
GIA	385.3 sqm	1,756.8 sqm	+ 1,371.7 sqm
GEA	419.4 sqm	1,880.3 sqm	+ 1,460.9 sqm

- 3.5 A full description of the proposal is provided in the accompanying Design and Access Statement (April, 2015) prepared by KSR Architects.

Design and Layout

- 3.6 The strong horizontality and simple geometry is respected and emphasised in the proposed composition, while the second floor material selection of metal and glass complements the elements of the existing facade.
- 3.7 The low level addition over the original garage and extensions to the main house are set back on all sides and therefore subservient to the central facade. The proportion and form of these additions create a unified front elevation.
- 3.8 The proposed rear facade design draws from the scale and proportion of the existing building. The horizontality is broken by the vertical stair element, which are referenced from the original design.

Materials

- 3.9 In terms of material finishes, these will compliment the retained existing front facade whilst also being sympathetic to the surrounding buildings. The introduction of copper and use of white render from the existing dwelling will offer a contemporary material which will unify the palette.
- 3.10 The existing architectural brickwork and timber panel features along the front elevation are to be repaired where required and continue throughout the new extension, as screening elements to the garage and rear facade, creating an element of continuity to the building.

Landscaping

- 3.11 The existing woodlands garden in both the front and rear of the property are to be maintained and enhanced, utilising these natural screens that envelope the centre of the site. This will be enlivened through the planting of groundcovers and evergreen shrubs strategically punctuating the space.
- 3.12 Green roofs are proposed where appropriate, in addition to climbers in order to screen the facades to further meld the architecture into the landscape.
- 3.13 The rear portion of the site lends itself to a sun catchment area with the potential for a south-west facing garden and extended living space. The western portion of the site will be enhanced as a woodland garden, incorporating a path network, specimen trees and shrubs. The main space to the rear will be opened up to create a generous lawn.

Summary

- 3.14 The proposed scheme seeks to refurbish the existing building comprehensively with the creation of a single basement and new extensions to the side and rear, together with new landscaping works to create a residential dwelling and separate one bedroom apartment of the highest quality, which remains sympathetic to the Redington and Frognal Conservation Area.
- 3.15 The proposals will bring the property up to modern day standards in a way which respects the privacy and amenity of residents whilst retaining the character of Frognal.

4.0 PLANNING POLICY FRAMEWORK OVERVIEW

4.1 This section provides an evaluation of the development against planning policy relevant to the site. The policy context comprises three levels of adopted and emerging policy – national, regional and local. The key planning policy documents taken into account at this stage and referred to in this planning statement include those listed below.

National Policy

4.2 National planning policy is set out in the form of the National Planning Policy Framework (NPPF), which was adopted on 27 March 2012. The NPPF sets out the Government’s economic, environmental and social planning policies. At the heart of the NPPF is a presumption in favour of sustainable development; with core planning principles including, amongst others, the requirement to “*drive and support development*”. This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

Regional Policy

4.3 On 10 March 2015, the Mayor of London published ‘*The London Plan - The Spatial Development Strategy for London Consolidated with Alterations Since 2011*’ (London Plan, March 2015). From this date, the document is operative as formal alterations to the 2011 London Plan and now forms part of the development plan for Greater London.

Local Policy

- 4.4 The statutory development plan, for the purposes of Section 54A of the Town and Country Planning Act 1990 (and as defined in Section 38(6) of the Planning and Compulsory Purchase Act 2004), are the London Borough of Camden's Core Strategy (CS) and Development Policies Document (DPD), which were both adopted in 2010, together with Camden's Planning Guidance (CPG) notes.
- 4.5 The Council are currently consulting on their Draft Local Plan which is out for consultation until the 17th April 2015. This will eventually form part of the Council's LDF. At present, the document is still in draft and will be issued for a further modifications consultation later in the year. The current proposals are considered to be in accordance with emerging policy and have been designed in-line with this guidance.

Site Designations

- 4.6 The site is identified within Camden's Proposals Map (2010) as falling within the Redington and Frogna Conservation Area. No other site specific designations apply.

Planning Assessment

- 4.7 This section considers the provisions of the planning policy framework for the area and assesses the proposals in the context of these policy provisions under the following headings:
- Land Use;
 - Affordable Housing;
 - Architectural Assessment;
 - Townscape and Conservation;

- Principle of Subterranean Development;
- Sustainability and Energy;
- Transport, Refuse and Parking;
- Daylight, Sunlight and Overlooking; and
- Trees.

Land Use

Principle of Residential Use

- 4.8 In regard to residential uses, the NPPF seeks to *'boost significantly the supply of housing,'* with paragraph 49 stating that applications should be considered in the context of sustainable development.
- 4.9 Paragraph 23 further states that local authorities should recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to *'encourage residential development on appropriate sites.'*
- 4.10 Of particular relevance to the current proposal, paragraph 50 identifies the objective to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 4.11 At regional level, London Plan Policy 3.3 seeks to increase housing supply with a target of 8,892 homes across Camden over a 12 year target and the Mayor of London recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. The Mayor will seek to ensure the housing need identified in paragraph 3.17 is met, particularly through provision consistent with at least an annual average of 32,210 net additional homes across London.

4.12 Policy CS6 of the Core Strategy states that the Council will maximise the supply of additional housing and exceed a local target of 5,950 homes from 2007 to 2017, including 4,370 additional self-contained homes. Housing is regarded as a priority land use within the LDF and the policy seeks to minimise polarisation and create mixed communities, by:

- Seeking a range of self-contained homes of different sizes to meet the Council’s identified dwelling-size priorities;
- Seeking a variety of housing types suitable for different groups; and
- Adjusting the type and mix of housing sought, having regard to the financial viability of development.

4.13 Development Management Policy DP2 states the council will seek to minimise the loss of housing in the borough and supports the creation of larger sized family dwellings, where this is a relatively low provision being accommodated locally.

4.14 The current proposals all contribute to improving the building as a single family residence and creation of a separate one bedroom apartment, enhancing the buildings original design and layout whilst ensuring the historic front facade’s form and integrity is sympathetically retained. The alterations are all intended to bring the property up to modern standards and provide the floor area expected in high-quality family homes. This will enable the building to continue in a historically appropriate and viable use – that is, residential – which is consistent with its conservation.

4.15 In summary, the site is located within a highly accessible area that is predominantly residential in nature. The current building is vacant and in a poor state of disrepair. The current proposal seeks to improve the overall function and use of the existing plot, which better responds to the needs of modern family

living to create a six bedroom dwelling and separate one bedroom apartment. As such, the development accords with the policy objectives at all levels.

Affordable Housing

4.16 The NPPF encourages local authorities to approach affordable housing delivery pragmatically. With respect to the appropriate mechanisms available to address local need for the provision of affordable housing, paragraph 50 requires boroughs to set policies to meet identified need for affordable housing on site, unless off site provision or a financial contribution of broadly equivalent value can be robustly justified.

4.17 At regional level, Policy 3.11 of the adopted London Plan (March, 2015) requires boroughs to set overall affordable housing targets which should take account of the London-wide target tenure mix and the viability of development. Further to this, Policy 3.12 sets out the approach to negotiating affordable housing in individual schemes and states that councils should accommodate the following aspects in the context of making planning decisions and in the preparation of their local plans:

'A - The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:

- a current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 and 3.10 and 3.11*
- b affordable housing targets adopted in line with Policy 3.11,*
- c the need to encourage rather than restrain residential development (Policy 3.3),*
- d the need to promote mixed and balanced communities (Policy 3.9)*

- e the size and type of affordable housing needed in particular locations*
- f the specific circumstances of individual sites.*

4.18 At local level, Policy CS6 of the adopted Core Strategy sets out the borough wide policy of seeking to secure 50% affordable housing across all additional residential development, and the maximum reasonable contribution towards affordable housing from scheme specific proposals, subject to financial viability.

4.19 Development Policy DP3 sets out the target for affordable provision based on a sliding scale that increases from 10% for developments with the capacity to deliver 10 homes (1,000sqm), up to 50% for developments with the capacity to provide 50 homes (5,000sqm). The local policy approach to affordable housing delivery can be summarised as an expectation to be delivered on-site and where this is not practical, particularly for schemes delivering between 1,000sqm and 3,500sqm of development (such as 41 Frogna), for offsite affordable housing or a payment in lieu to be provided.

4.20 In considering the practicality of on-site affordable housing delivery, the Council will have regard to; inter alia, the character of the development and local area, site size and constraints upon providing a mixed tenure development and the viability of the scheme.

4.21 The proposed scheme results in an uplift of 1,461 sqm and therefore triggers an affordable housing obligation. In considering the nature of the obligation, we have had regard to LBC's sequential approach which is outlined in further detail below:

On-Site Provision

4.22 The Site is unable to support on-site affordable housing delivery because the design does not allow for a separate driveway, or grounds which will result in a

potentially unaffordable service charge being applied to any affordable units delivered on site.

- 4.23 Given the quantum of affordable units that would be provided, it is unlikely that a Registered Provider would be prepared to purchase and manage so few units. Moreover, the provision of on-site affordable housing categorically will have a detrimental impact on the marketability and sales value of the proposed dwelling, which could result in the development not being delivered and remaining vacant.

Off-Site Provision

- 4.24 The applicant does not own another residential site within the borough. Furthermore there are a lack of sites for the applicant to purchase, particularly within the vicinity of the site.

- 4.25 Where sites do come to the market, the applicant would need to compete with purchasers on a market basis. Considering the size of the payment in lieu of circa £565,775 and given the high value location, it is highly unlikely that a site could be purchased in this area of the borough which would optimise the delivery of affordable housing in the borough, and offer the council value for money. A single one bedroom dwelling could be purchased as part of a ‘street property’ acquisition programme however this would raise the same management and service charge issues of providing a single affordable dwelling within a private residential block.

- 4.26 For this reason, the opportunity to provide off-site affordable housing has been discounted.

Payment in Lieu

- 4.27 Given the findings above, it is therefore considered that in this instance, due to a combination of the factors described above, that a payment in lieu to the Council’s affordable housing fund, instead of on-site or off-site provision, is the most practical and feasible method of delivering affordable housing.

4.28 This would allow the Council to pool the financial contribution and use it to fund a better housing outcome elsewhere.

4.29 Based on Camden’s sliding scale policy outlined in Camden’s Planning Guidance CPG2, the affordable requirement would be 14.61% of the uplift, or 213.5 sqm of affordable housing, subject to viability. If it were to be demonstrated that it would be unfeasible to provide affordable housing on or off-site, based on Camden’s payment in lieu formulae, the current proposals would derive a financial contribution of £565,775. Further justification is provided within the supporting Affordable Housing Statement (April, 2015), prepared by DS2.

Architectural Assessment

4.30 The NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. However, it is proper to seek to promote or reinforce local distinctiveness.

4.31 The London Plan sets out a number of key policies relevant to the design of the building:

- Policy 7.2 relates to an inclusive environment and states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:
 - Can be used safely, easily and with dignity by all regardless of disability, age gender, ethnicity or economic circumstance;

- Are convenient and welcoming with no disabled barriers, so everyone can use them independently without undue effort, separation or special treatment; and
- Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways;
- Policy 7.3 states that development should reduce criminal behaviour and contribute to a sense of security;
- Policy 7.5 seeks an improvement to public realm, encouraging the use of landscaping treatment, street furniture and way finding; and
- Policy 7.6 states that architecture should be of the highest quality, responsive and complementary to the surrounding context and not cause unacceptable harm to the amenity of surrounding land and buildings.

4.32 At local level, Policy CS14 within the Core Strategy states that the council will ensure that Camden's places and buildings are attractive, safe and easy to use by requiring development of the highest standard of design that respects local context and character.

4.33 Development Management Policies DP22 and DP24 state that the Council will require all developments to be of the highest standard of design and should consider (inter alia):

- a) Character, setting, context and the form and scale of neighbouring buildings;
- b) The character and proportions of the existing building, where alterations and extensions are proposed;
- c) The quality of materials to be used; and
- d) The provision of visually interesting frontages at street level.

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- 4.34 The supporting Design and Access Statement (April, 2015) submitted with the application provides an analysis of the constraints and opportunities presented by the development. The overall approach has been to retain the existing frontage along Frognaal where feasible, limiting the interventions that are needed to allow the residential accommodation to function behind.
- 4.35 The front facade is the key feature of the existing house, and therefore the most important element to be retained and considered in this proposal. The proposed design takes its cue from the horizontal characteristics of the existing facade.
- 4.36 The strong horizontality and simple geometry is respected and emphasised in the proposed composition, while the second floor material selection of metal and glass complements the elements of the existing facade.
- 4.37 The low level addition over the original garage and the extensions to the main house are set back on all sides and therefore subservient to the main facade. The proportion and form of these additions create a unified front elevation.
- 4.38 The proposed low level garage to the front of the building is single storey and set well back from the street edge. The existing entrance wall is incorporated into the new mass, creating an entrance forecourt and garage, relating well to the original architect's design. The new single level basement is situated predominately under the house and proposed garage.
- 4.39 The building is shielded from the surrounding area by the dense tree cover on the boundary of the property. The existing woodlands garden in both the front and rear of the property are to be maintained and enhanced, utilising these natural screens that envelope the centre of the site. This will be enlivened through the planting of groundcovers and evergreen shrubs strategically punctuating the space.

- 4.40 Green roofs are proposed where appropriate, in addition to climbers in order to screen the facades to further meld the architecture into the landscape.
- 4.41 The rear portion of the site lends itself to a sun catchment area with the potential for a south-west facing garden and extended living space. The western portion of the site will be enhanced as a woodland garden, incorporating a path network, specimen trees and shrubs. The main space to the rear will be opened up to create a generous lawn. As such the impact on the wider area will be negligible.
- 4.42 The proposed scheme, therefore, provides a significant contribution to meeting housing need locally, through the creation of a modern, six bedroom detached family residence and a one bedroom duplex apartment. The internal residential accommodation has been designed to a high standard and meets or exceeds the minimum residential space standards set out by both the Greater London Authority (GLA) and LBC, together with complying with lifetime homes standards, in accordance with local policies CS14, DP22 and DP24.

Townscape and Conservation

- 4.43 The NPPF describes heritage assets as *'an irreplaceable resource' which should be 'conserve[d] in a manner appropriate to their significance'* (paragraph 126). Furthermore, the NPPF considers local planning authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use consistent with their conservation when determining planning applications (paragraph 131).
- 4.44 Policy 7.8 of the London Plan explains that development should value and conserve heritage assets where appropriate. Policy 7.4 further encourages development to have regard to the form, function and structure of an area, and the scale, mass and orientation of surrounding buildings.

4.45 The Core Strategy seeks to ensure that development is of the highest standard of design and respects local context and character. Policy CS14 seeks to preserve Camden's heritage assets and their settings, including conservation areas and listed buildings. The current site is situated within the Redington and Frogna Conservation Area and regarded as an important contributor to its character. An Audit was published by LBC in 2004 which outlines the historic development of the area and its present day characteristics.

4.46 Development Management Policy DP25 states in order to maintain the character of Camden's conservation areas, the Council will only permit development that preserves and enhances the appearance of the area. Of particular relevance to the current proposal, part C states:

“The Council will prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exception circumstances are shown that outweigh the case for retention.”

4.47 The existing property is now fifty years old and in need of modernisation and updating to function in a similar but up-to-date way to that originally conceived. The design approach aims to ensure that the extensions reflect the modernist elements of the existing building while retaining its low impact in the streetscene. The approach to the building will retain and enhance the best elements of a now tired building.

4.48 Following pre-application discussion, particular emphasis has been placed on ensuring the horizontal form remains, in particular through emphasis on the fenestration in the extensions. In particular, the fenestration in the proposed second floor have been amended to reflect the horizontal glazing panel of the

lower floors. Likewise, the external vertical emphasis of the staircase at the rear has been broken up with further glazed detailing.

- 4.49 The primary views of the site from within the conservation area are from the road. From here, the extended building will continue to sit well within the large plot, surrounded by its mature landscape. The site will retain its sizeable – both front and rear – garden, a feature generally recognised as contributing to the character of the conservation area.
- 4.50 The effect of the works on the heritage significance is positive. The proposal will preserve the character and appearance of the conservation area and the setting of the nearby listed buildings, particularly from 1 and 2 Frogna Close, as well as 39 Frogna. The sylvan setting of the house will be retained and the key elements of the architectural style of the building will remain legible and appreciable. This will be continued through into the separate one bedroom apartment at the side of the property. Further details are outlined in the supporting Heritage Statement (April, 2015), prepared by KM Heritage.
- 4.51 In summary, the proposed extension and refurbishment of the current property, together with the creation of a separate one bedroom apartment, will result in a better proportioned and more balanced composition that will enhance the townscape locally and wider conservation area setting. The proposed development is therefore in line with national, regional and local policies which seek to protect the heritage environment; including the NPPF, London Plan policies 7.4, 7.8, Camden’s Core Strategy policy CS14 and Development policy DP25.

Principle of Subterranean Development

- 4.52 Policy DP27 within Camden’s Development Management Document details the Council’s requirements in relation to subterranean development, which will only

be permitted where the basement does not cause harm to the built/natural environment, local amenity and does not result in flooding or ground instability. In particular, proposals must demonstrate that they meet certain criteria including:

- *“No harm to the amenity of neighbours;*
- *No loss of open space or trees of townscape or amenity value;*
- *Provide satisfactory landscaping, including adequate soil depth;*
- *Do not harm the appearance or setting of the property or the established character of the surrounding area;*
- *Ensure the architectural character of the building is protected; and*
- *The development results in the loss of no more than 50% of the front garden or amenity area.”*

4.53 Given that 41 Frognal is not statutorily/locally listed and the proposed single storey basement will be positioned away from the main perimeter walls of the existing building (separated by a contiguous pile wall between), the stability of the site and neighbouring properties will be safeguarded, in compliance with Policy DP28. While there will be a requirement to underpin the main house during construction, the existing foundations will not be modified. Where the basement extends out below the driveway and front garden beyond, the use of a bored pile wall will be used.

4.54 A Basement Impact Assessment (BIA) and Subterranean Construction Method Statement (CCMS) have been submitted with this planning application (April, 2015). Both documents explain the measures and calculations that have been undertaken to ensure that the stability and integrity of the neighbouring properties and the main building is in no way compromised, including:

- A desk study of the sites history, age of the property, site survey, geology, historic river courses and underground infrastructure;

- An appraisal of the existing structure including any previous alterations and condition of adjoining buildings;
- A site investigation with trial pits to show the existing foundations and the material they are founded on;
- Details of the engineering design including the detailed proposals stage;
- An analysis of how the basement may impact upon any groundwater flow;
- An assessment of anticipated movements and how these will affect adjoin or adjacent properties; and
- Details of sequences of construction and temporary propping to demonstrate how the basement can be built to prevent movements.

4.55 In order to minimise disturbance to the occupiers of neighbouring properties, a number of mitigation methods are proposed within the supporting Construction Management Plan (CMP), including:

- No proposed parking bay suspensions or temporary traffic management orders will be required;
- The engines of delivery vehicles will be turned off whilst materials are being off-loaded;
- Due to the close proximity of the site to the adjacent school, all deliveries will be limited on weekdays to between 9:30am – 3pm during term time, in order to avoid school pick up and drop off times.
- No hoarding will be required on the public highway. Secure and lockable hoarding will be installed around the property within the boundary of the site; and
- All servicing and storage of materials will occur on site and no vehicles will be allowed to stop on the public highway.

-
- 4.56 Please refer to the CMP for full details of the mitigation methods being implemented to protect immediate neighbours and the adjacent school during the construction process.
- 4.57 The Council, as part of their Draft Local Plan partial review, are currently undertaking a modifications consultation until the 17th April 2015. As part of these changes and of relevance to the current proposal, draft Policy A5 will require all subterranean development to comprise no more than one storey and be designed, constructed and completed to the highest standard and quality. To achieve this, basement development should not exceed a maximum of 50 per cent of each garden or open part of the site.
- 4.58 The current proposals are considered to be in accordance with emerging policy A5, comprising no more than one storey in depth and not exceeding more than half of the front garden area.
- 4.59 In light of the above and the measures put in place with regard to design, use and construction, it is considered that the subterranean development complies with national, regional and local level policy. The proposed works will not detract from the character and appearance of the Redington and Frognal Conservation Area or have any structural impacts.

Sustainability and Energy

- 4.60 As noted previously, the NPPF establishes a presumption in favour of sustainable development. Paragraph 95 encourages proposals which support the delivery of renewable and low carbon energy, in particular:

- Local authorities should actively support energy efficiency improvements to existing buildings; and
- Take account of land form, layout, building orientation, massing and landscaping to minimise energy consumption.

4.61 London Plan Policy seeks to secure sustainable development by:

- Requiring developments to demonstrate that sustainable design and construction standards have been integral to a proposal, including minimising carbon dioxide emissions, avoiding internal overheating, efficient use of natural resources, minimising pollution, minimising waste, avoiding impacts from natural hazards, using sustainable construction practices, and promoting biodiversity (Policy 5.3); and
- Requiring developments to minimise carbon dioxide emissions through the latest transitional arrangement targets which have increased from a 25% improvement (during 2010-2013) to a 40% reduction (from 2013 to 2016) on the 2010 Building Regulations (Policy 5.2).

4.62 At local level, Core Strategy Policy C13 states that new development must incorporate exemplary standards of sustainable and inclusive urban design and architecture, and should reduce energy use and emissions that contribute to climate change during the life-cycle of the development, through the reduction, reuse or recycling of resources and materials, including water, waste and aggregates.

4.63 Regarding renewable energy, policy C13 sets out the Council's commitment to reduce Camden's carbon emissions in line with the national target of 80 per cent by 2050. The retention and refurbishment of the existing dwelling is considered an efficient use of land and buildings. The proposed main family dwelling and separate one bedroom apartment will both minimise carbon emissions through enhancements to the thermal performance of the building fabric, incorporation of

passive design measures and use of energy efficient active building services systems.

- 4.64 Overall, the proposed development will meet high standards of environmental sustainability, with a commitment to achieve BREEAM Domestic Refurbishment 2014 rating of 'Excellent', in line with Development Policy DP22. The pre-assessment score is appended to the back of the supporting Sustainability and Energy Statement (April, 2015), prepared by Integration.
- 4.65 A ground source heat pump (GSHP) will be provided, to serve the underfloor heating systems and to pre-heat the domestic hot water and swimming pool. On the roof of the main house, photovoltaic panels will also be installed in a southern orientation, to maximise electricity generation efficiency and to aid with a proportion of the energy demand required by the GSHP. Green and brown sedum roofs are also being explored in accordance with Camden's Planning Guidance 3 note on Sustainability.
- 4.66 A combination of passive energy measures and renewable initiatives are also proposed such as water efficient devices, automatic lighting control, together with smart metering and space heating in line with Policy 5.3 of the London Plan.
- 4.67 As such, the proposed development fully complies with Policies 5.2 of the London Plan, Core Policy C13 and Development Policies DP22 and DP23, achieving the required reduction in CO₂ emissions. The proposed development also includes a range of sustainability initiatives which meet the requirements of Policy 5.3 of the London Plan.

Transport, Refuse and Parking

4.68 The NPPF requires new developments to consider local transport capacity and promote sustainable transport choices (Paragraph 32). The London Plan promotes development that will not adversely affect safety on the transport network, setting out the following requirements:

- Policy 6.9 seeks secure cycle parking in line with the standards set out in Table 6.3 of the London Plan;
- Policy 6.10 seeks high quality pedestrian environments;
- Policy 6.13 states the maximum standards for car parking should be achieved as set out in Table 6.2 of the London Plan, and that 1 in 5 spaces should provide an electrical charging point.

4.69 At local level, Development Management Policy DP18 outlines the parking standards for new dwellings and the need for limiting the availability of car parking on site.

4.70 Developments should comply with the maximum local car parking standards for residential development (Class C3) and are also expected to meet the Councils minimum cycle parking standards, as shown in Table 1 below:

Parking Type	Standard
Cycle Parking (Minimum)	Residents – 1 storage or parking space per unit.
Vehicle Parking (Maximum)	Low parking provision areas: maximum of 0.5 spaces per dwelling. Rest of the borough: maximum of 1 space per dwelling.

- 4.71 The existing property benefits from a long driveway which leads to a double garage from Froggnal. The development results in the removal of the existing garage, which will be replaced by a one bedroom residential unit. A new double garage will be relocated adjacent to the eastern extent of the existing house.
- 4.72 The garage will provide facility for electric charging for cars and the dimensions allow for the use of the parking bays by wheelchair users. A single parking bay will also be provided for the new one bedroom unit, which will ensure that the dwelling can accommodate parking by disabled motorists in accordance with Table 6.2 of the London Plan.
- 4.73 A total of six covered secure cycle parking spaces will be provided for the house and one cycle parking space will be provided for the one bedroom unit in a secure shelter to the front of the property. This provision accords with London Plan and Camden's local standards. This is shown in further detail within the supporting Transport Statement (April, 2015) prepared by Motion.
- 4.74 Refuse for the development will be collected from Froggnal, as per the current arrangement. The driveway provides opportunity for deliveries to the properties to be undertaken on site and as such, it is considered that the extension of the existing property and the construction of an additional dwelling would not have a material effect on the operation of the local road network.

Daylight, Sunlight and Overlooking

- 4.75 The proposed development still retains a generous separation between buildings, being set back from the main road frontage and having far greater distances between the majority of dwellings along Froggnal. Furthermore, limited additional

windows will be introduced in to the eastern or western façade and thus no loss of privacy will be caused from the immediate neighbours.

- 4.76 The additional extensions to the property at both the rear, front and side are modest in relation to the size of the plot, being not too dissimilar in scale and overall footprint as the existing dwelling. Therefore it is not considered that adjoining occupiers would suffer from a material loss of daylight or sunlight. These points were accepted in principle by the council's case officer at the pre-application stage and subsequently there have been no requirements to provide any supporting documentation in relation to the material loss of daylight, sunlight or overlooking.

Trees

- 4.77 At local level, the Core Strategy sets out measures regarding tree protection. Policy CS15 requires the preservation of existing trees and the provision of new trees. The Council will also resist the loss of trees unless the tree has little or no amenity value.
- 4.78 Land Mark Trees have undertaken an Arboricultural Impact Assessment and detailed Arboricultural Method Statement (April, 2015) with respect to the existing trees within the site boundary and nearby. On and around the site there are a total of thirty six trees and shrubs of which only fourteen are of moderate to average quality and have been considered worthy of maintaining for their amenity value.
- 4.79 The trees of moderate quality would be subject to low and very low impacts from the proposals, with the line of the new basement being built primarily under the existing footprint of the house, extending outwards along the main property frontage. The mature boundary trees would be retained and supplemented with a

more rational scheme of planting. There are currently no Tree Preservation Order's (TPO) located to either the front or rear of the property.

- 4.80 The site has potential for development without impacting significantly on the wider tree population or local landscape as stated within the Arboricultural Impact Assessment. Thus, with suitable mitigation and supervision the scheme accords with local level policy.

5.0 CONCLUSION

5.1 The proposal seeks to undertake partial demolition, extension and full refurbishment of the existing house, retaining the existing front facade while adding a new single storey garage. Extensions to the rear, side and at roof level are also proposed, as well as introducing a new lower ground level to provide a six bedroom detached family dwelling and a one bedroom duplex apartment.

5.2 The proposed scheme has been subject to detailed assessment against national, regional and local planning policy and guidance and has been found to be in general accordance with the development plan and other material considerations.

5.3 In particular, it will deliver the following policy objectives and benefits:

- The proposal comprises a sensitively designed scheme which addresses the complexities, constraints and opportunities of the site;
- No material harm would be caused to the amenity of neighbours from the proposed works, since no new overlooking, loss of privacy or effect on outlook would occur. Access to the house would remain as it currently exists.
- The setting of the neighbouring listed buildings will be enhanced by virtue of the refurbishment of the existing neutral building on site with a high quality new family home and separate one bedroom apartment;

- The proposed development will remain set back in the existing plot and centralised to better reflect the grain and character of the conservation area; and
- The resulting sustainability and renewable energy strategy will see an improvement over the existing building and will aim to reach a BREEAM Domestic Refurbishment rating of Excellent. The proposals will incorporate passive energy measures (i.e. photovoltaics and green sedum roofs above the second floor, rainwater harvesting etc), together with the maximisation of other renewable energy technologies (i.e. Air Source Heat Pump) within the heritage constraints of the site.

5.4 In conclusion, the current proposals all contribute to improving the building as a single family residence and separate one bedroom duplex apartment, enhancing the buildings original design and layout whilst ensuring the historic front façade's form and integrity is sympathetically retained. The alterations are all intended to bring the property up to modern standards and provide the floor area expected in high-quality family homes. This will enable the building to continue in a historically appropriate and viable use – that is, residential – which is consistent with its conservation.

Appendix 1: Formal Pre-Application Response from LB of Camden



**Development Management
Regeneration and Planning**
Culture & environment directorate
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8EQ

Date: 17/02/2015
Our ref: 2014/7965/PRE
Contact: Zenab Haji-Ismail
Direct line: 020 7974 3270
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zenab.haji-ismail@camden.gov.uk
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chris.deeks@dp9.co.uk

Dear Mr Deeks,

**Town and Country Planning Act 1990 (as amended)
Re: 41 Frognal, London NW3 6YD**

Thank you for your enquiry received on the 22 December 2014, regarding the erection of a part 1 and part 2 storey extension to the side and rear of the existing house with creation of a new garage, the excavation of a single storey basement and the creation of a new dwelling adjacent to the existing house.

This letter represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Overview of the Site and Proposal

The site is located off Frognal surrounded by Grade II listed properties at Frognal Close and 39 Frognal. The existing house is a two storey, 1960's modernist style house set well back from the street frontage. The building sits within sub area eight in the Redington and Frognal Conservation Area and is noted as making a positive contribution to the Conservation Area. The proposal seeks to provide a part single storey and part two storey extension to the side and rear of 41 Frognal as well as the creation of a new garage, the excavation of a single storey basement and the creation of a new dwelling. The proposal is likely to result in an increase of approximately 1,300sqm of floorspace.

Assessment

Supply of Additional Housing

The Council's position with regards to the provision of housing is set out in Policy DP2 (Making full use of Camden's capacity for housing) whereby the Council seeks to maximise the supply of additional homes in the borough. It is considered that the proposed self-contained house which is proposed to sit adjacent to the existing property will provide an adequate one person unit and is above the minimum space standards of 32 sqm set out in CPG2.

Affordable Housing

Policy DP3 (Contributions to the supply of affordable housing) will apply to the proposed as the proposal would result in an increase of approximately 1,300 sqm of floorspace. In the first instance, the Council would require on-site provision of affordable housing; failing that, offsite provision of affordable housing will be sought. The Council has identified that there is opportunity to provide offsite affordable housing at the Gospel Oak regeneration site and this would be preferred over any contribution.

Design

The Council's policy position in respect of extensions to existing buildings is set policies CS14 ('Promoting high quality places and conserving our heritage') and DP24 ('Securing high quality design'). As the property lies within the Redington and Frognal Conservation Area, Policy DP25 ('Conserving Camden's heritage') and the conservation area statement are also relevant.

Policy DP24 of the LDF expects all developments to be of the highest standard and to consider the character, the setting and context of neighbouring buildings. Policy DP24 also expects developments to consider the quality of materials that are used and provide visually interesting frontages. At the same time Policy DP25 of the LDF requires all developments in designated conservation areas to preserve and enhance the character and appearance of the area.

In principle, the proposal is likely to be considered acceptable providing the design considerations are built in. The building is characterised by its low horizontal form; this should not be lost and so a full justification of the step up would be required.

The materials of the existing buildings must be built into the considerations of the proposed. The windows to the additional floor are currently quite solid whilst the windows to the ground and first floor have a horizontal glazed panelling going through, the same should be incorporated into the design of the second floor windows. The full length vertical window on the rear façade has lost the detailed panelling, whilst it is not expected that the original will be restored, some break up in the full length glazing would be welcomed.

The proposed extensions and creation of a new self-contained dwelling adjacent to the existing house is likely to be considered acceptable providing the existing horizontal form remains. The proposed garage incorporates references the original entrance wall design and therefore is considered to be acceptable.

Amenity

Protecting the amenity of residents and visitors is also a key Council priority. Policies CS5 ('Managing the impact of growth and development') and DP26 ('Managing the impact of development on occupiers and neighbours') set out the Council's stance in this respect. It is considered that there is unlikely to be any impact in terms of the loss of sunlight/daylight or overlooking issues as the site is proposed to maintain its low profile and sits well away from the neighbouring properties. The only impact on amenity will be noise impact that will arise during construction; this will need to be addressed through a construction management plan.

Sustainability

Policy DP22 (Promoting sustainable design and construction) requires sustainable design measures to be incorporated into the design. Given the extension is likely to result in an increase in more than 500sqm of floorspace, a BREEAM refurbishment of domestic building pre-assessment should be submitted with the application with the aim of attaining 'very good'.

Basement Excavation/Structural Issues

The proposal involves the excavation of the basement which sits beneath the house and projects out to the front of the building by approximately 21 metres within the existing sloping ground. The overall proposed floorspace of the basement would be approximately 730 sqm GIA. Consideration will need to be given to the Policy DP27 (Basement and lightwells).

Camden has a comprehensive policy framework dealing with basement applications. Policy DP27 (basements and lightwells) requires developers to demonstrate that proposed basements will not harm the built and natural environment or local amenity, result in flooding or lead to ground instability to both the host and nearby buildings.

Policy DP27 is supported by CPG4: Basements and lightwells. Any application would require a 'Basement Impact Assessment' (BIA) to be submitted, clearly identifying any potential impacts of the proposed scheme on structural stability and the water environment and sets out mitigation measures.

Independent verification of Basement Impact Assessments, funded by the applicant, is now also required (since CPG4 was updated in September 2013) in the following situations:

- Where a scheme requires applicants to proceed beyond the Screening stage of the Basement Impact Assessment (i.e. where a matter of concern has been identified which requires the preparation of a full Basement Impact Assessment);
- Where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow; or
- For any other basement applications where the Council feels that independent verification would be appropriate (e.g. where conflicting evidence is provided in response to a proposal).

A full scoping study is required as part of any application, identifying the potential impacts for each of the matters of concern. We would advise entering into consultation with local residents and the Redington and Frognaal CAAC at this stage, in order to fully understand and address their concerns before an application is made.

Detailed guidance is available within CPG4, which is available to view on the Council's website. In particular, it is imperative that the BIA is carried out by suitably qualified professionals and is fully comprehensive of stages 1-4 of the BIA process.

Transport/ Highways

The site has a PTAL rating of 5 and there is currently a vehicle crossover including a driveway leading upto the house. The proposal also includes a garage and so we will require a statement that sets out how many vehicles will be parked within the garage and whether the development is likely to increase the amount of journeys made to and from the site.

The proposal involves an extension and the excavation of the basement and therefore the transport planners may seek for a highways contribution to be secured as part of the redevelopment of the site. In practice, this would seek to repave the highway adjacent to the site, to make good any damage that may occur as a result of the construction works at the site. This financial estimate would be calculated at the time of any application and be secured via S106 Legal Agreement.

It is expected that this development will be car capped and there will be cycle parking provided for the additional unit, details of this should be provided during the application.

Construction Management Plan

The main highways issue in this case is the potential impact of construction / delivery vehicles associated with the basement excavation on the local highway network. A draft Construction Management Plan (CMP) is required to be submitted with any application setting out how construction matters would be dealt with, for example deliveries, how material will be stored and construction waste removed from site. This is particularly the case owing to the type of proposal sought; it is likely that the applicant would be required to enter into a S106 Legal Agreement in order to ensure the measures set out in this plan are adhered to. Please see CPG7 for details of the particular elements required to be included in the draft CMP. For ease of reference however I also attach a slightly updated list of CMP requirements, which transport planners have prepared more recently than the CPG guidance.

Trees

In principle the proposal looks to be acceptable in arboriculture terms. The trial pits which were created to ascertain whether roots were present have shown that the trees to be retained on site are unlikely to be adversely affected by the proposals. The four trees that the report makes reference to which are to be removed have been removed already as they were dead/dangerous. These are therefore exempt from the usual process. Furthermore, the trees were not considered suitable for tree preservation orders.

Community Infrastructure Levy

During the site visit, it was indicated that the proposed development is likely to qualify for self-build relief. However, there is also a new self-contained residential dwelling being created as part of this application. The creation of a new dwelling will therefore be calculated as a percentage of the overall dwelling and thereafter the percentage will be charged on the uplift in floorspace area. If the applicant wishes to qualify for exemption, it is strongly recommend that form SB1-2: Self Build Annex or Extension claim form is downloaded from planning portal and submitted with the CIL additional information form. I recommend Regulation 54A of the CIL Regulations (as amended) is read before the application is submitted.

Consultation

You are strongly encouraged to engage with neighbouring occupiers, the neighbourhood groups (Hampstead and Churchrow and Perrins Walk) and CAAC at an early stage in the process, given the likely concerns residents will have with the comings and goings of construction / delivery vehicles particularly if a demolition and excavation of basements construction are proposed. Although adjoining occupiers will be notified of any application by us, initial consultation may help offset any concerns neighbours have before any application is submitted.

Conclusion

In principle, the provision of the proposal for the extension, the excavation of the basement and the provision of a self-contained additional unit that is ancillary to the existing building is likely to be considered acceptable providing it takes into consideration the policies noted above. The proposed design requires some work to the details on the design aspects that have been set out above. Again, we strongly recommend that you consult the neighbourhood groups, CAAC and adjoining neighbours at an early stage given the history of the site and concerns expressed by neighbourhood groups.

How to submit your application

Please submit you application electronically via the national planning portal.

When submitting a planning application, the following information will be required:

- Appropriate fee
- Site location plan
- All existing elevations (including the front and the side), floor plans, sections and roof plan
- All proposed elevations (including the front and the side), floor plans, sections and roof plan
- Design and Access Statement
- Affordable housing viability
- A basement impact assessment
- A pre-assessment sustainability report (BREEAM Refurb)
- Landscape: including design, SUDS, green roof (design objectives, details of construction & materials, including section at scale of 1:20; planting details, technique, varieties sizes, densities; management plan detailed how the structure and planting will be maintained)
- Lifetime homes
- A construction management plan

- Noise report (pro-forma attached)
- CIL Form

After you submit your application

It would be useful if you could let me know when you have submitted the application along with the planning portal reference number. I will then pick the application up as the case officer.

We are legally required to consult on the application with individuals who may be affected by the proposals. We will notify your neighbours by letter, put up a 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.

All consultation responses will be available to view on the Council's website using the planning application search page. It is likely that an application of this size would be determined through members briefing.

I trust the above provides a useful summary; however should you have any queries about the advice contained in this letter please contact Zenab Haji-Ismail on **020 7974 3270**.

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our [pre application enquiry survey](#). We will use the information you give us to monitor and improve our services.

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

Yours sincerely,

Zenab Haji-Ismail