

Objection to retrospective planning application for replacement of the front hardstanding to 251 Goldhurst Terrace.

Dear Sir/Madam,

I object to the proposed replacement hardstanding in the 'front garden' of this property for the 2 following reasons:

1) No attempt to restore visual amenity to a level at least as good as how it was with the previous hardstanding, in keeping with at least some of the typical Conservation Area characteristics.

No attempt has been made to align with the key characteristics of typical lush green front gardens with low brick front boundary walls overtopped by hedges or railings, as frequently described in the South Hampstead Conservation Area (SHCA) Character Appraisal & Management Strategy document (and its predecessor Swiss Cottage Conservation Area 'Design Guide' description).

Whilst much of the rhetoric of the lengthy, so-called 'Heritage Statement' quite rightly, but actually hugely disingenuously, goes to great lengths to list and extol the many attractive features and protected characteristics of the SHCA, it then goes on to say, effectively, that none of these attractive special characteristics and considerations should apply to the proposed (but actually already built) unimaginative replacement for the previous hardstanding at the subject site!

Effectively it is asserting/arguing that, because there was already a relatively unimaginative and mundane hardstanding there before, then it is acceptable to replace it with an even more mundane and still less imaginative, tediously-uniform, new hardstanding, with even less soft-landscaping, no new greenery, no permeable paving and almost no characteristic low front walls with any overtopping hedge!

The 'Heritage Statement' therefore seems to be effectively saying that the subject property should (for some unspecified reason of historic privilege?) be entirely exempted from the obligations of in any way conforming to the Conservation Area Appraisal document requirements for 'front gardens'. The so-called 'Heritage Statement' even quotes from the Appraisal document several times about the importance of greenery and soft-landscaping in (proper) 'front gardens' along with low front boundary walls topped with hedges or railings, and the deprecation of paving them over for parking, namely:

The South Hampstead Conservation Area Character Appraisal and Management Strategy (February 2011)

2.3 Section 3.0 of the Appraisal is headed 'Assessment of Special Interest' and, under sub-heading "Summary Definition of Special Interest" the first three paragraphs set out the significance of the conservation area, as in the quote below:

3.2 One of the most prominent features of the area is vegetation – both to the front and rear of properties. Green front gardens demarcated by low or ornate garden walls topped with hedges contribute strongly to the area's character. Building lines of the residential streets are generally set-back from the pavement which, with the boundary landscape treatment and many mature specimen trees, are essential in giving the streetscape its attractive and serene quality. [red highlighting emphasis added]

3.3 The open green spaces of the private rear gardens and the communal gardens between terraces of houses remain undeveloped and are a very important amenity for local residents – both for those who look onto the spaces and those who have access to them. In some cases they are managed as natural wildlife spaces, in others as more formal parkland. These copses and gardens are a haven for wildlife with areas set aside as natural habitats, as well as picturesque herbaceous borders, flowering shrubs, fruit trees, communal vegetable plots and a number of mature trees. These private spaces, along with the green front gardens, are vital in providing wildlife corridors, enhancing biodiversity and reducing flood risk as well as in preserving the attractive, tranquil character of the conservation area [emphasis added]

And:

2.16 The Appraisal discusses Article 4 Directions from paragraph 7.4. It is here that we find the reason for the introduction of the Article 4 Directions in the conservation area:

7.4 In recognition of the issues outside planning control detailed survey work was undertaken in 2008/9 to assess the loss of features and make recommendations to halt erosion in the conservation area. The survey showed that 23% of boundary walls had been lost, and 43% of front gardens had been paved over for parking [...]

7.5 To stop this erosion, and give the opportunity for reinstatement of historic features an Article 4(1) Direction was made on the majority of properties within the conservation area in July 2010 [emphasis added].

And:

2.22: Section 13.0 is headed 'Management of Change'. Under the sub-heading 'Front Garden Spaces' paragraph 13.45 states:

"Loss of front garden spaces can significantly detract from the appearance of the area and further harm is caused by the paving over of green spaces, loss of boundary walls and hedges, the erection of inappropriate walls, railings and gates and the visual intrusion of the cars themselves parked within the former garden. Unfortunately a significant number of gardens and boundary walls have been removed in the area, making the retention of those surviving, and the reinstatement of those lost, a high priority [emphasis added]."

And:

The Swiss Cottage Conservation Area Design Guide

2.25 Page 3 of the Design Guide poses the question "Why is Swiss Cottage special?" and the answer states:

"One of the most prominent features of the area is lush green front gardens, with ornate garden walls topped with hedges or railings which give the area an attractive and serene quality. The gaps between properties and views into mature gardens contribute significantly to the area's particular character [emphasis added]."

2.26 On page 10, section 7. Is headed 'Front Gardens' and states:

"Green front gardens are vital not only in preserving the attractive, tranquil qualities of the conservation area, but also in providing wildlife corridors, enhancing biodiversity and reducing flood risk. Planting more soft landscaping – grass, flowers, shrubs and small trees – in front gardens, and reinstating it where lost, helps to ensure that Swiss Cottage remains a healthy, natural and beautiful place to live.

The creation of a hard surface at the front of a property, or the side of a property which faces the road, now needs planning permission and will be resisted. Vegetation in front gardens should be retained and replanted where lost. Original geometric tiled paths and landscaping materials such as York stone should be retained and repaired [emphasis added]

In short, if this property today still had a proper front garden in line with the true character of this Conservation Area, with no off-street parking spaces, it would, (following the imposition of Article 4 Directions in 2010) now be highly unlikely to receive planning consent for the entire front garden to be removed and paved over with impermeable hardstanding for 2-3 vehicles to park there. This is in view of the obvious visual harm and loss of greenery and habitat and amenity, that this would cause to the Conservation Area.

Consent might possibly still have been given for a more tasteful and sensitive treatment of the front garden by covering at most 50% of its area with permeable hardstanding for 1 vehicle, and ensuring the compensatory provision of a generous amount of soft-landscaping with attractive and dense planting. There would likely also only be consent for a single dropped kerb/crossover, which thereby removes less parking space from the on-street Residents Parking allocation in an already under-provided area for Residents Parking. This would also allow for much more of the original low front boundary wall to have been retained (For a very relevant and exemplary Case Study - please see the very sensitive and tasteful (by comparison) front garden treatment at 166 Goldhurst Terrace NW6, done a few years ago).

In recognition of this historic privilege, and in order to duly acknowledge the visual amenity of this Conservation Area, the size of the replaced hardstanding should be sufficiently reduced so as to allow the re-planting of full boundary hedges to each of the side boundaries and the re-planting of several large attractive shrubs that were formerly along the front of the house, which now need to be replanted in reasonable-sized new beds in front of the two new lightwells (that were created following major basement excavation a couple of years ago). This will restore the soft –landscaping and greenery to something

approaching the situation with the previous hardstanding and greenery that was seemingly removed prior to permission being granted for its replacement.

A reduction in the width of the hardstanding of approx. 60cm on each side (to allow for a full-size hedge to be re-planted) and a reduction in depth of about the same (adjacent to the lightwells to allow shrubs to be re-planted) would restore the amount of soft landscaping and greenery back to approximately the same as it was before the previous hardstanding was removed and the basement was excavated and the large lightwells created.

It should also be noted that in both planning application ref. 2019/4236/P (for the installation of the front railings, gates and brick piers to the front) and application ref. 2016/6697/P (for excavation of a very large basement) the drawings clearly show the retention of both the hedges at the sides of the 'front garden' as well as the attractive shrubs planted either side of the front door in front of the bay window structures. So, even to achieve full compliance with each of these planning consents, this would require the re-provision of this level of soft-landscaping and appropriate replanting.

At the end of this document, some pictures and extracts from the above-referenced plans are included that clearly show the previously-made commitment for at least this level of soft-landscaping and planting around the 3 sides of the replacement hardstanding, as well as pictures of the current situation, that seemingly have not been included in the 'Heritage Statement' even though they are wholly material to the Case.

2) No attempt to mitigate surface water run-off in a flood-prone area causing aggravation of surface water run-off during heavy rain in an area already at risk of surface water and drain flooding

Despite this location being in the close vicinity of flood-prone areas that were subject to surface-water/sewer flooding in the various recent flood events (of 1975, 2002 and two separate flood events in July 2021), no attempt seems to have been made to mitigate rainwater run-off into the street gutters.

For example there has been no re-provision/re-instatement of any significant degree of soft-landscaping around the hardstanding capable of approximating to the rainwater absorption characteristics of a green-field run-off via an on-site soakaway drain. Nor does it seem that permeable block paving or a permeable surface treatment have been used, thereby accelerating the speed and volume of rainwater run-off into the public sewer at times of very heavy rain.

Instead, the very large new hardstanding appears to be draining only into the street gutters across the public pavement, and (from other submitted planning applications relating to the large basement excavation) it appears that the drainage of the floors of the two large new lightwells at the front (which have themselves removed a fair degree of previously generously-planted, water absorbing, soft-landscaping) is also directly into the main drain leading to the public sewer.

It is suggested that the nature of the surface of the new hardstanding be investigated in order to confirm that it is sufficiently permeable, approximating to green-field run-off properties, and to ascertain the direction of the slope/fall, so as to ensure that it drains to the sides into the soft-landscaping rather than to the public highway, where it will cause an avoidable extra load on the public sewer in heavy rain.

I would respectfully request that you consider whether actions to address these deficiencies/omissions in the replacement hardstanding should be secured for early delivery through appropriate conditions being included in any eventual approval.

Thank you for your consideration of the above.

Best regards,

E. Peel Goldhurst Terrace, NW6 3HN

Enc: Annex 1 : Illustrations and pictures in support of the above concerns

Appendix 1: The following pictures and diagrams are in support of the two above main objections.

The 'Heritage Statement' shows (on pages 10 (photo 1) and 11 (figure 1)) two pictures of the 'front garden' before both the cellar/lightwells were built, and the new hardstanding was constructed.

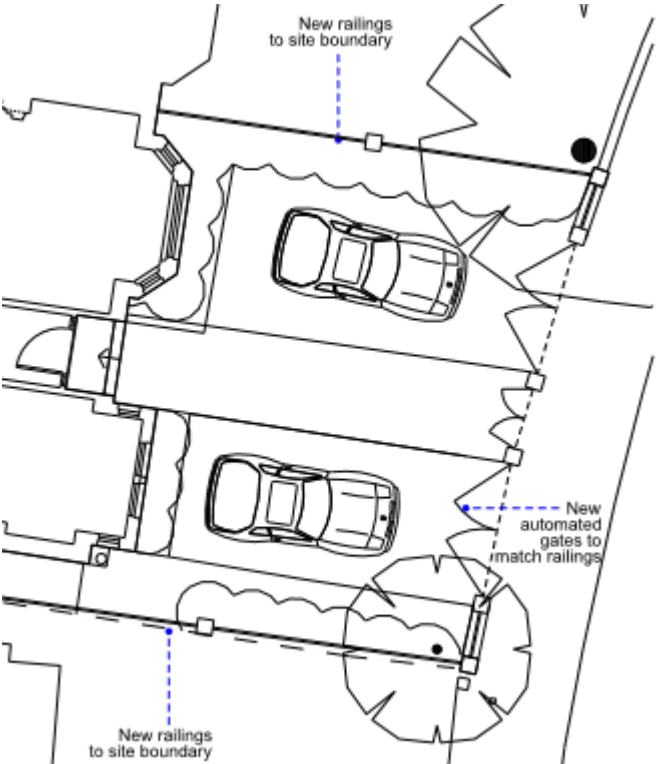
Unlike those two pictures in the 'Heritage Statement', the current 'front garden' has no soft-landscaping or planted vegetation whatsoever, except for about 0.5 sqm of bare soil around the tree at the very front left of the boundary (visible in the bottom-left picture on the final page).



Above: The new hardstanding in the 'front garden' appears to allow for no planting or soft-landscaping around its perimeter, unlike the hardstanding that it has replaced (see picture below). It is also not clear how/where the new hardstanding drains to (no evidence of a soakaway drain?), and there appears to be no differentiated central 'path' to the front door.



Above: The previous hardstanding allowed a generous margin on three sides for hedges (on either side) and large, attractive shrubs (in beds in front of the two bay windows near the house).



Above: An extract from application 2019/4236/P (for the installation of the front railings, gates and brick piers to the front) showing the then-existing (and proposed to be retained for that application) soft landscaping and generous/wide vegetation along each side boundary of the hardstanding area and in front of both the bay window structures. (Note: although this application substantially post-dates the earlier 2016 application for a large basement excavation including two large front lightwells, it does not appear to show the lightwells that were a part of the earlier application).

None of this soft-landscaping/vegetation is now present, but all is shown in the 'Photo 1' on page 10 within the 'Heritage Report' –apparently taken a few years ago and representing the 'before' situation. The

following extract from the Decision Notice for 2019/4236/P issued by Camden on 13th December 2019 also confirms that the side hedges are to be retained.

Currently the sides of the front garden are bordered by hedges. The proposal would aim to retain the hedges and include a line of railings and piers along the side. The height, dimensions and type of railings would match the front ones. The proposed railings would have simple detailing with traditional finials and bars, which are considered appropriate in the existing context.

Why has all the soft-landscaping and substantially-sized greenery been removed and with no stated intention to re-instate the hedges or the large shrubs in front of the bay structures? Note, the above diagram also shows some sort of 'path' between pavement and the front door, that is suitably differentiated in its surface treatment from the block/brick paving used for the hardstandings on either side. This was indeed a feature of the previous hardstanding, now removed, but seemingly this feature has not been replicated in the new version?

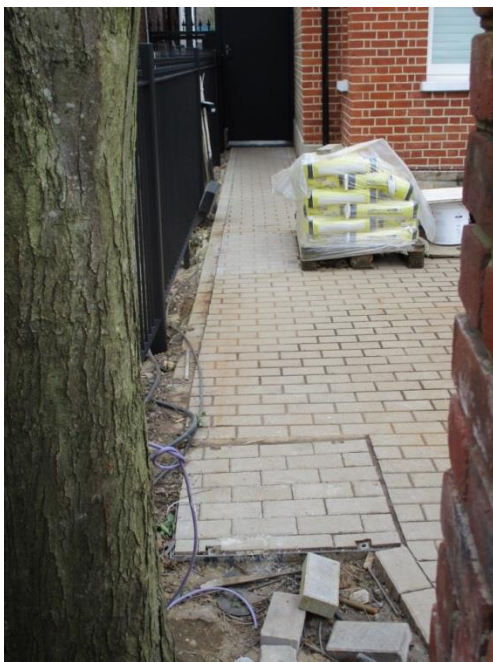


Above: The two extracts above are from plans/elevations provided with application 2016/6697/P (excavation of large basement with two front lightwells) and clearly show the intended re-planting of some small shrubs to the front of the house adjacent to the edge of the lightwell. This has not yet been done, and the paved area of the new hardstanding has encroached into the proposed planting area, and needs to be trimmed back by around 50—60cm from the lightwells in order to allow for this shrub planting.



Above: View of front garden in 2016 showing the former extensive hedges on both left and right-hand boundaries of the former hardstanding, as well as extensive tall shrubs and even a small palm-like tree in front of the left and right-hand bay window structures. None of this vegetation and soft-landscaping is present now (all was presumably removed when the basement was excavated) and should be required to

be re-instated so as to improve the visual amenity of the 'front garden' and comply with the key SHCA characteristics in the CA Appraisal document, and improve absorption of heavy rainwater run-off.



The three pictures above (taken in early March 2024) show the current replacement hardstanding in the 'front garden'.

The top picture shows no differentiation in surface treatment between the two parking spaces and the central path to the front door. This differentiation is clearly visible in the previous version of the hardstanding- please see the earlier pictures of the old hardstanding where cobbles define the parking spaces and larger block paving stones define the path. It also shows that no space has been left for soft-landscaping/re-planting adjacent to the two lightwells. This needs to be created by removal of a band of some 50-60cm of paving around the lightwells with re-planting to follow.

The bottom left picture shows the left-hand boundary with the new paving bricks/blocks coming right up to the fence on the boundary, with no room for a replacement hedge to be successfully planted. The bottom right picture shows the same lack of space for successful planting of a hedge on the right-hand-side boundary. Soft-landscaping space on both sides needs to be created by removal of a band of some 50-60cm of paving blocks on each side, with hedge re-planting to follow.