We are writing to object to several aspects of the proposed demolition of the building at 30 Glenilla Road and its replacement with a four-storey building that would severely harm a number of neighbouring properties.

1) The consultation process. As somebody who runs a large government agency and who is familiar with the obligations of consultation processes under public law, I find the consultation process followed by the Council utterly deficient. This is a very significant proposed development in a Conservation area and yet no letters or emails were sent to the neighbours to alert them to the consultation process.

We only saw three weeks into a four-week consultation process and just before the Easter holidays, a simple form attached to a lamppost that is very easy to miss. We understand the Council is happy to receive comments after the consultation process has closed, but this is not clearly advertised and it is not easy to do it on the website. Finally, this application contains many technical annexes and we think there is a real concern in relation to the ability of neighbours to properly engage with such voluminous applications. We strongly suggest that the Council re-opens the consultation period and sends letters to all the affected neighbours to discharge its obligations under public law or we would reserve our legal rights to judicially review the ultimate decision taken by the Council for obvious deficiencies with the consultation process.

2) Case precedent.   This application follows the nearly approved proposed development at 32 Glenilla Rd. After another flawed consultation process (we were never consulted on the proposal for 32 Glenilla Rd and, unfortunately, it is now too late for us to object to it), a very significant development has been approved for 32 Glenilla Rd. At least in the case of 32 Glenilla Rd there’s a need to demolish the existing church building (certainly not to replace it too very bulky houses), but in this case the proposed development is based on the demolition of a perfectly functional house simply for private profit to the detriment of neighbouring properties. The proposed development would increase significantly the volume of the house by digging a large basement, building on more than one third of the existing garden at the back and adding an extra storey. This would be a terrible precedent in a conservation area and unleash a new wave of speculative developments on Glenilla Rd (and other areas) to the detriment of the neighbours (and without doing anything in terms of affordable housing in the borough). This is in direct violation of paragraph 7.23 of the 2017 Camden Borough Planning Policy guidance stating that *“the Council also requires that the residential amenity of neighbours be considered in accordance with Policy A1 Managing the impact of development”*.

3) Demolition of the building. The proposed plan involves the demolition of the existing building.   This would seem to contradict Policy D2 in the 2017 Camden Borough Planning Policy guidance where at (f) the Council makes clear that it will *“resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area”.* While this building is not listed specifically as a building that makes a positive contribution to the area in the 2002 Belsize Conservation Area plan, it seems clear that its substitution with a much bigger modern building with a very daring colour scheme could unfortunately create another example of the *“oppressively large block”* that is Sussex House in the same street as described in the 2002 document. The 2017 Camden Borough Planning Policy guidance makes it clear (paragraph 7.49) that *“the Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention.”* It seems pretty clear to us that the case for demolition has not been made out in the current application. In fact, it would seem completely incorrect to focus exclusively on what is lost through the demolition in a conservation area without considering the impact of its replacement on the overall conservation area (and the impact of this approval as a precedent for future applications in the same conservation area).

4. Reduction in the size of the garden. The substantial planned reduction in the size of the garden to make room for a much bigger building to the back of the house seems to be in direct contradiction to Policy D2 in the 2017 Camden Borough Planning Policy guidance where at (h) the Council makes it clear that it would *“preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”* Our garden at 18 Belsize Park Gardens borders the garden at 30 Glenilla Rd and the view from our living room is of beautiful gardens in a Conservation Area. This is partly why we bought our property. The proposed development also seems to contradict paragraph 7.55 of the 2017 Camden Borough Planning Policy guidance where it is stated that *“the value of existing gardens, trees and landscape to the character of the borough is described in Policy A2 Open space and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.”* The current proposal to significantly shrink the size of the garden to extend significantly the house at the rear (and to build a garden room) is directly in contradiction of these policies and we would expect our rights to be uphold by a Court if needed.

5) Visual privacy and outlook.  As clearly stated at paragraphs 6.3 and 6.4 of the 2017 Camden Borough Planning Policy guidance, *“protecting amenity is a key part of successfully managing Camden’s growth and ensuring its benefits are properly harnessed. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties”.* *“A development’s impact upon visual privacy, outlook and disturbance from artificial light can be influenced by its design and layout.”* The proposed development will significantly increase the height of the existing house by adding an extra storey in the new building. The new top floor will have direct overlook over our flat and directly impact our privacy. The disturbance from artificial light will also increase. There is no reason why the new building should have an extra floor at the top to the direct detriment of neighbouring properties. We are frankly very surprised that the Council is even consulting on a proposal for an extra floor at the top of the building that is in direct contradiction with its own guidance for conservation areas.

6) Materials used.  The proposed color for the top of the house (dark grey) seems to be completely out of context with the style of the Belsize Park conservation area.

7) Ground water.

The proposed application shows a watercourse running through the site
with the area around this watercourse being susceptible to flooding. We are obviously not experts on this, but we would expect the Council to make sure through independent experts that the likelihood of flooding for the area will not increase if the proposed development were to be approved

For all the reasons above we would submit that the proposed development should be rejected in its current form.

Kind regards,

Andrea Coscelli and Giovanna Bertazzoni Coscelli (Lower Ground and Raised Ground Floor Flat, 18 Belsize Park Gardens)