

23 April 2025

Dear Daren,

I am writing to object to the 'Lamorna' planning application **2025/1375/P** and would also like to point out an error in the drawings which I believe has had an impact on the design - please see in detail below.

The application is significant as it proposes to demolish a house and build 6 dwellings on a small site in a conservation area. You have accepted the principle of building new homes on the site, and as the Local Plan says: "Good design can increase density while protecting and enhancing the character of an area."

Unfortunately the proposal fails to do this. It is too high, it does not consider the built form of its surroundings and has many effects of over-development, such as overlooking, noise impact and light deficiency. Its design, bulk and mass do not conform with Policy D1 (among other policies) which says the Council will expect developments to consider:

- character, setting, context and the form and scale of neighbouring buildings;
- the prevailing pattern, density and scale of surrounding development;
- impact on existing rhythms, symmetries and uniformities in the townscape;
- the composition of elevations;
- suitability of the proposed design to its intended use;
- contribution to public realm and its impact on views and vistas;
- the wider historic environment and buildings, spaces, features of local historic value.

The Conservation Area Appraisal says that development proposals must be considered in the context of "a thorough assessment at the time of the specific character and appearance of that part of the conservation area."

It describes Dartmouth West as:

"cohesive and well preserved".

"Pitched roofs with few roof alterations"

and Dartmouth Park Road:

"Most of the buildings are three storey with semi-basements."

"They are flat fronted".

First House has a "graceful and polite facade".

Lamorna is "a 1920s or 30s two-storey house in dark brick with hipped tiled roof."

The applicants explain that the building's design "takes reference from the Victorian villas further along the street" yet they fail to take reference from the more substantial features of the site's location:

- 1) The design does not reflect the prevailing height in that part of the road and chooses to use the height of the taller house (5-7 DPR) beyond, and making it still higher than the top of that roof. The site's immediate neighbours are 1-3 Dartmouth Park Road, No 2 opposite (why is this house not mentioned in the application or in drawings?) and two-storey First House. The new building would overwhelm this group and dwarf First House in particular. The height and excess bulk also affects houses behind, causing overlooking at the back on a small tight site. The design challenge is to find a height that is appropriate.
- 2) The applicant tries to make out that the location has 'piecemeal' architecture, yet its immediate neighbour to the left, 1-3 Dartmouth Park Road, with number 2 opposite, establish the coherent 19th Century character of the street. The proposal totally fails to make visual links with 1-3 and not a single horizontal line of its floors, windows or details is carried over into the elevation. The error in the drawings (see below) also means that the design has completely ignored the front door and lintel height common to these villas. It is ridiculous that the Heritage Statement claims there is '*emphasis across the principal front elevation to follow the establish[ed] building lines of the neighbouring villas.*' (Heritage Impact Statement 5.5)
- 3) Nothing about the design is flat fronted: essentially the facade comprises a grid of voids and angled glass. They have used a porch form on the ground floor and made the building hollow at street level. The materials are stone, brick and metal and **Design Review comments** said: '*The panel suggests using a single material for the front elevation to drive a more coherent and elegant architectural language.*' Also, '*It would benefit from some simplification to achieve a calmer effect.*'
- 4) The proposal does not reflect the street's prevailing three storeys with semi-basements, seeking to get six apartments out of the site. Houses in the area are sometimes refused permission to make dormers attic dormers due to being an 'unsympathetic and dominant addition to the Dartmouth Park conservation area contrary to policies D1 and D2 of the Camden Local Plan 2017, and policies DC2 and DC3 of the Dartmouth Park Neighbourhood Plan'. (2024/3826/P as an example. Nearby, several refusals of the former garage on Highgate Road were due to the same concerns about height and character of the street scene.) The same judgement should apply here.

DRAWINGS ERRORS

To maintain quality in the Conservation Areas, Camden will 'require all applications to include ... legible, accurate and up to date, fully annotated, scaled drawings'.

In the drawings and 3D views No.1 - 3 Dartmouth Park Road, adjacent to Lamorna, is shown with large windows on the first floor. In reality the largest windows are on the upper ground floor (glass measures 2200mm high), the first floor windows are smaller (glass 1790mm high) and the second floor smaller again. This error, also seen clearly in the computer renderings, gives the impression that the proposed building would be partly in keeping with its neighbour whereas in fact there would be a big contrast in window size, adding to the incongruity, giving the new building a very commercial look.

The error emphasises the proposed building's uncomfortably top-heavy appearance not in keeping with the street. Its facade at street level is comprised of low, hollow arches; the first floor has small windows; the second, third and fourth floors dominate with full length windows. The applicant describes this effect as being 'weightless', I do not agree. **As**

Design Review stated: "The ground floor arches seem out of place in relation to neighbouring houses, and should be reworked, potentially becoming taller."

The applicant's survey is not accurate, making the design unconvincing as a response to its context. The applicants should be asked to check and correct the whole survey and drawings, and the design needs to be re-thought as a result.





Drawing A214 - All window sizes and their details are wrong and need to be re-surveyed and re-drawn in relationship to the proposal. Red line = approximate true height of door and lintel. Dotted line = incorrect lintel height lining up with first floor windows (the only features that line up).



1-3 Dartmouth Park Road facade shows the upper ground windows are the tallest, also showing the strong horizontal lines referred to in Design Review.



Lintels over doors common to many of the houses have similar heights, about 4700mm high.



2) A second error shows No.3 with steps up to a front door: in reality the front door is in a stairwell addition built in the 1960's when the house was made into flats. The applicant's survey failed to notice this obvious fact.

3) Drawing 214 also shows that No. 9-11 has been sloppily cut and pasted from No. 1-3 and shows no gradient to the road. No. 9-11 is in fact narrower and has different details, which again shows the application's poor approach to context.



9 - 11 Dartmouth Park Road is not the same as 1 - 3.

NOTE ON SUNLIGHT

In the computer renders, the sun flooding the front of the building would only occur for a short time in spring and summer as the site faces north west. For most of the day the proposed tall block would have a much darker appearance on the street with the sun behind it (like in the above photo, for example).

DESIGN REVIEW

The review's opinion that the height is acceptable is highly questionable. Given the significance of a new build in a Conservation Area why was there no conservation specialist on the panel and why only two panelists?

The Review also had reservations about the scheme, some quoted above, and significant advice has been ignored, such as:

- the use of simpler materials similar to other projects by the same architect
- bringing the brick piers down to the ground
- raising the height of the arches
- concern about the carbon impact and method of construction
- concern over noise impact from heat pumps

CONCLUSION

I have tried to show that the application does not meet Conservation Area policy requirements due to its design and excess height. It is an example of how over-development - or trying to fit too many flats onto a site - compromises the conservation area, as well as compromising the quality of its living space, such as the proposed dark (and probably damp) basement. The housing would not be affordable, and anyway housing numbers alone should not be the only criteria for judging a scheme.

I really hope the Council follows its own advice from the Local Plan: "*Good design can increase density while protecting and enhancing the character of an area.*" This application should be refused - please ask the applicants to bring forward a better design for this site.

Thanks if you have read through all of this.

Yours sincerely,

Lucy Rogers

