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Dear Ms McBurney

Town and Country Planning Act 1990 (as amended)
Re: 81 Belsize Park Gardens, NW3 4NJ

Thank you for your enquiry received on the 20/04/2021, regarding the demolition and redevelopment of the site alongside a change of use from gym to 15 residential flats (12 x 2b4p units and 3 x 1b2p units).

The site falls within the Belsize Conservation Area and the site is not identified as making a positive contribution to the conservation area.

Immediately abutting the site to the west is the residential mews 'Lancaster Stables'. To the east of the site are residential properties on the southern side of Belsize Park Gardens. Behind these properties (83-89 Belsize Park Gardens) and to the south east of the site is a triangular communal garden.

Following the meeting on 25th May 2021, I am writing to provide the Council's formal pre-app response.

Planning History

2020/4338/P: Certificate of lawfulness (Proposed) - Use of the property as a nursery (Use Class E). Granted 23/03/2021

2020/4336/P: Alterations to front and side (south east) elevations incorporating new windows and entrance portico; replacement rooflights and installation of plant; removal of roof to form enclosed garden including acoustic barrier; and replacement store at front of site. Granted 18/05/2021

You have advised that the applicant purchased the site in January 2021 and while the use of the property as Class E is a fallback position, the applicant wishes to explore the option of redeveloping the site for residential use.

Land Use

Loss of private member's gym (Class E)

The proposed change of use of 81 Belsize Park Gardens from a private member's gym (Class E) to flats (Class C3) would involve the loss of a leisure facility. Policy C3 'Cultural and leisure facilities' of the Local Plan seeks to protect cultural and leisure facilities.

No. 81 comprises a 4 storey building which was formerly a Health and Leisure Club, known as Springhealth Leisure Club. The club included a gym, pool, fitness studios, changing rooms, restaurant and crèche. This use ceased in February 2017 and it is clear from recent planning applications that the property has been marketed. It is understood that the existing floorspace is approximately 1,456sqm arranged over 4 floors.

Where there is a proposal involving the loss of a cultural or leisure facility, it must be demonstrated to the Council's satisfaction there is no longer a demand. When assessing such planning applications, we will take the following into account:

- a. whether the premises are able to support alternative cultural and leisure uses which would make a positive contribution to the range of cultural and leisure facilities in the borough;
- b. the size, layout and design of the existing facility;
- c. proposals for re-provision elsewhere;
- d. the impact of the proposal on the range of cultural and leisure facilities; and
- e. the mix of uses in the area.

The Council recognises that the users of a leisure or cultural facility will be drawn from a catchment unique to the particular venue and therefore we will consider the value a facility provides to Londoners, including protected groups (as set out in the Equality Act 2010) where relevant, as well as the local community. Any future submission should consider whether the facility served any protected groups and if so what the impact on the protected groups would be.

Demand for cultural and leisure uses varies over time and as a result, there may no longer be a demand for an existing facility. Where proposals would involve the loss of a cultural or leisure facility we will expect the applicant to demonstrate to the Council's satisfaction there had been a search for alternative cultural and leisure uses for the site through a marketing exercise. The marketing exercise should be undertaken over a period of not less than 12 months and be based on a realistic price/rent.

When a proposal would result in the loss of existing cultural or leisure uses, we will take into account the size, layout and design of the existing facility, the mix of uses in the area and proposals for the re-instatement of a cultural or leisure facility on-site or elsewhere.

Camden Planning Guidance 'Community uses, leisure facilities and pubs' was adopted by the Council in January 2021. There is a range of indoor sports facilities in the Borough. They are well used and the Camden Open Space, Sport and Leisure Study 2014 demonstrated that there are no areas of surplus provision. There is pressure on existing facilities in much of the borough, exacerbated by Camden's very high student population and the increasing popularity of after-work sport and fitness. Many facilities have to cater for a diverse range of users which can include school children, students, professional athletes and people needing to improve their fitness in response to health problems.

The Council also recognise that the way floorspace is operated and services are delivered changes over time. New technologies, innovation and changes in preferences and expectations affect the type and quantum of floorspace that is needed over time. It is also noted that swimming pools smaller than 100sqm were excluded from the Camden Open Space, Sport & Recreation Study as they would not meet Sport England criteria. Indoor Sports Hall facilities were only included if they met the Sport England criteria. Sport England defines a large indoor sports hall as being greater than 3 badminton courts (or 440sqm), or if the hall has clearance for badminton. The existing building is cellular in nature and does not include any single space of 440sqm or greater. Given this criteria it is unlikely that the existing swimming pool and gym provision was included in the assessment of indoor sports facilities and their loss would therefore not affect the overall findings of the Open Space, Sport and Leisure Study 2014.

You should provide details of any alternative facilities (including a map of alternative facilities annotated to show the distance to the existing facility) to demonstrate that the loss of the private members gym would not result in a shortfall for this type of use.

Subject to the provision of a marketing exercise which demonstrates there is no demand for the existing floorspace for alternative cultural and leisure uses and consideration on the impact of protected groups, there is no objection in principle to the loss of the Class E floorspace.

Residential use

The Council regards self-contained housing as the priority land-use of the Local Plan, and the Council will make housing its top priority when considering the future of unused and underused land and buildings. The proposal would provide 15 self-contained flats. Such provision would accord with Policy H1 of the Local Plan and would be acceptable subject to it providing an acceptable quality of residential accommodation.

Demolition

Policy CC1 requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building.

The construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed.

In assessing the opportunities for retention and refurbishment developers should assess the condition of the existing building and explore future potential of the site using the hierarchy set out in paragraph 9.6 of Camden Planning Guidance (CPG) 'Energy efficiency and adaptation'. The London Plan 2021 highlights the importance of retaining the value of existing buildings with the least preferable development option of recycling through demolition, although Policy D3 of the New London Plan states the “best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development.”

All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Where the demolition of a building cannot be avoided, we will expect developments to divert 95% of waste from landfill and comply with the Institute for Civil Engineer’s Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. We will also require developments to consider the specification of materials and construction processes with low embodied carbon content.

A Whole Life Carbon assessment will be expected for all applications proposing substantial demolition. This should follow the GLA draft SPG and including long term carbon factors (as set out in the GLA Whole Life Carbon SPG).

Housing mix

The development would provide 15 flats (12 x 2b4p units and 3 x 1b2p units). The Council consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall. The Local Plan includes a Dwelling Size Priorities Table as set out below.

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

Where possible a mix of large and small homes should be included for both the social-affordable rented and the market housing. Local Plan paragraph 3.185 defines 'large homes' as homes with 3-bedrooms or more, and 'small homes' as studio flats, 1-bedroom and 2-bedroom homes. Three bedroom and 2-bedroom dwellings are a high priority for market housing in Camden.

Nevertheless, the Council acknowledges that there is a need and/ or demand for dwellings of every size shown in the above table and we expect most developments to include some homes that have been given a medium or lower priority level. The development would provide 12 x 2 bed 4person units and 3 x 1 bed 2 person units. You should investigate providing some 3 bed homes within the development in order to comply with Policy H7b.

For up to date guidance on the dwelling size priorities for social-affordable rented housing and intermediate rented housing, please refer to paragraphs 3.35-3.48 of CPG Housing. The precise mix of dwellings will be negotiated with the developers and affordable housing providers involved in each scheme taking into account the character of the development, the site and the area, and other criteria included in Local Plan Policy H7.

Housing quality

Housing development should be of high quality design and would be expected to meet or exceed the minimum internal space standards set out in the London Plan. The proposed layout would meet or exceed the London Plan space standard for internal and private amenity space. However, there is a concern that due to the proposed orientation of the development in relation to the neighbouring properties and the communal garden, the outlook from many of the proposed flats would be compromised with views towards louvres or blank walls. Furthermore, some of the east facing windows would be obscure glazed preventing any outlook for two of the bedrooms at second and third floor levels. Officers suggest re-orientating the development so as to provide higher quality accommodation (this suggestion is expanded further in the design section below).

It is noted that the plans include potential for basement non-habitable accommodation for Units 3, 4, 10 and 11. It is unclear how these rooms would receive daylight but officers would have concerns if the external amenity space currently shown at ground floor level was dropped to basement level.

Accessibility

The Council would require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2) and 10% to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3). In applying the requirement for 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair user dwellings, the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%.The Council will generally apply the requirement for 10% wheelchair user dwellings across each housing type or tenure in a scheme, seeking 10% of market housing, 10% of social-affordable rented housing and 10% of intermediate housing.

The Council will require 10% of social-affordable rented housing in each development to be “wheelchair accessible” and be fully fitted-out for occupation by a household containing a wheelchair user. We will use planning conditions to specify those social-affordable homes that must comply with Part M4(3)(2)(b) requirements for “wheelchair accessible” dwellings.

Waste

Policy CC5 Waste requires developments to include facilities for the storage and collection of waste and recycling. The Council recommends that internal space sufficient to store 127L of waste, food waste and recycling per week is provided for properties with three bedrooms or less. This will enable occupants to segregate their waste into general waste, mixed recycling and food waste, and store it temporarily, until it can be transferred to shared bin storage points or the kerbside.

Where communal facilities are required for waste storage the capacity of waste storage can be calculated by multiplying the number of dwellings by the following requirements for each dwelling:

- 120 litres for general waste or ‘refuse’
- 140 litres for mixed dry recycling
- 23 litres for food waste

Developers should consult the [technical guidance](#) for further advice on space standards and other requirements before submitting a planning application. When a planning application is submitted, the Council will expect details of the proposed storage space for waste and recyclable material to be specified and agreed.

The proposed volume of bin storage would meet the Council’s requirements.

Affordable Housing

Your submission states that the development would provide 1,142sqm of residential floorspace. This figure appears to be a sum of the total floor area of each of the flats. Calculations for affordable housing in Policy H4 are based on Gross Internal Area. This is defined as the whole enclosed area of a building within the external walls and includes the thickness of partition walls and common areas such as shared staircases, entrance halls and corridors. On this basis, it is calculated that the proposed development would provide 1,568sqm GIA of housing floorspace.

Policy H4 requires a proportion of the housing provided to be affordable in accordance with the sliding scale. Targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home. Targets are applied to additional housing floorspace proposed. A sliding scale target applies 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% of for each home added to capacity. On the basis of

1,568sqm GIA of additional housing floorspace proposed, this would result in a requirement for 32% affordable housing. For developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site. The on-site affordable housing floorspace target would be 501sqm GIA.

No affordable housing is proposed and you advised at the meeting that affordable housing would not be feasible on this site. Following discussions with the Council's affordable housing co-ordinator and taking account of the character of the development and site as well as site constraints, it is considered that affordable housing should be provided on site.

The Council expects 60% social-affordable rented housing and 40% intermediate rented housing. Shared Ownership is not considered an affordable tenure type in the borough.

The Council's priority for social-affordable rent is family-sized accommodation: 3-bed 5 or 6 person units and 2-bed 4 person units. Wheelchair Accessible units should be provided in the social-affordable tenure where there is an identified need for such units. The units should be located on the Ground Floor and have double bedrooms wherever possible i.e. 1-bed 2 person, 2-bed 4 person and 3-bed 6 person.

The Council seeks to ensure that the majority of intermediate rented housing on a scheme is affordable to households with gross annual income between £31,950 and £42,600 (at the time of writing) and the focus is on providing studio and 1 bedroom homes. A proportion of 2 bed 4 person units that are genuinely suitable for sharers (2 bedroom, 2 bathroom) which can be let to two jointly-eligible households or families is also welcomed and can help with viability. Three bedroom units in this tenure are generally considered to be unaffordable. The Council does not have information about the need for Wheelchair Accessible units for applicants on the Intermediate Housing Register of Interest and so we do not typically seek wheelchair units within this tenure

There is an expectation that the affordable housing will have a separate core so that services charges can be kept to a minimum. The inclusion of a lift in a small scheme could render the service charge unaffordable and / or unviable for an affordable housing provider.

It is important to engage with Registered Providers that are on the Council's Approved Strategic Partner List as early as possible in the process. Below are the contact details for the RPs that are more likely to be interested in smaller schemes:

John Delahunty	Chief Executive	Innisfree	john.delahunty@innisfree.org.uk
Neil Ayre	CEO	Odu Dua	NAyre@odu-dua.org ;
Saba	Head of	One	schoudhury@onehousing.co.uk ;

Choudhury	Acquisition & Planning	Housing	
Gareth Jones	Director of Development & Assets	Origin Housing	Gareth.Jones@originhousing.org.uk ;
Karl Phillips	Development Director	Sapphire Housing	karl.phillips@sih.org ;

Design and impact on conservation area

The existing building has a blank street frontage above ground floor level and the side elevation is rather stark. As such the existing building does not make a positive contribution to the Conservation Area and there is scope for either redevelopment or sensitively altering the existing building.

The proposed residential block has been conceived around the existing massing and would maintain the set back of upper floors but with a series of courtyard spaces along the east elevation which would help to break up the massing. The height and scale of the proposed development appears acceptable and the form and design appears sympathetic to the surrounding context. It is also evident that the layouts of the flats have been carefully considered to avoid overlooking of habitable rooms and gardens.

The site is clearly very constrained and as a result, a variety of mitigation measures are employed to prevent overlooking. There is concern that the mitigation measures would both reduce the quality of the accommodation and result in a fussy building with lots of appendages in the form of louvres and fins.

A different design solution might work better in terms of addressing neighbouring amenity and providing good quality accommodation. Officers question whether it could be simpler in form with the units orientated towards the south east, with longer views over the communal garden. Rotating the units, might reduce the need for mitigation and helped to design out overlooking. You should also seriously investigate whether a smaller number of units might provide a more workable solution.

The entrance on Belsize Park Gardens needs to be developed further as this appears quite unassertive and hidden and would benefit from being given a bit more space. Likewise the entrance on Lancaster Stables would need to have an appropriate presence. The proposed bin store would extend to the front edge of the pavement. The bin store should be integrated into the building as a projecting bin store would detract from the front elevation and would be poorly located in relation to the living room and patio of 'Flat 9'. The proposed development would bring the building line forward from existing so that it is in line with the neighbouring property (No.83). While this may be

considered acceptable, the addition of projecting balconies beyond this building line would not be supported. Balconies should be integrated into the front elevation rather than stuck on the front.

Officers also have concerns in relation to the location of the cycle stores. Wheeling cycles past the ground floor flat and lift should be avoided. This would likely have an unacceptable impact on the finishes of this area and could cause an obstruction near the lift / staircase. More thought needs to be given to both the bin and cycle store.

Amenity

Development should avoid harmful effects on the amenity of occupiers of nearby properties. As the proposed development has the potential to negatively impact the existing levels of daylight/sunlight of nearby residential properties, you should submit a daylight and sunlight report to support any future planning application. The report needs to be prepared in line with the methods described in the Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice" 2011.

Given that the proposed development would introduce minimal additional massing it is unlikely that it would harm the daylight and sunlight of the properties to the east. Nevertheless, it would be helpful for a daylight and sunlight report to confirm this. There is also a concern that the development could affect the light levels of 4 Lancaster Stables.

Particular care will need to be taken where the site adjoins 83 Belsize Park Gardens to ensure that any amenity impacts are minimised. A number of windows would be introduced facing towards the garden of this property and it would be important to consider how you could minimise light spill along this boundary. The obscure glazed windows would also need to be non-opening to maintain privacy to this property.

Not all the windows on the east elevation are shown having louvres. It is noted that the windows without louvres are those facing towards the southern end of the communal garden. It is not clear who uses the communal garden and you should provide details of who has access to this area. Who uses the communal gardens space will impact on how much officers feel we need to manage overlooking over this part of the site.

Basement excavation

Your submission confirms that one of the proposed flats would be approximately 1.7m below ground level. A basement is a floor of a building which is partly or entirely below ground level. A ground or lower ground floor with a floor level partly below the ground level (for example on a steeply sloping site) will therefore generally be considered basement development. The drawings show that excavation of the existing ground level will be required to create the lower ground floor level. In addition, the drawings show

the potential for additional ancillary residential accommodation to Flat 3, 4, 11, and 10.

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 site is identified as have the following underground development constraint: surface water flow and flooding. Belsize Park Gardens is identified as a street that previously flooded (in 1975).

The Council will require evidence of the impact of basement schemes in the form of a Basement Impact Assessment to be carried out by appropriately qualified professionals.

The BIA will include the following stages:

- Stage 1 - Screening;
- Stage 2 - Scoping;
- Stage 3 - Site investigation and study;
- Stage 4 - Impact assessment

Each of these stages is explained in full in chapter 4 of Camden Planning Guidance CPG Basements. Please also refer to Chapter 6 of the Camden Geological, Hydrogeological and Hydrological Study, which is available on the Camden Council website.

The BIA will comprise a factual report and an interpretative report. This is explained in more detail in Section 7 of the Camden Geological, Hydrogeological and Hydrological Study (hydrological and geological study). The interpretative report will have three sections:

- detailed site geology;
- the geotechnical properties of the ground; and
- an engineering interpretation of the implications of the ground conditions for the development of the site.

Appendix G3 of the study sets this out in more detail from which it should be noted that it must contain details of the retaining wall design for the basement excavation.

The engineering interpretation will require calculations of predicted ground movements and structural impact to be provided. Examples of these calculations are given in appendix D of the Camden Geological, Hydrogeological and Hydrological Study. The sides of excavation always move to some extent no matter how they are supported. The movement will typically be both horizontal and vertical and will be influenced by the engineering properties of the ground, groundwater level and flow, the

efficiency of the various support system employed during the underpinning and the efficiency or stiffness of any support frames used.

Applicants must demonstrate in the Basement Impact Assessment that the basement scheme has a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight'.

The cumulative effect of the incremental development of basements in close proximity, particularly when these are large, can potentially create a significant impact. Therefore, a Basement Impact Assessment must identify neighbouring basements and make the assessment considering all nearby basements.

Both existing and planned (with planning permission) underground development must be included in this assessment. To ensure cumulative impacts are considered Basement Impact Assessments must respond to the issues raised in paragraph 168 to 174 of the Camden Geological, Hydrogeological and Hydrological Study.

We will expect a 'non-technical summary' of the evidence that applicants have gathered against each stage of the BIA. This should be presented in a format which can be fully understood by those with no technical knowledge.

At each stage in the process the person(s) undertaking the BIA process on your behalf should hold qualifications relevant to the matters being considered. We will only accept the qualifications set out in paragraph 4.7 of CPG Basements.

In order to provide us with greater certainty over the potential impacts of proposed basement development, we will also expect an independent verification of the BIA, funded by the applicant. The audit fee ranges from £997.50 to £3045 (at the time of writing) depending on which category the basement excavation falls within. Once you have submitted an application further details of the independent verification process will be provided.

Camden has produced a '[BIA pro forma](#)' and a help note on '[Defining the Scope of Engineering input to preparing BIAs](#)' in order to help applicants who are preparing planning applications for basement development. You should submit a BIA pro forma with any future application.

Energy and sustainability

All major development are required to demonstrate how London Plan targets for carbon dioxide emissions have been met. Major residential development is expected to be net zero carbon with a minimum 35% reduction beyond Part L Building Regulations on site and with 10% reduction through on-site energy efficiency measures. Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction are to be met within the framework of the energy hierarchy. Major developments are required to assess the feasibility of

connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

Where it is demonstrated that the required London Plan reductions in carbon dioxide emissions cannot be met on site, the Council will require a financial contribution to an agreed borough wide programme to provide for local low carbon projects.

The Council expects developments of five or more dwellings to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible. This is in line with stage three of the energy hierarchy 'Be green'. The 20% reduction should be calculated from the regulated CO₂ emissions of the development after all proposed energy efficiency measures and any CO₂ reduction from non-renewable decentralised energy have been incorporated.

An Energy Statement should be submitted demonstrating how the development will comply with these standards that follows GLA Guidance on Preparing Energy Assessments.

Policy CC2 'Adapting to climate change' states any development involving 5 or more residential units is required to demonstrate climate change adaptation measures in a Sustainability Statement. Such measures to include:

- a) not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;
- b) incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
- c) measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

Any development involving 5 or more residential units is required to demonstrate the above in a Sustainability Statement. The proposed green roof and PV panels are welcomed. However, it is unclear how the planted wall at third floor level would be maintained.

The Home Quality Mark, launched 2015, is one way of demonstrating the standard of a new residential dwelling, which includes measures for low CO₂, sustainable materials, good air quality and natural daylight. The Council strongly encourage schemes to use the Home Quality Mark.

Water and drainage

You should provide a Surface Water Drainage Pro-forma with your application. SUDS strategies should be designed in accordance with NPPF policy (and written Ministerial Statement) and London Plan policy SI 13 SUDS hierarchy to reduce run off rates to greenfield rates. Where reasonably practicable, run off volumes should be constrained to greenfield run off volumes for the 1 in 100 year 6 hour event.

Residential developments are expected to meet the requirement of 110 litres per person per day (including 5 litres for external water use).

Air Quality

The whole of the borough has been declared an Air Quality Management Area (AQMA) for both NO₂ (Nitrogen Dioxide) and PM₁₀ (Particulate Matter). The proposed development involves substantial demolition. Therefore a detailed Air Quality Assessment would be required to support any future application. Air Quality Assessments must outline the predicted and forecast pollutant concentrations at the proposed development and the planned mitigations.

Any development which involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to Institute of Air Quality Management Dust Guidance and adhere to the Mayor's supplementary planning document (SPD) on 'The control of dust and emissions during construction and demolition'.

Transport

The Council requires all new development to be car-free. Any new residential units would be secured car free via legal agreement and future occupants would not be entitled to on-street parking permits.

Cycle Parking

We expect the development to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan. The Council will also seek an additional 20% of spaces over and above the London Plan standard to support the expected future growth of cycling for those that live and work in Camden. The cycle parking should allow step-free access as this is a key requirement of Camden Planning Guidance CPG7. Two short stay cycle parking spaces should be provided.

Cycle parking should be provided off-street, within the boundary of the site and close to the site entrance. Cycle parking needs to be accessible (in that everyone who uses a cycle can easily store and remove it from the cycle parking) and secure (in that both wheels and the frame can easily be locked to the stand). Security is a critical concern and careful consideration must be given to the location, design, enclosure and surveillance of all cycle parking. The proposed vertical cycle stands would not be acceptable as this type of stand requires cycles to be lifted into place and so would not be accessible to those users who are physically unable to lift their cycles.

Construction management plan

The proposed development raises concerns about traffic congestion and road safety issues during construction. Amenity issues are also likely to be a

concern. A draft CMP (using our standard pro-forma) should be submitted in support of any subsequent planning application. Should the application be recommended for approval, then a full CMP would be secured via a Section 106 Agreement together with the associated Implementation Support Contribution of £9,455.63 and Impact Bond of £15,000. The bond will be fully refundable on completion of works, with a charge only being taken where contractors fail take reasonable actions to remediate issues upon notice by the Council.

Highways contribution

Paragraph 6.11 (Policy A1) of the Camden Local Plan states that the Council will repair any construction damage to transport infrastructure and reinstate all affected footway surfaces at the developer's expense. The council would need to secure a financial contribution for highway works as a section 106 planning obligation if planning permission is granted. This would allow the proposal to comply with Policy A1 of the Local Plan. A cost estimate for highway works will be requested from our Design Engineering Team if a full planning application is submitted.

Trees

There is a Bird Cherry tree *Prunus padus* at the front of the site (north east corner) which is the subject of a TPO. This tree should be retained. You will need to demonstrate how measures will be put in place to ensure that this tree is protected during construction.

There is a large tree in the neighbouring communal garden which is close to the site boundary. There is also a tree in the rear garden of No.83 Belsize Park Gardens which is also close to the site boundary. Officers would need to be reassured that there would be an acceptable impact on the potential of these trees. You would need to demonstrate the position of balconies and windows in relation to the canopies of these trees. Sufficient space should be maintained beyond the crown to avoid undue pressure for felling or excessive pruning and to ensure there was sufficient light to habitable rooms.

Trees are at particular risk of being damaged during construction works. This can be from the creation of accesses, demolition, clearance and excavation works or poor management and supervision of the construction itself. Officers are particularly concerned about the trees in neighbouring gardens which are close to the site boundary. You would need to demonstrate that excavation close to these trees would have an acceptable impact.

You should provide a tree survey and arboricultural assessment at an early stage to determine the feasibility of the proposed development. This examination should be presented as part of pre-application process rather than at application stage. It is important the tree survey / arboricultural assessment are undertaken at an early stage to ensure their findings can properly influence the design process.

Mayor of London's Crossrail CIL and Camden's CIL

The proposal would be liable for both the Mayor of London's CIL and Camden's CIL as the development increases the number of residential units. The Mayoral CIL rate in Camden is £80 per sqm and Camden's CIL is £644 per sqm for residential (Zone C). The CIL would be calculated on the uplift in floorspace.

Planning performance agreement

A Planning Performance Agreement (PPA) provides a project management framework and timetable within which to carry out the various stages of progressing the scheme to the submission of a valid application and the potential completion of a Section 106 Agreement and issuing of planning permission.

A PPA does not guarantee a grant of planning permission and officers' recommendation for approval would be dependent upon the resolution of the issues identified in this letter. However the PPA identifies a collaborative approach to achieving a positive outcome and aims to improve the quality of the decision making process, as opposed to the speed of decision.

A PPA is considered appropriate in this instance due to the complex nature of the development proposals and the need for a number of issues to be resolved in pre-application discussions prior to formal submission.

The fee for a PPA is £13,120 inc VAT. This does not include any additional follow up pre-app meetings for which the fee would be £2601 inc VAT.

Conclusion

As the Council regards self-contained housing as the priority land-use of the Local Plan, the principle of providing flats is supported. However, this remains subject to demonstrating that there is no demand for the existing use and its loss would not adversely impact on protected groups.

Subject to the submission and review of a Whole Life Carbon assessment, it is expected that demolition and rebuild will achieve the best outcomes for the site in terms of efficiency of layouts and design.

The height and scale of the proposed development appears acceptable and the form and design appears generally sympathetic to the surrounding context. However, officers consider that a different design solution might work better in terms of addressing neighbouring amenity and providing good quality accommodation. The detailed design and form of the development should be agreed via an iterative approach in further discussions with the Council.

Taking account of the character of the development and site constraints, it is considered that affordable housing should be provided on site. The provision

of onsite affordable housing is a policy requirement which will need to be resolved prior to the submission of a planning application

There are a number of large trees in neighbouring gardens. Therefore you should provide a tree survey and arboricultural assessment as part of pre-application process to determine the feasibility of the proposed development.

Particular care will need to be taken where the site adjoins 83 Belsize Park Gardens to ensure that any amenity impacts are minimised. It is also not clear who uses the communal garden and you should provide details of who has access to this area. Who uses the communal gardens space will impact on how overlooking over this part of the site will need to be managed.

The Council would welcome and recommend continued dialogue with a view to agreeing a scheme prior to a formal application. A planning performance agreement would provide a project management approach for the resolution of the issues highlighted in this letter and is recommended as the best way forward.

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

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 5262.

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

Yours sincerely

David Peres da Costa
Senior Planning officer
Planning Solutions Team