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Date: 26/05/2017
Our ref: 2017/0804/PRE
Contact: Laura Hazelton
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Simoni Devetzi

By email

www.camden.gov.uk/planning

Dear Simoni,

Re: Boncara, 35 Templewood Avenue, NW3

Thank you for submitting a pre-planning application enquiry for the above property which was received on 24/03/2017 together with the required fee of £3,600.00.

1. Drawings and documents

Drawings and documents received on 08/02/2017, 24/03/2017 and 27/03/2017.

2. Proposal

Proposal 1: Demolition, rebuilding and lowering of listed swimming pool towards West Heath Road; lowering of surrounding garden to street level; erection of a 3 storey extension in between the two existing wings of the application building; extension of the ground floor and the removal of the first floor of the side wing fronting Templewood Avenue; extension of top floor of main building, re-cladding and alterations to fenestration, and excavation of basement floor.

Proposal 2: Demolition, rebuilding and lowering of listed swimming pool towards West Heath Road; lowering of surrounding garden to street level; conversion of existing house to provide 8 flats (3 x 2 beds, 3 x 3 beds, 2 x 4 beds); erection of 4 storey extension in between the two existing wings of the application building; infill of the main wing at garden level; extension of the side wing; extension of the 1st, 2nd and top floor of the main wing; and excavation of basement floor.

3. Site description

The site is located at the corner of West Heath Road and Templewood Avenue, facing the western part of Hampstead Heath which sits directly to the north. The site is located within the Redington and Frogna Conservation Area within sub-area 4 (Redington Road and Templewood Avenue).

The existing house on the site (no.35 Templewood Avenue) is a 3-storey house plus basement, of modern design in red brick with stone banding, which was built in the 1990's. This modern house was constructed in the eastern part of the former garden of the Grade II

listed Schreiber House (no.9 West Heath Road), which was built in 1962-4 to designs by the architect James Gowan for the furniture designer Chaim Schreiber. In 1968 an external sunken and domed swimming pool, also designed by Gowan, was constructed to the east of the house on land that now comes under the ownership of no.35 Templewood Avenue but which forms part of the statutory listing of the Schreiber House. The modern house at no.35 Templewood Avenue surrounds the listed swimming pool on the south and east sides and the basement level is built out under the garden and encloses the pool, which opens into the basement rooms.

4. Relevant planning history

2004/3604/P & 2004/3607/L - Conversion of existing garage into an additional habitable room, erection of a front extension to this habitable room, infilling of existing vehicular opening and crossover, plus excavation and construction of an underground garage involving the formation of a new vehicular access and crossover on West Heath Road. Granted subject to S106 Legal Agreement 14/02/2005 – Not implemented.

LW9903068 - Formation of new openings in the wall surrounding the pool at ground floor level. Listed building consent granted 24/02/2000.

LWX0002256 - Replacement of internal tiles/pool surround. Listed building consent refused 30/05/2000.

PL/9200115/R1 – Erection of a single family dwelling with new means of access to the highway. Granted 31/01/1992.

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)

CS6 (Meeting Camden's needs)

CS11 (Promoting sustainable and efficient travel)

CS14 (Promoting high quality places and conserving our heritage)

[LDF Development Policies](#)

DP2 (Making full use of Camden's capacity for housing)

DP3 (Contributions to the supply of affordable housing)

DP5 (Homes of different sizes)

DP16 (The transport implications of development)

DP17 (Walking, cycling and public transport)

DP18 (Parking standards and limiting the availability of car parking)

DP19 (Managing the impact of parking)

DP20 (Movement of goods and materials)

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

CPG2 (Housing) 2016

CPG4 (Basements and Lightwells) 2015

CPG6 (Amenity) 2011

CPG7 (Transport) 2011

Redington and Froggnal Conservation Area Statement

Emerging policy:

The Inspector's report on the Local Plan was published on 15 May 2017 and concludes that the plan is 'sound' subject to modifications being made to the Plan. While the determination of planning applications should continue to be made in accordance with the existing development plan until formal adoption, substantial weight may now be attached to the relevant policies of the emerging plan as a material consideration following publication of the Inspector's report, subject to any relevant recommended modifications in the Inspector's report. The Council is intending to formally adopt the Local Plan incorporating modifications in late June 2017, after which the Local Plan will replace the current LDF policies. A copy of the submission 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 H1 (Maximising housing supply)

Policy H3 (Protecting existing homes)

Policy H4 (Maximising supply of affordable housing)

Policy H6 (Housing choice and mix)

Policy H7 (Large and small homes)

Policy A1 (Managing the impact of development)

Policy A5 (Basements)

Policy D1 (Design)

Policy D2 (Heritage)

Policy T1 (Prioritising walking, cycling and public transport)

Policy T2 (Car-free development and limiting the availability of parking)

Policy T4 (Promoting the sustainable movement of goods and material)

6. Assessment

The key planning issues are as follows:

- Land Use – conversion to residential flats;
- Provision of affordable housing;

- Design (the impact of the proposal on the character and appearance of the host building, special character of the Grade II listed swimming pool, the setting of the adjacent Grade II listed Schreiber House, and the wider Redington and Frognal Conservation Area);
- Basement considerations;
- Standard of residential accommodation;
- Impact on neighbouring amenity;
- Transport Considerations; and
- Impact on trees.

7. Land Use – conversion to residential flats

Housing is regarded as the priority land-use of the Local Development Framework, and the Council will make housing its top priority when considering the future of unused and underused land and buildings. As such, the creation of a new residential flats is compliant with policies CS6 and DP2 as long as it meets the Council's and national residential development standards and does not harm local amenity. This requirement is continued in policy H1 of the Draft Local Plan which expects the maximum provision of homes on sites that are underused or vacant.

To ensure we make the best use of sites for housing, we use the London Plan's density matrix (Table 3.2) to seek the maximum housing density appropriate to the site. We would expect densities to be towards the higher end of the appropriate density range, which should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare. In the interests of mixed and inclusive communities, the Council seeks a range of dwelling sizes, and does not favour concentrations of very large homes.

Current Development Policy DP5 seeks to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table. The table identifies 2-bedroom market homes as being very high priority and 3-bedroom units as medium priority. The policy also aims for 40% of market homes to contain two bedrooms.

The Local Plan Submission Draft has adjusted the priorities from the current local plan and has identified that both 2 bedroom and 3 bedroom market dwellings are the highest priority, whilst 1 bedroom and 4+ bedroom units are lower priority. Nevertheless, the Council acknowledges that there is a need and/ or demand for dwellings of every size and would expect most developments to include some homes that have been given a medium or lower priority level.

Option 2 would involve the creation of 3 x 2 bed, 3 x 3 bed, and 2 x 4 bed flats which would represent an uplift of 7 residential units of an appropriate range of dwelling sizes. Furthermore, with a site area of approximately 0.1027 hectares this would represent a housing density of 78 dwellings per hectare. Option 2 is therefore likely to be considered acceptable in terms of land use.

8. Affordable Housing

The Emerging Local Plan sets out new requirements for the provision of affordable housing within new residential developments. Policy H4 will seek to secure a contribution to affordable housing from all developments that include housing and provide one or more additional homes. Targets are based on an assessment of development capacity whereby 100 sq m (GIA) of housing floorspace is generally considered to create capacity for one home. Targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace.

A sliding scale target will apply to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.

Proposal 2 would result in an uplift of residential floorspace over 100sqm and 7 new residential units. It is therefore likely that the Council would seek a contribution towards affordable housing for this development.

9. 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 and CS14 of the Core Strategy and policies DP24 and DP25 of the Development Policies are relevant to the application: development should consider the principle of the development; and the impacts of the development on the character, setting, context and the form and scale of neighbouring buildings. 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 LDF policies are supported by CPG1 (Design) and the Redington and Frogna Conservation Area Statement.

Significance of the Schreiber House and associated swimming pool

The Schreiber House (no.9 West Heath Road) is a detached house of 3-storeys plus basement of a striking design of vertical piers of blue rustic Staffordshire engineering bricks separated by continuous vertical strips of glazing defining internal spaces. The garden wall to the original garden of the Schreiber house is also in blue engineering bricks which continues around the application site. The swimming pool was added by Gowan in 1968 when he completed the external landscaping of the house. The house and swimming pool were listed at Grade II in 1998, the listing entry describing it as 'one of the most significant town houses of the post-war period' and was Gowan's first solo project following his split with his former partner James Stirling.

The swimming pool is 30 foot in diameter and was constructed out of reinforced concrete set into a turf mound, reminiscent of Gowan's designs for the Brunswick Park Primary School.

Two asymmetric circular changing / shower and WC rooms are located either side of the sunken stairs to the west, both top-lit by small domed rooflights. The pool is topped with a striking dome of tubular steel. Internally, the pool is finished with a white Sicilian marble surround and base, which has two rings of black Nero Marquina marble, with blue and white glazed tiles to other surfaces. Access to the swimming pool from the Schreiber House was originally via a recessed side door in line with the stairs down to the sunken pool.

The existing pool structure has experienced various changes to its original design that has to some extent eroded its significance. This is primarily as a result of the physical separation with the Schreiber House and the impact of the construction of 35 Templewood Avenue, with which the pool is directly linked through openings at basement level. While the planted boundary between the two plots has resulted in some severance between the swimming pool and Schreiber House, and some harm to the building's settings, the legibility of their original relationship can still be appreciated. The original turf mound has been lost and replaced with a masonry wall. Some changes have also occurred to the external brickwork around the circular shower room.

Condition

The Heritage Assessment has identified that the pool was on the English Heritage Buildings at Risk Register in 2002 and notes that there is evidence of general wear and tear and damage to existing tiles. The structural statement submitted to support the pre-application indicates that the leaks experienced with the pool are associated with cracking in the structural concrete.

The Structural Statement is clear that the existing structural arrangement of the pool is unknown because the structural elements are covered with tiled finishes, but based on archival evidence it is assumed that the construction is of reinforced concrete walls and base slab. The report identifies that the pool experiences leakages, the cause of which is unknown, which have rendered the pool unusable. The report indicates three potential causes of leakage: 1) deficiencies in the original design / construction 2) tree root activity 3) presence of contaminants in concrete resulting in deterioration. At this stage it is not clear what extent of repair is required to bring the pool back into use.

Relevant planning history

An application for listed building consent for the replacement of internal tiles and pool surround was refused in 2000 (ref LWX0002256) as the loss of the original materials was considered to harm the special interest of the building.

Underpinning works within the vicinity of the swimming pool were granted in 2004 (2004/3604/P & 2004/3607/L) relating to the conversion of the existing garage into an additional habitable room, erection of a front extension to this habitable room, infilling of existing vehicular opening and crossover, plus excavation and construction of an underground garage involving the formation of a new vehicular access and crossover on West Heath Road.

Comments on proposals

The proposals relate to the relocation of the existing listed swimming pool further to the north of the site within the garden of 35 Templewood Avenue, orientated at a 45 degree angle to the Schreiber House. It is proposed to reintroduce the turf mound and concealed drainage runs and to salvage and re-use the existing steel domed structure and to replace the original Georgian wired glass. Other original elements of the swimming pool structure are proposed to be rebuilt in facsimile.

Two options for alterations to the main house have been submitted as part of the current pre-application. The submission of a Heritage Assessment to support the proposed changes is welcomed. The relationship with and impact on the setting of the Gr II listed Schreiber House and swimming pool, as well as the impact on the character and appearance of the Redington / Froggnal Conservation Area are assessed below:

Relocation of listed swimming pool structure

While the swimming pool has experienced a number of changes (see above), it does retain a large amount of its original character and fabric, and is still considered to hold a high level of significance. The proposed relocation would result in significant harm caused to the listed swimming pool through the loss of original fabric and further severance of its relationship with the Schreiber House. It is accepted that the current house on the application site has a poor relationship with the swimming pool and it is recommended that more substantial changes to the existing house are explored to try and improve this relationship and the setting of the listed swimming pool structure.

The Heritage Assessment has identified several heritage benefits of the proposals, namely the:

- reintroduction of the turf mound, concealed drainage runs, Georgian wired glass to the dome, original lighting scheme and removal of retaining wall;
- blocking up of later openings to the modern house; and
- the new structure will allow for the pool to be brought back into use.

It is considered that the majority of the heritage benefits set out above could be delivered without relocation, and that repairs to rather than complete replacement of the structure should be investigated. The removal of the modern retaining wall and replacement of the turf mound could be reintroduced to the exposed half of the pool. The blocking of later openings, reinstatement of original lighting scheme and replacement of glazing could be addressed with the pool in its current location. As such, the benefits identified are not considered to be sufficient justification to outweigh the harm caused as a result of the pre-application proposals, and as a result the proposed relocation is not supported.

It is recommended that a programme of investigation works to assess the structural problems and agree a repair strategy for the swimming pool is agreed with the Council. Depending on the nature of the works required, this may need to form part of a listed building consent application.

As the proposals would equate to demolition of a Grade II listed structure it is recommended that pre-application advice is sought from Historic England (contactable via 'e-london@HistoricEngland.org.uk'). It should also be noted that the proposed demolition and reconstruction of the swimming pool structure would trigger the consultation of national amenity societies, and the views of the 20th Century Society would be taken into account as part of the determination process.

Proposed alterations/extensions to existing house

Limited assessment of the impacts that the proposed development would have on the character and appearance of the conservation area, or of the way in which the design proposals have responded to the established character of the surrounding area, have been included in both the Design & Access Statements and Heritage Assessment submitted to support the current pre-application.

The existing situation represents an opportunity for enhancement of the conservation area as the existing building is not considered to positively contribute towards its character and appearance. Any changes proposed will need to be sensitive to the area's existing character and streetscene. Additional bulk and massing visible from the street is unlikely to be supported.

Both options involve the relocation of the existing swimming pool structure (see assessment above), the lowering of the pool and garden level and the creation of a new basement.

Option 1 proposes to retain the house as a single dwelling with the addition of a 3-storey extension in between the two existing wings; the extension of the ground floor of the side wing; the removal of the side wing's first floor and the extension of the top floor. The intention is to redesign the existing house in a contemporary aesthetic.

Option 2 proposes to convert the existing house to provide 8 flats with the associated addition of a 4-storey extension in between the two existing wings; the infill of the main wing at garden level; the creation of an extra floor inside the existing volume of both wings (new ground floor level); the extension of the side wing and the extension of the first, second and top floor of the main wing. The extensions are proposed to be designed to follow the existing character of the building.

Both options propose substantial additional massing to the south-east corner of the existing building (referred to as being 'between the two existing wings' within the D&A Statements). This would bring the building line of the upper storeys significantly further forward towards the street compared to the set-back front elevation of no.33 Templewood Avenue, which is of concern. This would result in an unfamiliar relationship of the dwelling to the street in a part of the conservation area that is characterised by larger and more generously spaced dwellings, set back from the street in mature landscaping. The addition of massing above the existing wing facing Templewood Avenue is not supported as it is not considered to preserve or enhance the character and appearance of the conservation area.

Option 2 proposes to extend the first floor of the wing facing Templewood Avenue to the north, which is of concern due to the open character facing Hampstead Heath.

Both options involve additional massing at third floor level. Some additional massing may be acceptable; however its impact on the streetscene will need to be carefully considered. The visuals from the electronic model submitted to support the proposals don't show any views from street level which would help with the assessment.

At this stage neither of the options put forward would appear to preserve or enhance the character and appearance of the conservation area, and would not be supported in design or conservation terms. The proposed redesign of the existing building is welcomed in principle, however it is not clear how the proposed white render cladding and large expanses of glazing indicated within option 2 relate to the area's existing character. It is recommended that further consideration is given towards developing a clear design concept for alterations to the existing building. Continued dialogue as part of a further pre-application would be welcomed.

10. Basement Development

Proposal 1 involves the excavation of a new basement floor under the building footprint as well as extending the footprint of the side wing at basement level to the north. The total basement floor area would be approximately 393sqm and a maximum depth of 3.3m.

Proposal 2 also involves the excavation of a new basement floor underneath the footprint of the entire building measuring approximately 382sqm extending to a maximum depth of 3.3m.

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.

The application site is located in an area subject to a number of underground development constraints including surface water flow and flooding, slope stability, subterranean groundwater flow and hydrological constraints (Bagshot beds). Both proposals involve the use of the new basement floor as a parking area and a gym which are considered the most appropriate uses given the area's susceptibility to flooding (however, please see transport assessment below in relation to the provision of car parking).

Given the fact that the application site sits within a highly constrained area in terms of underground development, you are advised to thoroughly examine the requirements of Policy A4 of the Local Plan submission draft and 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 need to 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.

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).
- A full scoping study is required as part of any application, identifying the potential impacts for each of the matters of concern.

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 basement development is located close to the Grade II Listed swimming pool and because there are a number of underground development constraints (identified previously).

11. Standard of residential accommodation

The Council expects development to provide high quality housing that provides secure, well-lit accommodation with well-designed layouts and rooms in accordance with guidance provided by CPG2 (Housing). The London Plan 2016 sets out new nationally described space standards which all new dwellings, including conversions of existing residential units, must meet.

Option 2 involves the creation of the following dwelling sizes:

- Flat 1 – 3 bedroom – 118.44sqm
- Flat 2 – 4 bedroom – 184.10sqm (duplex)
- Flat 3 – 4 bedroom – 195.88sqm (duplex)
- Flat 4 – 2 bedroom – 104sqm
- Flat 5 – 2 bedroom – 115.62sqm
- Flat 6 – 3 bedroom – 136.13sqm
- Flat 7 – 2 bedroom – 95.66sqm (duplex)
- Flat 8 – 3 bedroom – 92.38sqm (duplex).

All flats would comfortably exceed the DCLG's [Nationally Described Space Standards](#) which sets minimum gross internal floor areas for various dwelling sizes.

Flats 2, 3, 6 and 8 would be dual-aspect which would ensure adequate natural daylight and ventilation to the flats and they all benefit from large room sizes and acceptable layouts.

Flat 7 would be single aspect and appears fairly cramped with limited living space.

Flats 1, 4 and 5 have very deep floorplates making it difficult to provide natural light to the whole area; however, all habitable rooms feature at least one window. It is recommended that extra windows (obscure glazed if necessary) are provided along the western elevation of the side wing to improve light levels along the long internal corridor.

Overall, the dwelling and room sizes are considered acceptable, but you are encouraged to make minor revisions to improve the quality and standard of flats 1, 4, 5 and 7.

12. Impact on neighbouring 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 to development that would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.

The nearest residential property, no.33 Templewood Avenue to the south of the site would be the most affected by any development at the site. Any further massing to the existing building would need to be carefully tested, to ensure it did not result in a harmful loss of daylight or overlooking of this property.

13. Transport Considerations

The Council's Transport Officer has assessed the proposals and confirmed the principal issues relate to the following:

- Car-capped development
- 16 long-stay cycle parking spaces;
- Approval in Principle (AIP) report and associated fees;
- Highways contribution;
- Construction Management Plan (CMP) and associated fees

Car Parking

The Council's Core Strategy CS11 seeks to promote sustainable travel and make private transport more sustainable by minimising the provision for private parking in new developments. Development policy DP18 states that the Council seeks to ensure that developments provide the minimum necessary car parking provision. Policy T2 of the emerging Local Plan states that all new developments in the borough are to be car-free.

Both development options propose to create a basement car park, accessed via a car lift, which provides 8 car parking spaces. The site does currently benefit from a crossover and some off street parking; however, it is unclear from the plans how many spaces are currently

present. The Council would require the proposed development to be car-capped, and will resist any increase in off street parking, including the proposed bays in the basement.

A car-capped development would therefore be secured as a Section 106 planning obligation for all residential dwellings. This would allow the proposal to be in accordance with Core Strategies CS11 and CS19 and Development Policies DP18, DP19 and DP21, while also allowing the proposal to be in accordance with Emerging Local Plan policy T2.

Cycle Parking

Development Policy DP18 (Paragraphs 18.12 and 18.13) requires a development to provide cycle parking facilities in accordance with the minimum requirements of our cycle parking standards (Refer to Appendix 2 of Camden Development Policies document). We also expect the development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan.

Table 6.3 in the London Plan lists the minimum number of cycle parking spaces required for C3 residential use and states that 2 long stay spaces are required for each dwelling with 2 or more bedrooms. In order to comply with policy, option 2 would be required to provide 16 long stay cycle spaces due to the uplift in the number of residential units.

One of the proposed plans show 12 cycle parks located in the basement. This is below the minimum requirements of the London Plan. Cycle parking must also be located close to the site entrance and the route to cycle parking from street level should be step free or, if level access is not available, the cycle parking must be accessible via a ramp or lift that is adequate in size to accommodate a bike. Long-stay cycle parking must also be located internally, be covered, secure and fully enclosed, and be of sufficient dimensions to allow users' access and egress to them easily and comfortably with their bicycles.

When you submit a formal planning application, all detailed dimensions of the cycle parking facilities must be provided as part of the planning application. The cycle parking facilities and access arrangements would need to comply with the guidance provided within [CPG7](#).

Excavation in close proximity to the public highway

The proposal involves basement excavations within close proximity to the footway directly adjacent to the site. The Council must ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. You would be required to submit an 'Approval In Principle' (AIP) report to our Highways Structures & Bridges Team within Engineering Services as a pre-commencement obligation. This is a requirement of British Standard BD2/12. The AIP would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any mitigation measures which might be required.

An AIP assessment fee of £1,800 is required and would be secured as section 106 planning obligations if planning permission is granted.

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 at the junction on the public highway. Camden would need to undertake highway remedial works following completion of the proposed development and a financial contribution for highway works would be secured as a Section 106 planning obligation. A cost estimate would be requested from our Highways Delivery team at full planning application stage.

Management of Construction Impacts on the Public Highway in the local area

The proposal would involve a significant amount of construction works and Basement excavation; this is likely to generate a significant number of construction vehicle movements during the overall construction period. The Council's primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion. There are a number of sites within close proximity to the site which must be considered in order to reduce cumulative impacts.

The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A Construction Management Plan (CMP) would therefore be secured as a Section 106 planning obligation.

The Council has a CMP pro-forma which must be used once a Principal Contractor has been appointed. The CMP, in the form of the pro-forma, would need to be approved by the Council prior to any works commencing on site. The CMP pro-forma is available on the Camden website [here](#).

A financial contribution would need to be secured to cover the costs of reviewing the Construction Management Plan (these fees are under review and will be confirmed at application stage). This would also need to be secured by a Section 106 planning obligation if planning permission is granted.

Some highway licences would be required to facilitate the proposed works. You 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](#).

14. Impact on trees

The scheme involves the removal of 5 trees and one group of trees. The trees proposed to be removed are all category C in line with BS5837:2012. The trees are considered to be of low significance to the character of this part of the conservation area. It is considered that the loss

of visual amenity and canopy cover these trees provide could be mitigated through replacement planting.

An arboricultural impact assessment has not be included with the pre application details. As such it is not possible to assess the impact of the proposals on the existing trees that are to be retained.

An arboricultural impact assessment and method statement must be provided with the formal planning application to show that the works would not cause harm to these trees.

You would need to provide information about:

- species, spread, roots and position of trees,
- which trees you are proposing to fell,
- which trees will be affected in any way by the proposed development, and
- the measures that will be used to protect them during construction.

You will need to provide the information in the form of the documents and plans listed below in line with BS5837:2012 (trees in relation to design, demolition and construction):

- a pre-development tree survey
- a tree constraints plan
- an arboricultural impact assessment
- an arboricultural method statement including a tree protection plan.

15. Conclusion

Although the Council welcomes the creation of new residential homes, the current proposals are not considered acceptable in design terms and because of the harm caused to the listed swimming pool. You are advised to re-submit revised proposals which take account of the issues raised in this report for further pre-application discussions.

16. Planning application information

If you submit a planning application which addresses the issues 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
- Daylight & sunlight impact assessment

- Arboricultural impact assessment and method statement.
- Sample photographs/manufacturer details of proposed materials
- 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