Fergus Wong
Camden Planning Solutions Team

8 August 2022

Re: 12 Pilgrim's Lane, Planning Reference 2022/2398/P

Dear Fergus,

The Forum has reviewed the application and is concerned about the loss of garden and potential impact on the biodiversity corridor from the side extension, extensive terracing, and new hard landscaping in the rear garden, contrary to **Policy NE3 (1)** of the Hampstead Neighbourhood Plan (HNP). In the pre-planning advice, Camden officers note that no. 12 has both a rear garden and landscaped frontage, both with numerous trees, and advise that "no harm to the well-being of trees of significant amenity value would be supported". The line of trees seen in the satellite photo below running between Pilgrim's Lane and Downshire Hill is identified in the HNP as a biodiversity corridor and an historic tree line (see attached document).

The excavation under the new extension would take place within the root protection zones of several trees, including a 16m tall ash (T12) on the historic tree line. The new side extension and pool would extend at one point to merely 2.2m from the boundary with 4 Downshire Hill that is part of the historic tree line, the paved terrace reducing this to 1.3m. This is contrary to **Policy BA1 (3)** of the HNP: Local requirements for Basement Impact Assessments:

Policy BA1 3. Basement developments under gardens should leave a minimum distance of 15m from any veteran tree or from a boundary that is an historic tree line (see Map 5 for details of both), unless it can be demonstrated that any harm to the trees would not be significant or could be mitigated.

The proposed terraces wrapping around the rear of the property and additional paving would erode the back garden still further, leaving only a small triangle of a garden, little more than roughly 30m². One can see from the satellite photo below the extent of the current garden wrapping around the property.

The Forum would advise that the current proposal be amended to lessen the impact on trees, habitat, and garden, in accordance with **Policy NE2** and **Policy NE3** (1, 2 and 3). Policy NE2 states that development will protect trees that are important to local character, streetscape, biodiversity and the environment. **Policy NE3** (2) identifies this line of trees both as a biodiversity corridor and an historic tree line. Despite the extensive proposed garden loss, no baseline ecological appraisal and species surveys have been performed according to **Policy NE3** (4).

Removing the rear hard landscaping and adopting mitigation measures or reducing the size of the extension might help.

Energy efficiency and surface run-off mitigation

We note that the existing borehole descriptions and data have been ignored in favour of gross summary desktop statements about 'London Clay' and perched water. The applicant appears not to have been undertaken further exportation regarding this site's specific ground permeability and potential for groundwater surging during heavy rainfall. This is contrary to Camden's Guidance for subterranean development 7.2.3. para 291-294.

Number 12 Pilgrim's Lane is located at the bottom of Kemplay Road whose surface run-off has contributed to flooding in the past, including most recently in July 2021 (see attached article about the serious flooding of South End Green and the local contour map).

As mitigation, we suggest the applicant consider a combination of vertical and horizontal ground source coils installed principally beneath the building footprint and incorporating attenuation tanks and wells, which could help capture surface run-off and groundwater from storm surges.

Parking

Camden has advised the applicant that expanding the car parking space would not be supported. We cannot determine from the plans whether the paving in the front could be used for additional parking.

We include a photo to show that the front paved area is not currently used for parking and should not be developed in a way to support additional parking.

Sincerely,

Alex Nicoll





Site of side extension

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