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London Borough of Camden
2nd Floor, 5 Pancras Square
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London
WC1H 9JE

20 February 2023

Ref: 23/020 – JM/HA/RE
via EMAIL

Dear Sir / Madam,

REQUEST FOR PRE APPLICATION ADVICE – MEDIUM DEVELOPMENT CATEGORY

134 GREENCROFT GARDENS, 3 WESTCROFT COTTAGE, LONDON, NW6 3PJ

Iceni Projects Limited ('Iceni') is pleased to submit this request for pre-application advice in relation to 134 Greencroft Gardens, 3 Westcroft Cottage, London, NW63PJ (the 'Site') on behalf of our client and the Applicant Mr and Mrs Squire.

Pre-application advice is sought for demolition of an unlisted residential building and store in a conservation area to provide a lifelong family home for the client and his family who are the existing residents on the Site, replacing the existing dwelling with a high quality designed and more energy efficient 2 storey, with a set-back 3rd storey, dwelling and additional 2-storey annex space, alongside associated amenity space ('the Proposed Development').

The pre-application package which has been submitted includes this pre-application cover letter and the following documents and plans:

Table 1: Pre-application submission documents

Document	Consultant
Covering Letter (February 2023)	Iceni Projects
Pre-Application Design Document (February 2023)	Holland Harvey Architects
Drawings: <ul style="list-style-type: none">Existing Block Plan: 22028-0000Ground Floor Plan - Existing: 22028-0100First Floor Plan – Existing: 22028-0101Second Floor Plan – Existing: 22028-0102Section AA – Existing: 22028-0200Section BB – Existing: 22028-0201Elevation 01 & 02 – Existing: 22028-0300Elevation 03 & 04 – Existing: 22028-0301Elevation 05 & 06 – Existing: 22028-0302Ground Floor Plan – Proposed: 22028-1100	Holland Harvey Architects

<ul style="list-style-type: none"> • First Floor Plan – Proposed: 22028-1101 • Loft Floor Plan – Proposed: 22028-1102 • Site Landscape Plan – Proposed: 22028-1103 • Section AA – Proposed: 22028-1200 • Elevations - Main House – Proposed: 22028-1300 • Elevations - Annexe – Proposed: 22028-1301 	
Accommodation Schedule	Holland Harvey Architects
Energy and Sustainability Statement (January 2023)	Green Tiger Sustainability
Tree Survey and Arboricultural Impact Assessment (December 2022)	GHA Trees

In line with pre-application guidance, a fee of £4264.69 (including VAT) will be paid to the Council upon provision of payment details and pre-application reference number from the Council.

The Site and Surrounding Context

Site Description

The Site is a back land residential plot set back from the residential street of Greencroft Gardens, accessed via Westcroft Mews. The Site comprises an existing 3 storey residential dwelling and single storey store building within an area of hard landscaping. The quality of this hardstanding area is not of a good quality and does not add to the character of the area. Photographs of the Site are included with the Pre-Application Design Document.

The Site is bound immediately to the north, west and east by residential rear gardens of those properties located on Canfield Gardens, Priory Road, and Greencroft Gardens. The south of the Site is also bounded by rear gardens of properties on Greencroft Gardens and the access road, via Greencroft Gardens Mews. The Site is significantly screened on the neighbouring boundaries by existing vegetation to the north and west.

The local urban context is characterised by residential properties of varying architectural styles of three and 4 storey buildings including flatted development on Priory Road and Greencroft Gardens. Greencroft Garden Mews comprises an eclectic mix of mews type buildings which step down in scale northwards away from Greencroft Gardens.

The Site has a Public Transport Accessibility Level (PTAL) of 5, with a number of underground and overground stations within a 10-minute walk including South Hampstead and Finchley Road. There are also several bus stops on Finchley Road to the East and the B510 to the west, providing regular services to Waterloo and Victoria and also towards Cricklewood and Willesden.

The Site is within the South Hampstead Conservation Area ('the SHCA'. The existing dwelling is not identified to be a 'building of local interest'. However, the location of the Site is amongst other unlisted buildings which are identified as positive contributors to the SHCA in Supporting Map 9. South Hampstead CA Townscape of the SHCA Appraisal and Management Strategy.

The Environment Agency Flood Risk Map for Planning shows that the Site is located in Flood Zone 1, indicating that it has a low probability of flooding.

Site Designations and Planning History

The Camden Development Plan comprises of:

- The Camden Local Plan (July 2017);
- Policies Map; and
- The London Plan (March 2021).

There are also a number of Supplementary Planning Guidance (SPG) documents which provide further detail on a number of relevant topics, such as Amenity (January 2021), Design (January 2021), Energy efficiency and adaptation (January 2021), Housing (January 2021), and the South Hampstead Conservation Area Appraisal (February 2011).

In addition to the Local Policy, the Proposed Development should be considered against the National Planning Policy Framework (July 2021), which has a presumption in favour of sustainable development and encourages the use of previously developed land.

Planning Designations

The Site is not allocated for a specific use within the Local Plan. Camden's Local Plan (2017) shows that the Site is subject to one policy designation – the SHCA.

Relevant Planning History

A desk-based review of the Council's online planning records, identifies that there is limited information on the historic applications for the Site. The records show that there have been various applications for the neighbouring mews properties and for the installation of a gate at the beginning of the mews driveway, granted in 2016.

Given the limited history of the Site available, and the existing use as a residential property, it is considered that the planning history is not likely to have a material impact on the redevelopment of the Site for a residential scheme.

Surrounding Planning History

Given the predominantly residential nature of the surrounding context there are limited notable recent planning applications, however it should be noted that there are a number of recent approvals for rear single storey extensions on Greencroft Gardens.

Proposed Development

The Proposed Development is sought by the Applicant to create a lifelong family home, providing an uplift in space within the home as well as an annex house for the Applicant's relatives to stay in when they visit. The Annex house will remain under the Applicant's ownership and is intended to be ancillary to the main dwellinghouse.

The Proposed Development seeks the demolition of the existing single dwelling on the Site and store building to allow for the development of 2-storey, with set-back 3rd storey dwelling (216 sqm) and a 2-storey annex house (101 sqm) for family relatives.

The Proposed Development consists of the following elements, further detail of which is provided in the Pre-application Design Document, prepared by Holland Harvey Architects, accompanying this submission.

Planning Benefits

The planning benefits of the Proposed Development include the following:

- Development of an underutilised brownfield site for residential self-build floorspace to support the needs of the Applicant and their family;
- High quality residential build which reflects the local vernacular and meets nationally described housing standards;
- Landscape strategy to provide suitable amenity space and boundary treatments on the Site;
- 12 sqm sedum roof over the annex and secure cycle store;
- Ground level planting/ grass area of 46sqm;
- Retention of existing magnolia tree on the Site;
- Provision of external amenity terrace on the main building including 7sqm of planting;
- Biodiversity benefits through a net gain of 29sqm of urban greening;
- Improvement in the energy credentials on the Site and reducing emissions through advanced building fabric, highly efficient services, investigating heat networks and through the use of renewable energy technology;
- Provision of two secure and covered cycle parking spaces; and
- Covered and secure bin and recycling and cycle storage (two cycle parking spaces).

Key Planning Considerations

Principle of Residential Use

Demolition of Existing Dwelling

The Applicant wishes to demolish the existing residential building and store on the Site to accommodate the Proposed Development. The overall principle of demolition is not resisted in the Local Plan. However, Local Plan Policy CC1 'Climate Change Mitigation' part (e), does seek proposals for demolition to demonstrate necessity.

The Proposed Development for the Site seeks to demolish the existing building with a current EPC rating of F in order to provide a sustainable and efficient home for the Applicant's family. Adaptations to the existing building do not meet the Applicant's needs and more importantly, the existing dwelling suffers from subsidence and it is anticipated that this problem will only get worse should alterations be made to the existing building. As such a full redevelopment is the most suitable approach to development.

Whilst the 'embodied' carbon emissions of the construction works will be higher than a refurbishment/extension option, it is anticipated that the new dwelling and annex house will have lower carbon emissions in use, and over the buildings lifecycle the properties will be lower carbon, alongside all other sustainability and efficiency benefits of new buildings.

For any future Planning Application, an Energy and Sustainability Assessment, a Whole Life Carbon and a Pre-Demolition audit will be undertaken.

It is also the intention of the Applicant to ensure that the quality of life for occupiers and neighbours is protected. As such, the demolition of the building will be carefully considered in terms of noise and air pollution as well as the access arrangements for construction vehicles. As such, a Construction Management Plan will be prepared for any future Planning Application.

Proposed Residential Use

The Site accommodates an existing residential property, in use by the Applicant. In line with the aspirations of the NPPF and London Plan, the Council recognises in Local Plan Policy G1 'Delivery and location of growth' the limited availability of development land in London which means that new housing on brownfield sites within sustainable locations is a priority. Furthermore, London Plan Policy H2 'Small sites' states that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) in order to support those wishing to bring forward self-build housing.

The Proposed Development is exactly the sort of development the policy promotes given that it is well located (PTAL 5), in walking distance to shops and services of Finchley Road Town Centre, is by definition a small site (the Site is approximately 0.02 hectares) and optimises a previously developed site for a residential self-build project.

It is also noted in the Camden Local Plan (2017), that Local Plan Policy H1 'Maximising Housing Supply' and Local Plan Policy H3 'Protecting existing homes' seek to maximise housing supply within the borough, ensuring that there is no net loss of residential floorspace. The Site delivers an uplift of 195 sqm in residential floorspace on the Site to meet the needs of the Applicant and his family. Additionally, Local Plan Policy H6 'Housing choice and mix' looks to secure a variety of housing, including for people who wish to build their own home, whilst ensuring that high quality homes are delivered through development.

Accordingly, the use of the Site for residential accommodation meets the aspirations of national and local planning policy and guidance. Therefore, it is considered that the proposed use as a continued single-family residential dwelling, with annex house, is acceptable in principle on the Site.

Design

The design of the Proposed Development has been developed by the project team in response to the brief of the scheme, whilst reflecting the relevant policies of the Local Plan and London Plan.

The Pre-Application Design Document provides details on the design rationale for the Proposed Development and demonstrates the high quality of design and sustainability standards which the Applicant is seeking. The document includes an analysis of the local context, identifying importantly, the architecture and materiality of the SHCA and showing how the design responds to the existing character of the area.

Local Plan Policy D1 'Design' refers to the necessity for high-quality design, which is responsive to local context whilst also encouraging sustainable design, incorporating best practice to mitigate against climate change. Similarly, to the ambitions of the Local Plan Policy D1, the Design SPG (January 2021) seeks design excellence for developments in Camden, and notes that high-quality, efficient design should be supported, especially where it responds to the existing context and streetscape and also the verdancy of sites, preserving and improving landscaping where possible.

Given the complete redevelopment of the Site, there is opportunity for the design to respond to the local context, which it seeks to achieve through proportion, elevational treatment, and materiality.

The SHCA Character Appraisal and Management Strategy (February 2011) describes the special character of the Conservation Area and the predominantly Victorian style of the existing residential urban context. Local Plan Policy D2 'Heritage' notes the Councils intention to preserve, and where

appropriate, enhance Camden's rich diverse heritage and appearance. Notably also, Local Plan Policy D2 seeks to preserve trees and garden spaces which contribute to the character of the conservation areas.

As such the design of both the residential dwelling, annex house and landscape strategy responds to these policy requirements creating elevations which respond to the proportions and fenestration of the surrounding context and also responds to the materiality of the SHCA. Additionally, the landscape strategy seeks to maintain the verdancy of the Site, including retention of the existing magnolia tree, and increase the greening of the Site to preserve and enhance the existing appearance and increase on site biodiversity benefits.

In line with Local Plan Policy CC1 'Climate change mitigation', a sustainable design approach has been taken to meet the sustainability aspirations including achieving energy efficiency and minimising carbon dioxide emissions through modern methods of construction.

London Plan Policy D3 'Optimising site capacity through the design-led approach' states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The Proposed Development seeks to make the best use of the land whilst providing a high-quality build that will stand the test of time and respond positively to its surrounds.

Scale and Massing

London Plan Policy GG2 'Making the best use of land' states that development must enable the development of brownfield land, utilise small sites and prioritise well-connected locations near to public transport. The London Plan takes a flexible approach to density, setting out that development proposals must make the most efficient use of land and be designed at the optimum density, taking into consideration the surrounding design and character, as well as the PTAL and access to local services. The Proposed Development seeks to make optimum use of the Site whilst being sympathetic to the character of the area and amenity of neighbouring properties.

The Site accommodates an existing 2-storey, with pitched roof, residential dwelling, on the eastern side of the Site. The Proposed Development seeks to broadly align with the footprint of the existing building, siting the main dwelling to the east of the Site and sitting at a similar part-2, part-3 storeys. The Proposed Development pulls back from the eastern boundary with the rear gardens of Greencroft Gardens, focusing the massing on the access courtyard for the property to maintain existing privacy for the neighbouring property.

The annex building is of a contemporary design and creates a modest massing, including chamfered edges to soften the boundary relationship to both the north and south of the annex.

The surrounding area is characterised by a range of heights with the two to three storey mews cottages to the south-west of the Site, and the three to four-storey properties on the surrounding residential streets dominating the context, with larger, more recent buildings, such as flatted West End Court, sitting at four storeys. The main dwelling sits comfortably within these height ranges, whilst the annex is designed to step down in scale from the existing row of mews properties to integrate within the existing townscape.

The siting and massing of the Proposed Development remain broadly consistent with the existing massing on the Site. The design has also sought to consider the local context, the existing building and the relationship with neighbours.

Overall, the scale and massing of the Proposed Development is considered appropriate for the Site.

Residential Quality

The Proposed Development comprises a residential dwelling with three double bedrooms, and the annex house comprises two double bedrooms. All the proposed spaces exceed the nationally described space standards.

The overall design of the buildings have sought to create a high-quality design including skylights to maximise natural light into the property, whilst also conserving the privacy of both the future residents and those residing in the existing neighbouring properties.

The design standards outlined in the Camden Housing SPG (January 2021) have been considered in the evolution of the design and it is therefore considered that the residential quality is of a high standard for this single dwelling and annex house.

Residential Amenity

Local Plan Policy A1 'Managing the impact of development' seeks to ensure the protection of occupiers and neighbours of developments. Importantly it seeks to protect amenity and requires mitigation where necessary to minimise adverse impacts. Local Plan Policy A1 refers to factors such as, visual privacy, daylight, transport and access, impact of construction and noise, all of which have been considered in the evolution of the Proposed Development and will continue to be explored via technical assessments prior to the submission of any future planning application which will include a Daylight and Sunlight Assessment, a Noise Assessment, and a Construction Management Plan, to ensure that amenity is preserved.

The Site currently accommodates a large area of low-quality hard standing. The new design seeks to incorporate a soft landscaping strategy into the scheme, increasing urban greening opportunities at both the ground floor, terrace and roof level. The Proposed Development is in accordance with Local Plan Policy A2 'Open Space', Part o, which seeks to ensure opportunities of private amenity provision to secure open space and remove the pressure on the borough's network of open spaces.

It is also the intention of the Proposed Development to provide a roof terrace amenity space for the main dwelling, accessed from the third-floor lounge area of the dwelling. The roof terrace is orientated westwards towards the Site's courtyard space, directing views away from the neighbouring gardens.

The external amenity spaces have been designed to comply with the Camden Amenity SPG (2021) which covers the key amenity issues, such as overlooking, privacy, daylight, and sunlight, among other points. Importantly it notes that the amenity of both the future occupants of a development and the existing neighbouring properties should be preserved.

Camden's Amenity SPG (2021) also identifies that the separation distances between windows of habitable rooms directly facing each other, should be preserved, and maintained at 18 metres where possible, to protect privacy and overlooking. The Proposed Development remains a considerable distance from both the residential dwellings on Greencroft Gardens and Canfield Gardens, as well as the mews properties.

The two-storey annex building is situated on the west of the Site. It sits closer than a distance of 18 metres to the main residential dwelling. However, it is considered that as an ancillary use to the main dwelling, flexibility can be applied to the separation distances.

There are no instances where the windows of the Proposed Development sit opposite those of other neighbouring habitable rooms and as such the Proposed Development is considered to be effective at preserving overlooking and privacy and is acceptable.

Affordable Housing

Local Plan Policy H4 'Maximising the supply of affordable housing' states that affordable housing should be sought from all developments that *provide one or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA*. It is noted however in the supporting text of this policy that *the council will not seek a contribution from schemes that simply extend or replace an existing home*.

The text goes on to say that *this will help us to expedite replacement of homes that are subject to damage or disrepair, and extension of homes for families that are growing or need space to care for an elderly or disabled relative*.

The Proposed Development seeks to provide a replacement self-build home on the Site and the additional floorspace and annex house is for the Applicant's family and parents. The annex is not an additional dwelling and is ancillary to the main dwelling house.

It is considered that an affordable housing contribution does not apply, which is supported by the Local Plan policy position.

Car and Cycle Parking

The Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in areas with good accessibility, encouraging efficient bike storage, pedestrian facilities, and access.

London Plan Policy T6 'Car Parking' states that car-free development should be the starting point for all development proposals that are well connected to public transport. The maximum car parking standards are set out in Policies T6.1 – T6.5 and are determined by the PTAL.

As the Site has a PTAL output of 5, the following car parking standards apply:

- Residential car parking:
- Car free allocation.
- Residential cycle parking:
- 2 spaces per dwelling (larger than 1-bedroom)

The Proposed Development removes the onsite car parking space and will maintain the existing on-street parking permit the Applicant holds for one car vehicle. Occupiers of the Annex will utilise public transport.

Two secure and covered cycle parking spaces are provided for on the Site to house the Applicant's bicycles which also supports policies of the Local Plan and London Plan.

Biodiversity

Local Plan Policy A3 'Biodiversity' seeks to protect and enhance biodiversity throughout the borough, protecting garden spaces, encouraging biodiversity benefits in development, and resisting the loss of trees and vegetation of significant amenity, historical, cultural or ecological value. The Camden Design SPG (January 2021) and the SHCA Appraisal, similarly, recognise the importance of preserving green landscaping and identifies the Site as within a dense continuous tree cover.

The Proposed Development will retain the magnolia tree on Site. The Proposed Development seeks to increase and enhance the biodiversity on Site by removing the existing poor quality hard standing to the front of the property and replacing this with a soft landscaping strategy which seeks to provide

a range of plant species to encourage biodiversity on the Site, as well as at terrace and roof level via planting and a sedum roof.

Permeable paving leading up to the main house and annex house will be interwoven with vegetation to increase biodiversity benefits. In total the Proposed Development achieves a net gain of 29sqm of urban greening compared to the existing situation.

An arboriculturist has assisted the project team in identifying the trees present on Site and how to respond to these to protect and preserve them. The foundation of the annex sits within the root protection area of an existing Magnolia tree on the north boundary within the demise of the Site. A tree protection strategy has been developed comprising of a foundation system of employing mini piles in conjunction with ground beams as set out in section 3 of the Pre-application Design Document and the arboriculturist's report.

Climate Change Mitigation and Energy and Sustainability

The Proposed Development intends to provide an efficient and sustainable family dwelling on the Site, integrating key principles to mitigate against climate change, reduce carbon dioxide emissions, and achieve sustainability goals of both Local Plan Policy CC1 'Climate change mitigation' and national policy.

A high-level Energy and Sustainability Statement accompanies this pre-application submission and sets out how the design will seek to address energy reduction, overheating, water use and reducing whole life carbon.

Water and Flooding

The Site is located in Flood Zone 1 and the Proposed Development is a minor development. As such a flood risk assessment is not required for the scheme. However, the London Plan Policy SI 13 'Sustainable drainage' states that development proposals should ensure that surface water run-off is managed as close to its source as possible in accordance with the drainage hierarchy. Thus, permeable paving and SUDS will be used for the external paved areas, to reduce rainwater runoff.

Air Quality, Noise and Vibration

The Proposed Development will seek to respond to Local Plan Policy CC4 'Air Quality' to ensure the impact on air quality is mitigated. An Air Quality Assessment can accompany a future planning application to set out mitigation against dust created through onsite demolition.

Noise and vibration during demolition and construction of the development will be controlled through the mitigation measures set out in a submitted Construction Management Plan and Noise Impact Assessment. This will comply with Local Plan Policy A1 'Managing the impact of development - demolition existing building and policy requirements on demolition and construction management' and A4 'Noise and Vibration'.

Waste and Recycling

Local Plan Policy CC5 'Waste' will be met within the Proposed Development, with appropriate waste and recycling storage provided in accordance with policy.

CIL

It is considered that self-build exemption will apply, and no CIL contribution will be required subject to the necessary qualifying requirements being met.

Validation Checklist

Provided below is a validation checklist of the documents we anticipate will need to accompany a future planning application for the Proposed Development.

A discussion with officers will be sought at the pre-application meeting to confirm this list is suitable and the Applicant requests that officer's pre-application written response letter also details the required documents required to accompany a future Planning Application based upon the proposals presented to them.

Validation Document Required
Cover Letter
Planning Statement
Completed CIL Liability Assessment form
Completed Application Forms
Completed Ownership Certificates
Design and Access Statement
Existing and Proposed Drawings (including Plans, Sections and Elevations)
Heritage Statement
Air Quality Assessment
Construction Management Plan
Daylight and Sunlight Assessment
Energy Statement
Sustainability Statement (including SuDs strategy)
Tree Survey and Arboriculture Report

Summary

Overall, this Site and the Proposed Development, present an excellent opportunity to deliver a high quality and truly sustainable lifelong family home on an existing residential site. The design is well considered and appropriately addresses the relevant policy and guidance.

I trust the above information is sufficient to assist officers at Camden in considering the proposal set out. We would welcome the opportunity to meet with officers as soon as possible to discuss the proposals in further detail.

Please do not hesitate to contact Helen Allan (07795 447 976 / hallan@iceniprojects.com) or my colleague John Mumby (07887 294 390 / jmumby@iceniprojects.com) should you require any additional information.

Yours sincerely,

A handwritten signature in black ink that reads "Iceniprojects Ltd." in a cursive, slightly slanted script.

Iceniprojects