

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/1971/P	Ben Phillips	30/06/2023 12:01:38	OBJ	<p>We are the owners and occupiers of no 46 Alma Street and are writing to object to the above planning application. Our property immediately neighbours the application site to the north.</p> <p>We understand the desire to modernise and upgrade the property. However, the proposed extension in form, scale, and bulk is, in our opinion, excessive and does not conform to Policy D1 Design or Policy D2 Heritage, as outlined in the Camden Local Plan 2017 (CLP). Neither is it in line with the Inkerman Conservation Area Statement or Camden Planning Guidance 2021 (CPG).</p> <p>Our own property (46 Alma Street) was extended by the previous owners. Even that considerably smaller extension was turned down by the council as too bulky on the basis of height and width and it went to appeal. We therefore consider that the extension at no 46 should be the benchmark for the maximum bulk permissible.</p> <p>The maximum size of the ground floor (GF) and first floor (FF) extensions to no 47 should be no greater than that of no 46, particularly given (unlike most of the properties on Alma Street) no 47 already has an additional second floor (SF) which is large and voluminous. This removed the desirable feature of the butterfly roof and compounds the impact of the proposed GF and FF extensions. Such over-development is contrary to the values identified in the Inkerman Conservation Area Statement.</p> <p>The proposed extension is not subordinate to the host building. The proposals are very intrusive and dominate no 46, from which they would be overbearingly visible. They would take light and cause a sense of enclosure and affect the outlook from no 46. Even were this not a conservation area, we consider that the proposals would be excessive. However, they are particularly inappropriate in a conservation area. We object to the proposals in their current form and consider that the proposed new extension should be reduced in scale.</p> <p>Please see below comments specific to various aspects of the proposals:</p> <p><b>SCALE</b></p> <p>In our opinion, the depth of the GF and FF extensions should be no greater than at no 46. Recent extensions to properties along the terrace, including both our own property and no 42, have adopted a similar build line and there is a high degree of consistency in extensions particularly to the north of the application site (please see the Google Earth image that we have sent to <a href="mailto:planning@camden.gov.uk">planning@camden.gov.uk</a>). This proposal would extend well beyond the established building line and, in doing so, would be both detrimental to the immediate neighbours (including ourselves) and be wholly out of keeping with the established character of this part of the street.</p> <p>GF – the proposal has this protruding by a further 2.15m beyond the extension wall of no 46. Whilst this may be the depth of the existing outrigger, the outrigger is not full width, is untypical of the terrace and it is lower.</p> <p>The proposed full plot width ground floor (GF) extension is 5.8m from the core back wall, compared to no 46 which is 3.6m from the core back wall.</p> <p>FF – the proposal has this protruding by a further 0.9 m beyond the extension wall of no 46.</p> <p>The proposed FF extension is 4.5m from the core back wall. This is excessive compared to no 46, where the</p>

Application No:      Consultees Name:      Received:

Comment:      Response:

FF extension is 3.6m from the core back wall.

The scale compounds what is already a bulky building with the second floor (SF) extension. In view of this previous SF extension, any volume increase should relate to the original form (before the SF extension) and the GF extension should not exceed – in any manner, full width or otherwise – 3.6m from the core back wall to match no 46.

The proposed GF extension would loom approximately 1.2m above the 2m boundary fence (height 3.15m– Ground Level 19.9m, GF Roof 23.05m). This is unacceptable.

The proposed extension occupies an excessive part of the garden. This is contrary to CLP Policy D1 Design and Policy D2 Heritage, to the Inkerman Conservation Area Statement and to CPG.

Policy D1 Design 7.20: Development within rear gardens and other undeveloped areas can often have a significant impact upon the amenity and character of an area. The Council will resist development that occupies an excessive part of a garden and where there is a loss of garden space which contributes to the character of the townscape.

Policy D2 Heritage 7.55: The value of existing gardens, trees and landscape to the character of the borough is described in Policy A2 Open space and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

Inkerman Conservation Area Statement Ink 22: 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.

CPG Home Improvements 2.1.1:

Rear extensions should:

Be subordinate to the building being extended, in relation to its location, form, footprint, scale, proportions, dimensions and detailing

Respect and preserve the original design and proportions of the building, including its architectural period and style

Be carefully scaled in terms of its height, width and depth

Allow for the retention of a reasonably sized garden

Respect and duly consider the amenity of adjacent occupiers with regard to daylight, sunlight, outlook, light pollution/ spillage, and privacy

Ensure the extension complies with the 45 degree test and 25 degree test as set out in the Amenity CPG – or demonstrate BRE compliance via a daylight test

Consider if the extension projection would not cause sense of enclosure to the adjacent occupiers

Not cause light pollution or excessive light spillage that would affect neighbouring properties

Respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space

Retain the open character of existing natural landscaping and garden amenity, including that of neighbouring properties, proportionate to that of the surrounding area

Application No:    Consultees Name:    Received:

Comment:    Response:

Have a height, depth and width that respects the existing common pattern and rhythm of rear extensions at neighbouring sites, where they exist.

CPG Home Improvements 5.2:

Gardens have become particularly prone to development pressures where the loss of soft landscaping has resulted in the erosion of local character, amenity, biodiversity and their function as a sustainable drainage system to reduce local storm water runoff.

SUNLIGHT

There is already shadowing of no 46 from the additional second storey of no 47. Due to the NE orientation/alignment of Alma Street, no 47 already removes light from the house and garden. The Daylight and Sunlight Report provided with the application shows that under the proposals no 46 would receive significantly less sun and light.

The proposals, as the submitted report confirms, are non-compliant with the British Research Establishment (BRE) recommendations as confirmed in the Daylight and Sunlight Report Item 4.4.1.

Sunlight hours to the garden would be reduced from 28% to 17% (a loss of 11%). After the development the area of garden receiving at least 2 hours sunlight in March will be just 0.59 of its former value against the BRE's clear guidance that any loss, in such circumstances, should be no more than 0.8 of its former value. This level of loss, again as the BRE Guidance accepts, will be clearly noticeable and detrimental to our enjoyment of our garden. Indeed, as the shadow drawings show (Appendix 3) the only part of our garden that will receive direct sunlight is the north east corner away from the house itself.

In particular, we do not agree with the implication in paragraph 4.4.1 of the Daylight and Sunlight Report that, because the garden is small and already receives shading, it is permissible for it to lose even more sunlight (or that it is "not practical" to meet the 21 March 2 hour sunlight recommendation). The fact that the garden is small and is already shaded means that further reduction of sunlight should be minimised. Again the BRE Guidance recognises in terms the particular importance of sunlight to gardens in tight urban settings.

Additionally, under the proposals window 2 in the dining and kitchen area would receive only 20% sunlight hours in the summer (down from 39%, meaning a reduction by 19% / a reduction by almost half in relative terms) and would lose all of the sunlight hours that it currently receives in the winter.

LIGHT POLLUTION/EXCESSIVE LIGHT SPILLAGE

The protrusion of the GF and FF extensions beyond no 46 would cause light pollution/ excessive light spillage to the ground and first floors of no 46, including into a bedroom.

In sum, we reiterate that we understand the desire to modernise and upgrade the property, but we object to these proposals in their current form for the reasons set out above.

FOOTNOTES

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

**Comment:**    **Response:**

Links :

Camden Local Plan (2017) (incorporating Policy D1 Design and Policy D2 Heritage)

<https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>

Inkerman Conservation Area Statement

<https://www.camden.gov.uk/documents/20142/7629312/Inkerman.pdf/f1d68477-503f-0de2-c0ac-61d8e20587d1>

Camden Planning Guidance (2021)  
Home Improvements

<https://www.camden.gov.uk/documents/20142/4823269/Home+Improvements+CPG+Jan+2021.pdf>

---