

19th March 2015

Planning Services,  
London Borough of Camden,  
5 Pancras Square,  
London  
N1C 4AG

3 Leverton Street,  
London NW5 2PH

Dear Mr Clark,

**FAO: James Clark**

**Re: 300 Kentish Town Road, NW5 2TG. Planning Application Ref. 2015/0818/P**

I am writing to submit an objection to the above application on the following grounds:

- a) **The proposals will cause unacceptable loss of light in neighbouring properties.**
- b) **Inconsistent, incomplete and misleading submission information.**
- c) **The proposals raise issues concerning the privacy and adjacency of neighbouring homes.**
- d) **The proposals are not in line with Camden Planning Policy with regard to the planning and the historical environment.**

I will address the above points below. For your information I have enclosed the Officer Delegated Report for an application submitted by the applicant for an extension to the residential accommodation at the rear of 300 Kentish Town Road in May 2007 (application ref. 2007/2735/P). Several of the key issues raised by that application are the same as those raised by this one, which caused the officer at the time to recommend refusal.

**a) Loss of daylight in neighbouring properties**

**Nos. 1 and 3 Leverton Street.** Our house, 3 Leverton Street, is beside the proposed development. The proposed first floor extension to 300 Kentish Town Road will have a hugely detrimental effect on the natural light levels in our ground floor rear rooms and garden, potentially contravening our right to light. Our kitchen and dining room will be turned into rooms requiring artificial light during the day, summer and winter. The garden will be cast into almost day-long shade, even in the summer. The submitted drawings do not indicate the effect of the proposals on our kitchen window facing the boundary with the 300 Kentish Town Road plot, in the rear projecting extension – the 35 degree line shown on their drawings is drawn from the original rear façade of the house. Further, Camden Planning Guidance recommends a 25 degree line test, which is already substantially cut across by the existing building, let alone the new proposals. In the attached Officer Delegated Report - specifically the section under '1 and 3 Leverton Street' - the Planning Officer refers to her visit to 1 Leverton Street and concludes that as light levels are already low, the proposed extension would reduce light levels to unacceptable levels. The new proposals would be even worse than the previous ones in this respect, because the proposed separation between the side face of the new extension and the back face of the Leverton Street houses has been reduced further still, from 9.5m in the previous application to 8m in this one.

**Nos. 1, 2 and 3 Leverton Place.** Using Camden's guidance of a 25 degree line from facing ground floor windows, the new proposals will cause unacceptable loss of daylight in the neighbouring properties along Leverton Place (Nos. 1, 2 and 3).

**300 Kentish Town Road.** The new proposals will also unacceptably reduce light levels in the two bedrooms on the first floor at the back of the original building of 300 Kentish Town Road. The new proposals place storey high brick walls right in front of the only windows to these two bedrooms, just 1.5 and 1.9 metres away from them.

No daylight or sunlight report has been submitted to support this application for a site surrounded closely by residential properties. The proposals should be refused because of the unacceptable loss of light they would cause in neighbouring homes.

## **b) Inconsistent, incomplete and misleading submission information**

**The Application Form.** Section 3 of the Application Form, 'Description of the Proposal', states 'Conversion of first floor apartment from three bedroom to four bedroom with extension'. This is a misdescription of the works, significantly understating the additional accommodation being proposed. The building as it exists has two apartments on the first floor; one apartment with three bedrooms and one apartment with one bedroom. The works proposed turn the existing one bedroom apartment into a four bedroom apartment.

**Demolition.** Section 9 of the Application Form, concerning demolition, refers only to demolition of the existing first floor building. The Design Statement states that the current ground floor elevation facing onto Leverton Place will be retained. However drawing P\_03, the proposed elevations, shows that the ground floor elevation is to be changed and undergo partial demolition, along with the roof to the office at ground floor level. These documents have major discrepancies. This leads to confusion about design intent and the extent of the works, and that is unacceptable.

**Roof Top Plant Equipment.** Neither the existing or proposed plans or elevations show any of the ventilation plant for the restaurant business located on the ground floor. The existing plant on the first and second floor roof levels is large, antiquated and badly maintained. The sensitive placement or better still the concealment of plant equipment should be part of the planning consideration for a proposal in a conservation area. Omitting any indication where the required plant might be located, in either the drawings or Design Statement is a serious and unacceptable omission.

**Floor, Roof or Parapet Level Information on the Drawings.** The first floor level shown on the elevation drawings is not correct - note that the floor levels are not shown on the existing elevation drawing E\_03, where their inaccuracy would have been immediately apparent. No accurate existing or proposed floor, roof or parapet setting-out levels (i.e. measurements) are given on the plans or elevations. This is unacceptable.

**Misleading Information.** Drawing P\_03 shows the ground floor facade facing onto Leverton Place approximately 700mm shorter than the existing. It also shows the proposed new first floor rear apartment extension as taller than the existing first floor apartment by about 300 to 400mm, without apparently exceeding the current eaves level. However the Design Statement and Application Form both state that no demolition will occur to the ground floor. If they build the new taller first floor extension shown on P\_03 (arguing that they are keeping to the number of brick courses shown on the proposed first floor elevations) on the existing ground floor structure, this would result in a the new building being overall around a metre taller than shown on the drawings, and thus also about the same amount taller than the current building. This would make the loss of light issues to neighbouring homes described earlier even worse. By not showing any accurate setting-out levels in the submission, it will make it very difficult, if not impossible, to hold the developer to account once construction starts on site.

The drawings have other omissions/inconsistencies. For instance the plans do not show how the new change in level on the first floor would be handled internally (if their proposed elevations are a true statement of their intent). Or give enough information about adjacent properties to allow reasonable assessment of the impact of the proposals. Submitting such inconsistent and conflicting information, with such omissions, is unacceptable. In effect it prevents both neighbours and the planning authority from fairly assessing the potential impact of the proposals.

## **c) Privacy and Adjacency of Neighbouring Residential Properties**

**Leverton Place.** The new enlarged first floor extension proposal will substantially reduce the privacy and increase overlooking of the facing properties on Leverton Place, in particular nos. 1, 2 and 3. The front face of the new extension will be approximately 8.4m from the front facades of these houses on Leverton Place. This is substantially closer than the 18m window-to-window guideline for facing windows between residential properties. This, together with the proposed fully-glazed, fully openable french window openings, means that the privacy of the properties opposite will be hugely compromised compared to the current situation. The Design Statement makes no mention of what planning guidance has been followed in determining appropriate setback distances.

**Leighton Road.** The new extension proposes to increase the number and size of the windows looking towards the back of the properties on Leighton Road. In particular the window from the proposed bedroom 3 (see plan P\_02) looking towards the back of no. 1 Leighton Road will only be about 6m from this property's first floor living/dining room window (although not directly opposite). I can't measure exactly as no drawn information

concerning adjacent windows is provided in the application documents. However this degree of visual intrusion into a neighbouring residential property is not acceptable.

**Roof Terraces.** The current roof terrace/perimeter railings were never granted planning permission. It was an illegal development that has only gained acceptance because of the passage of time. (Similarly the first floor rear accommodation, developed as an office, was never granted planning permission to be converted into residential accommodation). A roof terrace in such a location is completely inappropriate, and contravenes all planning guidance. The current terrace is a source of frequent noise nuisance and intrusion into neighbouring properties' privacy. No permission should be granted for a roof terrace as part of a new planning application approval.

#### **d) Design within a Conservation Area and in the Context of Listed Buildings**

The proposals run against Camden Planning Policy with regard to development within a conservation area and within the context of listed buildings (nos. 1, 3 and 5 Leverton Street).

I believe the proposals do not follow the spirit or the specifics of the policies with respect to the following:

- Respect of scale, massing and alignment within a historic environment so as to harmonise the development with its neighbours in the conservation area.
- Form and massing to conserve or enhance the quality of space between and around listed buildings.

In particular they run against Camden Planning Policy in the following two respects:

Firstly, whilst the existing rear development to 300 Kentish Town Road is no design exemplar, it was clearly permitted to be developed on the basis that from street level in Leverton Place, the first floor development is almost completely hidden. This maintained, at least from street level, the 'rhythm' of a large property on Kentish Town Road followed by lower walls to back gardens and then the mass of the residential property fronting onto Leverton Street (3 Leverton Street). The building line of the proposed new first floor extension has moved significantly forward towards Leverton Place compared to the existing 1<sup>st</sup> floor apartment. The new development will be clearly visible from street level, completely altering the context of the surrounding buildings along Leverton Place in terms of massing. The new development will significantly enclose Leverton Place, reducing light levels and altering the character of the lane. This does not 'conserve or enhance' the context or the character of Leverton Place as part of the conservation area. Furthermore the effects described would significantly alter and be detrimental to the setting of the adjacent listed properties on Leverton Street, most particularly nos. 1 and 3.

Secondly, the elevations of the proposals do not fit in with the nature of street frontages in the conservation area. They deserve more design consideration than just settling for a brick box with a flat roof and randomly scattered window and door openings. There is no facade composition or design integrity to the proposal, and little attempt to harmonise its appearance with the architecture of the conservation area. For instance there are no other properties with french windows opening onto first floor terraces overlooking the street in the conservation area. No attempt to cite precedence has been made in the Design Statement.

In conclusion, I request that the proposals as they stand are rejected. The submitted information is inadequate to assess the impact of the proposals on neighbouring properties in key respects (e.g. no daylight or sunlight report), as well as inconsistent, factually incorrect in places, and with significant omissions. As a consequence of these issues the submitted information is misleading. The design as it stands will be detrimental to the conservation area and in particular to neighbouring residential and listed properties, causing unacceptable loss of daylight and privacy.

If you would like to visit our house to assess for yourself the potential impact of the proposed development, please don't hesitate to contact me.

Yours sincerely,

Richard Porter