



APRIL 2024

Planning and Heritage Statement

75 Greencroft Gardens, London, NW6 3LJ

Iceni Projects Limited on behalf of
Cohabs

April 2024

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ON BEHALF OF COHABS

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75 GREENCROFT GARDENS, LONDON, NW6 3LJ

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1. INTRODUCTION

1.1 This Planning Statement is submitted to the London Borough of Camden ('the Council') on behalf of Cohabs ('the Applicant') in support of an application for full planning permission at 75 Greencroft Gardens, London, NW6 3LJ ('the Site').

1.3 Specifically, this application seeks planning permission for:

Installation of 5 no. rooflights to front, 5 no. rooflights to rear, 2 no. skylights to the main roof and replacement roof to an existing large HMO (sui generis)

1.4 75 Greencroft Gardens is a large 3-storey semi-detached house in multiple occupation ('HMO'). The existing quality of living accommodation is sub-standard and thermally inefficient, failing to make an efficient use of the generous loft space. The property is at risk of falling into a state of disrepair and requires a comprehensive refurbishment in order to improve the living conditions for future occupiers.

1.5 This application seeks consent for the installation of 5 no. conservation style roof lights to the front, 5 no. conservation style rooflights to the rear, 2 no. skylights to the main roof, associated conversion of the underutilised loft space and like-for-like replacement of the existing roof. These interventions would all serve the Applicant's ambition to improve the quality and thermal efficiency of the existing HMO.

1.6 This Planning Statement has been prepared by Iceni Projects and provides the planning case in support of this application. It assesses the proposals in the context of the relevant adopted planning policy and guidance at national, regional and local levels, together with other material considerations.

The Submission

1.7 This Planning Statement should be read in conjunction with the other documents submitted in support of this planning application. These documents comprise:

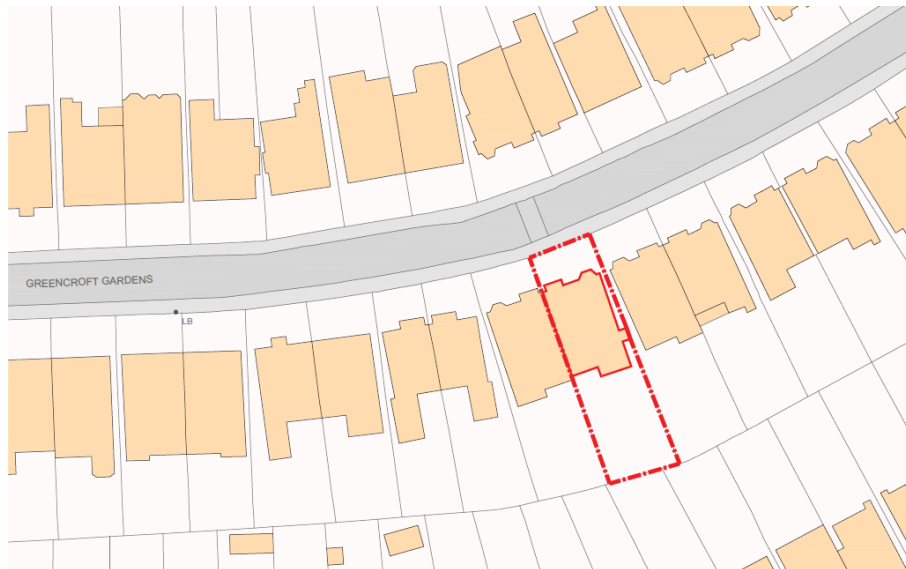
- Application Forms and Certificates of Ownership, prepared by Iceni Projects;
- Planning and Heritage Statement, prepared by Iceni Projects;
- Covering Letter, prepared by Iceni Projects;
- CIL Form, prepared by Iceni Projects;

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- Site Location Plan, prepared by Icen Projects;
 - Existing and Proposed Drawings, prepared by Nick Baker Architects;
 - Design and Access Statement, prepared by Nick Baker Architects.

2. SITE AND SURROUNDINGS

- 2.1 75 Greencroft Gardens lies in the South Hampstead ward, within the administrative boundary of the London Borough of Camden.
- 2.2 The Application Site contains a large 3-storey semi-detached HMO, with large bay window on ground and first floor and decorative gable end to the front. The property is characterised by a number of decorative features to the principal elevation, including sash windows with a stain glass top panel and an ornate metal porch. The property benefits from a large private amenity space to the rear.
- 2.3 The Site has an approximate area of 602 sqm and a Site Location Plan is provided at Figure 2.1.

Figure 2.1. Site Location Plan



- 2.4 The surrounding area is largely residential in character, with surrounding properties of similar scale and design to the application Site. The street scene features buildings of largely uniform design grouped in both semi-detached and detached pairings.
- 2.5 Many properties within the street have been altered at roof level through the addition of rooflights, dormers and minor increases to roof height to accommodate loft conversions. More recently, 59 Greencroft Gardens received planning permission for 5 no. rooflights to the front, 2 no. rooflights to the rear and 4 no. flat roof lights to the main roof amongst other alterations (PA Ref. 2018/5581/P). The proposals look to replicate this design which has previously been considered acceptable by the Council.

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- 2.6 The Site is one of the few properties along Greencroft Gardens that has not had the loft space converted and provided with rooflights. It is therefore currently incongruous with the prevailing character of the street at roof level.
- 2.7 The Site is located within the South Hampstead conservation area (previously the Swiss Cottage conservation area). The Site is not statutorily listed and there are no listed buildings within the immediate locality.
- 2.8 In terms of planning designations, the Site is subject to two Article 4 Directions including a borough-wide removal of permitted development rights for basement development and another removing certain householder permitted development rights within the conservation area boundary.
- 2.9 The Site benefits from a Public Transport Accessibility Level (PTAL) of 5, indicating good access to public transport. The Site is within walking distance of Finchley Road tube station and South Hampstead overground station. There are also numerous bus services operating close by along Canfield Gardens and Belsize Road.

Planning History

- 2.10 It is important to note that planning permission was approved at the application Site in 1946 (LPA Ref. TP32014/5984), prior to the Town and Country Planning Act (1948) for the sub-division of the dwelling into 3-self-contained flats. There is no evidence of this permission having been lawfully implemented on Site.
- 2.11 Following this application, planning permission was then refused in 1948 for the conversion of the dwelling into 7 flats (LPA Ref. TP32014/5323) due to issues with increased density.
- 2.12 In 1973, under CTP/H5/8/31/16138, planning permission was also refused for the conversion of 75 Greencroft Gardens into 5 self-contained units. This was refused due to the loss of the existing HMO accommodation which the Council considered should be retained in the area.
- 2.13 Since the application in 1973, the property has continued to operate as a sui generis large HMO confirmed and was granted an HMO licence on 12th May 2013 under notice reference number 7254.
- 2.14 It is also important to note that elsewhere in the Conservation Area, among other alterations, there is evidence of a number of dwellings where planning permission has been granted for rooflights to the front and rear. As mentioned above, this includes 59 Greencroft Gardens, which received planning permission for 5 no. rooflights to the front, 2 no. rooflights to the rear and 4 no. flat roof lights to the main roof, amongst other alterations (LPA Ref. 2018/5581/P).

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- 2.15 Also, of note elsewhere in the conservation area, a recent application was granted for roof alterations associated with an existing HMO at 110 Greencroft Gardens (LPA Ref. 2018/5981/P). This application seeks a similar level of intervention to these recently approved schemes.
- 2.16 It is noted that there are multiple other properties within the surrounding area which display roof lights to the front and rear, including but not limited to, 77, 73 and 69 Greencroft Gardens, and 92, 90, 86 and 84 Greencroft Gardens found opposite the application Site. There is no planning history associated with these interventions but it is understood that these were implemented under permitted development rights, prior to their removal via the Article 4 direction in 2010. Nevertheless, the approved roof lights are deemed to set a precedent for future interventions such as those proposed.

3. PROPOSED DEVELOPMENT

- 3.1 The development proposals at 75 Greencroft Gardens comprises the installation of 5 no. conservation style roof lights to the front, 5 no. conservation style rooflights to the rear, 2 no. skylights to the main roof, associated loft conversion and replacement roof.
- 3.2 The proposed development would allow for the conversion of the generous loft, in order to make a more efficient use of the currently underutilised space and provide a greater quantum of living accommodation for the residents of the HMO. The alterations would allow the dwelling to become more thermally efficient and therefore improve the existing standard of accommodation for future occupiers.
- 3.3 The proposed rooflights would be conservation style and would be flush to the front and rear roof slope. They would be aligned with the window arrangement to upper floors to maintain a sense of order with the host dwelling. The skylights to the top of the main roof would also be flush and located towards the rear elevation.
- 3.4 The replacement roof would match the design of the existing roof, with original tiles re-used where possible and decorative design features maintained. The replacement would involve a minor increase in the ridge height to accommodate a suitable floor-to-ceiling height and to match the previously altered roof profile of the neighbouring property, No. 73 Greencroft Gardens.
- 3.5 The development has sought to achieve the following objectives:
- Make a more efficient use of the existing floorspace to improve the quality of living accommodation for all future occupiers.
 - High-quality design which replicates surrounding alterations.
 - Respect for the heritage of the surrounding Conservation Area by using conservation style rooflights which do not alter the existing roof profile.
 - Maintain a good quality of residential amenity for surrounding residential properties.
 - Retrofitting the existing accommodation to allow for its continued long-term use.
 - Improve thermal efficiencies and insulation against heat loss to reduce carbon and greenhouse gas emissions associated with heating properties.

Description of Development

- 3.7 The proposed description of development is as follows:

Installation of 5 no. rooflights to front and 5 no. rooflights to rear, 2 no. skylights to the main roof and replacement roof to an existing large HMO (sui generis)

Land Use Area Schedule

- 3.8 Overall, the proposals would result in the provision of 589 sqm GIA of additional floorspace, a net increase of 98 sqm in overall GIA. An existing versus proposed land use area schedule is below.

Use	Existing sqm (GIA)	Proposed sqm (GIA)	Net Change sqm (GIA)
HMO (Sui Generis)	491 sqm	589 sqm	+98 sqm

4. PLANNING CONSIDERATIONS

- 4.1 This section of the Planning Statement defines the Development Plan and assesses the proposed development against the relevant adopted and emerging policy and guidance at national, regional and local levels.

Planning Policy Framework

- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 The statutory Development Plan for the Site consists of:
- The London Plan (2021)
 - The Camden Plan (2017)
- 4.4 The London Borough of Camden also has a number of supplementary planning documents/guidance (SPDs/SPGs) which form material considerations for this application. These include but are not limited to, Home Improvements CPG (2021), Design CPG (2021) and the South Hampstead Conservation Area Character Appraisal and Management Strategy (2011).
- 4.5 The updated National Planning Policy Framework (NPPF) was revised in December 2023 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.
- 4.6 The National Planning Policy Guidance (NPPG) is a web-based resource that was published on 6 March 2014 and provides information and guidance on planning. The NPPF and NPPG form material considerations in the determination of the application.
- 4.7 The London Plan 2021 was adopted in March 2021 and provides information and guidance on planning for London. It sets out the vision of a more 'design-led' planning process and holds material weight in the determination of this planning application.
- 4.8 In addition to the above, LB Camden is in the process of the regulation 18 consultation for its local plan review, with public consultation running from Winter to Spring 2024. Although at initial stages, these draft policies will also be a material consideration within the assessment of this application.

Planning Considerations

4.9 The relevant planning considerations associated with this application include:

- Design
- Heritage
- Neighbouring Amenity
- Sustainability.

4.10 Each consideration is addressed in turn below.

Design

4.11 Paragraph 126 of the NPPF states that the creation of high-quality buildings and places is fundamental to what planning, and development should achieve. It acknowledges that good design is a key aspect of sustainable development. Paragraph 130 states that great weight should be given to developments that help to raise the standard of design more generally in an area.

4.12 Good design is a central objective of the London Plan (2021). The plan puts focus on a design-led approach to development, which is outlined in Policy D3 and identifies form and layout, experience, quality, and character as key drivers of the design-led approach. Policy D4 outlines that new developments should deliver high-quality design and place making.

4.13 These policies are supported by strategic Local Plan Policy G1 (Delivery and location of growth), which looks to delivery growth by securing high-quality development and promoting the most efficient use of land, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and other relevant considerations.

4.14 Local Plan Policy D1 (Design) requires development to secure high-quality design that respects local context and character, preserves the historic environment and heritage assets, is sustainable in design and construction, comprises materials that are of high quality and provides a high standard of accommodation.

4.15 The home improvements SPD (2021) notes that the installation of rooflights can help to make a space in the loft habitable by providing light and ventilation. The following guidance is set out with regard to rooflights:

- Should be flush with the roofslope for properties in Conservation Areas;

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- Should be significantly subordinate both in size and number to the roofslope being altered and roof form overall;
 - Their position should take into account other architectural roof elements, e.g. gables, chimneys, turrets; and,
 - Their position and dimensions should ensure a consistent rhythm with other rooflights on adjacent/neighbouring roofs.
- 4.16 With regard to the above considerations, the proposed loft conversion would be achieved through conservation style rooflights to the front and rear, which would not result in any change to the existing roof design and would be subordinate to the roofslope being altered. All other architectural roof elements, including the gable end would be retained.
- 4.17 Most importantly, the proposed location of the rooflights would help to ensure a consistent rhythm with other rooflights on neighbouring properties by replicating the arrangement seen to No. 59 Greencroft Gardens. The layout of the rooflights to the front matches the arrangement of upper floors and is considered to be a more rational arrangement compared to other properties in the street scene, helping to introduce a sense of order to the proposed roof alterations. The roof lights to the rear would be located directly above the windows on lower levels to maintain a sense of order to the rear façade.
- 4.18 Although the guidance states that rooflights should generally be located to the rear, it is noted that planning permission at 59 Greencroft Gardens (LPA Ref. 2018/5581/P) was approved for 5 no. roof lights to the front. The officer report noted that most buildings within the vicinity have been altered at roof level and that roof lights are a common feature. The proposed development was considered sympathetic in respect of its impact on the roof scape, including the number and siting of roof lights. The proposals at 75 Greencroft Gardens look to replicate the rooflight arrangement approved at 59 Greencroft Gardens and would therefore not introduce an alien feature into the street scene.
- 4.19 The proposals at 59 Greencroft Gardens also comprised the installation of skylights to the main roof, similar to the proposed development at 75 Greencroft Gardens. The skylights would remain flush with the roof and would not be visible from the street scene.
- 4.20 Furthermore, it must be noted that the proposed rooflights would be considered permitted development if the application site were not subject to an article 4 direction. We note that the application Site does not benefit from permitted development rights but the host dwelling is of a similar form to other dwellinghouses within the wider conservation area. The proposed rooflights have been designed with permitted development rights in mind and in this regard, should be considered acceptable.
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- 4.21 With regard to the replacement roof, the home alterations SPD (2021) states that for roof refurbishments, materials should visually blend within or match the existing building materials and should re-use any decorative features where possible.
- 4.22 The replacement roof would be replicating the existing design of the roof, with a minor increase in height to match the alterations seen to the neighbour property, No. 73 Greencroft Gardens. Accepted as an appropriate form of development to provide high-quality accommodation in the roof.
- 4.23 The existing tiles would be re-used where possible, and any new roof materials would match the existing design to ensure that the proposals would not result in an alien feature within the wider conservation area. All decorative features would also be maintained.
- 4.24 In summary, the proposals have emerged through a careful design-led process, which optimises the potential of the property whilst also ensuring that the proposals remain in keeping with the character of the surrounding area.

Heritage

- 4.25 Local Plan Policy D2 (Heritage) looks to preserve and where possible, enhance Camden's rich and diverse heritage assets and setting, including the character and appearance of conservation areas. In order to maintain the character of conservation areas, proposals must take account of conservation area statements, appraisals and management strategies.
- 4.26 The South Hampstead Conservation Area appraisal states that alterations to a roof should not result in increased visual bulk to the roof or draw more attention to the existing roof slope. Roof lights may be considered acceptable if they are fitted flush with the roof and located on the rear roof slope. Each application will be considered in relation to its impact on the character and appearance of the conservation area.
- 4.27 As outlined above, the proposed rooflights to both the front and rear would replicate a common feature of the surrounding conservation area and would be sympathetic to the host dwelling and wider context. The roof lights represent a high-quality design approach to increasing the living area of the existing HMO accommodation, whilst remaining contextually appropriate to the character and appearance of the South Hampstead conservation area.
- 4.28 The proposed replacement roof would be like-for-like, re-using existing tiles where possible and maintaining the existing roof design, meaning that there would be no impact on the character of the host dwelling and its contribution to the wider conservation area.

4.29 Furthermore, the ornate metal porch to the front and stain glass windows, identified as important contributors to the special interest of the surrounding Conservation Area, will be maintained as part of the proposals.

4.30 Overall, the proposed rooflight and replacement roof are therefore considered acceptable from a heritage perspective and would have a neutral effect on the setting and character of the Conservation Area.

Neighbouring Amenity

4.31 Local Plan Policy A1 (Managing the impact of development) seeks to ensure that development protects the quality of life of occupiers and neighbours and will only grant permission for development that would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise and impact on daylight and sunlight.

4.32 The proposed rooflights would not extend the property or alter the existing roof profile and therefore there would be no loss of amenity caused by increased massing. The rooflights would offer generally skyward views and would be at a high level only. Downward views would be limited, and it is therefore considered there would be no loss of privacy.

4.33 Neighbours' privacy, access to daylight/sunlight, sense of openness and quality of outlook will not be negatively impacted as there will be no protrusion beyond the established elevations, creation of new openings or extension of any of the window profiles.

4.34 Overall, the proposals are not considered to give rise to any amenity impacts on neighbouring occupiers and should therefore be considered acceptable.

Sustainability

4.35 Local Plan Policy CC1 (Climate change mitigation) requires all developments to minimise the effects of climate change and meet the highest feasible environmental standards that are financially viable during construction and occupation. This includes supporting and encouraging sensitive energy efficient improvements to existing buildings and a requirement for all development to reduce carbon dioxide emissions by following the energy hierarchy set out in the London Plan (2021).

4.36 Local Plan Policy C2 (Adapting to climate change) goes on to state that all development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of overheating. The policy goes on to state that the Council will promote sustainable design and construction by ensuring development demonstrates how sustainable design principles have been incorporated into the design.

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- 4.37 The Home Improvements SPD (2021) makes specific reference to roof insulation to reduce energy use and improve thermal efficiencies.
- 4.38 The replacement of the roof would allow for improved thermal insulation of the dwelling, helping to reduce energy use and thereby reducing carbon dioxide emissions. Various options were explored to retain and refurbish the existing roof but a replacement roof provided a significantly better thermal performance than alternative options.
- 4.39 Furthermore, one of the key benefits of the proposals is the retrofitting of the existing building, rather than a complete redevelopment. This would ensure the embodied carbon in the building would be retained and the existing building will continue to be used into the future.
- 4.40 Overall, the improved sustainability of the dwelling will contribute towards the Council's objectives of both reducing carbon dioxide emissions from energy use, as well as adapting to the effects of climate change, such as overheating. This is seen as a significant benefit to the proposed scheme and should weigh favourably in the decision-making process.

5. CONCLUSION

- 5.1 This Planning Statement has been prepared in support of a planning application that seeks permission for installation of 5 no. conservation style roof lights to the front, 5 no. conservation style roof lights to the rear, 2 no. skylights to the main roof and replacement roof to 75 Greencroft Gardens, to improve the overall size and quality of living accommodation. The proposals would allow for the current HMO accommodation to be optimised, whilst having no impacts on the character of the townscape, Conservation Area, surrounding views or neighbouring amenity.
- 5.2 The proposed alterations would deliver a number planning benefits which would include:
- Make a more efficient use of the existing floorspace to improve the quality of living accommodation for all future occupiers.
 - High-quality design which replicates surrounding alterations.
 - Respect for the heritage of the surrounding Conservation Area by using conservation style rooflights which do not alter the existing roof profile.
 - Maintain a good quality of residential amenity for surrounding residential properties.
 - Retrofitting the existing accommodation to allow for its continued long-term use.
 - Improve thermal efficiencies and insulation against heat loss to reduce carbon and greenhouse gas emissions associated with heating properties.
- 5.3 Overall, the proposals are considered to constitute high-quality design that complies with the relevant planning policies that form the Development Plan and would make a more efficient use of the existing dwelling to deliver an improved quality of accommodation. It is therefore considered that the development should be supported, and planning permission be granted.