

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2016/5181/P	Jeff Waage	402 Brinsmead 25a Ryland Road London NW5 3EH	13/10/2016 06:00:37	COMMEMP ER	<p>I am writing as a resident of Kentish Town, regarding the planning application for 3-6 Spring Place. I live in the Brinsmead Apartments on Ryland Road, part of the Inkerman Conservation Area.</p> <p>I am supportive of a development in Kentish Town to provide more opportunities for small businesses and employment, and also a development that would covert unattractive garages and warehouse space into more functional buildings. However, I believe that the Spring Place proposal as designed would have a serious, negative impact on the Conservation Area and the living conditions of the residents of the nearby area. Here are my reasons.</p> <p>Firstly, the size and scale of the proposed development is quite out of step with the scale of architecture in the neighbourhood. The information provided in the application on the size of this building is a bit misleading. On page 27 of the Design and Access Statement the height of the proposed Development is stated as being "GF (Ground Floor) + 4" storeys. In fact, the proposed Development is a six story building that will tower over the neighbourhood.</p> <p>I attended the open day for Spring Place held in August 2016 and appreciated the opportunity to examine the plans for the building. The lower, northern aspect of the building is architecturally attractive, in design, with attractive use of materials and clever use of the building extension under the railway. However, the southern aspect of the building is simply a brick wall of six stories, with no features. I was disturbed to be told by the architects that this was done because they anticipate that the property immediately to the south would also be developed soon as a high-rise building, so "why waste time on windows and appearance?". I find that an unacceptable basis for creating a very unattractive, obtrusive six story structure in a residential area.</p> <p>The Inkerman Conservation area was developed to preserve a unique area of historical buildings, and my understanding of the National Planning Policy Framework and its para 132 is that development around a designated heritage asset should place great weight on being in harmony with that area and its architecture. The proposed development really makes no concessions to its Inkerman and nearby residential surroundings, and certain only cannot be said to enhance it. No heritage statement has been submitted.</p> <p>I have no objection to business development in this area, but it should be in harmony with its neighbourhood. I am concerned that approval of the present application will encourage further high rise development across the many hectares of warehouse like property to the east and north of Spring Place, which is sore need of development. This would completely change the aspect of the central part of Kentish Town.</p> <p>For very local residents in parts of Grafton Road and Spring Place, this building will block daylight and sunlight to what I understand is a legally unacceptable degree and make the street dark and unattractive for those of us who use the area regularly. Specifically, I have learned that the development falls short of the standards set out in the British Research Establishment"s (BRE) Site Layout Planning for Daylight and Sunlight and therefore breaches the Council"s policy relating to daylight and sunlight.</p>

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In conclusion, I believe that the application is not policy compliant (specifically it does not comply with policies CS1, CS14, CS5 and CS8). The plan as presented should be rejected. The developers may wish to consider that most of the objectives above relate to the scale of the building, not its intended use. A smaller property, designed to be more attractive and designed to complement the appearance of its historic neighbourhood, may be quite appropriate.

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2016/5181/P	richard stokes	301 Brinsmead 25a Ryland Rd LONDON NW53EH	12/10/2016 21:01:41	OBJ	<p>I am a resident of the Brinsmead Apartments, 25A Ryland Road NW5 3EH. I write on behalf of myself and neighbouring residents (there are 15 apartments and each owner/occupier will send their additional comments) who are adversely affected by the proposed Development. For the reasons set out below we strongly object to the Application for the Development due to its unacceptable impacts on residential amenity, the Inkerman Conservation Area and inappropriate mix of uses. We do not think the Application should be granted consent until it is redesigned to make its adverse impacts acceptable and the office use is replaced with residential development.</p> <p>As you will be aware, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the Planning Application be determined in accordance with the development plan unless any material considerations indicate otherwise. The Site is not subject to any specific designations or allocations in the relevant development plan. Given that the property is used as a garage that is only two storeys in height the scale and massing of the proposed Development is a significant material consideration particularly with respect to its impact on the Inkerman Conservation Area and residential amenity.</p> <p>The proposed Development is of a poor quality design and its scale and massing is disproportionate in the context of the surrounding area which is residential in nature. The Design and Access Statement is misleading when describing the proposed height of the Development. On page 27 of the Design and Access Statement the height of the proposed Development is stated as being "GF (Ground Floor) + 4" storeys. In fact, the proposed Development is a block that is six storeys high with very little architectural detail. The design does not contribute to making the area a better place and in our view fails the policy tests in paragraphs 56, 57, 60 and 64 of the National Planning Policy Framework. There is no precedent for this scale and type of development in the area and such a proposal will have a negative impact on the residential character of the area and the quality of life of neighbouring residents by restricting daylight and causing overshadow.</p> <p>The Application Site is also adjacent to the Inkerman Conservation Area. The Inkerman Conservation Area is characterised by low level two storey residential development, as shown on page 27 of the Design and Access Statement. Paragraph 132 of the National Planning Policy Framework states that when considering the impact of a proposed development on the significance of a designated heritage asset (such as the Inkerman Conservation Area) great weight should be given to the asset's conservation. The proposed Development makes no concessions to its surroundings and the character of the Inkerman Conservation Area and accordingly does not conserve or enhance it.</p> <p>The proposed Development overshadows neighbouring properties at 110-114 Grafton Road and 7 Spring Place and obstructs their access to daylight and sunlight. The Development falls short of the standards set out in the British Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight and therefore breaches the Council's policy relating to daylight and sunlight. The BRE Guidelines permit a percentage reduction of up to 20% of the current Vertical Sky Component (VSC) value after which the change in lighting conditions are obvious.</p> <p>The Daylight and Sunlight Report identifies five rooms in 110-114 Grafton Road that will experience a loss of VSC that is excess of the 20% permissible margin of reduction stated in the BRE Guidelines.</p>

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Whilst the Daylight and Sunlight Report identifies two examples of a loss of VSC that are in excess of the 20% permissible margin of reduction it fails to bring the Council's attention to two greater losses of 26.43% and 24.55% for two of the rooms in 110-114 Grafton Road.

The report does not contain any internal assessment of the development itself. We suspect the reason for this is there would be a significant number of BRE fails. We would ask the Council to critically review the report and draw its own conclusions as to why this study was not undertaken. The amenity space provided to the Development is inadequate; all that is provided are small external courtyards and walkways.

The proposed office use is also inappropriate for a mostly residential area and is not compatible with garage use. Recent announcements by the Government and Mayor of London have highlighted the vital need for housing in London. The proposed Development is for office, cafe and event space with no provision for housing. This is not appropriate for a predominantly residential area, especially in light of the need for quality housing.

The application documents do not consider the impact of the development on the Inkerman Conservation Area and no heritage statement has been submitted. The Application should not be granted consent until the heritage impacts are addressed.

#### CONCLUSION

We consider that the Application is not policy compliant. It does not comply with policies CS1, CS14, CS5 and CS8. If granted the Development will have an adverse impact of the Inkerman Conservation Area and have a harmful effect on the amenity of existing and future occupiers and nearby properties. There is no evidence to support a policy departure and the adverse impacts of the development significantly and demonstrably outweigh any benefits it may have thereby falling foul of the policy test in paragraph 14 of the National Planning Policy Framework.

The Development's bulk and mass is not in context with the surrounding residential development. It represents over-development. There is insufficient amenity space and there has been no assessment of the daylight and sunlight internally to the development itself. We request that the application is not granted in its current form and that it is amended so that it is reduced in height to two/three storeys in keeping with the residential development throughout the Inkerman Conservation Area.

I would also request that myself or another Brinsmead resident be given the chance to speak at the committee stage.

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