

# Planning Statement

24 Heath Drive, London

*Prepared For*  
**Mr & Mrs Y Sassoon**

**8292**  
**February 2018**



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CHARTERED TOWN PLANNERS

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## CONTENTS

<b>1</b>	<b>INTRODUCTION</b>	<b>1</b>
	The Site	2
	The Proposed Development	2
<b>2</b>	<b>PRE-APPLICATION ADVICE</b>	<b>3</b>
<b>3</b>	<b>PLANNING POLICY CONTEXT</b>	<b>4</b>
	NPPF/ NPPG	4
	The London Plan	5
	Camden Local Plan	6
<b>4</b>	<b>PLANNING ASSESSMENT</b>	<b>7</b>
	Principle of Development	7
	Design and Heritage	8
	Basement	10
<b>5</b>	<b>CONCLUSIONS</b>	<b>12</b>



## 1 INTRODUCTION

- 1.1 This Planning Statement is written in support of an application for Planning Permission and Listed Building Consent (the '**Application**') from the London of Camden (the '**Council**' or '**LBC**'). The Application to the Council is for the "*demolition of the garage and utility room; lowering of the ground levels of the existing basement and new basement extension, erection of single storey garage replacement; part double, part single height extension to north east elevation; rear glazed extension following removal of the bay window; front and side dormers and roof lights, including internal alterations, tree works and landscaping including wooden shed to the rear*" (the '**Proposed Development**') at 24 Heath Drive, London, NW3 7SB (the '**Site**').
- 1.2 24 Heath Drive has recently been purchased by the Applicants as their main residence for their family of five. The property is a Grade II Listed Building in poor condition located within the Reddington and Frogna Conservation Area. The applicants went to school and have always lived in Hampstead, and have developed a passion for restoration with a good understanding and appreciation of the historic value of the area. This experience and understanding has allowed a team of professionals to be involved from the early design stages.
- 1.3 The property, being a Listed Building, is protected and considered to be of national historical or architectural interest. In terms of the Conservation Area designation this requires recognition of the importance of the quality of the area as a whole, as well as protecting individual buildings and trees which are considered to make a positive contribution to the character and appearance of the area.
- 1.4 The property, when purchased, was in poor condition both internally and externally and the garden/landscaping was unmanaged. This is evidenced by the Photographic Survey accompanying this Application within the Design and Access Statement. This submission is therefore not simply about remodelling but significant necessary restoration.
- 1.5 The Application will be supported by (but not limited to) the following documents:
- Planning Statement (this Statement)
  - Heritage Statement
  - Design and Access Statement (Planning Brochure)
  - Drawing Pack (inc. Site Location Plan, Elevations and Block Plan)
  - Basement Impact Assessment
  - Construction Management Plan



- Tree Survey/ Arboricultural Impact Assessment/ Tree Protection Plan
- Landscaping Plan
- Noise Survey
- Ecology Survey
- Householder Application Form(s), CIL Form and Notices
- Application fee (payable to LBC)

## THE SITE

- 1.6 The Site is a red brick double-fronted, two-storey (with basement, attic and garden) house built in 1907 in the Neo-Georgian style on the south-eastern side of Heath Drive. Number 24 is a Grade II Listed Building (*Ref: 1378821*) and was first Listed in 1999. The Site is also located in the Reddington and Frognal Conservation Area and is stated as having a positive contribution to the Conservation Area, as part of the group of Quennell House which *'form an impressive and coherent group'*.

## THE PROPOSED DEVELOPMENT

- 1.7 The Proposed Development is for:

*"demolition of the garage and utility room; lowering of the ground levels of the existing basement and new basement extension, erection of single storey garage replacement; part double, part single height extension to north east elevation; rear glazed extension following removal of the bay window; front and side dormers and roof lights, including internal alterations, tree works and landscaping including wooden shed to the rear".*

- 1.8 The Proposed Development will involve the sensitive re-configuration of the existing planform to ground and uppers floors whilst retaining and incorporating surviving historical features. The external works will include the partial removal and rebuilding of the side and rear extension, including revised fenestration and new dormer windows, which are designed to maintain the existing outlook to avoid any loss on neighbouring residential amenity.



## 2 PRE-APPLICATION ADVICE

2.1 The Applicant has undertaken extensive pre-Application discussions (*Ref: 2017/0914/PRE*) with the Council, which have helped to shape the content of this Application and establish the principles of the Proposed Development.

2.2 In February 2017 an initial scheme was presented to the Council, who formerly responded on 15 May 2017. As a result of these comments a revised scheme was presented to the Council, by way of follow up pre-app in July 2017. The follow up pre-Application aimed to respond to the Council's comments received in May, including:

- dormer windows to front and side roofscapes;
- removal of first floor extension over garage and set back of existing garage;
- two storeys side/ infill extension/ demolition of sections of side elevation;
- replacement single storey rear extension (existing utility room)
- replacement of the bay window on the rear extension;
- revised internal arrangements;
- omission of front lightwell in favour of projected swimming pool area to the rear;
- retention of existing coal chutes; and
- reinstatement of second crossover has been omitted.

2.3 The content of this Application is a direct result of the second pre-Application response from the Council (25 August 2017) and has addressed all of the minor comments made the by Council, including (but not limited to):

- minor alterations to the side extension;
- reduction in the amount of glazing on the rear extension;
- moving walk on glazing within the rear garden and incorporating it into landscaping;
- minor internal alterations to further enhance restoration; and
- additional tree surveys and justification of loss.

2.4 As a result of the pre-Application discussions with the Council it has been established that key planning considerations for the Proposed Development related to design (the impact of the proposal on the special character of the host Grade II Listed Building) and wider Reddington and Froggnal Conservation area, residential amenity and the basement considerations.

2.5 Other planning considerations include trees and landscaping which have been dealt with in this Application within the supporting evidence.



### 3 PLANNING POLICY CONTEXT

- 3.1 The Site is situated in the Reddington and Froggnal Conservation Area and located outside, but adjacent to, the Archaeological Priority Area (APA) for Hampstead Heath. The host building is Grade II listed for its special architectural or historic interest detailed in the accompanying Heritage Statement.
- 3.2 The main policies for consideration (the development plan) are set out in the London Plan, the Camden Local Plan and other supplementary documents. Consideration of national policy and guidance set out in the NPPF and NPPG alongside those legal tests of The Planning (Listed Buildings and Conservation Area) Act 1990 in particular Section 66(1) and 72(1) are also of relevance.
- 3.3 The Reddington and Froggnal Conservation Proposal Statement holds weight in policy terms in association with a series of planning guidance prepared by the council including that relating to design, basements and light wells.
- 3.4 Policy and guidance relevant to Conservation Areas and Listed buildings is set out in detail in the accompanying Heritage, thereby only summarised in this document to avoid repetition.

#### **NPPF/ NPPG**

- 3.5 The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 3.6 NPPF Paragraph 14 states:
- "At the heart of the NPPF is a presumption in favour of sustainable development....."*
- 3.7 In context, the NPPF identifies three dimensions to 'sustainable development':
- an economic role;
  - a social role; and
  - an environmental role.



- 3.8 Where householder Applications are concerned, the social role is obviously paramount, relating to the improvement of residential living conditions, but there are also economic and environmental impacts to consider, such as employment and maintenance of building fabric [economic] and visual appearance, landscaping and preservation and enhancement of the Conservation Area and the Listed Building [environmental].
- 3.9 The NPPF states that there is a presumption in favour of sustainable development, which for decision-taking means, “...approving development proposals that accord with the development plan without delay” (paragraph 14).
- 3.10 Within the 12 principles listed in paragraph 17 there is a desire that planning should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives and always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. In doing so there is a need to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Those paragraphs of the NPPF that are of particular relevance relate to heritage assets and design and include paragraphs 56, 60, 61, 63, 128 131, 132, 133, 134, 137 and 138. These are thoroughly considered in the accompanying Heritage Statement.
- 3.11 With regard to the determination of planning Applications, paragraph 196 reiterates Section 38(1) of the Planning and Compulsory Purchase Act 2004 in as much that “*Local planning authorities should consider using Local Development Orders to relax planning controls for particular areas or categories of development, where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area...*”

## **THE LONDON PLAN**

- 3.12 Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor has to produce a spatial development strategy (SDS) – which has become known as ‘the London Plan’ – and to keep it under review.
- 3.13 Boroughs’ local development documents have to be ‘in general conformity’ with the London Plan, which is also legally part of the development plan that has to be taken into account when



planning decisions are taken in any part of London unless there are planning reasons why it should not.

3.14 Policies of relevance include:

**Policy 3.14.** This provides for support for the maintenance and enhancement of the condition and quality of London's existing homes.

**Policy 7.4.** This requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should also improve an area's visual or physical connection with natural features.

**Policy 7.6.** This requires development to ensure architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape. It should include the highest quality materials and design appropriate to its context.

**Policy 7.8.** This requires development to be sympathetic to the form, scale, materials and architectural detail of heritage assets.

**Policy 7.21.** This requires existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'.

#### **CAMDEN LOCAL PLAN**

3.15 The Camden Local Plan (CLP) was adopted on 3 July 2017 and replaced the Core Strategy and Camden Development Policies documents, as the basis for planning decisions and future development in the borough.

3.16 The policies from the CLP most relevant to the Proposed Development (as confirmed by the Council in their pre-app response dated 25 August 2017) include:

- Policy G1 – Delivery and Location of Growth
- Policy A1 – Managing the Impact of Development
- Policy A5 – Basements
- Policy D1 – Design
- Policy D2 – Heritage

3.17 These policies are covered in the following section of this Statement in more detail, specifically examining how the Proposed Development complies with the details of these policies.





## 4 PLANNING ASSESSMENT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning Applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.2 For the purposes of this Application the Development Plan comprises the following (as confirmed by the Council in their pre-app response dated 25 August 2017):

- The London Plan (March 2016)
- Camden Local Plan (July 2017) (CLP)
- Camden Planning Guidance:
  - CPG1 (Design) (2015)
  - CPG4 (Basements and Lightwells) (2015)
  - CPG6 (Amenity) (2011)

4.3 The National Planning Policy Framework (NPPF) is also a material planning consideration in the determination of planning Applications. It places a presumption in favour of sustainable development at the heart of planning decisions, for there are three dimensions: economic, social and environmental.

4.4 For decision taking the presumption in favour of sustainable development means that Councils are obliged to approve developments that accord with the development plan without delay. Given the localised nature of the Proposed Development, the following section focussed on Borough wide policy.

### **PRINCIPLE OF DEVELOPMENT**

4.5 The presumption in favour of sustainable development is the golden thread that runs through the planning system, not least through the Council's Local Plan. This positive approach to new development presumes that all sustainable development is acceptable, unless material considerations indicate otherwise.

4.6 CLP Policy G1 (Delivery and location of growth) supports the Council's ambitions to harness the benefits of growth for those who live and work in the Borough. As part of this, the Council seeks to ensure high quality development and by promoting the most efficient use of land and



buildings in Camden by “*supporting development that makes the best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage.....*”.

- 4.7 The Council’s second pre-app response confirmed that the revised designs were a significant improvement from the initial submission, but additional work would be required to ensure that the Application would be acceptable. As a result of these comments, the design has evolved further to take account of the comments and therefore the principle of the Proposed Development should be deemed acceptable to the Council.
- 4.8 In addition to the above, the Proposed Development adheres to the ambitions of CLP Policy G1, as it is a high-quality design, which makes the best use of an otherwise constrained site. The Proposed Development does not amount to a loss of housing within the Borough. To the contrary the Proposed Development protects the residential use of this family self-contained permanent home. Not only maintaining but enhancing the condition and quality of this home through sensitive renovation and alteration increasing residential floor space.

#### **DESIGN AND HERITAGE**

- 4.9 The existing property is a Grade II Listed Building, which is located within the Reddington and Froggnal Conservation Area. As a result, the implications of design will have direct effects on the heritage asset and Conservation Area. Therefore, these elements are intrinsically linked and should therefore be considered together (CLP paragraph 2.11). CLP Policy D1(b) (Design) references CLP Policy D2 (Heritage) stating the Council will require development to “*preserve or enhance the historic environment and heritage assets in accordance with Policy D2...*”.
- 4.10 Furthermore, CLP D1 seeks to promote high quality landscape designs, health, high standards of living accommodation with outdoor amenity space and carefully integrates building services equipment into the development. CLP D1 also promotes the use of details and materials that are of a high quality, which complement the local character. This is even more important with the Conservation Area, where development must be seen to at least preserve the character of the area.
- 4.11 The existing property benefits from a large rear garden, which will be extensively landscaped as part of the Proposed Development. In addition to the extensive works at the rear, the landscaping proposals also include extensive works to the front of the Property, further improving the street scene within the Conservation Area. The Application is supported by a



detailed landscape masterplan and planting schedule, which are designed to be both functional and sympathetic to the existing house and the neighbouring properties. As a result, this element of the Proposed Development clearly complies with CLP D1(k). These detailed proposals are considered to be a positive enhancement to the Site, which mitigate the loss of the Yew Trees and Cherry Tree (as requested by the Council) through the planting of native species.

- 4.12 It should be noted by the Council, that the Applicant has discussed the Proposed Development with the owners of neighbouring properties, all of whom are supportive of the proposals including the removal of the overgrown trees from the rear garden. Furthermore, these trees are not easily visible from publicly accessible areas, so the loss is considered to have negligible effects on the setting of the Conservation Area.
- 4.13 CLP Policy D1(h) promotes health through design through the promotion of good physical and mental health through the creation of spaces and buildings which allow and encourage healthy lifestyles. Designing buildings to promote physical activity, such as a swimming pool must not be at the detriment of neighbours. Therefore, the consideration of the effects of the Proposed Development on air quality and noise must also be considered. The Proposed Development incorporates a swimming pool at basement level with associated plant rooms, including the sunken room, located directly behind the swimming pool, which is required only for plant and maintenance of the pool.
- 4.14 The supporting noise survey, has considered the effect of the new plant and concluded that its effects will not have any detrimental effects and therefore is in compliance with CLP Policy D1 (Design), CLP Policy A1 (Managing the Impact of Development) and CLP Policy A4 (Noise and Vibration).
- 4.15 CLP Policy D2 (Heritage) sets out the Council's ambitions to *"preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation area, listed buildings....."*. CLP D2 (j & K) seek to protect Listed Buildings and would resist any proposal for alterations and extensions where harm would be caused to the special nature of the Listed Building or its setting.
- 4.16 The existing property is a Grade II Listed Building and is located within the Reddington and Froggnal Conservation Area. As a result, this Application is supported by a Heritage Statement (KM Heritage, January 2018), which concludes that the Proposed Development...*"builds on the*



*essential architectural character of the building. It respects the primacy of the original design and is consistent with, and subservient to, the massing, scale, composition and materials of the buildings. The interventions proposed are in keeping with and respect the heritage significance of the house, the conservation area and the setting of nearby listed buildings. The scheme will assist in updating this 110-year-old house for 21st century living whilst respecting its original character and appearance”.*

- 4.17 The Proposed Development will, at the very least, preserve the significance of 24 Heath Drive and the character and appearance of the Conservation Area. It does this not only by virtue of the quality of its design (CLP Policy D1), but also by helping to underpin and reinforce the residential nature of this part of the Conservation Area in retaining the house for use as one family unit, thereby maintaining the contribution that 24 Heath Drive makes to the Conservation Area over the long term. It is felt that the Proposed Development goes beyond this - it will preserve and enhance No. 24 Heath Drive with the addition of high quality residential accommodation that will help sustain this listed building in its optimum viable use over the long-term. The removal of the garage/bathroom extension to the first floor is a positive measure that enhances both the house and the Conservation Area.
- 4.18 None of the interventions proposed approach the level of change that would diminish or harm the special interest or significance of the listed building at 24 Heath Drive, harm the setting of its listed neighbours, or harm the character and appearance of the Conservation Area. As a result, it is felt that Proposed Development fully complies with CLP D2 and enhances both the Listed Building and setting of the Conservation Area.
- 4.19 A particular design feature for consideration are the dormers which have been sensitively located and are proportionate to the roof slope. Dormers are a feature of many buildings in the locality and already exist to the side rear of 24 Heath Drive, and was considered acceptable by the Council in their pre-application response dated 15 May 2017.

## **BASEMENT**

- 4.20 CLP Policy A5 (Basements) sets a 22-point checklist which must be satisfied in order for the Council to permit basement development. CLP Policy A5 A-E states that: *“The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:*



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

- 4.21 Policy A5 also sets out a number of criteria, which are required in order to protect the host building and neighbours. These criteria (f-m), have been fully adhered to. The supporting evidence submitted as part of this Application suggests that there will be no long-term or significant effects as a result of the construction of the Proposed Development on the host building, the Conservation Area, neighbouring properties or ground conditions/ structure.
- 4.22 Part F of the policy suggests that any new basement should not be more than one storey. Whilst the Proposed Development includes a low sunken plant room located directly behind the swimming pool, its sole purpose is to accommodate plant equipment required for serving the pool. As a result, it is considered that the basement will remain subordinate to the host building, as per the requirements of the CLP Policy A5.
- 4.23 As a result of the pre-Application discussions with the Council, several alterations have been made to the design of the basement, including the skylight, which has been moved to the rear of the property and now forms part of the detailed landscaping proposals. In making these amendments, the Applicant has further demonstrated the Proposed Developments compliance with CLP Policy A5, in particular parts N to U.
- 4.24 For the Council’s benefit the Application is supported by a detailed Construction Method Statement (CMS), which was prepared by Form Structural Design. The CMS includes reference to the Basement Impact Assessment (BIA) undertaken by Gabriel Geoconsulting. The BIA confirms that the Proposed Development will have negligible impacts on the structure (Category 0 of the Burland Scale). It is also confirmed that further monitoring will take place at regular intervals during the construction to ensure that there is no change or impact on neighbouring property, which given the detached nature of the Property is considered unlikely.
- 4.25 This information ensures that the Application adheres to the requirements CLP Policy A5 and as a result, there can be no in principle objections to the Proposed Development.



## 5 CONCLUSIONS

- 5.1 The Proposed Development as presented in this Application, has fully considered the Council's pre-application comments and is a well-considered scheme respecting the identified value of the heritage assets. The sensitive restoration, alterations and extensions will individually and cumulatively preserve and enhance the Listed Building and its contribution to the setting of the Listed Buildings locally and the character and appearance of the Conservation Area.
- 5.2 The Proposed Development makes a positive contribution to a coherent public realm and streetscape comprising the highest quality materials and design appropriate to its context. The revised proposal, through consultation with the Council is sympathetic to the form, scale, materials and historic architectural detail of the heritage assets. To complement this the intent is for the interior to be designed and decorated in a traditional manner, respecting original features such as panelling, parquet flooring, cornicing, beading and railing and reinstating these where necessary.
- 5.3 The Proposed Development has also been designed to ensure that the proposal respects the amenity of neighbouring dwelling and provide desirable family accommodation for both current and future occupants.
- 5.4 For the reasons set out in this Planning Statement at Section 3, it is considered that the Proposed Development fully complies with Policies G1, A1, A5, D1 and D2 of the Camden Local Plan (2017) and other development plan documents, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. In our judgement there are no other material considerations to weight against it.
- 5.5 Accordingly, we respectfully request that the Application be approved without delay.



## APPENDIX 1 – CAMDEN PRE-APP RESPONSE (2017/0914/PRE)



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*By email*

Dear Mr Cole,

**Re: 24 Heath Drive, NW3 7SB**

Thank you for submitting a pre-planning application enquiry for the above property which was received on 15/02/2017 together with the required fee of £1,200.00 on 20/02/2017.

### 1. Drawings and documents

Planning statement dated February 2017, Creation of new Footway Crossover Statement dated April 2017, Tree Constraints Plan ref: 001 Rev.1, Tree Protection Plan ref: 001 Rev.1, Arboricultural Method Statement dated 10/02/2017, Arboricultural Impact Assessment dated 10/02/2017, Pre-application brochure dated February 2017, and Initial Heritage Appraisal.

### 2. Proposal

Pre-application advice is sought for the following proposals:

- Demolition of existing side garage and utility room;
- Lowering of the ground levels of the existing basement;
- Erection of single storey garage replacement;
- Part double, part single height side extension to the north east elevation;
- Removal of existing rear bay window and erection of single storey rear extension;
- Creation of a lightwell to the front of the property;
- Erection of 2 x front dormers, 2 x side dormers and installation of 4 x rooflights.
- Internal alterations including the reconfiguration of plan form on ground and upper floors.
- Repair and rebuilding of chimney stack;
- Removal of trees and re-landscaping works; and
- Reinstatement of crossover serving the south side of the driveway.

### 3. Site description

The building is located on the east side of Heath Drive and is a detached Grade II listed property designed by CHB Quennell, dated 1907, in the Neo Georgian style. The house is a red brick two storey detached property with a tall tiled roof, its double-fronted symmetrical composition only disrupted by the later first floor extension over the original garage. External detailing includes rusticated pilasters, overhanging eaves with timber soffits and tall chimneys.



The house is part of a run of twelve houses (nos.22-33) designed by Quennell, built 1905-7, of which nos. 24-26 and 31-33 are Grade II listed. It remains in use as a single house, largely retaining its original plan form, and retains a significant amount of original historic fabric. The internal layout is characterised by its large central hall / staircase / landing with cellular arrangement leading off from this.

The site is located within the Reddington and Frogna Conservation Area, which is characterised by the large number of high quality late 19th/early 20th century houses designed in a range of architectural styles.

#### **4. Planning history**

CTP/E5/8/13/14246 - The conversion of No 24 Heath Drive N.W.3. to provide 4 self contained flats, including the erection of a side staircase and a rear extension at 1st floor level. Granted 07/09/1972.

CTP/E5/8/13/24913 - The change of use to 4 self-contained units including works of conversion and the erection of a side staircase and a rear extension at 1st floor level. (Renewal of consent dated 7th September 1972 - Ref: 14246). Granted 23/09/1977.

These works were granted prior to the building's listing, and were not implemented.

#### **5. Relevant policies and guidance**

##### **[National Planning Policy Framework 2012](#)**

##### **[The London Plan March 2016](#)**

##### **[LDF Core Strategy](#)**

CS5 (Managing the impact of growth and development)

CS14 (Promoting high quality places and conserving our heritage)

##### **[LDF Development Policies](#)**

DP24 (Securing high quality design)

DP25 (Conserving Camden's heritage)

DP26 (Managing the impact of development on occupiers and neighbours)

DP27 (Basements and Lightwells)

##### **[Camden Planning Guidance](#)**

CPG1 (Design) 2015

CPG4 (Basements and Lightwells) 2015

CPG6 (Amenity) 2011

CPG7 (Transport) 2011

##### **[Reddington and Frogna Conservation Area Statement 2000](#)**

##### **Emerging policy:**

It should be noted that the Camden Local Plan will replace the Core Strategy and Development Policies in 2017. The submission draft has now been approved by Cabinet and Full Council after a period of public consultation. The Local Plan and associated documents were formally submitted to the Secretary of State for public examination along with copies of

all representations received on 24 June 2016. In accordance with Section 20 of the Planning & Compulsory Purchase Act 2004, Inspector Katie Child, was appointed to conduct an examination to determine whether the Plan is sound. The public hearings for the Examination were held at the Camden Town Hall during October 2016.

The submission draft is a material consideration in planning decisions. At this stage the Plan has weight in decision making and is a statement of the Council's emerging thinking. Emerging policy is therefore a relevant consideration to this pre-app advice. A copy of the draft Local Plan can be found on our website [here](#).

The following policies would be relevant in the determination of a future application:

Policy G1 (Delivery and location of growth)  
 Policy A1 (Managing the impact of development)  
 Policy A5 (Basements)  
 Policy D1 (Design)  
 Policy D2 (Heritage)  
 Policy T2 (Car-free development and limiting the availability of parking)

## 6. Assessment

The key planning issues are as follows:

- Design (the impact of the proposal on the special character of the host Grade II listed building and wider Redington and Frogna Conservation Area)
- Amenity (impact on neighbouring amenity in terms of daylight, outlook, and privacy)
- Basement considerations
- Transport
- Trees and landscaping.

## 7. Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. The following considerations contained within policies CS5, CS14 of the Core Strategy and policies DP24 and DP25 of the Development Policies Document are relevant to the application: development should consider the principle of the development; the impacts of the development on the character, setting, context and the form and scale of neighbouring buildings; and the residential amenity impacts of the proposals. Similarly, replacement policy D1 requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Camden's Development Policies Document is supported by CPG1 (Design), as well as the Redington and Frogna Conservation Area Statement.

### Comments on proposals

The submission of an Initial Heritage Assessment to support the proposed changes is welcomed as it helped to facilitate various discussions with the architect team and heritage consultant held on issues relating to the proposed design interventions and alterations to the internal layout.

However, limited information/justification has been included within the initial heritage assessment regarding the proposed internal alterations, some of which are considered to be harmful and unjustified (see below). Further assessment on the interior affected by the proposed changes should be included within a revised Heritage Assessment to accompany any forthcoming applications.

Additionally concerns are raised regarding some of the proposed external changes and overall, the extent of alteration proposed to this largely unaltered Grade II listed house is not supported.

#### Dormer windows to front and side roofscapes

The proposed installation of modest sized dormer windows within the roofscape is considered to be acceptable in principle. It would involve the loss of only small areas of historic fabric within the existing roof and the designs shown within the pre-application pack are considered to complement the Neo-Georgian design of the existing building. The symmetry of the front elevation would be preserved through the placement of two dormers. Consideration should be given towards retaining the existing dormer window within the north-east roofscape in its current location (see also comments regarding the acceptability of the proposed new staircase below).

Detailed drawings including 1:20 elevation and section drawings of new dormer windows will be required to support any future application.

#### Removal of 1<sup>st</sup> floor extension over garage and set back of existing garage

The principle of the removal of the existing 1<sup>st</sup> floor extension and the proposed setting back of the existing garage at ground floor level is welcomed as it will return the building to its original symmetrical composition, enhancing both the character of the host building and that of the wider conservation area.

#### Two storey side/infill extension / demolition of sections of side elevation

The proposed two storey side/infill extension is not supported due to the extent of historic fabric that would be lost as a result of the proposals. The provision of a single storey infill extension behind the existing garage may be supported subject to the retention of existing openings through to the original house to enable the extension to read as a contemporary addition and to preserve the building's historic fabric.

#### Replacement single storey rear extension (existing utility room)

It appears that the existing single storey rear extension is a later addition to the original house and therefore the principle of its replacement is acceptable in principle. Evidence for this was discussed on site, including observations regarding joints in the brickwork and the fact that the existing ridge tiles match that of the roof of the main house, which is thought to have been replaced during the 20<sup>th</sup> century. Further commentary on this should be included within a revised Heritage Assessment to accompany any forthcoming applications.

The proposed set back from the main rear elevation and reduction in width of the proposed replacement single storey is welcomed. However, the extent of historic masonry wall proposed to be removed to enlarge the kitchen is not supported (see below).

### Rear extension

The principle of the removal of the existing bay window is supported as it is clearly a non-original later addition, evidenced by the poorer quality of the joinery and contrasting brick tone to the main building. However while the principle of a small rear extension may be acceptable, the scale and height of the proposed rear extension is considered to be overbearing and insufficiently subservient to the main building. Any extension and roof terrace wrapping around the corner of the existing two storey projecting bay would not be supported. The existing French doors to the right hand side of the bay window appear to be historic joinery and as a result should be retained.

Consideration should be given to the replacement of the non-original bay window with a smaller rear extension that preserves the character of the existing rear elevation but also allows more natural light to the living room.

### Internal alterations

As outlined above, limited assessment of the significance of the building's interiors has been included within the heritage assessment to support the proposed interventions. The extent of internal changes proposed as part of this pre-application is not supported due to the resultant harm caused to the special interest of this Grade II listed building as a result of the loss of historic fabric and the building's original plan form.

The extent of demolition proposed at ground floor level, including the removal of a large amount of the existing side elevation and partition walls around the existing basement staircase, which appears to be the original layout of the service areas of the house, is not supported. The changes would result in the loss of historic fabric, and have not been justified within the submission material.

At first floor level, the layout of the spaces is in a cellular arrangement with four larger rooms and two smaller rooms accessed from the central landing. The proposed subdivision of both of the smaller rooms is of concern as it would affect the legibility of the original plan form of the building; it is considered that at least one of the smaller bedrooms should be retained. Given the existing doorway between the existing dressing room to bedroom 4 it is considered more appropriate for this smaller room to be subdivided and for the existing bedroom 2 to be retained in its original proportions.

The insertion of a partition wall within the existing dressing room and the associated insertion of an additional doorway to the proposed bedroom 2 is considered to be acceptable and to have a minimal impact on the special interest of the building, subject to the retention of the existing door to the landing. Details of service runs / pipework for the proposed en-suites will be required.

The proposed removal and relocation of staircase between 1<sup>st</sup> and second floor levels is not supported due to the harm caused through the loss of historic fabric and the original plan form of the building. Furthermore, limited information regarding the significance of the layout of the second floor level has been included. The principle of extending accommodation into the eaves space and the currently blocked off areas could be acceptable subject to further information.

### Basement Extension

The current pre-application proposes to extend the existing basement to cover the whole footprint of the building through excavation of a large amount of crawl space under the existing building. No assessment of the significance of the existing basement area, which

appears to include the original coal shutles to the side elevation, has been included within the heritage assessment.

The extent of demolition and excavation proposed as part of the basement extension is of concern and consideration should be given to reducing the overall footprint. Any future application will be required to demonstrate that the significance of the building is not harmed as a result of the proposals and that the building's existing fabric, structural integrity, interrelationships and hierarchy of spaces, layout and any features that are architecturally or historically important are preserved, in line with paragraph 2.9 of Camden's Basement and Lightwells CPG4. Full details of any underpinning works will be required.

The provision of a lightwell to the front elevation of the building is not supported and is considered to be harmful to the character of the house and the wider character and appearance of the conservation area.

## **8. Amenity**

Policy CS5 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. Policy DP26 and replacement Policy A1 support this, by seeking to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise and impact on daylight and sunlight.

### Rear first floor terrace area

The proposals include the creation of a new terrace area set into the roof slope of the proposed single storey rear extension. It is noted that it would be in very close proximity to the side elevation of no. 25. Council records show that the single storey side extension with pitched roof and 2 x rooflights at no 25 previously served a bedroom, although it is not clear what its current use is. There are also 2 windows at first floor level of this property.

The proposed terrace area would be very close to the neighbouring property and it is likely that occupants using the terrace would be able to easily look into the neighbouring windows. This is a concern and is unlikely to be supported at application stage unless it is demonstrated that the terrace would not result in overlooking. It is likely that a privacy screen would be required to preserve the privacy of occupants; however, this is unlikely to be supported on design grounds due to the impact on the character of the listed building and the increased bulk at first floor level.

### Side extension

The part single, part double storey side extension would result in a reduction in the number of windows to the north east elevation facing no.23. The windows would serve the utility room at ground floor level and the new ensuite at first floor level. Although there would be a reduction in the overall number of windows facing the neighbouring building, the Council would expect the first floor window to be obscured to preserve the privacy of both properties.

### Roof alterations

The north east facing roofslope would see a reduction in the number of rooflights and the relocation of the dormer window to provide head height for the proposed staircase. The rooflights would not cause any harm to neighbouring amenity due to their angle on the roofslope, and the proposed dormer is unlikely to result in overlooking as it would serve a stairwell rather than a habitable room.

The proposals also include the creation of a new dormer window to the south west facing side elevation and two new smaller front dormers serving bedrooms 5 and 6. The proposed south west elevation drawings shows the new side dormer as sitting further back on the roofslope, nearer the rear chimney stack, whilst the proposed second floor and roof plans show it as sitting further forward to serve bedroom 5. It is assumed that this is the proposed location. This dormer would directly overlook the existing dormers at no. 25; however, council records suggest that these dormer windows serve a bathroom and internal stairwell. Nevertheless, it is recommended that the neighbouring internal arrangement is investigated prior to the submission of a full application; and any necessary measures to prevent overlooking are included within the proposals.

## 9. Basement excavation

The property currently has a basement area measuring 4.7m by 9.5m and 1.9m deep under the existing dining room and pantry, with crawl space under the remainder of the building's footprint. The proposals involve extending the existing basement area to the rear of the building and excavating down to a depth of 4.2m to provide a swimming pool; along with the excavation of the remainder of the footprint to provide a new basement floor measuring 2.7m deep. The proposed lightwell would measure 4m x 1.5m (please see section 7 above which discusses the acceptability of the basement excavation in terms of the impact on the listed building).

Policy DP27 (Basements and Lightwells) provides guidance on basement proposals and advises that a basement development that does not extend beyond the footprint of the original building and is no deeper than one full storey below ground level (approximately 3 metres in depth) is often the most appropriate way to extend a building below ground (paragraph 27.9).

This is supported in Policy A5 of the Draft Local Plan, which states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

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

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- a) not comprise of more than one storey;
- b) not be built under an existing basement;
- c) not exceed 50% of each garden within the property;
- d) be less than 1.5 times the footprint of the host building in area;
- e) extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- f) not extend into or underneath the garden further than 50% of the depth of the garden;
- g) be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- h) avoid the loss of garden space or trees of townscape or amenity value.

The Council will require applicants to demonstrate that proposals for basements:

- a) maintain the structural stability of the building and neighbouring properties;
- b) avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c) do not harm the structural stability of the host building, neighbouring buildings or the water environment in the local area;
- d) avoid cumulative impacts;
- e) do not harm the amenity of neighbours;
- f) provide satisfactory landscaping, including adequate soil depth;
- g) do not harm the appearance or setting of the property or the established character of the surrounding area;
- h) protect important archaeological remains; and
- i) do not prejudice the ability of the garden to support trees where they are part of the character of the area.

The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

Given the site's location in an area subject to a number of underground development constraints (slope stability, surface water flow and subterranean groundwater flow), you are advised to thoroughly examine the requirements as per CPG4 prior to submission. The development would require a comprehensive and accurate Basement Impact Assessment to be submitted with the formal application demonstrating no significant harm to the application site, neighbouring sites or those surrounding.

The BIA will include the following stages:

- Stage 1 - Screening;
- Stage 2 - Scoping;
- Stage 3 - Site investigation and study;
- Stage 4 - Impact assessment; and
- Stage 5 - Review and decision making.

Further detail on BIAs can be found in Camden Planning Guidance 2013 (CPG4 Basements). At each stage in the process the person(s) undertaking the BIA process should hold qualifications relevant to the matters being considered. The Council will only accept the qualifications set out in paragraph 2.11 of CPG4.

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).

Please note that the Council's preferred provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charge a fixed fee dependant on the category of basement audit, outlined in [appendix A](#) of Camden's BIA audit service terms of reference.

It is likely that the BIA will need to proceed beyond the scoping stage due to the fact that the host building is Grade II listed, the basement would be fairly deep at 4.2m, and because there are a number of underground development constraints (identified previously).

### Construction Management Plan

It is important that effective measures are taken during demolition and construction works to ensure that damage is not caused to the host building, neighbouring buildings or the surrounding highways.

The Council will generally require a construction management plan for basement developments to manage and mitigate the greater construction impacts of these schemes. Construction management plans will be required for schemes on constrained sites, in conservation areas, for listed buildings, or in other areas depending on the scale of the development and the conditions of the site.

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) would be 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 etc.

A draft (based on the Camden [pro-forma](#) found online) should be submitted with the application, with the full CMP to be secured via S106 legal agreement. Chapter 4 of CPG4 (Basements and lightwells) provides more information [here](#).

A financial contribution would be needed to cover the costs of reviewing the Construction Management Plan, details of which will be confirmed at the full planning application stage. This financial contribution will also need to be secured by a Section 106 planning obligation if planning permission is granted.

The CMP Implementation Support Contribution will be used to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and ensure that the planning objectives we are seeking to secure are actually achieved.

Some highway licenses would be required to facilitate the proposed works. The applicant would need to obtain such highway licences from the Council prior to commencing work on site. Any such licence requirements should be discussed in the CMP. Details for the highway licences mentioned above are available on the Camden website [here](#).

## **10. Transport**

### Car Parking and Crossover Creation

Development policy DP18 states that the Council seeks to ensure that developments provide the minimum necessary car parking provision. Policies CS11, DP18, DP19 and CPG7 collectively require new (or additional) developments to be car-free in areas that are easily accessible by public transport. Further to policy DP18, Camden's emerging local plan policy T2 states that all new developments in the borough must be car-free.



Whilst the proposals do not increase the amount of onsite car parking provision, the introduction of a second vehicular crossover would result in the loss of an on-street car parking bay. Removing resident car parking bays would require further consultation via the Traffic Management Order (TMO) process, something that is advised against given the likely resistance the consultees may have with the proposal. The creation of a crossover is not welcomed by the Council and thus the proposal has been deemed as unacceptable by the Transport Officer.

It is advised that the applicant removes the crossover from the proposed plans at the full planning application stage.

### Highway Works Contribution

The summary page of Development Policy DP21 states that 'The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'.

The proposed works could lead to damage to the footways and carriageway directly adjacent to the site. Camden may need to undertake highway remedial works following completion of the proposed development and if necessary, a financial contribution for highway works would be secured as a Section 106 planning obligation. A highways cost estimate would be requested from our Highways Delivery Team once the final submission has been reviewed at the full planning application stage.

## **11. Trees and landscaping**

The Councils Arboricultural Officer visited the site with the applicant's planning agent, architect and arboricultural consultant on 25/04/2017. He confirmed that broadly speaking, the trees that are proposed to be removed to facilitate development are largely of low quality and of low significance to the character of this part of the conservation area.

T14, a mature cherry tree within the application site close to the boundary of no. 26 Heath Drive has some decay on the stem and it is requested that further internal investigation of T14 be carried out in order to quantify the extent of the decay. T15 and T16, two mature yew trees in the rear garden are proposed to be removed, although they are not required to be removed to facilitate development. It was made clear to those on site that without justification and mitigation through replacement planting, it is likely the retention of T15 and T16 would be preferable. Proposed hard and soft landscaping details are yet to be devised; whether or not the removal of T15 and T16 is acceptable will depend on the proposed replacements and justification. Native species of a large ultimate size would be the most acceptable replacements; this was communicated to all on site.

T1 and T2, two Camden owned and managed trees on the highway to the front of the property are considered not to be at risk from adverse effects of development provided full tree protection details are secured by condition if the scheme is to be recommended for approval.

## **12. Conclusion**

The current proposals are unlikely to be supported at application stage due to the harm caused to the special character of the listed building and the loss of an on-street car parking space. If the proposals are amended in line with officer guidance, and an acceptable scheme is submitted, approval would be subject to a S106 legal agreement with the following heads of terms:

- A Section 106 planning obligation to secure a financial contribution to cover the cost of public highway works in the general vicinity of the site;
- A Section 106 planning obligation to secure a Construction Management Plan (CMP) in the form of the council's pro-forma found at the following link: <https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/construction-management-plans.en>  
The Section 106 agreement shall state that the CMP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority; and
- A Section 106 planning obligation to secure a one off financial contribution to cover the costs of reviewing the Construction Management Plan

### 13. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – full planning and listed building consent
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Heritage assessment
- Detailed drawings as described in the design section above.
- Sample photographs/manufacturer details of proposed brick cladding
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site 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.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Laura Hazelton on the number above.

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

Yours sincerely,

Laura Hazelton

Planning Officer  
Planning Solutions Team



## APPENDIX 2 – CAMDEN PRE-APP RESPONSE (2017/4244/PRE)



**Date: 25/08/2017**  
**Our ref: 2017/4244/PRE**  
**Contact: Laura Hazelton**  
**Direct line: 020 7974 1017**  
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[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

*By email*

Dear Mr Cole,

**Re: 24 Heath Drive, NW3 7SB**

Thank you for submitting a follow up pre-planning application enquiry for the above property, which was received on 19/07/2017 together with the required fee of £609.00.

### **1. Drawings and documents**

Pre-application brochure dated July 2017; Initial heritage appraisal addendum by KM Heritage; covering letter dated 18 July 2017; and tree condition survey dated 21/07/2017.

Following comments raised during a pre-app meeting on 26/07/2017, revised drawings were received on 14/08/2017, which this report responds to.

### **2. Proposal**

Pre-application advice is sought for the following proposals:

- Demolition of existing two storey side extension (including garage) and single storey side extension; and erection of part one part two storey side extension including replacement garage;
- Removal of existing rear bay window and erection of single storey rear extension; and
- Removal of trees and re-landscaping works;

### **3. Site description**

The building is located on the east side of Heath Drive and is a detached Grade II listed property designed by CHB Quennell, dated 1907, in the Neo Georgian style. The house is a red brick two storey detached property with a tall tiled roof, its double-fronted symmetrical composition only disrupted by the later first floor extension over the original garage. External detailing includes rusticated pilasters, overhanging eaves with timber soffits and tall chimneys.

The house is part of a run of twelve houses (nos.22-33) designed by Quennell, built 1905-7, of which nos. 24-26 and 31-33 are Grade II listed. It remains in use as a single house, largely retaining its original plan form, and retains a significant amount of original historic fabric. The internal layout is characterised by its large central hall / staircase / landing with cellular arrangement leading off from this.

The site is located within the Redington and Frogna Conservation Area, which is characterised by the large number of high quality late 19th/early 20th century houses designed in a range of architectural styles.

#### 4. Planning history

CTP/E5/8/13/14246 - The conversion of No 24 Heath Drive N.W.3. to provide 4 self contained flats, including the erection of a side staircase and a rear extension at 1st floor level. Granted 07/09/1972.

CTP/E5/8/13/24913 - The change of use to 4 self-contained units including works of conversion and the erection of a side staircase and a rear extension at 1st floor level. (Renewal of consent dated 7th September 1972 - Ref: 14246). Granted 23/09/1977.

These works were granted prior to the building's listing, and were not implemented.

#### 5. Relevant policies and guidance

##### [National Planning Policy Framework 2012](#)

##### [The London Plan March 2016](#)

##### [Camden Local Plan 2017](#)

Policy A1 Managing the impact of development

Policy A5 Basements

Policy D1 Design

Policy D2 Heritage

##### [Camden Planning Guidance](#)

CPG1 (Design) 2015

CPG4 (Basements and Lightwells) 2015

CPG6 (Amenity) 2011

##### [Redington and Frogna Conservation Area Statement 2000](#)

#### 6. Assessment

Please see pre-app response ref: 2017/0914/PRE, which set out the site's significance/designations and provided detailed comments on the initial proposals submitted; as well as a full assessment of amenity, basement, transport and trees issues.

Many of the concerns raised at the initial pre-app stage have been addressed within the revised submission. However, some concerns regarding the proposed internal alterations remain outstanding and aspects of the proposals are not supported. It is recommended that these concerns are addressed through further minor revisions prior to any formal submissions.

No further detailed Heritage Assessment, including that of the building's interior, has yet been submitted to support the revised proposals, but it is understood that this will accompany the formal submission. It is emphasised again, that this is a statutory validation requirement and must be submitted as part of the full application.

### Side extension

The removal of the existing two storey and single storey side extensions and proposed replacement part one part two storey side extension set behind the externally expressed chimney stack is considered to be acceptable in principle, subject to the more traditional brick appearance. It is recommended that the front building line of the proposed 1<sup>st</sup> floor extension is pulled back further to allow for the full expression of the chimneystack which would sit more comfortably; this would only involve a small reduction in the additional floorspace within one of the proposed dressing room spaces.

### Rear extension

The proposed single storey rear extension has been designed to be a lightweight and clearly distinctive addition to the rear elevation. The width of the extension has been reduced to around 4m and the depth of the extension has been reduced to around 4.75m. Due to the generous proportions of the house this is considered to be acceptable in terms of bulk and massing. It is welcomed that the south-west flank elevation is proposed to be solid, and that a small plinth has been introduced to part of the rear elevation of the extension; however, it is recommended that the extension should incorporate more solidity to reduce the overall amount of glazing. This would be considered to help the extension better respond to the character of the existing building.

### Basement

Please refer to previous pre-app response (ref: 2017/0914/PRE) for full assessment of basement works and outline of Basement Impact Assessment requirements.

The proposed retention of more original fabric within the existing basement is welcomed. Going forward it will be important to understand the extent and details of the underpinning works that would be required and whether this would have any adverse impact on the listed building.

The proposed strip of walk on glazing within the rear garden should be pushed as far away from existing building as possible and incorporated into a landscaping feature to disguise its appearance.

### Internal alterations

As set out in previous comments, limited assessment of the significance of the building's interiors has been included within the heritage assessment to support the proposed interventions. However, it is welcomed that the revised proposals include a reduced level of alteration and preserve more of the building's historic fabric and original plan form.

#### *Ground floor*

At ground floor level, the revised plans indicate that most of the original side elevation to the existing kitchen area is now proposed to be retained, re-using the existing doorway and dropping the cill to the existing window opening to enable circulation from the proposed kitchen to the new side extension. The plans also indicate that the existing window to the existing WC and the existing external door (both of which will be internalised within the proposed side extension) will also be retained. It is proposed to drop the cill of the existing pantry window to incorporate a door to a new cupboard.

These changes to the proposals are welcomed as they will help to maintain the legibility of the original side elevation and maximise the amount of retained original masonry wall. Original external brickwork should remain exposed within the extension and consideration should be

given to re-using existing doors wherever possible, for example the existing door between the kitchen and utility room could be re-used within the new door opening proposed within the original side elevation. The retention of the first tread and riser of the existing basement staircase within the proposed coat cupboard is welcomed as it will retain the memory of this service stair.

However, it is still considered that the revised proposals would eradicate much of the existing character of the domestic service spaces in and around the existing kitchen and cellular spaces. The plans indicate the complete clearance of the internal joinery, some of which may be original. In the absence of any assessment of the significance of these spaces to support/justify the proposals, **significant concerns remain regarding the extent of the removal of internal joinery.**

Furthermore, a new opening is proposed between the kitchen and dining room through the existing chimneybreast, **which is not supported.** The proposed new doorway within the corridor, adjacent to the chimneybreast may be supported subject to assessment of the quality and significance of the existing joinery within the corridor space. As opposed to the proposed double doors, this opening should incorporate a simple single leaf door, or possibly a jib door.

#### *First floor*

At first floor level the revised proposals have largely addressed previous concerns raised regarding the proposed subdivision of spaces, the proposed layout is considered to be acceptable in principle. The proposed subdivision of the existing dressing room to bedroom 4 to form 2 en-suite spaces is considered to be acceptable. Further details will be required to demonstrate how the additional services will be incorporated whilst minimising harm to historic fabric. The retention of the original architraves and doors to the two smaller rooms accessed from the central landing is welcomed.

The amended proposals to retain the existing staircase in its current location are welcomed. However, the proposed plans indicate that the existing cupboards at the foot of this secondary staircase and the existing corner cupboard within the proposed master bedroom are proposed to be removed. In the absence of any assessment of the significance of this joinery, it is assumed that the cupboards are original and should therefore be retained.

It is also proposed to enlarge the existing bathroom to take in the spaces currently occupied by the separate WC and cupboard, retaining nibs and presumably a downstand. While there is no objection to the principle of this alteration, the existing architraves and doors to these spaces from the corridor should be retained and fixed shut.

Notwithstanding the above advice, in addition to the normal validation requirements, the following additional information would be required to be submitted either at application or condition stage:

- Detailed drawings including elevation and section drawings at a minimum scale of 1:20 showing the proposed glazing within the proposed rear extension.
- Detailed drawings including elevation and section drawings at a minimum scale of 1:20 showing new dormer windows supported by 1:5/1:2 detailed sections as necessary.
- Details of all new internal and external doors and windows, including plan, elevation and section drawings at a minimum scale of 1:20 supported by 1:5/1:2 detail sections as necessary.
- Door schedule, indicating where doors proposed to be removed and their possible re-use elsewhere within the building.
- Internal elevation drawings at a minimum scale of 1:20 showing proposed new openings within internal walls.



- Details of new services for new 1<sup>st</sup> floor bathrooms include details of any alterations required to historic fabric.

### Trees and Landscaping

The proposal includes the removal of T14, a mature cherry tree within the application site close to the boundary of no. 26 Heath Drive. The Council's Tree Officer previously advised that though the tree has some decay on the stem, it is requested that further internal investigation of T14 be carried out in order to quantify the extent of the decay. A tree condition survey has been submitted with the pre-app demonstrating that the tree is suffering from fairly severe internal decay; and there is likely to be no objection to its removal.

T15 and T16, two mature yew trees in the rear garden are still proposed to be removed, as specified in the original pre-app proposals. The removal of these trees would require convincing justification and mitigation through replacement planting. The Council's preference is still for these trees to be retained.

## 7. Conclusion

Whilst the revised proposals represent a significant improvement, there are still minor revisions which should be made prior to the submission of the full application to ensure a favourable decision at application stage.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Laura Hazelton on the number above.

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

Yours sincerely,

Laura Hazelton

Planning Officer  
Planning Solutions Team