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Dear Mr Sild

Objection to Planning Application 2018/1673/P for 23 Perrins Walk

I am writing on behalf of the Church Row and Perrins Walk Neighbourhood Forum to object to the above planning application.

Background

23 Perrins Walk is a mid-terrace property on the north side of Perrin's Walk backing onto the listed buildings of Church Row and next to 24 Perrin's Walk (also listed). The site is within the Hampstead Conservation Area, and the area statement describes Perrins Walk as "*a distinctly tranquil cul-de-sac off Heath Street... The overall appearance is tied together by the scale and rhythm of the terrace of mostly three storey buildings.*" and Number 23 was listed as making a positive contribution to the Conservation Area. The building is occupied as a single-family dwelling house.

Development Creep

23 Planning Walk used to be a mews building with a ground floor and a first floor.

- Planning permission was granted in March 1991 for the erection of a first-floor extension, thereby increased the number of floors to three.
- In 1996 an application for a spiral stair case at the rear was refused because it was detrimental to the character and appearance of the building and the Hampstead Conservation Area.
- In January 2007 permission was given for the erection of a staircase enclosure, balustrades and screen at roof level to facilitate the use of the flat roof of the dwelling house as a roof terrace (2006/5692/P).
- The staircase enclosure was extended in April 2010 (2009/5862/P) to extend over half way across the roof.
- The current application (2018/1673/P) seeks to extend the roof "conservatory" across the whole of the roof, effectively converting what used to be a two-storey building into four storeys.

The latest application is tangible evidence of the risk, flagged by objections to prior applications, of development creep. Approval of this application will set a further undesirable precedent, that is slowly, inexcusably and detrimentally altering the shape and character of a set of buildings that make a positive contribution to the Hampstead Conservation Area.

Loss of Garden Space

A key argument used for the proceeding applications was that the applicant did not have a garden and they created and gave access to a roof garden. The new proposals will result in the loss of that garden space, and is thus contrary to the Council's guidance on green roofs¹

Impact on Bats

Camden is home to a number of species that are protected by law, including at least nine species of bat. The gardens to the rear of Perrins Walk is a substantial tree area and corridor for bats. The "conservatory" on top of 23 Perrins walk is already known as the "Lighthouse of Hampstead", and the extension of the conservatory to the entire width of the house will increase this light pollution. Camden Council's Planning Guidance² states that *lighting can have a particular negative impact on biodiversity and that it can displace species and disrupt behaviour*. The application should be rejected as it represents an unnecessary extension of light pollution that will affect the habitat of bats.

¹ Camden Council Planning Guidance CPG3 Clause 10.3

² Planning guidance 6.51 of CPG1, 13.26 of CPG3 and its successor guidance e.g. clause 4.13 of Camden Council Planning Guidance on Biodiversity - March 2018.

Draft New London Plan

In December 2017, the Mayor of London published the Draft New London Plan. Whilst this New London Plan is still under consultation, the Town and Country Planning Act 1990 requires planning decisions to still give it weight.

Policy D6 of the New London Plan requires Camden Council to “*refuse planning permission for residential development that does not demonstrably optimise the housing density of the site*”.

Residential development is not defined in the Draft Plan, but “*development*” is defined in Section 55 of the Town and Country Planning Act 1990 and it includes “*all operations normally undertaken by a person carrying on business as a builder*”, and thus D6 requires Camden Council to refuse all applications where the existing density is anything less than optimal.

No guidance is given in the New Plan on optimum density other than “*the optimum density of a development should result from a design-led approach to determine the capacity of the site*”, but elsewhere there is a presumption of high density if the location is within 800 m of a tube station, and clause 3.6.9 states “*average density across London of new housing approvals in the monitoring year 2015/16 was 154 units/hectare with the highest average density being recorded in Tower Hamlets at 488 u/ha.*” It is unlikely that a three-storey house occupied by two adults will be considered by the London Plan to be optimal.

Whilst the Mayor’s Policy New London Plan D6 is questionable, under it, the fourth-floor extension should be refused.

Camden Council Guidance on Design (CPG1)

The application is not in keeping with Camden Council Planning Guidance:

- Roof alterations should be sympathetic and not harm the character and appearance of buildings or the wider townscape in the borough³.
- The extension of the roof space is not of the traditional dormer or mansard roof form. Whilst Camden planning guidance recognises⁴ that on some contemporary buildings a less traditional form of roof addition may be more appropriate, this is not a contemporary building.
- The guidance continues⁵ to state that a terrace provided at roof level should be set back behind the slope of a pitched roof, and the dimensions of the roof should be sufficient to accommodate a terrace without adversely affecting the appearance of the roof or the elevation of the property.
- Camden Planning guidance states that a roof alteration or addition is likely to be unacceptable where a building is already higher than neighbouring properties and the proposals add significantly to the bulk or unbalance the architectural composition³. The proposals will extend a building that has already been extended higher than the rest of Perrins Walk. It results in a building that will be dominant, intrusive, unbalanced in its layout, and disproportionate. Such visual prominence, scale and bulk is against Camden’s planning guidance⁴.

Hampstead Conservation Area Planning Guidance

The application is not in keeping with the policies contained within the Hampstead Conservation Area Statement⁶:

- Roof extensions are unlikely to be acceptable where the building is higher than many of its surrounding neighbours (H31)
- Extensions should be in harmony with the **original form** and character of the house and the historic pattern of extensions within the terrace or group of buildings (H27)
- Conservatories, as with extensions, should be small in scale and subordinate to the original building and at ground floor level only (H29)
- Roof extensions are unlikely to be acceptable where it would be detrimental to the form and character of the existing building (H31).

For all of the above reasons, planning application 2018/1673/P should be refused.

Yours sincerely



David Milne

For and on behalf of the Church Row and Perrins Walk Neighbourhood Forum

³ Clause 5.1 of CPG1 Design

⁴ Clause 5.20 of CPG1 Design

⁵ Clause 5.25 of CPG1 Design

⁶ The Hampstead Conservation Area Statement Planning Policies are part of Camden Council Planning Guidance as a result of clause 5.4 of CPG1 Design...