



CHARTERED TOWN PLANNING CONSULTANTS

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HERTFORDSHIRE
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Our Ref: AB/SLD
Your Ref: 2015/3796/P

Development Management (Planning)
Camden Council
5 Pancras Square
London
N1C 4AG



For the attention of Ms F Davies

11 March 2016

Dear Madam

PLANNING APPLICATION FOR ERECTION OF SECOND FLOOR EXTENSION AND DORMER TO REAR OF PROPERTY – 38 BROOMSLEIGH STREET, LONDON NW6 1QH

I refer to the planning application and your consultation letter in respect of the above matter. On behalf of Ms A Dunkley and Mr S Basquil, of Flat A, 38 Broomsleigh Street, I confirm our **OBJECTION** to the proposal.

The main concerns with the proposed development relate to the impact on the character and appearance of the host building and surrounding area and the amenities of the adjoining occupiers. These concerns are set out in turn below.

Planning Policy

The starting point for assessing development proposals is always the Development Plan. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states *“if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”*. The Development Plan for this proposal consists of the Camden Core Strategy (Adopted 2010) and the Camden Development Policies (Adopted 2010).

In addition, the Government’s National Planning Policy Framework is an important material consideration for determining planning applications along with supplementary guidance produced by the Local Planning Authority.

I N C O R P O R A T I N G B R I A N B A R B E R A S S O C I A T E S
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National Planning Policy

The National Planning Policy Framework (NPPF) attaches great importance to the design of the built environment, stating *"good design is a key aspect of sustainable development...and should contribute positively to making places better for people"*. It stresses the need to plan positively for the achievement of high quality and inclusive design for all development. Whilst it states that local authorities should not impose architectural styles or particular tastes, it reinforces that it is also important to consider local character and distinctiveness, continuing that *"permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions"*.

Local Planning Policy

Camden Core Strategy (2010-2025)

The importance of achieving high quality design is also identified in local policy. Core Strategy Policy CS14 ('Promoting high quality places and conserving our heritage') states that the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:-

- a) requiring development of the highest standard of design that respects local context and character

Camden Development Policies (2010-2025)

Policy DP18 ('Parking standards and limiting the availability of car parking') states that the Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport.

Policy DP22 ('Promoting sustainable design and construction') states that the Council will require development to incorporate sustainable design and construction measures.

Policy DP24 ('Securing high quality design') states that the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:-

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;

- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.

Policy DP26 ('Managing the impact of development on occupiers and neighbours') states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors we will consider include:-

- a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels;
- d) noise and vibration levels;
- e) odour, fumes and dust;
- f) microclimate;
- g) the inclusion of appropriate attenuation measures.
- h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- i) facilities for the storage, recycling and disposal of waste;
- j) facilities for bicycle storage; and
- k) outdoor space for private or communal amenity space, wherever practical.

Camden Planning Guidance Design

The Design Guidance was prepared to support the policies in the Local Development Framework and forms a Supplementary Planning Document which is a 'material consideration' in planning decisions.

In terms of roof dormers the guidance states:-

"Alterations to, or the addition of, roof dormers should be sensitive changes which maintain the overall structure of the existing roof form. Proposals that achieve this will be generally considered acceptable, providing that the following circumstances are met:-

- a) *The pitch of the existing roof is sufficient to allow adequate habitable space without the creation of disproportionately large dormers or raising the roof ridge. Dormers should not be introduced to shallow pitched roofs.*
- b) *Dormers should not be introduced where they cut through the roof ridge or the sloped edge of a hipped roof. They should also be sufficiently below the ridge of the roof in order to avoid projecting into the roofline when viewed from a distance. Usually a 500mm gap is required between the dormer and the ridge or hip to maintain this separation (see Figure 4). Full-length dormers, on both the front and rear of the property, will be discouraged to minimise the prominence of these structures.*
- c) *Dormers should not be introduced where they interrupt an unbroken roofscape.*

- d) In number, form, scale and pane size, the dormer and window should relate to the façade below and the surface area of the roof. They should appear as separate small projections on the roof surface. They should generally be aligned with windows on the lower floors and be of a size that is clearly subordinate to the windows below. In some very narrow frontage houses, a single dormer placed centrally may be preferable (see Figure 4). It is important to ensure the dormer sides (“cheeks”) are no wider than the structure requires as this can give an overly dominant appearance. Deep fascias and eaves gutters should be avoided.
- e) Where buildings have a parapet the lower edge of the dormer should be located below the parapet line (see Figure 4).
- f) Materials should complement the main building and the wider townscape and the use of traditional materials such as timber, lead and hanging tiles are preferred.

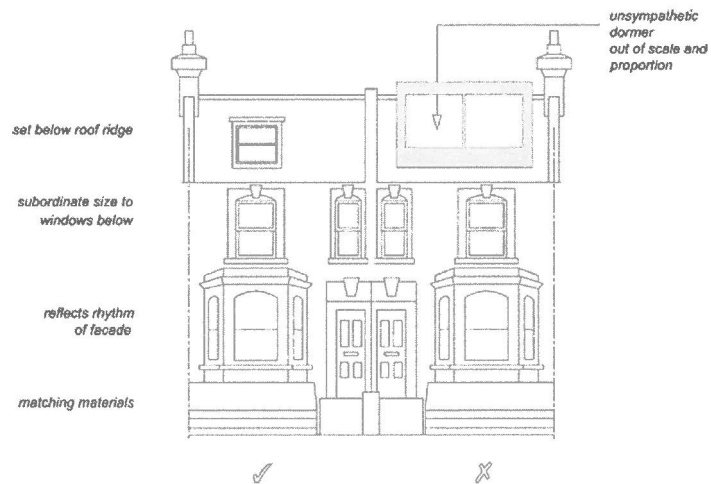


Figure 4. Dormer windows from Camden Design Guidance showing good practice standards for roof extensions

The guidance advises that the presence of unsuitably designed new or altered dormers on neighbouring properties will not serve as a precedent for further development of the same kind.

Site/Surroundings and Proposed Development

The application site consists of a two storey end of terraced building located on the west side of Broomsleigh Street at the junction with Ravenshaw Street. Given the property's prominent location within the street views of the front, side and rear elevations are clearly available from the public realm.

The surrounding area is residential and is characterised by similar two storey terraced dwellings. Whilst not a Conservation Area, the buildings and locality have an attractive character and the visual amenity of the area is one of a pleasant nature. In general, surrounding dwellings have largely retained their existing form and character. While extensions have been added, in the main, these consist of roof lights, small front and rear dormer windows and single storey additions.

The property has historically been subdivided to provide two self-contained residential flats and the current application relates to the extension of the first floor property.

The proposed development seeks to convert the existing loft space and construct a rear dormer window to provide two bedrooms and an ensuite bathroom. Furthermore, permission is sought to construct a second floor rear extension, also in the form of dormer window, over an existing two storey rear projection at the building.

The proposed rear facing dormer would extend back from the existing rear roof slope, which is staggered in depth. It would be located on the deeper part of the existing roof slope and would extend up close to the main ridge on the original building.

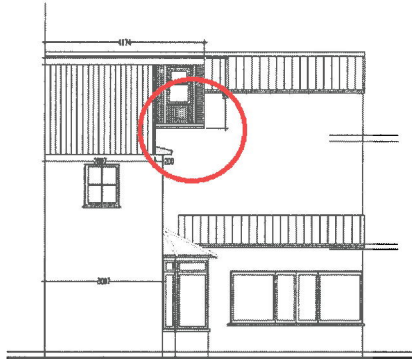
The proposed second floor extension would be constructed on top of an existing two storey outrigger at the rear of the building. It would extend above the existing ridge (on the two storey projection) and like the rear dormer would be just below the ridge on the main building.

Drawing discrepancies

Two discrepancies have been identified on the plans.

The first relates to the width of the proposed rear dormer window and its relationship with the width of the existing roof on the main building. As set out above, the rear roof slope on the main property is staggered in depth and the rear dormer window, as shown on the proposed roof plan, would be constructed on the deeper part of the existing roof.

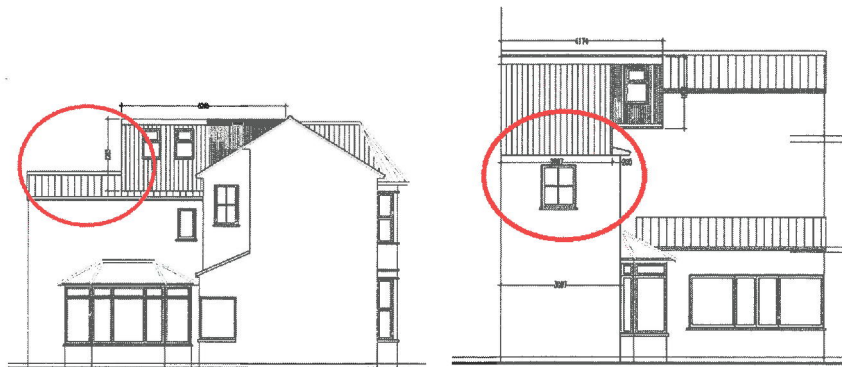
However, the width of the dormer shown on the proposed rear elevation exceeds that of the existing roof and, as a result, part of the dormer is shown floating (not supported by the roof or building underneath). Consequently, there is a discrepancy between the proposed roof plan and the proposed rear elevation. This matter urgently needs to be investigated by the Council.



PROPOSED REAR ELEVATION

Dormer discrepancy circled in red

The second discrepancy relates to the depth of the proposed second floor extension. On the proposed side elevation the rear elevation of the extension stops short of the rear elevation of the two storey outrigger. However, on the proposed rear elevation it is shown level. Again, this matter urgently needs to be investigated by the Council.



LEFT SIDE ELEVATION

PROPOSED REAR ELEVATION

*Discrepancy between the depths of the second floor extension
(shown on the side and rear elevations highlighted)*

As it stands, the discrepancies identified above prevent both the Council and local residents from fully assessing the extent and impact of development.

Please note if amended plans are sought to clarify the proposal, neighbours must be re-consulted to ensure they are given the opportunity to comment on any revised/amended drawings.

Character and Appearance

The proposed roof extensions would be large and dominant additions and would fail to relate acceptably to the scale, character and form of the original property. As a result, the development would be detrimental to the visual amenity and character of both the existing building and the surrounding local area.

As set out above, the existing property is located prominently at the corner of Broomsleigh Street and Ravenshaw Street. Consequently, the proposed roof extensions would be visible from public viewpoints and given their scale, prominence and incongruous design, would have an obtrusive and adversely overbearing impact within the street. Furthermore, due to their bulk and height they would give the building a contrived three storey appearance.

Access to the ground floor flat is provided via the rear of the existing building (below the proposed roof extensions). Planning permission has recently been granted (though not yet implemented) for external works to the ground floor flat to improve its entrance and the general appearance of the building. The proposed roof additions would dominate the rear of the building and entrance to the ground floor flat (including its outdoor amenity space), significantly detracting from the current and proposed visual amenity of the building.



Entrance to the ground floor flat

The proposed flat roof design would not be in keeping with the pitched roof on the main property and the proposed openings would not be in keeping with the size and appearance of the existing windows at the building. Consequently, the development would fail to respect the design and appearance of the host building.

The sloped roof on top of the existing outrigger is very shallow and is not suitable for a dormer type extension. As a result, the proposed extension is significantly higher than the existing rear projection (contrary to local design guidance) appearing incongruous and contrived as a result.

Similarly, the height and width of the rear dormer would dominate the existing roof slope, and the top of the dormer would sit very close to the ridge on the main building (contrary to local design guidance).

In terms of materials, the application forms state brick and tile to match. However, this would not alleviate the concerns identified above with regard to design, scale and siting.

In the main, roof extensions in the area have been sympathetic to the scale and character of the original building. While some larger roof extensions have been constructed (in some cases on the front roof slope), as local design guidance states, these should not set a precedent for the proposed development.

In summary, the proposed development is considered to detract from the character and appearance of the building, street scene and surrounding area, contrary to the provisions of the Core Strategy, Development Plan Policies, Local Design Guidance and the National Planning Policy Framework, which aim to achieve a high standard of environment.

Impact on Neighbouring Amenity

A core planning principle, as set out in the NPPF, is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. This is echoed in Local Policy DP26 which states that development should avoid loss of sunlight and daylight, overshadowing and outlook, loss of privacy and disturbance to the surrounding properties.

The proposed roof extensions would adversely dominate the entrance and outdoor amenity area of the existing ground floor flat by reason of their height, scale and visual dominance.



Outdoor amenity space for the ground floor flat

The outdoor amenity space is an important area and is used regularly by the occupiers. The proposed roof extensions would overshadow this area resulting in the loss of ambient light and would have a significant adverse overbearing impact.

The new side and rear facing openings would compromise the existing levels privacy and would result in a significantly greater level of perceived overlooking. It is noted that the only first floor side facing opening in the existing two storey rear projection serves a non-habitable room (bathroom), and therefore has very little impact on the privacy of the ground floor occupiers. Furthermore, views from the other first floor side facing opening (on the main property) are from an oblique angle down to the amenity area.

Therefore, if permission is granted, we would ask the Council to consider conditioning the proposed openings to be obscure glazed and non-opening (below 1.7m internally).

In addition, if permission is granted, we would also like the hours of working (construction) to be conditioned, so as not to impose on the residential amenity of neighbouring occupiers through noise or general disturbance.

Internal Floorspace/Room Sizes

Local Policy DP26 (h) requires development to achieve an acceptable standard of accommodation in terms of internal arrangements; including room sizes. This is echoed by the London Plan, and the recent revisions in October 2015, which set minimum standards for new bedroom sizes.

The London Plan states that the minimum area of a single bedroom should be 7.5m² and the minimum for a double bedroom should be 11.5m².

The proposed roof extension would provide one double bedroom and one single. The proposed single bedroom in particular appears to be very small, approximately 5m², and therefore would provide a very poor standard of environment for future occupiers (below minimum standards). We ask that the Council carefully consider this matter as part of their assessment.

Ownership and Processing

It is important to note that the owners of the ground floor flat (Ms A Dunkley and Mr S Basquil) also own the freehold to the whole building. Certificate A has been signed on the submitted application forms (checked on the Local Authority website), declaring that the applicant is the owner of all the land included within the red line on the Site Location Plan. However, the red line and Site Location Plan also includes land and parts of the building owned by my client. Therefore, it is our view that Certificate B should have been signed in this instance. Certificate B clearly states:-

"I certify/The applicant certifies that I have/the applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner (owner is a person with freehold interest or leasehold interest with at least 7 years left to run) and/or agricultural tenant of any part of the land or building to which this application relates."

To our knowledge no confirmation in writing (from the applicant) has been received notifying the owners of the ground floor flat about the proposed development. This matter needs to be investigated fully as, if the Council is to proceed with the determination of the current application, they would appear to be in breach of legislation.

Conclusion

In conclusion, the proposed roof extensions would, by reason of their size, bulk, design and siting result in a visually obtrusive and unsympathetic addition. They would fail to relate acceptably to the character and appearance of the original building and, furthermore, would impact adversely on the visual amenity of the local area. The proposal would therefore be contrary to the provisions of Local and National Policy which aim to achieve a high standard of environment.

The proposed development would also have an adverse impact on the amenity of the occupiers of the ground floor flat, culminating in an adverse overbearing form of development that would also impact on the receipt of ambient light and privacy.

Furthermore, the sizes of the proposed bedrooms need to be considered against minimum space standards and the issues surrounding the discrepancies on the plans and ownership need to be fully investigated.

We, therefore, request that the planning application is refused.

Yours faithfully

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Andrew Boothby BA (Hons) MA
Planning Consultant

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