

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/1971/P	Paul Seviour	22/06/2023 21:09:22	OBJ	Planning Application - 2023/1971/P 47 Alma Street London Camden NW5 3DH

I refer to the planning application to build a new full width ground floor extension and part width first floor extension. I am writing to object to this application for the reasons given below.

In addition to the Camden Council planning policies and guidance and the Inkerman Area Conservation Area Statement (the latter of which I will refer to), I ask the officer (if the application is to be decided by delegation) or alternatively the planning committee, to also take into account the policies in the Kentish Town Neighbourhood Plan (the "Neighbourhood Plan"). The Neighbourhood Plan, which was formally adopted on 19th September 2016, contains policies, to which I will refer, which are a material consideration to the determination of this planning application.

My objection is that the proposed ground floor and first floor extension, taken together, are out of scale to the host building. In addition, it is out of scale and context to the adjoining properties in Alma Street and the extensions in Raglan Street opposite the host building.

Specifically, by virtue of the depth of the proposed ground floor, and by inference, the overall scale of the first floor, taken together, the massing of what is proposed is out of proportion to the host property. It is also out of scale and keeping with the relatively recent extension at the adjoining property at No 46 Alma Street, and the slightly earlier extensions (but still quite recent) at No 45 Alma Street and No 44 Alma Street. The proposed extension is also out of proportion and keeping with the ground and first floor extensions at No 4 Raglan Street, No 6 Raglan Street, No 8 Raglan Street, No 10 Raglan Street, No 12 Raglan Street.

Why I think the application should be refused.

The design and access statement makes reference to other planning applications. It is worth rehearsing and stating at the outset that it is a central planning principle that each development should be assessed on its own merits, as I have done in this instance.

On first inspection of the plans, I was struck by the depth of the ground floor extension. It appeared at first glance to me be very deep compared to the ground floor extensions at the adjoining property at No 46 Alma Street and the next properties in a straight run from No 45, and 44 Alma Street. My immediate thought was the impact, the scale and massing of what is being proposed would inevitably have on the daylight and sunlight on No's 46 and 48 Alma Street. But it is difficult to gauge this just from the plans. However, it becomes clearer from the "Daylight and Sunlight Report" just how detrimental the proposed massing will be.

A picture paints a thousand words and the following extract from the Daylight and Sunlight Report illustrates why the proposal is out of scale with the host building and the adjoining properties at No's 46 and 48 Alma Street.

I could not upload the drawing on page 19 of the Daylight and Sunlight report. Please refer to the drawing on page 19 of that report.

Application No: Consultees Name: Received:

Comment: Response:

It can be seen that the depth of the ground floor extension extends out into the garden beyond the depth of the extension at No 46 Alma Street. It should be noted that the depth of the extension at No 46 Alma Street is in line with No 45 Alma St, which in turn is in line with the extension at No 44 Alma Street and so on. So, in the context of the recent existing extensions in Alma Street, it is evident that the proposed ground floor extension is not in conformity to the local context.

The detriment the proposed extension will have to No's 46 and 48 Alma Street is clear from the Daylight and Sunlight Report. But it does not have to be like this. If the depth of the extension at the ground floor matched the depth of the ground floor extension at No 46, with a commensurate reduction in the massing of the first floor (again taking its cue from No 46 Alma St), the extent of the harm would be significantly reduced.

Whilst talking about the Daylight and Sunlight Report, I would like to pick up on a comment that the proposal will "have a relatively low impact on the light receivable by its neighbouring properties". I don't agree. However, the point I want to make is that the additional living space which the new owners of 47 Alma Street are seeking can be delivered without any impact on the neighbouring properties. This can be achieved by instructing the architects to modify the proposal so that the depth of the ground floor matches the adjoining property at No 46 Alma Street; and at the same time, modify the first floor, taking as a cue the scale and massing of No 46 Alma Street. The extra additional living accommodation can be provided without being detrimental to the existing neighbours.

Inkerman Area Conservation Statement

In my opinion, the proposed ground floor and first floor extension do not meet the following 2 criteria set out in the Inkerman Area Conservation Statement

Ink20 Extensions and conservatories can alter the balance and harmony of a property or of a group of properties by insensitive scale, design or inappropriate materials. Some rear extensions, although not widely visible, adversely affect the architectural integrity of the building to which they are attached, such that the character of the Conservation Area is prejudiced. Rear extensions should be as unobtrusive as possible and should not adversely affect the character of the building or the Conservation Area. In most cases such extensions should be no more than one storey in height, but its general affect on neighbouring properties and Conservation Area will be the basis of its suitability.

The proposal is not as unobtrusive as possible. Far from it; it is out of context of the host building, and by virtue of its depth and massing is far from unobtrusive.

Part of the intrusion will be experienced by neighbours in Raglan Street because of artificial light pollution emanating from the full width floor to ceiling glass. Because of the depth of the ground floor, taking up as it does a lot of the garden, one can only imagine the amount of artificial light which will out onto the houses at No's 2, 4 6 and 8 Raglan Street.

Ink21 Extensions should be in harmony with the original form and character of the house and the historic pattern of extensions within the terrace or group of buildings. The acceptability of larger extensions depends on the particular site and circumstances.

Application No: Consultees Name: Received:

Comment: Response:

In the particular circumstances, the proposal damages and lessens the amenity (daylight and sunlight) of the existing dwellings at No's 46 and No 48 Alma Street.

Ink22 Rear extensions will not be acceptable where they would spoil a uniformed rear elevation of an unspoilt terrace or group of buildings; or would encroach significantly on the rear garden space; or harm public views of rear garden/spaces.

The proposal spoils a uniformed rear elevation of extensions running from No's 44 to 46 Alma Street. The proposal would create an abrupt visual break in an otherwise uniform depth and scale and massing of rear extensions.

The proposal encroaches significantly on the rear garden space.

Kentish Town Neighbourhood Plan

I turn now to the Kentish Town Neighbourhood Plan. The relevant policy is:

POLICY D3: DESIGN PRINCIPLES

Applications for the development of new and the redevelopment of existing buildings (which may include demolition, alteration, extension or refurbishment) will be supported where they meet the following criteria:

- a) Proposals must be based on a comprehensive understanding of the site and its context
- b) Proposals must be well integrated into their surroundings and reinforce and enhance local character, in line with paragraph 64 of the NPPF
- c) Proposals must identify and draw upon key aspects of character, or design cues from the surrounding area. Appropriate design cues include grain, building form (shape), scale, height and massing, alignment, modulation, architectural detailing, materials, public realm and boundary treatments
- d) Design innovation will be encouraged and supported where appropriate
- e) Design proposals must be of the highest quality and sustainable, using materials that complement the existing palette of materials in the surrounding buildings
- f) Proposals must enhance accessibility in buildings by taking into account barriers experienced by different user groups

In my opinion, the proposal fails:

a) because it does not take into account the surrounding area or the context – the neighbouring extensions at No's 46, 45, and 44 Alma Street are of the same depth. And they do not damage the daylight and sunlight amenity of their immediate neighbours. It also takes up too much of the garden.

b) because it is not well integrated into the immediate surroundings – it does not enhance but detracts from the conservation area.

c) because its scale and massing and alignment are out of context with the neighbouring extensions in Alma

Application No: **Consultees Name:** **Received:**

Comment: **Response:**

Street or the immediate dwellings in Raglan Street.

Conclusion

I understand that the proposal will provide additional living accommodation that would improve the living conditions for the applicant. However, these considerations do not outweigh the damage and loss of amenity to the neighbouring properties.

I don't say that an extension should not be built. What I say is that it has to be done in keeping with the character and appearance of the host building with no discernible negative effect on the local area.

If the new owner of 47 Alma Street adopted the same depth and massing as that of the neighbouring properties at No's 46, 45, and 44 Alma Street, I'm sure it would be in compliance with the planning rules.

In summary, the application should be refused because:

- it is not in compliance with Ink 20, Ink 21 and Ink 22 of the Inkerman Area Conservation Statement.
 - in addition, by reason of the site context, surroundings and its scale and massing, it fails to meet Policy D3 of the Kentish Town Neighbourhood Plan.
 - its negative impact on the sunlight and daylight of the neighbouring properties at No's 48 and 46 Alma Street also mean that this application should be refused.
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