

Mr D Pope
Chief Planning Officer
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Dear Mr Pope

Kentish Town - 5 Hargrave Place, N7 0BP

DLP Planning has been instructed by the owners of Flat 5, 5 Hargrave Place following the submission of a planning application (2023/2627/P) by Hargrave Development Ltd. This planning application proposes development directly above our client's property. We have assessed the application, the site itself and the context and reviewed the relevant planning policy applicable to this application and my client's property.

On behalf of our client, we formally object to the application and for the reasons set out below it warrants refusal.

The application

The planning application proposes a two-apartment rooftop extension.

Relevant Planning History – 5 Hargrave Place

2014/3714/P

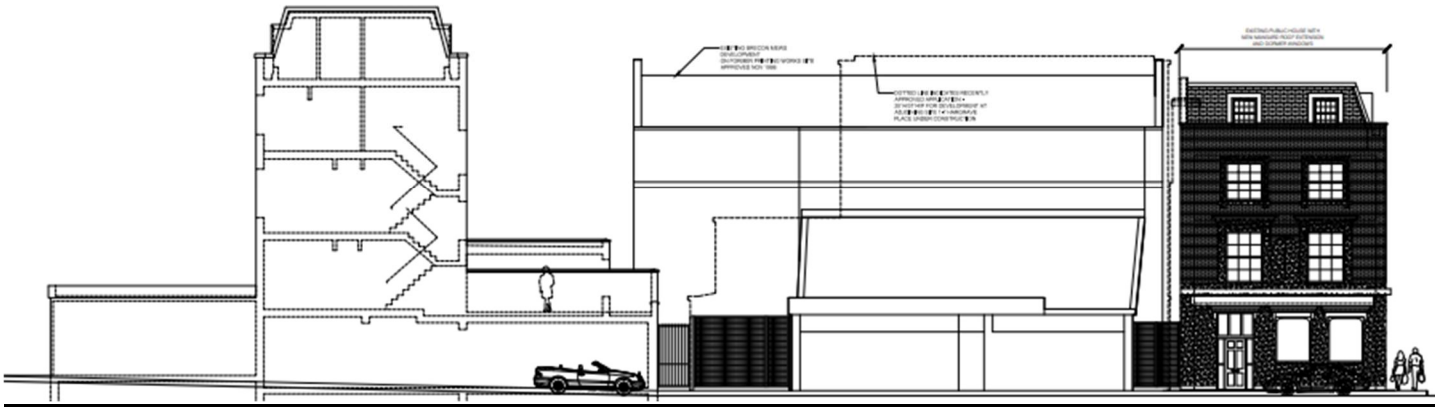
Planning permission was granted for the demolition of the existing industrial building and the erection of a ground floor industrial (B1c) and 6 apartments above, 4 storeys in total. This permission was built out.

2022/0425/P

Prior Approval was sought (on 3rd June 2022) through Permitted Development Rights (PDR) for a single-storey roof-top extension to the building. This was not a "Full" planning application, rather the applicant sought to utilise Permitted Development Rights (PDR) to achieve this objective. A planning statement accompanied a series of drawings. The statement explains that this approach being taken was in response to a revision to PDR on 1st August 2020 which allowed the construction of up to two additional storeys, subject to Prior Approval and attendant considerations/requirements. A daylight/sunlight was also submitted.

On 3rd February 2022 an objection from an individual "Margaret Conroy" detailed objections concerning overlooking and sunlight/daylight matters. Twenty-five days later (28th April 2022) a response (letter) from the applicant's daylight/sunlight consultant further assessed these matters. This was followed 14 days later (16th May 2022) by revised plans, a sound insulation note and a surveyors report opining the building's status as being "detached."

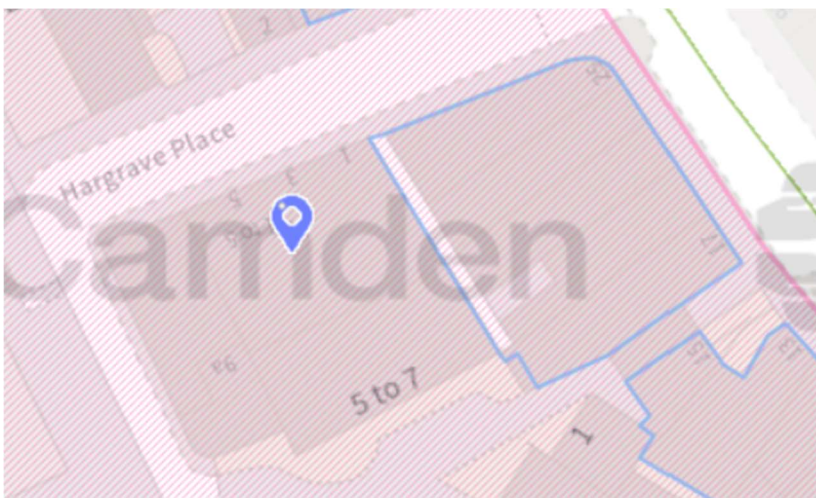
On 6th June 2023 further plans and a planning statement were submitted. As no documents such



Planning Policy

In addition to the National Planning Policy Framework (NPPF) 2021 and the London Plan (2021), your authority’s Local Plan (2019) and the emerging Local Plan, contain the policies against which any proposed development must be assessed and in your authority’s case determined. The latter plan is at a very early stage of preparation with broad views being requested to inform an initial draft Local Plan, this ending on 13th January 2023. There are therefore no draft policies against which this application can be assessed.

LB Camden Local Plan (2019) – proposals map



The site is located within the Kentish Town Neighbourhood Plan area and lies adjacent to the Borough boundary with LB Islington. The Admiral Mann pub, directly adjacent, is a Locally Listed Building.

LB Camden Local Plan - policies

Design

Design and appearance for any new development should be afforded a high degree of sensitivity, thought and consideration. In respect of design, policy “D1 – Design” is of relevance, not least the section within it which is entitled “Tall Buildings.”

Policy D1 – Design (D1)

As Policy D1 Design states, “All of Camden is considered sensitive to the development of tall buildings” and “... will be assessed again the design criteria set out above ...” (Policy D1 Design a-o).



“D1 (a.) respects local context and character”

The current disposition of building height along Hargrave Place is 2,3,4 and fronting Brecknock Road 5 storeys. At 2A, opposite the application site, there is a slender recessed 5th-storey addition. For the properties Hargrave Place elevation, most evidenced is what is already a substantial 4-storey to 2-storey step down with the application proposing a 5 to 2-storey step down.

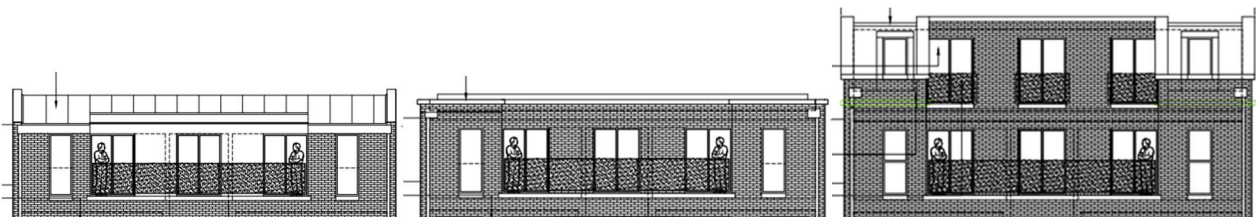
The lack of sensitivity to step-down is also evidenced by how the same elevation treats The Admiral Mann. The modest relatively modest four to three-storey step down (2m) is negatively accentuated by a 4m difference in height. It is clear from this elevation that what brings added significance is that The Admiral Mann is a Locally Listed building where increased sensitivity to design/height must occur.



Furthermore, again, the recessed fifth-storey buildings fronting Brecknock Road, act effectively as bookends to the northeastern end of Hargrave Place. Brecknock Road as the main arterial route enjoys a 23m separation distance across that street, while Hargrave Place has a far smaller 8m wide separation distance. The introduction of a fifth storey at this site could lead to a wider precedent being set, where, the result could be a far more enclosed street with opportunities for direct light limited.

The application's additional storey will negatively impact the current and surrounding built form through the increased step down. Should the precedent be set and this is followed, Hargrave Place's ability to enjoy direct sunlight will be limited severely. These effects do not respect local context and character.

It is notable that during consideration of the original application (2014/3714/P) the issue of height was assessed.



- As originally submitted, 2014

- As amended/approved, 2014

- As proposed today

The case officer's report to Planning Committee states that during the course of the application;

"To give the building a more cohesive appearance, a pitched, aluminium-clad roof has been replaced with a flat roof reducing the height of the by 350mm."

It is clear that when consideration of a 4-storey building was being undertaken that height was deemed to be sensitive. The subsequent height reduction (and other matters) resulted in the application being approved.


Analysis of the planning history for Hargrave Place since those officer's views were articulated in that Committee report, does not show any precedent for additional height being approved. In terms of height, we believe the situation has not changed. We also believe that the additional

storey proposed, far in excess of the 350mm back then being deemed inappropriate, accentuates the negative impact this storey has on the street scene and context for this property. Accordingly, we believe that on this ground the application does not comply with Policy D1 and warrants refusal.

“Policy D2 Heritage” and “Policy D1 Design b. – preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage.”

Policy D2 Heritage, states that *“The Council will preserve, and where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including ... locally listed heritage assets.”*

The Admiral Mann public house directly adjacent to the application property has been designated by your authority as a Locally Listed Building (ref477), as such it is deemed to be of heritage significance.

<p>Ref477:</p>  <p>(Click here to return to the ward map)</p>	<p>Address: Admiral Mann Public House, 9 Hargrave Place</p> <p>Significance: Architectural, Historical, Townscape and Social Significance</p> <p>Asset Type: Building or Group of Buildings</p> <p>Ward: Kentish Town</p>	<p>Mid 19th century Public House on corner plot, remnant (along with 9a and a much altered no. 2 Hargrave Place opposite) of an enclave of small scale workers housing that was demolished in the early-mid 20th century and replaced by the Long Meadow Estate.</p>
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As noted from the Locally Listed building assessment it is deemed to be of architectural, historical, townscape and social significance.

The above statement is not dated, however, the officer's report to the planning committee in 2014 does not state the building to be Locally Listed but does refer to Local Listings in terms that the application site then, did not *“... lie within a conservation area or appear on the draft local list.”* Consideration was given to heritage and specifically Local Listing. We surmise that The Admiral Mann was given Local Listing Status after 2014. If this is correct, a heritage consideration applies now which was not back in 2014. We would be grateful if you could confirm when this status was applied to The Admiral Mann.

The lack of moderated step-down has already been expressed in relation to Policy D2. The further increase in height proposed by this application accentuates negatively the application properties' presence on the street and diminishes the stature of this Locally Listed asset. As such, it is contrary to Policy D2 and Policy D1 b. and warrants refusal.

“Policy A1 Managing the impact of development”

This policy seeks *“... to protect the quality of life of occupiers and neighbour,”* permission will be granted *“unless this causes unacceptable harm to amenity.”* Specific factors within this policy of relevance to this application are visual privacy, outlook, sunlight/daylighting and noise.

We note the applicant has submitted a Sunlight/Daylight Report and a Noise Insulation Note. We wish to have sight of your internal Environmental Health Officer's comment(s) in respect of these matters. Thereafter, we will consider whether a further objection is appropriate. In this respect, I would be grateful if you could forward me a copy of their response(s) when received.

Waste disposal

As part of your authorities' aim to make Camden a low waste Borough Policy CC5 Waste d. seeks to "make sure that developments include facilities for the storage and collection of waste recycling." None of the submission documents including drawings and the planning statement indicate how waste will be dealt with. As such the application is contrary to policy and warrants refusal.

Traffic generation/car parking

Policies T1 and T2 address the prioritisation of walking, cycling and public transport and parking/car-free development respectively.

None of the submission documents including drawings and the planning statement deal with transport matters. For instance:

- Will the increase in 2 apartments warrant on-site car parking?
- Will there be a requirement to find off-street car parking or enter into a parking permit scheme?
- If a permit scheme is in place can the surroundings deal with the potential car needs of new residents?
- Is the need for a "parking stress test" triggered?

As there is no information present to assess whether this scheme is transport policy compliant the application warrants refusal on transport grounds.

Summary

This application follows the original planning permission (2014/3714/P) which was built out. When considering the original application, the case officer believed that as submitted originally the building was, from a height perspective, not acceptable. After the building's height was reduced by 350mm, the height was deemed acceptable and this led (in part) to the application being recommended for approval and then granted.

This application proposes an additional storey, far over 350mm. We do not believe circumstances have changed since that view on height was taken. The drastic increase in height since that view was taken is therefore contrary to Policy D1 – Design.

The adjacent pub, The Admiral Mann is a Locally Listed Building. As it stands, we surmise this status was added after the original 2014 planning permission was granted. This gives an increased level of scrutiny to this application which was not present in 2014. We believe the proposal will have a negative heritage impact. The increase in height is also contrary to policies D2 – Heritage and D1 b. – Design.

With no indication given as to how the proposal addresses waste and transport matters the proposal is contrary to Policies CC5 Waste d., T1 Prioritising walking, cycling and public transport and T2 Parking and car-free development.

As the application is contrary to adopted planning policies, on the aforementioned grounds, with there being no other material considerations, the application warrants refusal.

I would be grateful if you could confirm receipt of this letter.

Yours sincerely



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Richard Anderson
Associate Director