

Head of Planning

London Borough of Camden

Development Management

Camden Town Hall

Judd Street

London

WC1H 9JE

117 Mount Pleasant Road

London

N17 6TQ

11th January 2017

Dear Sir/ Madam,

**The Hall School, 23 Crossfield Road, London, NW3 4NT**

**Planning Application Ref: 2016/6319/P**

I write in connection to the above planning application and would like to strongly object, on behalf of the Hall School Opposition Group, to the proposed extension of The Hall School as set out in the above planning application for:

*Full Planning permission for the demolition of the 'Centenary' and 'Wathen Hall' buildings and erection of new four storey building with glazed link to original school building, two storey rear extension with external terrace and enlarged basement replacing the existing Wathen Hall, and enlargement of rear roof storey and insertion of three dormer windows to old school building, all in association with providing additional accommodation for the existing school use. (Class D1).*

The application site is located in the London Borough of Camden and within the Belsize Park Conservation Area. The proposal to extend the school involves the demolition of two of the school’s existing buildings and replacement with a larger, modern four storey building with glazed link to original school building and a larger two storey rear extension. My view is that:

* The scale and massing of the proposed extension is disproportional to original School Building and as an extension would no longer be ‘subordinate’ or ‘secondary’ to the existing building or respect the original design of the building and surrounding properties;
* Although the proposal will cause ‘less than substantial harm’ to the conservation area, this harm outweighs any public benefits of the proposal;
* The proposed development will have an impact on the amenity of neighbouring residential properties, due to a visual intrusion, loss of views and outlook and potential increase in noise levels.
* drainage proposals to deal with wastewater and surface water from the new development are not adequate and the development will increase the risk of flooding in the local area.
* The proposal is contrary therefore, to the National Planning Policy Guidance, the London Plan and local planning policy and should be refused.

Hall School sits within the context of Belsize Park Conservation Area, surrounded on all sides by residential properties of Crossfield Road, Eton Avenue, Strathray Gardens, and Lancaster Grove, the gardens of which back onto the application site. The rear of the school creates a pleasant green outlook for those properties and views through to the school’s playground form part of the character and appearance of the conservation area.

## *Design Issues*

The proposed extension replaces the existing two storey Centenary Hall, which sits on Crossfield Road frontage with a larger, red brick four storey modern building with a more substantial red brick two-storey extension with pitched zinc roof to the rear (east elevation). Although the proposed extension attempts to take architectural design cues, materials and proportions from the original school building, the following design issues are of concern:

* The new four storey extension is substantial and is of a greater height and massing than the existing building on site;
* The scale, massing and form of the new extension and the rear extension will have a negative impact on surrounding properties in terms of loss of residential amenity and visual amenity;
* Residents’ views and concerns regarding the design of the new extension were not adequately taken into account.

The Core Planning Principles of the National Planning Policy Framework (NPPF, 2012) require that new development not only makes an effective re-use of land, but also seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings as well as conserve heritage assets in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life of this and future generations.

Paragraph 9 of NPPF sets out that seeking positive improvements in the quality of the natural and historic environment is key to sustainable development *‘replacing poor design with better design’*. Section 7 of the NPPF supports this, by stating that the design of the built environment and development ‘*should contribute positively to making places better for people*’ by meeting a number of key design characteristics:

* Function well and add to the overall quality of the area for the lifetime of the development;
* Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
* Respond to local character and history and identity of local surroundings and materials;
* Create safe and accessible environments;
* Visually attractive as a result of good architecture and appropriate landscaping.

Policy 7.4 of the London Plan requires new development to consider the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass and contribute to a positive relationship between the urban structure. Camden Core Strategy policies CS13, CS14 and CS15 require new development to meet the highest standard sustainable design, in a way that respects local context and creates high quality spaces and places. Preserving and enhancing the unique character of Camden and the distinctiveness of conservation areas is key.

Although the proposed extension looks to the original school building (built in 1889) for its architectural design, materials and detailing, the size and massing of the new extension of four storeys at the front and two at the back fails to relate successfully to the original building and is not appropriate to this location in the context of its neighbouring residential properties. The form of the new extension will be over-dominant in the streetscape, particularly to the rear of the school, where the sense of openness will be lost and outlook and views are reduced for those living in Eton Court and Strathray Gardens.

The neighbouring properties on Crossfield Road will be overwhelmed by the four-storey blank red-brick façade of the proposed southern elevation and the increased height of the rear extension – again red brick with a dominant zinc roof. Any long-range views of the school grounds will be reduced from the rear gardens of Crossfield Road properties and Eton Court and replaced with blank brick facades. These modern brick facades will be visible along the length of Crossfield Road and will detract from the existing character and interest by creating a soulless, over-dominant feature in the townscape (see Proposed South Elevation cross section drawing P30-EL-14).

The proposed development does not therefore adhere with Policy 7.4 of the London Plan in relation to scale, massing and will not make a positive contribution to the urban structure, or comply with Camden Core Strategy policies CS13, CS14 or CS15 as it does not adequately respect the surrounding context nor positively contribute to the Belsize Park Conservation Area due to its height and massing.

## *Conserving and enhancing the historic environment*

Hall School is identified as a key feature on Crossfield Road in the heart of the Belsize Park Conservation Area (Belsize Park Conservation Area Statement, 2003). Any alteration to this façade is likely therefore, to have an impact on the character and distinctiveness of the conservation area.

Section 12 of the NPPF Conserving and Enhancing the Historic Environment states that Councils should look for opportunities for new development to make a positive contribution and enhance conservation areas. The original school building, built in 1889, is a key feature in the conservation area and any extension to it should be considered carefully, so as not to be harmful to the integrity of the original building or detrimental to the conservation area as a whole.

## *Harm vs public benefit*

Paragraphs 128 and 129 of the NPPF set out that in applying for planning permission, applicants should describe the significance of the heritage assets affected and the contribution made by their setting; assessing such matters as siting, location, form, appearance identifying and assessing the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering any impact upon the heritage asset. Paragraph 134 states that ‘*where a development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against public benefits of the proposal’*.

The Heritage Statement supporting the application does not set out a clear assessment of the harm the development would cause to the significance of the conservation area. The assessment also fails to weigh this harm against the public benefits of the proposal. It simply concludes that the current building offers a ‘*neutral contribution’* and suggests the proposed development will be a clear enhancement to the conservation area. In accordance with paragraph 134, the assessment should weigh the less than substantial harm to the significance of the CA against any public benefits arising from the proposal.

As set out in the above section, the proposal would result in the following harm:

* a disproportionately large extension to replace Centenary Hall, which is visually intrusive to both the Conservation Area and neighbouring properties;
* a taller rear extension of two storeys, which blocks the current mature green outlook of properties on Eton Avenue;
* the construction of an enlarged basement area to accommodate a larger hall and further studio/ hall accommodation that is unnecessary considering the current size of the school and the existing facilities;

The scale of the proposal is at odds with the current size of the school, which is not a publicly funded and publicly accessible school. There are no clear public benefits resulting from this scheme and as set out elsewhere in this letter, the scheme would result in adverse impacts to local residents and the surrounding area. Furthermore, the proposed facilities appear to go beyond the current requirements of the school. While the applicant has made assurances that student numbers are not due to increase in the short term there is, of course, no control over the school increasing its student numbers in the longer term.

In conclusion, I consider that the proposed development would be contrary to Camden policies CS14 and CS15 and as such would lead to less than substantial harm to the significance of the conservation area. Furthermore, I do not consider that the scheme would not result in any significant public benefits and as such this would not outweigh the harm arising. The proposals are therefore considered to be contrary to paragraph 134 of the NPPF.

## *Extensions*

Camden’s Policies CS14 on Design and heritage requires high quality design which is visually interesting and attractive that respects local character and context. CPG1 requires new development to contribute positively to the character and distinctiveness of the conservation area and in paragraph 4.2 rear extensions to be ‘subordinate’ or ‘secondary’ to the existing building and to respect the original design of the building and surrounding properties. In addition, extensions should respect and preserve the existing historic pattern and townscape. In the case of extensions taller than one storey, a smaller footprint is encouraged to compensate for any increase in visual mass and bulk, overshadowing and overlooking that would be caused by the additional height

The existing Centenary Hall sits comfortably as a ‘secondary’ part of the group of buildings with a modest, unobtrusive, single storey rear extension with no windows to the southern elevation and having little or no impact on the amenity of neighbouring properties on Crossfield Road and Eton Avenue. The mature plane tree within the grounds is subject to a TPO and any alterations and additions to the school that impact on the tree have been refused in the past.

Surrounding streets are characterised by a range of architectural styles, such as terraced and semi-detached homes, as well as modern multi-storey flats of varying heights. The Centenary Building dating from 1989 is not currently a negative feature in the streetscape, although it is recognised that it does not have same architectural qualities as the original school building.

The Belsize Park CA Statement policy BE22 states that extensions can alter the balance and harmony of a property and rear extensions should be as unobtrusive as possible as to not affect the character of the conservation area and policy BE23 states that extensions should be in harmony with the original form and character of the house and the historic pattern of extensions within the terrace or group of buildings with the acceptability of larger extensions depends on the particular site and circumstances.

It states that new developments such as the extensions of *“excessive bulk, massing and height”* can have *“…a cumulative impact on elements that contribute to the character and appearance of buildings, streets and areas as a whole.”* (p. 36, Belsize Park CAS, 2003).

As the elevational drawings (P30-EL-4, 5 and 14 and 15) the proposed rear extension replaces the unassuming, unobtrusive one storey flat roofed building (Wathen Hall) with a significantly larger and more imposing two storey, red brick building of 4.5 m with pitched zinc roof. This is clearly contrary to the aims of the Belsize Park CA Statement, Policies BE22 and BE23, as it will lead to more striking and imposing extension to Hall School, altering the balance and resulting in an intrusive development within the CA.

In terms of the loss of visual amenity for surrounding residents, the proposed development would result in the loss of a mature green outlook for the residents of Eton Court, 24 - 30 Crossfield Road and 6-14 Strathray Gardens. Also, despite the applicant’s attempts to reduce the impact of the height of the rear extension with a mansard roof, the overall impact of the proposed extension on neighbouring gardens would remain a 4.5m blank elevation, harmful to the visual amenities of the surrounding residents. Immediate neighbours have formally objected to the increase in the height of the roof at this point.

These conclusions fall in line with the Inspector’s ruling in May 2006 (APP/X5210/A/06/1197705) at the appeal for the development of a basement swimming pool to the rear of the site and minor extensions and alterations. This appeal was dismissed by the Planning Inspector on the basis of a loss of character to the conservation area, harm to the appearance of the surroundings and loss of visual amenity of the appeal site. The proposals here are considerably more prominent than those dismissed by the Inspector in 2006.

The development proposals are therefore, contrary to Section 11 of the NPPF, policies CS14 and CS15 of the Camden’s Core Strategy, the Belsize Park Conservation Area Statement, CPG1 and policies D1 and 2 of the Draft Local Plan, that set out Camden’s commitment to enhancing conservation areas and high quality design that respects the context of the new development.

### *Residential Amenity*

A Core Planning Principle of the NPPF Paragraph 17 is to “*always seek high quality design and a good standard of amenity for all existing and future occupants on land and buildings*”.

The London Plan Policy 7.6 on Architecture in the City states that new development should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. Camden’s Core Strategy Policies CS5 and CS14 aims to promote and protect the high levels of amenity and quality of life that make Camden such a popular place to live. Policy CS14 aims to manage the impact of growth by protecting the amenity of Camden’s residents by making sure that the impact of developments on their occupiers and neighbours is fully considered. Furthermore, the draft Local Plan (currently being examined so its policies hold some weight) Policies A1-5 set out the standards for protecting local amenity to include managing the impact of new development, biodiversity and noise.

Camden sets out its requirements for all developments in DP26, which include alterations and extensions to existing buildings. Policy DP26 sets out that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity in terms of visual privacy and overlooking, overshadowing and outlook and noise.

### *Visual Privacy and Overlooking*

In terms of visual privacy, the provision of new classrooms in the four-storey extension with windows facing northwards, including dormer windows in the roof and new windows to the east elevation (rear) and to a certain extent to the south will increase overlooking to neighbouring properties and thus reduce levels of privacy to the back properties on Eton Court, Crossfield Road and Strathray Gardens.

Residents on Strathray Gardens have formally objected to increase levels of over-looking from proposed windows to the proposed east elevation (rear)- this will occur on the third and fourth floors of the new extension and the proposed glass link between old and new parts of the building.

### *Overshadowing and Outlook*

The scale, height and massing is proposed to increase on the Crossfield Road frontage and increase from one to two storeys in the rear extension; this will sever the views and outlook of properties in Eton Court, Crossfield Road which are currently open with views of the mature trees, including the view of the mature plane tree to the rear of the school. Although these are private views, they are part of the residential amenity of neighbouring residents. Any views of plane tree will also be compromised by the provision of a staircase that wraps around the protected tree.

### *Noise (post development)*

The NPPF states that development policies and decisions should “*avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development.”*

The additional three new classrooms above the studio and new ground floor assembly hall with doors onto the playground will lead to an increase in activity and potentially noise levels both during the day and in the evening when the hall is rented out to community groups and outside parties.

The increase in activity and associated traffic, noise and disturbance that would be linked to a new ‘community hall’ in such a quiet residential location is not considered acceptable, due to its proximity to back gardens and homes. There is a concern amongst neighbours about how this will be managed in the long term, particularly in the evenings and at weekends. Access to the hall is directly onto the playground and via the new staircase so are likely to increase noise at the southern end of the playground. Is this additional hall necessary in a school of this size, is it fully justified in the context of the wider concerns regarding the development as set out in this letter?

In addition, there is concern about any daily noise or vibration created by the plant machinery proposed to be located in the basement area, close to neighbouring gardens of properties on Strathray Gardens.

### *Traffic Impact*

Neighbouring residents from Buckland Crescent, Lancaster Grove and Eton avenue are concerned about the increase in traffic associated with the increase in activity at the school and any future increase in pupil numbers associated with it in the future (if past trends are considered).

### *Construction*

Camden’s Development Plan policy DP27 on basements sets out that Camden requires an assessment of the scheme’s impact on drainage, flooding and groundwater and land stability and will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. It states that it will not allow basements with habitable rooms in areas prone to flooding.

The proposed extension of the basement to lower and expand the existing Wathen Hall as well as provide changing rooms and workshop facilities, will necessitate significant engineering and construction works which have the potential to lead to adverse environmental impacts on neighbouring properties. Residents have not been consulted in relation to the proposed mitigation methods and remain extremely concerned about the potential impact the significant basement excavation could have on their properties.

Local residents are also particularly concerned with the potential noise, construction traffic and disturbance during a two-year construction period.

### *Flood Risk Management and Drainage*

The NPPF and associated technical guidance set out that all development proposals must comply with flood risk assessment and management requirements over the lifetime of the development.

The London Plan Policies 5.12 (Flood Risk Management) and 5.13 (Sustainable Drainage) set out that all new development should use Sustainable Urban Drainage (SUDs) and aim to meet greenfield run-off rates and that surface run-off is dealt with as close to the source as possible using sustainable methods, such as infiltration (soakaways) in preference to discharging rainwater into the existing sewer network, which may not have the capacity to cope with the additional discharge (leading to the potential for sewerage flooding).

Camden Borough is particularly vulnerable to surface water flooding so sets out clear intentions in its Flood Risk Management Strategy, 2013 to ensure new development does not exacerbate the problem. The draft Local Plan identifies surface water flooding as a key climate change risk for the Borough and Camden’s Development Policy DP23 sets out the council’s intention to reduce the amount and rate of run-off and surface water entering the sewers and identifies key areas at risk.

In addition, Thames Water Ltd indicate that there have been recent incidents of surcharging public sewers in the area and neighbouring properties maybe at risk (Sewer Flooding Inquiry, May 2015).

The drainage strategy, submitted to support the application, states that despite the increase in foul and surface water generated by the development (an increase of 33% building footprint including additional basement), the strategy is to use the existing means of drainage, via the existing gravity connections to discharge its waste and surface water. It does not propose any additional forms of sustainable drainage.

Thames Water Ltd responded to the application on 3rd January 2017 stating that the drainage strategy is inadequate for the following reasons:

* The inability of the existing sewer network to cope with the additional waste and surface water created by new school extension.
* The site falls within the Counter’s Creek Catchment, where significant flooding already occurs. The proposals do not meet the greenfield run-off rates required for the new building footprint and the drainage strategy proposed is therefore inadequate to deal with the additional surface run-off created by the proposed extension.

In conclusion, the proposals do not adhere to the NPPF principles or London Plan policies 5.12 and 5.13 on flood risk management and sustainable development, Camden’s Flood Risk Management Strategy or policy DP23 due to the potential increased risk of flooding to surrounding properties. The application should be refused on these grounds.

### *Pre-Application Consultation*

Paragraph 66 of the NPPF states that design should be developed to take account of the views of the community and should be looked upon favourably, where it is demonstrated that these views have been considered in the proposals. Core Strategy Policy CS5 reflects this view at a local level, requiring the views and concerns of local residents to be considered in design development.

The residents’ views and concerns about the design of the extension have not adequately been taken into account in the evolution of the design. One resident feels the extension will be a ‘blight’ to the historic nature of the conservation area and a ‘sore thumb’ that does not tie in with the original school building (formal objection, January 2017).

Two pre-application consultation exercises were undertaken in September and October 2016, as outlined in the Statement of Community Involvement, but the residents feel that it did not provide them with an appropriate level of detail for them to fully understand the true impact of the extension’s scale and massing. They feel that it is only at the current formal application consultation stage that they have been able to comment on the design in a meaningful way. In this respect, the proposals do not meet the objectives of Paragraph 66 the NPPF.

## *Summary*

The group of buildings that currently comprise Hall School provide a positive feature in the Crossfield Road streetscape and Belsize Park Conservation Area’s townscape. This objection to the proposed extension to Hall School is for the following reasons:

* the height, scale and massing of the proposed extension is excessive and over-shadows adjoining properties and extension will not be ‘secondary’ to the original school building;
* Although the proposal will cause ‘less than substantial harm’ to the conservation area, this harm outweighs any public benefits of the proposal;
* The proposed development will have an impact on the amenity of neighbouring residential properties, due to a visual intrusion, loss of views and outlook and potential increase in noise levels.
* the construction period and the particularly the extension of the basement area will have an unnecessary environmental impact on surrounding properties;
* drainage proposals to deal with wastewater and surface water from the new development are not adequate and the development will increase the risk of flooding in the local area.

The development proposals are therefore contrary to the core planning principles of the NPPF and its technical guidance, the design and residential amenity policies as set out in the London Plan, Camden’s Core Strategy, Draft Local Plan and Camden’s design guidance documents and should not therefore be supported.

Appendix 1 sets out a summary table of Local Policy Compliance.

I would be grateful if the members of the Planning Committee can be informed of the contents of this letter and if you have any queries please do not hesitate to contact me.

Yours sincerely

Sarah Ballantyne-Way MRTPI

Director

SBW Planning Ltd

### **Appendix 1**

### **Summary of Local Policy Compliance**

|  |  |
| --- | --- |
| **Key Policies** | **Compliance with key planning policies** |
| **London Plan (2015)** |  |
| Ch.5 London  Policy 5.12 (Flood Risk Management)  Policy 5.13 (Sustainable Drainage) | Chapter 5 of the London Plan set out London’s Response to Climate Change setting policies on flood risk management and sustainable drainage within new development.  The application does not adequately address the issues of flood risk management or sustainable drainage and therefore pose a flood risk to neighbouring properties and the local area. |
| Ch7. London’s Living Places and Spaces | This policy sets out that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.  The proposed extension will have a negative impact on the conservation area due to its size, scale and massing, particularly at the rear and will reduce the amenity of neighbouring properties. |
| Policy 7.4 Local Character | Policy 7.4 states that buildings, streets and open spaces should provide a high quality design response that:  -has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass  -contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area  -is human in scale, ensuring buildings create a positive relationship with street  level activity and people feel comfortable with their surroundings  The proposal has an overbearing impact on surrounding residential properties and is of an inappropriate scale and massing at four storeys, stepping forward of the existing building line and taller than the original school buildings. |
| Policy 7.6 Architecture | Paragraph B states that new buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.  The proposed development reduces the amenity of surrounding residential properties in relation to overshadowing, loss of privacy and views. |
| **Camden Core Strategy, 2010** |  |
| **Core Principle**  Sustainable Camden Policies CS13, 14 and 15 | To promote high quality, sustainable design and physical works to improve our places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our many conservation areas and our other historic and valued buildings, spaces and places.  The increase in scale and size of the extension is not appropriate; particularly the massing to the rear, the building steps forward of the consistent building line on Crossfield Road and is of a greater height than the original school buildings. |
| **Core Principle**  Policy CS5 (Managing the impact of growth and development) | To promote and protect the high levels of amenity and quality of life that make Camden such a popular place to live.  The proposal detracts from the visual amenity of the local area and therefore the quality of life of Camden residents in respect of privacy, overshadowing and noise. |
| Policy CS14 (Promoting high quality places and conserving our heritage) | This policy aims to places and buildings are attractive, safe and easy to use by requiring development of the highest standard of design that respects local context; preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas;  The proposed scale and massing of the extension does not respect the local context and therefore will have a negative impact on the Belsize Park Conservation Area. |
| **Camden’s Development Plan Policies** |  |
| DP25 Preserving Camden’s Heritage | This policy aims to preserve the unique heritage of Camden’s conservation areas and historic buildings.  The red brick of Hall School is a notable building within the Belsize Park Conservation Area and the sense of enclosure of Crossfield Road is described as being ‘softened by the mature trees within the area’.  The scale and massing of the proposed development is over-dominant at four storeys to the front and two storeys with roof to the rear; it sits forward from the consistent building line on Crossfield Road.  The loss of views of the mature trees, such as the plane tree, which make up part of the green and pleasant character of conservation area is detrimental to the character of the CA. |
| DP26 Managing the impact of development on occupiers and neighbours | The Council sets out its requirements for all developments in DP26 which includes alterations and extensions to existing buildings. The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. These include visual privacy and overlooking; overshadowing and outlook; sunlight, daylight and artificial light levels and noise and vibration levels.  The new classrooms above the sports hall and new ground floor assembly hall with doors onto The rear extension will block the green outlook of properties to its rear. Windows in the new classrooms facing Strathray Gardens will reduce privacy to these residents the playground will lead to an increase in activity and potentially noise levels. |
| Camden Borough Council  CPG1 Design, 2015 | Para 4.2 Rear extensions require them to be subordinate or secondary to the existing building and to respect the original design of the building and surrounding properties.  Extensions should respect and preserve the existing historic pattern and townscape. In the case of extensions taller than one storey, a smaller footprint is encouraged to compensate for any increase in visual mass and bulk, overshadowing and overlooking that would be caused by the additional height.  As the extension is taller and the roofline above that of the existing school buildings and it sits forward of the building line on Crossfield Road, the proposal cannot be considered as ‘subordinate or secondary’ to the existing school buildings. |
| Belsize Park Conservation Area Statement, 2003  Policies BE22 and 23 | The Crossfield Road area falls within the Belsize Park Conservation Area(CA) with the Hall School forms a key feature which forms the character of the CA.  BE22 states that extensions can alter the balance and harmony of a property and rear extensions should be as unobtrusive as possible as to not affect the character of the conservation area and BE23 states that extensions should be in harmony with the original form and character of the house and the historic pattern of extensions within the terrace or group of buildings. The acceptability of larger extensions depends on the particular site and circumstances. |
| DP23 Water | Camden as Lead Local Flood Authority (LLFA) sets out its commitment to reducing the amount and rate of run-off and surface water into sewers and identifies areas particularly at risk and where flooding has occurred in recent years. |
| DP25 Conservation | This policy sets out Camden’s only permit development within conservation areas that preserves and enhances the character and appearance of the area and prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character. |
| DP27 Basements | The Council will only support basements that maintain the structural stability of neighbouring properties, avoid adversely affecting drainage and run-off causing other damage to the water environment.  The widening of the basement will have an impact on neighbouring properties and the rate and amount of run-off from the new development will potentially lead to flooding. |
| DP28 Noise and Vibration | This policy aims to control and manage noise and vibration created by new development.  The proposal includes 7 new classrooms, the provision of a new large assembly hall and the impact on residents in terms of future noise to the north of the site has not been properly assessed or mitigation measures proposed. The letting of the proposed assembly hall in the evening will potentially have a detrimental impact on the neighbourhood, unless mitigation measures are applied. This has not been assessed and as such no mitigation measures proposed. |
| **Camden’s Draft Local Plan, 2016** | The Local Plan has been submitted for examination and therefore, will be given some (limited) weight in decision-making. |
| Section 6 Protecting Amenity  Policies A1-5 | The draft Local Plan sets out standards for protecting local amenity to include managing the impact of new development, biodiversity and noise.  The proposal does not adhere to this policy due to its scale, massing, overshadowing and negative impact on surrounding residents. |
| Section 7 Design and Heritage  Policies D1 and 2 | The draft Local Plan reinforces the council’s commitment to high quality design across the borough and the need to enhance conservation areas.  The proposal does not comply with draft Local Plan policies D1 and 2 the proposed extension will detract from the character of the conservation area. |
| Camden Flood Risk Management Strategy (2013) | Camden as Lead Local Flood Authority (LLFA) on flood risk sets out an action plan to manage future risk of flooding in areas of Camden particularly vulnerable to surface water flooding and how partners can work together to manage the problem holistically in the future. |