

From: Gracie, Ian
Sent: 13 October 2016 12:32
To: Planning
Subject: FW: planning application 2016/5181/P
Attachments: 3-6 Spring Place Development Letter of Objection .docx

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Ian Gracie
Planning Officer

Telephone: 02079742507



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From: Chris Cook [REDACTED]
Sent: 13 October 2016 12:07
To: Gracie, Ian
Cc: Inkerman Area Residents Association
Subject: planning application 2016/5181/P

Dear Mr Gracie [as designated Planning Officer]

Please see the attachment [also sent as comments on the on-line form] in relation to the proposed development at Spring Place. I am sending this on behalf of the residents of Brinsmead Apartments , 25a Ryland Road, NW5 3EH.

You may recall that the Brinsmead building [on older maps marked as Portland House 'works'] now contains 16 flats. Should the development go ahead in its present form, many residents will be seriously affected, particularly those on the Wilkin St side. Such flats directly face the proposed enormous block. This is not apparent in the the plans and

accompanying documents on your website. Instead the developers offer an optimistic single image from street level from the corner of Holmes Road and Spring Place, which in no way captures the negative effect of the building from our perspective.

You would be welcome to visit to see what I mean.

Yours sincerely

Chris Cook [Prof.]

Dear Sirs

Planning Application: 2016/5181/P (the "Application")
Property: 3 - 6 Spring Place London NW5 3BA (the "Site")
Development Proposal: Erection of a part-six and part-two storey building comprising Office at ground and upper floors; Cafe and flexible event space at ground floor and associated works following demolition of existing two-storey industrial building (the "Development")

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.

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.

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.

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.

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.

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. 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.

I look forward to hearing your comments.

Yours sincerely,

RICHARD STOKES
301 Brinsmead, 25a Ryland Rd, LONDON, NW53EH



