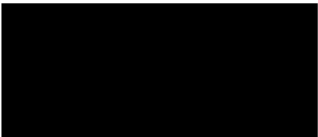
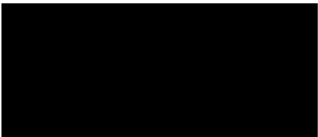
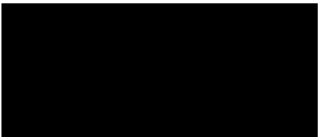


**Camden Council Customer feedback and enquiries  
Comments on a current Planning Application - Ref. 20762242**

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**Planning Application Details**

Year	2016
Number	2822
Letter	P
Planning application address	80 Greencroft Gardens
Title	Miss
Your First Name	sarah
Initial	
Last Name	Eldridge
Organisation	AFA Planning Consultants
Comment Type	Object
Postcode	
Address line 1	The Canterbury Business Centre
Address line 2	18 Ashchurch Road
Address line 3	Tewkesbury
Postcode	GL20 8BT
E-mail	
Confirm e-mail	
Contact number	
Your comments on the planning application	see attached.

**If you wish to upload a file containing your comments then use the link below**

[Objection Letter](#)

**About this form**

**Camden Council Customer feedback and enquiries**  
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Form reference	20762242



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13<sup>th</sup> October 2016

John Diver  
Development Management  
Camden Borough Council  
Camden Town Hall  
Judd Street  
WC1H 9JE

**Re 2016/2822/p – 80 Greencroft Gardens, London. NW6 3JQ.**

Dear Mr Diver

We wish to object to the proposals set out in planning application 2016/2822/P 80 Greencroft Gardens, London. NW6 3JQ on behalf of our client, Mr Gunson of Unit 3, 78 Greencroft Gardens which immediately adjoins the application site. We set out the detail of our objections below.

**Site and Surroundings**

The application site is a three storey detached dwelling in a residential street, located within the South Hampstead Conservation Area. The subject property, like many nearby properties, has been subdivided into flats. The buildings are predominantly sited on large plots with generous amenity provision.

**Proposed development**

The application relates to extensions at basement, ground and roof levels and provision of rear terraces, to facilitate the further alteration and subdivision of the property from four into seven self-contained flats.

The external alterations comprise a basement excavation and provision of light wells and a sunken garden, single storey ground floor rear extension and rear terraces at ground, first and roof level along with insertion of dormers and skylights as well as alterations to some ground floor windows.

## Summary of objection

Objections to the development are based around a) Procedural matters that may be considered to render the application invalid, b) Impact on the amenities of adjoining residential occupiers, c) Impact on the character and appearance of the Conservation Area and, d) Impact on flooding. These are broken down below.

The following policies are considered to be relevant to the consideration of the application:

- National Planning Policy Framework
- London Plan (2015)
- Core Strategy (2011)
  - CS1 – Distribution of growth
  - CS5 – Managing the impact of growth and development
  - CS6 – Providing quality homes
  - CS14 – Promoting high quality places and conserving our heritage
- Development Policies (2011)
  - DP2 – Making full use of Camden's capacity for housing
  - DP 6– Lifetime Homes and wheelchair Homes
  - DP16 – The transport implications of development
  - DP17 – Walking, cycling and public transport
  - DP18 – Parking standards and limiting the availability of car parking
  - DP19 – Managing the impact of parking
  - DP24 – Securing high quality design
  - DP25 – Conserving Camden's heritage
  - DP26 – Managing the impact of development on occupiers and neighbours
  - DP27 – Basements and lightwells
  - DP28 – Noise and Vibration
- Camden Supplementary Guidance
  - CPG 1 – Design
  - CPG 2 – Housing
  - CPG 4 – Basements and lightwells
  - CPG 6 – Amenity
  - CPG 7 – Transport
  - CPG 8 – Planning Obligations
- South Hampstead Conservation Area Statement

### a) Procedural Matters

Part 15 of the application form requires the applicant to identify if there are any trees or hedges on the application site or adjoining land. The applicant has responded no to this question. It is contended that there are a number of trees both within the application site and the surrounding properties that are within proximity to be affected by the development, particularly in view of the excavation required. This is evidenced in the applicant's own Basement Impact Assessment document that identifies presence of tree roots in some samples. No details of these are provided within the application documents.

Given the above it is considered that the application should be considered as invalid. The application documents should be amended to take into consideration nearby trees and hedges, these should be shown on the site plan. If necessary an Arboriculture Impact Assessment should be included to demonstrate the impact of the development and outlining any protection measures or mitigation.

**b) Impact on Amenities.**

The impact on amenities can be broken into three components: daylight and sunlight, privacy and noise and disturbance. There are addressed in turn:

The application is not accompanied by a Daylight and Sunlight Assessment. There is a sun path plan included within the application. This simply observes shadow caused by the development drawing some generic assumptions, there is no assessment of particular impact in relation to windows of habitable rooms of neighbouring properties or indeed living conditions for occupiers of the proposed development.

In the absence of a more detailed assessment, it is contended that there will be a clear impact resulting from the development, particularly in relation to the dwellings immediately to the east and west (78 & 82) who would lose morning and evening sun. Given the depth of the proposed ground floor extension of some 5m, the loss of light will be predominantly felt at the lower and ground floor levels. This is considered to be directly contrary to Policy DP 26 which confirms that permission will only be granted for development that does not cause harm to amenity.

In considering the layout of the proposed development it is noted that the basement flats have only front and rear aspect with a considerable depth of living accommodation that would fail to be served by natural light. The ground floor is slightly improved however there is a bedroom that does not have any external window (as shown on the floor plan). The proposed development itself seems to fall well below basic levels of amenity that would be expected to be provided and therefore contrary to Policy DP 26.

The proposal incorporates a sunken garden and then terraces at ground and first floor and a recessed balcony at roof level. It is noted that a number of properties within the area incorporate similar features, to a large extent these have evolved over time and not been subject to consideration under the current policies which seek to manage the impact of development on occupiers. On this basis it is not considered that the presence of such terraces or balconies sets a precedent for further additions that would be likely to have increased detrimental impact on the amenities of nearby and surrounding occupiers by virtue of both loss of privacy but also increased noise and disturbance. The cumulative impact of which would lead to an almost complete degradation of amenity to both habitable rooms and all outdoor amenity space. There would also be a questionable relationship between the various outdoor amenity spaces within the development as proposed. This loss of privacy is a clear breach of Policy DP 26 which seeks to prevent development that would cause harm to amenity.

The site is located within a tight knit area of residential development. The adjoining properties are within a few metres of the site and there would undoubtedly be disturbance through the duration of any construction and/or excavation works. There would also likely be subsequent noise disturbance resulting from the use of the development in particular the proposed basement.

The Basement Impact Assessment provides a very factual assessment of the ground conditions etc. It does not go further to interpret these or provide any analysis of the subsequent impact on amenities of adjoining occupiers. It also notes the need for further survey work in respect of the neighbouring properties. Policy DP27 seeks to ensure that there would be no harm to amenity as a result of basement proposals and Policy DP 28 seeks to resist development that would be likely to generate noise pollution. It is contended that there is not sufficient information to be able to assess the impact on amenity as a result of the

basement excavation and subsequent use, and therefore the proposals must be considered contrary to this Policies DP27 and 28.

**c) Impact on the Character and Appearance of the Conservation Area**

The site falls within the South Hampstead Conservation Area. The history and evolution of the buildings can be seen from the general pattern of development. Many of the buildings have evolved over time and there are numerous examples of additions and alterations to the rear of the properties. The Conservation Area is not limited to those areas that can be seen from the public highway but covers the whole of the designated areas.

It is accepted that in this context that rear of properties will have less importance, simply in terms of the hierarchy of buildings, however this does not mean they are of no importance. The rear of the properties still play an important role in defining the character of the area and are highly visible from the surrounding properties. Any alterations therefore need to respect the character of the building, and adjoining area and need to be of a quality that will preserve or enhance the Conservation Area to comply with both Local and National Planning policy and the statutory duty set out in S72 of the Planning (Listed Buildings and Conservation Area) Act 1990.

The proposed alterations are significant and incorporate contemporary detailing; balconies with glass balustrades and Upvc windows, although details of the windows are not clear. There is also a sunken garden proposed which seems to be a completely alien feature. These elements are at stark odds with the existing building and the wider area. They do not seem to have any integrity or respect for the historic environment or the heritage assets (both the designated conservation area and the undesignated host building). It is our opinion that they would have a detrimental impact on the character and appearance of the building and the wider Conservation Area, being contrary to Policies CS14, DP25 and the aims of the NPPF.

**d) Flood Risk.**

The application is supported by a technical assessment of the impact of the basement. This document makes a number of recommendations including that further groundwater monitoring is undertaken. It would seem premature to determine the application in the absence of the further monitoring that is suggested.

Local evidence suggests that the area is prone to flooding and nearby occupiers report that garden areas flood regularly and that existing basements are damp.

Policy DP27 confirms that the Council will not permit basement schemes in areas that are prone to flooding.

The BIA report includes a number of recommendations as to the need to mitigate against water ingress but does not go further to define these. There is also no consideration as to how the development might impact on existing properties in terms of ground water being diverted or indeed alterations to surface water drainage.

It is contended that the development would worsen existing drainage problems for surrounding occupiers and would be likely to result in severe issues for the occupiers of the basement accommodation that is proposed. The proposal is considered to be contrary to Policy DP27.

Whilst it remains our view that application should be invalidated and that the proposals are clearly in conflict with both local and national Planning Policy, should the LPA be minded to grant planning permission it is requested that consideration is given to the following:

- The submission for consideration of a full structural report and construction method statement to ensure that there will be no damage to adjoining building or loss of amenity as a result of the excavation or future use.
- Submission of a general method statement around how the construction would take place, where materials would be stored, timescales for undertaking the work and hours of construction etc. also be submitted. This is considered to be necessary given the highly development nature of the site and proximity of neighbours.
- The submission of an Arboricultural Impact Assessment to ensure no adverse impact on existing trees within the Conservation Area.
- That the recommendations for further work in the BIA are undertaken prior to determination.
- That a full Daylight and Sunlight assessment is undertaken that factors the relationship with surrounding properties and also demonstrates that the proposed development itself will achieve adequate amenity.
- A S106 agreement that would demonstrate the development to be 'car free'. Given the complexities of managing existing on-street provision and the fact that there is limited on-site parking, it is assumed that the LPA would otherwise have very little control in terms of how the existing parking is allocated and to ensure that there would be no abuse of existing permitted on street parking.

I trust that the above will be taken into consideration in your assessment of the application.

Yours sincerely

Sarah Eldridge, BA(hons) BTP, Dip SML, MRTPI- AFA Planning Consultants.