

6 August 2013

Angela Ryan
Camden Planning
Camden Town Hall Extension
Argyle Street
London
WC1H 8ND



Dear Ms Ryan

CAMDEN: 23 GAYTON ROAD LONDON NW3 1TY- 2013/3578/P

1. This letter encloses comments in respect of the above application which seeks consent to replace the existing 2-storey rear extension with a larger full width extension.
2. I live next door at No. 22 Gayton Road with my wife and our 21 month old daughter.

The Application Site

3. This is a Victorian 3-storey plus basement terraced building on the northwest side of Gayton Road in Hampstead. It is an attractive building with a canted bay on three floors and decorative brickwork stringcourses and cornices at the front.
4. The building is identified as a positive contributor in the Hampstead Conservation Area.
5. At the rear the building has its original rear return.



6. The aerial oblique image below shows that most buildings in the terrace are unchanged at rear upper ground floor level.

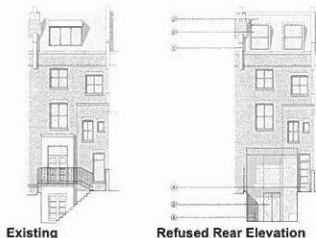


Planning History

7. Consistent with this it should be noted that the application building has the same footprint on the 1895 OS as now. There have always been shallow rear returns over about a third of the rear elevations. The rear return on the application building is on the opposite side of the rear elevation to my house (No. 22) to the south.



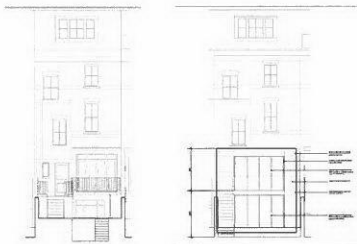
8. In 1970 permission **8461** was granted for alterations to convert the basement of No. 23 into a self contained flat.
9. In 2003 consent **X0302251** was granted for the partial enclosure of the existing Gayton Road lightwell area; the extension of the existing Gayton Crescent single storey entrance lobby; the increased excavation of the existing cellar area to provide additional habitable floorspace; with alterations to the fenestration pattern and the enlargement of the garage entrance.
10. Of considerable significance to this application, **Application 2012/1987/P** was submitted in 2012 for a similar extension at No. 30 that did not extend over the full width of the rear elevation. No 30 is part of the same terrace seven houses away from this application site (the road is numbered consecutively).



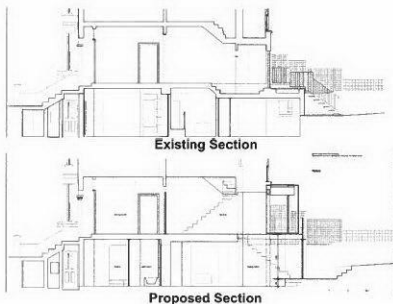
11. It was refused in June 2012 for the following reason: *The proposed 2-storey glazed extension, by reason of its design, height and bulk, would create an unduly visually prominent and discordant feature that would harm the character and appearance of the host building and wider Conservation Area, contrary to policies CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework Core Strategy; and policies DP24 (Securing high quality design) and DP25 (Conserving Camden's heritage) of the London Borough of Camden Local Development Framework Development Policies.*

The Application Scheme

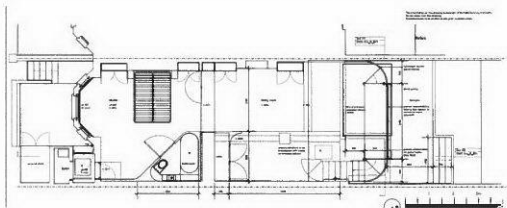
12. I have found the plans accompanying the application some of the most difficult to read that I have ever encountered.
13. Important sections are missing and some seem to have been drawn in reverse (for example dwg no. 246_G_027 shows the section from No. 22 yet it does not properly show the parts of the existing building to be retained). The full extent of the proposal would only be clear if the plans showed the entire building and including annotation.
14. The application seeks consent to demolish the existing rear extension at lower and upper ground levels and replacement with a full width glazed extension. The similarity between it and the refused scheme at No 30 are evident from the elevations reproduced below.
15. The principal difference between the two is that No 30 was not full width whereas this proposal is.



16. The height of the lower ground extension is 2.9m with the stepped back upper ground extension being 2.6m high. The stepped design creates a balcony at upper ground floor level. It has round edges that are unprecedented in this area and detract from the contribution the building makes as part of a generally consistent group to the Conservation Area.
17. At lower ground level the extension extends 1.7m from the rear of the building. At upper ground level it extends 940mm deeper than the existing rear projection.



18. At lower ground level further excavation is required to provide a further 5qm of living room. As the extension proposed is outside the footprint of the existing building a BIA is required by CPG 4 and LDF Policy DP27. It is surprising that the Council has validated this application without a Basement Impact Assessment. To have done so is inconsistent with its current practice (for example application 2013/1470/P at No. 60 Frogna).



Grounds of Objection

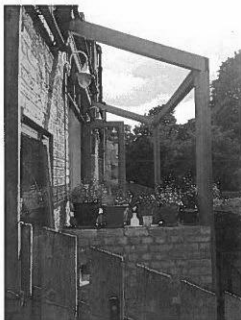
Harm to Heritage Assets

19. The Hampstead Conservation Area is a heritage asset. The Council has identified the application building as a positive contributor to it. NPPF requires an analysis of the effect of the proposal on the heritage asset.

20. It is surprising that the application was validated without a Heritage Asset Significance Appraisal contrary to NPPF Para 128.
21. The application property has a rear return identical to the other properties along Gayton Road.
22. The proposal for a full width extension at both lower ground and upper ground levels and associated demolition would materially alter the building's historic form, which is inconsistent with **CAS Policies H26 and H27**.
23. The proposed full width projection and infilling of the gap at lower ground level would have a significantly harmful impact on the character of the Conservation Area and this section of the terrace. It will disrupt the rear building line along Gayton Road, which is consistent in scale with few fluctuations and unspoiled.
24. This is contrary to **CAS Policy H28**, which states that rear extensions will not be acceptable where they would spoil a uniform rear elevation of an unspoiled terrace or group of buildings.
25. It follows that the proposal is contrary to **LDF Policy DP25** (Conserving Camden's Heritage) as it fails to preserve and enhance the character and appearance of the Conservation Area. It is also at odds with **NPPF para 134** in that no substantial public benefits that outweigh the harm identified have been demonstrated.

Precedent

26. There are concerns that the proposal would constitute a precedent for further proposals that might harm the CA. The adjoining property at No. 21 has recently erected a timber and brick enclosure and expressed an intention to create an enclosed extension – consent for this application would inevitably have a domino effect.



Lack of a Basement Impact Assessment

27. The application plans are extremely difficult to interpret. The selected sections are not helpful in explaining the proposal.
28. A Basement Impact Assessment is required for the lower ground works as they extend beyond the footprint of the original building. The absence of a BIA means the proposal is

contrary to policies **CS5** (Managing the impact of growth and development) and **CS13** (Tackling climate change through promoting higher environmental standards), **DP23** (Water), **DP26** (Managing the impact of development on occupiers and neighbours) and **DP27** (Basements and lightwells).

Impact on No. 22

29. The proposed 1.6m projection at upper ground level will affect the amount of light going into my living room and will harm the outlook from this room.
30. Overlooking from the proposed balcony into my living room will also be a problem as shown below:



31. It will therefore conflict with NPPF paragraph 17, which seeks a good standard of amenity for all existing occupants.

Conclusion

32. The proposal is at odds with current planning policy. It will have a materially harmful effect on the historic environment and the living conditions of myself and my family.
33. The extension would be contrary to paragraphs 56 and 132 of the National Planning Policy Framework which attach great importance to the design of the built environment, and to the conservation of designated heritage assets.
34. The Council is thus respectfully requested to refuse the applications.

Yours sincerely