

## Planning and Heritage Statement

Chalcot House,  
59 and a Half Netherhall Gardens  
London, NW3 5RE



PlanningSense

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## 1 Introduction

This Planning and Heritage Statement has been prepared by Planning Sense Ltd on behalf of Mr C Angelides (the Applicant), in support of their planning application to the London Borough of Camden.

The planning application is submitted in relation to the proposed demolition of 9 and a half Netherhall Gardens (also known as Chalcot House) and replacement with new dwelling and associated landscaping.

The scheme has been designed by d-raw studios following pre-application meetings with the Council and advice received from officers subsequently.

As well as presenting the proposed scheme, this report also sets out the background to the site and an assessment of the planning policy issues which are considered to apply to the proposals and the area.



*Existing view of the site entrance from Netherhall Gardens*

## 2 Site Description and Planning History

### Site Description

Chalcot House, also known as “59 and a half Netherhall Gardens” (the application site), is positioned behind 61 Netherhall Gardens, between the junctions of Fitzjohn’s Avenue and Maresfield Gardens. The site is accessed via a driveway between Nos. 59 and 61.

The property is not listed but lies within the Fitzjohn’s and Netherhall Conservation Area designated in 1984. The Conservation Area contains a variety of architectural styles including neo-Gothic, Classical Italianate and Arts and Crafts / Norman Shaw. No. 50 Netherhall Gardens and no. 61 Fitzjohns Avenue, both opposite and south-east of the site, are Grade II listed.

There are several institutions and schools along the street, including Southbank International School and South Hampstead High School on Netherhall Gardens and North Bridge House Schools on Fitzjohn’s Avenue and Netherhall Gardens. However, the surrounding area is predominantly residential in character and is comprised of a mix of mainly red brick large detached residential villas, occasionally interspersed with blocks of flats.

The site is well served by public transport with Hampstead Underground Station approximately 500m to the North and Finchley Road underground station and Finchley Road and Frognal overground station located approximately 800 m to the east. Many bus routes pass along Fitzjohn’s Avenue and Finchley Road to the east. The site is located within a CPZ (CA-B). Parking exists on site with space for multiple vehicles to the front driveway.



*Aerial photograph of the site*



### **Planning History**

2020/1736/P - Erection of a hipped roof over the existing flat roofed dwelling house with two front and three rear dormer windows – Granted 22/12/2020

### **Pre-Application Discussions**

The application hereby submitted has been devised following a series of discussions with LB Camden at pre-application stage, during which the scheme design has developed significantly with feedback from officers. The Council provided a written response to the pre-application scheme (attached at appendix 1) which confirms that officers considered the scheme to be acceptable in principle subject to the provision of further detailed information on certain topics (notable sustainability, basement impact and architectural detailing).

Section 6 of the report considers the points raised by the pre-app and sets out our response / directs the reader to the relevant additional information submitted as part of the application.



*Existing Front Elevation*

### 3 Proposed Scheme

The aim of the proposed scheme is to create a modern family home that meets contemporary living standards. The proposed architectural solution pays homage to the existing building with a narrative of a main house and a contemporary annexe. The proposed replacement house is a contemporary family home with extensive glazing linking the interiors to the private walled gardens on all sides. The house will be laid out as a modern open plan ground floor living area with four bedrooms at first floor. There is a semi inset swimming pool wing to the East with extensive green roof covering reinstating the East Garden garden over.

The proposed house is to be built of solid crafted materials with a restrained palette of solid natural materials primarily hand cast clay bricks, large glazed areas with extensive green roofs. Rough 'tumbled' Grey limestone floor internally and externally will help to merge the internal and external spaces. The first floor will have solid limed oak rustic flooring. The structure will be a minimal steel frame with cross-laminated timber infill panels clad externally with hand cast bricks and internally in textured clayworks plaster. All roofs will be extensive green roofs to nestle the building into the landscape.

The steep site is set on three levels with the main house on the lower southern level. The trees whilst preventing any overlooking also help to control solar gain from the glass facade elements in the Summer months. The walled garden context is to be retained and enhanced with further green areas added to the existing front courtyard area and extensive green roofs to nestle the building into the landscape. Rainwater and grey water will be harvested and stored below ground to be used to maintain the gardens.



*CGI of proposed replacement house*





*Proposed Rear Elevation*



*Proposed View from Netherhall Gardens*

## 4 Planning Policy Framework

In preparing the scheme we have considered Camden's Local Plan, adopted 2017. IN addition the documents comprising Camden Planning Guidance (CPG) were first adopted in April 2011 and partly revised since, most recently in 2015. Whilst these documents remain adopted, they are in the process of being updated to reflect the CLP.

The main planning issues for consideration with the proposed scheme are land use, design, residential mix, quality of accommodation and amenity, basement considerations, transport, sustainability and planning obligations.

The adopted policies considered relevant to this proposal are listed below.

### Local Policies

#### Camden Local Plan 2017

Policy H6 Housing choice and mix  
Policy A1 Managing the impact of development  
Policy A3 Biodiversity  
Policy A4 Noise and vibration  
Policy A5 Basements  
Policy D1 Design  
Policy D2 Heritage  
Policy CC1 Climate change mitigation  
Policy CC3 Water and flooding  
Policy CC5 Waste  
Policy T1 Prioritising walking, cycling and public transport  
Policy T2 Car-free development and limiting the availability of parking  
Policy DM1 Delivery and Monitoring

#### Supplementary Guidance (CPG)

The following Camden Planning Guidance is relevant.

- CPG 1 Design (As amended 2013 and 2015)
- CPG 2 Housing (As amended 2013 and 2015)
- CPG 3 Sustainability (As amended 2013 and 2015)
- CPG 4 Basement and Lightwells (As amended 2013 and 2015)
- CPG 6 Amenity (2011)
- CPG7 Transport (2011)
- CPG8 Planning Obligations (As amended 2015)

In addition, the guidance contained in the Fitzjohns / Netherhall Conservation Area Statement is relevant to this proposal. This was adopted in February 2001.



### **National Guidance**

The National Planning Policy Framework (NPPF) 2012 is also relevant to the proposals. The National Planning Policy Framework was adopted in April 2012.

Chapter 6 supports the delivery of a wide choice of high-quality homes and the creation of sustainable, inclusive and mixed communities. To enable the delivery of a wide choice of housing, Paragraph 50 states that local authorities should “plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, with disabilities, service families and people wishing to build their own homes)”; and “identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand;”

Paragraph 49 introduces a presumption in favour of sustainable development for applications for residential use. The guidance states that “Housing applications should be considered in the context of the presumption in favour of sustainable development.”

Sustainable development is defined by the UK sustainable development strategy and the five principles guiding this are: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance, and using sound science responsibly.

## 5 Heritage Assessment

### Character of the Conservation Area

The Fitzjohn and Netherhall CA is divided into the two sub-areas of distinct character. The application site lies in sub-area one — Fitzjohn's.



*Conservation Area – Sub-Areas Key Map*

Although no.59 and a half is not listed, it lies in proximity to listed buildings (opposite), and the surrounding buildings are of similar scale and character.

The Conservation Area lies on the southern slopes of Hampstead, between Rosslyn Hill and Finchley Road. The area consists of wide roads with detached or semi-detached houses laid out on substantial plots and is characterised by its generous tree cover and plentiful soft landscaping.

Netherhall Gardens rises from Finchley Road to nearly the top of Fitzjohn's Avenue. A very steep incline from Finchley Road gives the road a dramatic impact from either direction with the roof lines standing out. Due to this local topography, no.61's south-west elevation is prominently visible in the ascent from Netherhall Gardens towards Fitzjohns Avenue.

The CA Statement sets out that roofs are an important and conspicuous element of the Conservation Area that dominates the profile of the skyline. The most common types of roofs are gables (various designs) pitched with dormers, shallow pitched with overhanging eaves.

The CA guidance seeks to prevent what is described as "*further erosion to the character of the area by further development that unbalance the historic urban grain and architecture by inappropriate scale, design and/or materials*".

### **Character and Appearance of the Host Building**

It is understood from historical searches and previous studies of the building that Chalcot House was originally constructed as a service building for staff serving 59 Netherhall Gardens in the 1930's. The image below (artist's impression from previous heritage report) illustrates how the building was designed with no particular reference to the Conservation Area given its location away from the street and hidden behind the main houses at nos. 59 and 61.

The property was subsequently extended with a habitable wing to the right (see second photo below) effectively providing a garage and living accommodation above. Planning permission has also been granted for upwards roof extension to the main house (though this is unimplemented).



*Artist's impression - original building*



*Photo of property - 2016*



## 6 Planning Assessment - Response to Pre-Application

This section considers the relevant policies and sets out the points raised by the pre-application process and our response (either through design change or additional information provided as part of the application).

### Design and Conservation

Camden's guidance for design and heritage is contained in Policy D1 (Design) and D2 (Heritage). Additional design guidance is contained within CPG 1 (Design) into account.

Policy D1 requires that all development is of a high quality design that:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage);*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g. is inclusive and accessible for all;*
- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. incorporates outdoor amenity space;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.*

Policy D2 seeks to preserve and, where appropriate, enhance Camden's heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

The Council will not permit development which results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Development within Camden's conservation areas is required preserve or, where possible, enhances the character or appearance of the area. This is a statutory requirement. The total or substantial demolition of an unlisted building which makes a positive contribution to the character or appearance of a conservation area will be resisted. In addition, to preserve or enhance the borough's listed buildings, the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting

The defined character of conservation areas includes natural features. As such, the policy seeks to preserve trees and garden spaces which contribute to the character and appearance of a conservation area or contribute to the setting of heritage assets.

The pre-application response commented as follows:

*"Since the initial submission, the size of the proposed replacement building has been scaled back in both height and footprint. The revised proposal in massing terms feels comfortable in relation to its plot and would retain front and rear building lines as well as maximum height. Additional massing would be positioned to the east in the form of a single storey addition to the annex that would house a swimming pool. A green roof over the entire annex would help the building establish itself within the leafy context. Full details will be secured by condition but a generous substrate depth that can support the desired soft landscaping should be designed in from the outset"*

As noted in the pre-app response, reductions to the scale, height and massing of the proposal were made during the course of the pre-application process to the extent that officers considered the revised proposal acceptable. The applicant is happy to provide much more detailed cross-sectional build up details for the substrate and soft landscaping by way of condition as suggested.

*"The proposed design has been considered from the perspective of impact on the conservation area. Given its setback position from the street and the fact that only fleeting glimpses of a small section of the front elevation would be possible, it is considered that no harm would result to the conservation area. As such, the proposed design in this inconspicuous location is considered acceptable. Full details of architectural detailing as well as materials particularly the brickwork will be subject to condition to ensure high quality execution."*

Further details relating to the architectural detailing of the proposed dwelling is provided in the Design and Access Statement submitted with the application.

*"It is crucial that the proposal does not lead to an erosion of the garden context in both design, biodiversity and sustainability terms. Enhancing the biodiversity and drainage qualities of the site should strongly inform the landscaping approach. Full details should be provided in support of any planning application and will be secured by condition where required. There are a number of trees in the garden that could be impacted by the proposed works and so a full Arboricultural report should be submitted alongside the application."*

A survey of all trees at the property has been carried out by Liam McGough Tree Services, to provide information regarding the condition of existing trees and to inform the design of the

scheme and extent of building works. The position of existing trees at the site (and the presence of existing built structures\_ means that there is no encroachment into existing root protection areas, however advice has been given on protection during construction.

*“Excavation works - To ensure that the excavation does not impact on the stability of surrounding structures and hydrogeology of the local environment, you are advised to submit a Basement Impact Assessment to screening stage level to determine whether a full BIA is required. Further information can be found in CPG Basements.”*

Whilst excavation at the site is limited in comparison to the two schemes at 59 and 61 Netherhall Gardens, the applicant has commissioned a basement impact assessment which has been submitted as part of the application. The applicant is happy for this to be reviewed by external consultants as necessary and awaits confirmation of the associated cost of this in due course.

### **Energy and Sustainability**

*“Any proposal for substantial demolition must be mindful of Policy CC1 (Climate Change Mitigation), in particular, points (e) and (f)) which require all proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building. Paragraph 8.16 of the Local Plan describes how the construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed and should be explored further in this instance.”*

*“As such, any proposal to demolish the existing building would need to be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building. Where the demolition of a building cannot be avoided, we will expect developments to divert 85% of waste from landfill and comply with the Institute for Civil Engineer’s Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. We will also require developments to consider the specification of materials and construction processes with low embodied carbon content.”*

The principle of demolition and reconstruction was discussed at length during the pre-application process and following on from this further detailed work has been undertaken by Eight Associates to demonstrate that the approach taken to construction is the most sustainable option.

To summarise, having carried out a detailed assessment of each scenario (0. existing house, 1. renovation and extension, 2. new build) the report concludes that the most carbon efficient route would be the new build super-insulated construction after Year 15. This is due to the lower embodied carbon associated with refurbishment and no work done at all (i.e. existing) resulting in a very energy inefficient structure in its current condition.

The 3 scenarios are summarised overleaf for ease of reference.



0. Existing

- Backlands service building converted and extended sometime in the 1990's;
- Basic construction with limited insulation;
- Shallow Foundations;
- Concrete slab without insulation;
- Single brick external walls;
- Low ceiling heights;
- Single glazed windows;
- Flat roof to main building with limited insulation;
- Internal floors with timber joists

Study 1. Renovation & Extension

- Renovation and extension model working with the existing building fabric;
- Retains a majority of external walls to the main house (dark blue on the plan);
- Existing walls underpinned to increase capacity of walls to bear live loads;
- New insulated slab to main house (existing removed during foundation works);
- New insulated slab on piled foundations to side extension;
- Utilise recycled brickwork to the new walls (bricks from existing walls removed) built as cavity walls with insulated void;
- Existing walls upgraded with thermal insulation externally with new external finished brick skin to create cavity wall;
- New Roof, timber joists with substantial insulation and intensive green roof externally;
- Floors, new timber floors on rebuilt timber joists;
- New Internal walls in timber stud with clayboards and render.

Study 2. New Build

- Complete demolition and new build using contemporary super-insulated construction;
- Existing building carefully demolished with all construction materials set-aside for re-use;
- New insulated slab on piled foundations throughout;
- Steel frame super structure;
- External finished brick skin with interior timber stud partitions with super insulation interlayer;
- New Roof, timber joists with substantial insulation and intensive green roof externally;
- Floors, new timber floors on timber joists;
- New Internal walls in timber stud with clayboards and render.

*"The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation."*

*"The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. It requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. Policy CC2*

*requires development to be resilient to climate change by adopting climate change adaptation measures.”*

The proposed energy and sustainability strategy demonstrates that the proposed development has been designed to achieve the following standards:

- The whole development will reduce total carbon emissions by 57.2% and 56.5% over Building Regulations using SAP 2012 and draft SAP 10 carbon dioxide emission factors, respectively.
- Reduce energy consumption by targeting improved U-values and airtightness. Low energy lighting will be specified.
- Implement a site waste management plan and stringent resource efficiency benchmarks.
- Follow best practice policies in terms of air, water and ground pollution and appoint a contractor who will register for the Considerate Constructors Scheme.
- Achieve a water consumption target of 110 litres/person/day (including 5 litres for external water use) through the implementation of low water-consuming fittings.
- Utilise sustainable transport, including access to public transport and inclusion of cycle storage facilities.
- Minimise embodied carbon through efficient design, procurement of materials from a local source, or with a high-recycled content.
- Be of high build quality, surpassing the minimum Building Regulations.
- Ensure all materials are responsibly sourced and of low environmental impact where feasible.
- Consider health and wellbeing through design and operational procedures, including daylight, optimum indoor air quality and thermal comfort.
- Protect and enhance the ecological value of the site through integrating measures such as flower rich perennial planting. The incorporation of bird and bat boxes are also being considered by the design team where feasible.

### **Residential Amenity**

*“The replacement dwelling would, for the most part, be no higher than the existing property. Where there is additional massing compared to the existing building it would be a sufficient distance away from neighbouring properties for there to be no amenity implications.*

*It is expected that plant equipment will be provided in association with the swimming pool. If so, an acoustic report that demonstrates the impact on the nearest sensitive residential receptor should be provided.”*

An acoustic report has been prepared by Noico Noise Control which demonstrates that the proposed plant equipment will have no adverse effect on the living conditions of surrounding occupiers.

### **Transport**

*“A dedicated cycle store sufficient to accommodate two cycles should be shown in an accessible, covered and secure location on the proposed floor plan.”*

A secure cycle store has been provided adjacent to the proposed plant room (see ground floor plan)

*“It is understood the redeveloped property would be for a returning occupier and therefore there would be no car-free obligation but the Council may seek the inclusion of a mechanism that prohibits future occupiers from obtaining parking permits. New developments should not design in on-site car parking and so any on-site spaces must be justified. You are advised to incorporate landscaping features and planting to limit the scope for on-site car parking.”*

A parking area is available to the front of the house (and along the driveway) although this has been landscaped to limit parking as advised by officers (see ground floor plan).

*“Due to the location of the building in a residential area combined with the scale of works, a Construction Management Plan (CMP) would be secured plus an implementation support contribution of £3,136 and a construction impact bond (£7,500). These would be secured by a section 106 legal agreement.”*

This is acknowledged and a Construction Management Plan has been prepared by Quoin Consultancy as part of the application submission.

### **Planning Obligations/CIL**

*“The following Section 106 planning obligations may be required if planning permission were granted:*

- Construction Management Plan (plus associated contributions)*
- Highways contribution (£tbc)*
- Energy and sustainability plan (subject to floorspace)”*

This is acknowledged and will be discussed further during the course of the application.



## 7 Conclusion

The application hereby submitted seeks permission for a replacement dwelling and associated landscaping at 59 and a half Netherhall Gardens (also known as Chalcot House).

The scheme design is a contemporary take on a Georgian home with vertical emphasis to window patterns, and a house constructed in two sections to reflect the character and layout of the existing property.

The site lies within the Fitzjohns and Netherhall Conservation Area, but as officers have noted is very concealed from public and private viewpoints and as such a more contemporary approach is supported in this instance.

Particular care has been taken to ensure that the building fits comfortably into its context - with a focus given to retaining and improving the garden spaces and “nestling” the new home into the landscape.

The proposed scheme has been devised following extensive pre-application discussions with the officers, during which reductions and adjustments have been made to the design. The overall approach is now supported subject to provision of some further detailed information - which has now been provided as part of this submission.

We are confident that the proposals described in this planning application will make a wholly positive contribution to the Conservation Area. For all the reasons outlined in this report, we consider that the proposals pass the Section 38 Test of the Planning and Compulsory Purchase Act 2004, and we trust that officers can therefore support the application and grant planning permission for the scheme accordingly.

## APPENDICES

**Appendix 1 - Pre-Application Response, June 2021**

**Date: 15/06/2021**  
**Our ref: 2021/1453/PRE**  
**Contact: Kristina Smith**  
**Direct line: 020 7974 4986**  
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Dear Matt Bailey,

**Re: Chalcot House, 59.5 Netherhall Gardens, NW3 5RE**

Thank you for submitting a pre-planning application enquiry for the above property. Two pre-application meetings have been held and additional information provided throughout the process. An initial fee of £1,008.80 was received followed by a follow-up payment of £504.40.

**1. Proposal**

The proposal is for:

- Demolition of existing building and erection of new detached single dwelling house
- Hard and soft landscaping works

**2. Site description**

The site comprises a two storey building of early 20<sup>th</sup> Century construction set well back from the street along a private driveway. It is surrounded to the front, rear and side by a private garden area with a number of trees.

The site is situated within the Fitzjohns and Netherall Conservation Area and the building is not specifically recognised by the Conservation Area statement as making a positive, neutral or negative contribution to the conservation area.

**3. Relevant planning history**

**2020/1736/P** - Erection of a hipped roof over the existing flat roofed dwelling house with two front and three rear dormer windows – **Granted 22/12/2020**

**4. Relevant policies and guidance**

[National Planning Policy Framework 2019](#)

[London Plan 2021](#)

[Camden Local Plan 2017](#)



H6 Housing choice and mix  
 A1 Managing the impact of development  
 A3 Biodiversity  
 A4 Noise and vibration  
 A5 Basements  
 D1 Design  
 D2 Heritage  
 CC1 Climate change mitigation  
 CC3 Water and flooding  
 CC5 Waste  
 T1 Prioritising walking, cycling and public transport  
 T2 Car-free development and limiting the availability of parking  
 DM1 Delivery and Monitoring

#### Camden Planning Guidance

CPG (Design)  
 CPG (Housing)  
 CPG (Sustainability)  
 CPG (Amenity)  
 CPG (Transport)  
 CPG (Developer's Contributions)

### **5. Assessment**

The planning considerations material to the determination of this application are as follows:

- Design
- Sustainability
- Amenity
- Transport
- Planning obligations/CIL

### **6. Design and conservation**

The existing building is a two-storey-plus-dormers stucco house of traditional, vaguely Regency character. It is understood to have been constructed in the 1930s and so is not of authentic style to its period. It forms an L-shape with an attached single-storey-plus-dormers coach house and owing to the arrangement of massing, reads as a collection of buildings in a garden setting.

The proposed replacement house is understood to be a contemporary take on a Georgian home with a vertical emphasis to its fenestration, and a contrasting contemporary annex building of horizontal proportions. The main facing material would be brickwork.

Since the initial submission, the size of the proposed replacement building has been scaled back in both height and footprint. The revised proposal in massing terms feels comfortable in relation to its plot and would retain front and rear building lines as well as maximum height. Additional massing would be positioned to the east in the form of a single storey addition to

the annex that would house a swimming pool. A green roof over the entire annex would help the building establish itself within the leafy context. Full details will be secured by condition but a generous substrate depth that can support the desired soft landscaping should be designed in from the outset.

The character of the building has little similarity with the surrounding conservation area which largely comprises large buildings of various architectural styles.

The fenestration would be very regular with five vertical openings of the same proportions at both ground and first floor levels. The more contemporary annex would combine a largely glazed ground floor with solid brickwork at first floor level above. The two masses would be connected by a glazed link. The annex would create a subordinate relationship with the main house owing to its slightly lower height, more contemporary architectural character and the break in massing between the two volumes.

Initial comments on the proposed design were that the character felt jarring in relation to its leafy context and overly urban compared to the very domestic architecture of the surrounding area. Revisions were made to the scale of the building but the character has remained much the same.

The proposed design has been considered from the perspective of impact on the conservation area. Given its setback position from the street and the fact that only fleeting glimpses of a small section of the front elevation would be possible, it is considered that no harm would result to the conservation area. As such, the proposed design in this inconspicuous location is considered acceptable. Full details of architectural detailing as well as materials particularly the brickwork will be subject to condition to ensure high quality execution.

It is crucial that the proposal does not lead to an erosion of the garden context in both design, biodiversity and sustainability terms. Enhancing the biodiversity and drainage qualities of the site should strongly inform the landscaping approach. Full details should be provided in support of any planning application and will be secured by condition where required.

There are a number of trees in the garden that could be impacted by the proposed works and so a full Arboricultural report should be submitted alongside the application.

#### *Excavation works*

To ensure that the excavation does not impact on the stability of surrounding structures and hydrogeology of the local environment, you are advised to submit a Basement Impact Assessment to screening stage level to determine whether a full BIA is required. Further information can be found in [CPG Basements](#).

## **7. Amenity**

The replacement dwelling would, for the most part, be no higher than the existing property. Where there is additional massing compared to the existing building it would be a sufficient distance away from neighbouring properties for there to be no amenity implications.

It is expected that plant equipment will be provided in association with the swimming pool. If so, an acoustic report that demonstrates the impact on the nearest sensitive residential receptor should be provided.

## **8. Transport considerations**

### *Cycle parking*

A dedicated cycle store sufficient to accommodate two cycles should be shown in an accessible, covered and secure location on the proposed floor plan.

### *Car parking*

It is understood the redeveloped property would be for a returning occupier and therefore there would be no car-free obligation but the Council may seek the inclusion of a mechanism that prohibits future occupiers from obtaining parking permits. New developments should not design in on-site car parking and so any on-site spaces must be justified. You are advised to incorporate landscaping features and planting to limit the scope for on-site car parking.

### *Construction Management Plan*

Due to the location of the building in a residential area combined with the scale of works, a Construction Management Plan (CMP) would be secured plus an implementation support contribution of £3,136 and a construction impact bond (£7,500). These would be secured by a section 106 legal agreement.

### *Highways contribution*

Depending on the construction approach and whether vehicles need to park on the public highway, a Highways contribution may be required to repair any damage sustained by the footway outside the site.

## **9. Energy and Sustainability**

### Principle of demolition

#### *Policy*

Any proposal for substantial demolition must be mindful of Policy CC1 (Climate Change Mitigation), in particular, points (e) and (f) which require all proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building. Paragraph 8.16 of the Local Plan describes how the construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed and should be explored further in this instance.

As such, any proposal to demolish the existing building would need to be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building. Where the demolition of a building cannot be avoided, we will expect developments to divert 85% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. We will also require developments to consider the specification of materials and construction processes with low embodied carbon content.

It is necessary to understand resource efficiency when comparing the overall impact of a new development with that of refurbishing an existing building. The stages to assess include:

- production of materials and components (raw material extraction, material production, wastage and waste processing, transportation)
- construction stage (transport, storage of products, wastage and waste processing, energy and water use in construction, ancillary materials)
- use stage (energy and water used in operation, maintenance, repair, replacement and refurbishment)
- end of life stage (de-construction or demolition, transport, waste processing, disposal of waste).

When comparing the carbon impacts of a new development and a refurbished scheme, the following should be included within the scope of the assessment:

Refurbished scheme	New development
Embodied carbon of any <u>new</u> materials used within the refurbishment (do not include the carbon content of the existing building materials as these are considered 'spent').	Embodied carbon of all materials used within the development.
Expected operational carbon emissions of the refurbished scheme over the expected lifetime of the building (60 years is typical)	Expected operational carbon emissions from the new scheme over the expected lifetime of the building (60 years is typical)

#### *Review of submission*

A whole life carbon assessment has been submitted with the application. It compares three scenarios: existing building; refurbishment scheme; and full demolition and rebuild. The assessment has been reviewed by the Council's Sustainability officer and feedback was issued in an email on 11/06/21.

#### *Energy efficiency and sustainable design*

The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.



The Council promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met, including zero carbon development; and expects all developments to optimise resource efficiency. All major developments are required to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible, establishing a new network.

The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. It requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.

Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013. The Council expects zero carbon development, with at least 35% reduction to be made on-site. A carbon offset contribution would be required for the shortfall. This would be used to secure the delivery of carbon reduction measures elsewhere in the borough.

Developments are also expected to implement the sustainable design principles as noted in policy CC2 by achieving a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

As part of the assessment of resource efficiency, all developments involving five or more dwellings and/or more than 500 sqm gross internal floor space are encouraged to assess the embodied carbon emissions associated with the development within the energy and sustainability statement. Where such an assessment has been completed we would encourage that the results are logged on the WRAP embodied carbon database in order to contribute to the embodied carbon knowledge base.

### *Cooling*

All new developments will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design. Any development that is likely to be at risk of overheating (for example due to large expanses of south or south west facing glazing) will be required to complete dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated.

Active cooling (air-conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.

#### *Water and flooding*

The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures (policy CC3).

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site.

Policies D1 and CC2 of the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. The inclusion of a green roof is therefore welcomed.

### **10. Planning obligations**

The following Section 106 planning obligations may be required if planning permission were granted:

- Construction Management Plan (plus associated contributions)
- Highways contribution (£tbc)
- Energy and sustainability plan (subject to floorspace)

### **11. Conclusion**

Given the concealed location of the property and the very limited contribution it makes to the streetscene, the proposed design – whilst not very in-keeping with the wider conservation area – is thought to be acceptable in this instance. The height and massing of the proposed new dwelling would be similar to the existing situation. There appears to be slightly more garden take up where the swimming pool would be provided and you are reminded about the importance of green landscaping, including deep green roofs, so as to retain the leafy garden character. Elsewhere, soft landscaping must be prioritised over hard landscaping including in the front driveway area.

The key consideration of the application is therefore the acceptability of the proposed demolition. You have provided a whole life carbon assessment which the Council's Sustainability officer has provided feedback on. The feedback should inform an updated assessment to be submitted with the full application. The Council will come to a view at application stage as to whether the rebuild scheme is preferable to a retention and refurbishment scheme. The energy and sustainability credentials of the new build should be exemplary and aim for the best possible performance.

### **12. Planning application information**

Should you choose to submit a planning application which addresses the outstanding issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full Planning Application
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Energy and sustainability statement(s) including justification for demolition
- Noise Impact Assessment if any plant is proposed
- Basement Impact Assessment – screening level
- Arboricultural report
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received. You are advised to contact your neighbours and the Fitzjohn's Netherhall Conservation Area Advisory Committee to discuss the proposals prior to submission.

Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Kristina Smith on **020 7974 4986**

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Kristina Smith

**Principal Planning Officer  
Planning Solutions Team**