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2019/3109/P	Alexander	14/08/2019 16:17:42	OBJ	

Please see comments below split into areas and why I oppose this planning application

#### Loft/roof extension

The design and access statement states the application is to simply mirror what 3 Hillfield Road (will refer as 3HL) has created. 3HR has created its loft conversion on permitted development rights (PD) and even so it was not built for the maximum floor space as it could have been done but opted to leave a gap with the chimney breast at the rear creating the L shape loft conversion (area could have been increased by playing with ceiling heights). This was important when one looks at the houses from Gondar Garden the overall extension is not that noticeable, and it is evident by the pictures submitted in this application. However 1 Hillfield Road loft conversion will have a great impact on the view from Gondar Gardens and will be heavy and unappealing. Each application should be considered on its own merits and it is simply doesn't comply with current planning guidelines. I believe the dormer will look boxy even without the L shape projection and will be an eye sore. Maybe a mansard loft conversion and a full floor extension on the rear would work better but as currently stands it is completely out of keeping. The windows of the loft conversion at 3HR was not done as the application to make the visual looks from the rear and from the mansion more pleasing and appealing. The current existing dormer that was created in 1HR does not comply with the current guidelines but overall it is aesthetic pleasing and in keeping.

It seems the drawings of the proposed cross sections is wrong as it doesn't show the rear chimney stack and chimney pots. In both cross section the rear chimney detailing is missing, and it is hard to see the relationship of the dormer to the chimney detailing and how it will impact visually. In addition, the main chimney stack of the main house is missing.

A further error is the main dormer window as it appears in the cross section the rear wall is raised but on the rear elevation it shows as two set of large doors with a juliet balcony. The cross section shows a more sympathetic design of a window. As mentioned above 3HR did put the PD application with the same design of French doors with juliet balcony but this was not built instead a more sympathetic window was built. A window approach will look nicer as the French doors will be over bearing and will not be in keeping with 3m high doors in the loft area.

The six Velux windows to the front no objections.

The application states that slate tiles for the roof will be used but does not state whether man made slate or natural slate. I would put an objection on man made slate due discoloration and looks.

#### Front light well

The current front elevation is completely misleading or simply wrong. The right hand side bay window at basement level viewed from the road will simply not be visible from the front elevation. The front door is about 4.2m high from street level that results in a high stair case leading to the house. Just before the last few stairs leading to the front door there is a landing, this landing has been extended in the current design (please see floor plans) to enable a new staircase that will go down to the new basement flat. The new landing and

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staircase going down blocks the side bay window completely. If one looks at the floor plans this becomes clearer where the landing starts and one looks at the front elevation it is obvious the front elevation is wrong (the top landing and top stairs is simply missing and it is too narrow). Blocking one side of the bay window breaks the rhythm of the front bays in the street, makes the bay asymmetric and overall not esthetic. This design does not comply with CPG1 and will harm the architectural and character of the host building. The railing to the main staircase and the new staircase is missing probably as this will emphasise further the defective (sub standard) this current design is.

I think the entrance should be from the main internal corridor if an alternative solution is not found, also having to go up stairs, then down stairs then up again stairs is not the best solution for an occupier and could be frustrating. Entering via the main door will result with only two sets of stairs and more important will feel more intuitive to the occupier.

Also the policy CPG states "suitable access should also be provided to basement accommodation to allow for evacuation" the current design doesn't allow for evacuation of occupants from the bedrooms and having the staircase from the main hallway solves the issue by providing means of escape.

Approved document B 2.16 and 3.1 emergency escape routes need to lead to a place of safety. 3.9 that states "A protected stairway (minimum REI 30) leading from the basement to a final exit." This current design doesn't comply.

#### Rear lightwell

I believe this lightwell is not adequate enough as main source of light for the basement flat and possibly a rear garden light well should also be included. The current light well will have all three bedrooms of the basement flat all looking/facing into this light well and the rooms above will also be looking/facing into this light well resulting in a privacy issues as well. This part of the light well has the house next door which will reduce light further and it is north facing, making the bedrooms overall very dark. No daylight report has been carried out.

CPG, A1 section 2 states in its key message that "Development should be designed to protect the privacy of occupiers of both existing and proposed dwellings" this aspect was overlooked and it is not the case as bedrooms have no privacy in basement bedrooms and the bedrooms on the ground floor.

Mayor SPG 2.3.39 "the design of single aspect flats will need to demonstrate that all habitable rooms and the kitchen are provided with adequate ventilation, privacy and daylight and the orientation enhances amenity, including views. North facing single aspect dwellings should be avoided wherever possible." The current design of all bedroom leading 90 degrees from the corridor in effect will have the same effect of a single aspect flat which should be avoided under the mayors guidance for larger units as stated in 2.3.40 and 2.3.41

Further more policy 2.3.44 of the mayor spg of minimum ceiling height of 2.5m to improve the quality of light and ventilation. However the basement is designed to a height of 2.4m.

#### Rear extensions and side extension

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The rear extension is modest and small however the patio will be the only space the garden flat will have as the developer is planning to develop on the land. No attempt to hide this fact by the developer and no stairs leading to the garden is drawn up (the garden is roughly 1.2m high). Once a fence will be erected or a building will be erected the patio will be closed in even further. With an end result of at least a 2.1m high screen or effectively a wall. The living space is north facing with a small patio with a high wall will lead to poor amenity for the flat. In this context this extension might be too large or should be assessed together with the future development plans that the developer yet to propose.

The rear extension, rear elevations is drawn not as a party wall as 3HR was built on his own land. However the floor plans and roof plans are shown as if it was built as a party wall.

The side extension as above will result in overall in loss of amenity and possibly best not to be created to enable more light into the basement flat. Perhaps a day light report would be appropriate to assess the impact of the side extension on the basement flat.

#### Basement conversion

No issue with the basement conversion into habitual space but the basement impact assessment is riddle with errors as it has the wrong thickness of the structure of the walls in the main house and the rear. No detailing of progressive collapse taken into account in the structural drawings. The party wall line is drawn in the wrong place and the consequence detailing. No consideration on how the current 3 Hillfield Road extension is constructed as a raft foundation and what impact this will have. However my understanding this is a tick box exercise.

However more importantly the basement flat simply doesn't work. The entrance with the current design is cumbersome with a cramped entrance hall with low ceiling. The three bedrooms at the back all facing one small dark light well with very poor amenity as mentioned above however one also needs to consider the ventilation of the inner bathrooms that will most likely also lead to that same light well. Mayor SPG 2.3.39 stated above "habitable rooms and .... are provided with adequate ventilation" which is not the case. Further more one needs to ask where the boiler will go? Surely not in the same rear light well as well or will it go to the front? Modern boilers are condensing boilers and are quite noticeable in winter but all this should taken in consideration.

#### Balcony

A balcony needs railing and screening. The current low screening shown on the cross section is unacceptable especially when relying on planters that can be moved. I am not sure what screening or planters/pots low levels will provide in any case. This needs proper permeant design and needs to be 1.8m high on the side boundary.

The balcony also extends on top of the side extension and surely one needs some screening for privacy as residents on the terrace can look straight into the bedrooms of the ground floor flat and the basement flat.

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However this screening will exacerbate the issue of how dark the light well is for the basement flat even further and will make it darker for the ground floor rear bedroom windows. So perhaps the balcony should be scaled back not to go on the side extension.

#### Removal of the rear first floor bay window

One might wonder what would be the reason to remove this bay window. What is concerning the application doesn't mention removing the bay window and one can only wonder what else this application has in store. Surely an application should be very transparent. One would wonder why there are many omissions therefore I am also wondering what I have not spotted yet due to lack of transparency.

Houses where built in bunches at a time in West Hamstead so in one street it may seem all the same Victorian houses but if one looks close enough you will find material differences. This gives our area of West Hampstead its beauty and uniqueness or as some would say character. Houses 1 till 11 was built as one element and all where built with the a rear bay window at first floor. Number 9 bay window was removed but when looking from Gondar garden number 9 is further away and less noticeable. Due to the elevated position of Gondar garden these bay windows are quit prominent and it would be a shame to see a key architectural feature of the Victorian era disappear with no reason.

#### Moving the refuse area

This is simply not practical to walk outside down the stairs, cross the road to go around the greenery of the cul-de-sac and then walk up Gondar Garden to throw the rubbish. Currently at the corner of the greenery area we have a rubbish bin which is often used by some residents as rubbish dumping point this will increase this problem even further. We shouldn't forget that as we are enjoying our current lovely weather that on a rainy cold day when darkness sets early this will becomes a real unpleasant chore. This solution simply doesn't work and clearly will not serve the residents well.

#### Cycling storage area

I think this is a great solution which will work well for the tenants. However this needs further design details and not stating something similar. This needs a proper design as it will be viewed from Gondar Garden and the neighbours on Gondar Gardens need to be consulted unless this is going to be a low level shed out of view.

#### New basement unit and ground floor flat

The new basement conversion to a self-contained flat simply doesn't work in the current design. CPG 3.2 "Policy H6 Housing choice and mix sets out the Council's intention to seek a wide variety of high quality homes suitable for Camden`s Existing and future households. The Council will attach equal weight to the quality and quantity of new homes proposed in the borough and will not sacrifice housing quality in order to

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maximise overall housing supply”

As it states in policy 3.2 it literally sacrifice the housing quality. The current new flat has three illogical set of flight of stairs just to enter with very poor amenity.

The new basement flat and the ground floor flat should be simply combined to create a good family unit. As a family unit the secondary external stairs can be eliminated the existing stairs to the basement can be the same access point to the basement. The side and rear extension will not be necessary which will give more light and amenity to the family unit which also will enable the basement areas to be linked to the rear garden via a staircase from the light well. Combining the two flats will enable to comply with the 50% rule of not developing more than 50% of the front garden.

Furthermore CPG 3.1 “However, a wider range of considerations feed into creating a high quality housing development, including sustainability, energy efficiency and responsiveness to climate change, residential amenity, the standard of design, layout..... Living in satisfactory housing conditions is a key element of quality of life” by combining the two flats the developer will be able at least to meet some of these objectives . Further more the family unit will also fit nicely with CDP2 5.1 key points for a family unit.

Splitting the site Under Camden local plan section H4 3.119 states the following “the Council will expect proposals to take the form of a comprehensive scheme rather than piecemeal development....” The developer assumes he will be able to utilise 100% of the rear garden and this might not be the case. If the development does not achieve the development to utilise the plot it may become apparent that the remaining garden could be more beneficial for the amenity of the garden flat and thus combining the garden flat with the basement could be more compelling for a family unit and perhaps even a bigger extension this in return will give the developer a better return on his investment.

Under the Policy 3.5 Quality and design of housing developments for the Mayor of London, Strategic “ A Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London’s residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.” Camden Local Plan does address the aspect of gardens under 6.37 and state “The Council will protect such spaces in accordance with paragraph 74 of the National Planning Policy Framework.” The Interim Housing CPG also address it in section 4 Residential development standards and states “Existing gardens and green space should be retained” and the above demonstrates that there is strong grounds for the garden not to be developed. Hence the developer might not obtain any development and thus further demonstrates this application splitting the land is simply premature.

Parking

It is unclear what happens to the remaining two parking spaces. Would one or two of the spaces will be designated to the new basement flat which defeats the point of having a car free flat. Or would the remaining spaces will belong to the new development, it is simply unclear. If the parking spaces will be taken to the new development this will mean further lose of parking spaces on our roads as the current residents will park on

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the road.

Top flat

This flat demonstrates further the lack of thought of this development on amenity. The second bedroom is simply carved out from what should be the living accommodation. The kitchen start from the work top height in the slope of the roof as can be seen in the cross section i.e. 90cm high and one can wonder if one can even stand next to the work surface. If one examines the cross section further one can see a man standing reading some papers so if one takes that image and places next to the kitchen unit it becomes clear that he will not fit in the space created for the kitchen. The small bedroom area is shown including 90cm height. This overall results in an inferior living/kitchen accommodation and a poor second bedroom. Worse of all is the new staircase design. The current staircase has been replaced to give a bit more space for the first floor flat. The new stairs goes straight up with three turning and as a main entrance to the flat this is far from practical. Under part K of the building control one must have a 400mm clear landing from the entrance door as a minimum requirement and a minimum width 900mm which the design is lacking in both.

Policy C6 Access for all has clear guidelines “The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.

We will: a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;”

Design policy

I don't believe this scheme complies CPG 7.1 below

7.1 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

Reason – The design is poor as explained above with poor amenity and will attract tenants only for short periods with poor design internally and externally.

Below is Policy D1 and extract of what I believe this application does not comply

Policy D1 Design The Council will seek to secure high quality design in development. The Council will require that development:

“a. respects local context and character;”

As above, both elevations are unattractive and does not respect the current building or the character of the area with the over development of the loft, odd frontage and removal of the bay window on rear first floor.

“b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2

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Heritage; “

As above

“c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;”

The planning application has not taken the opportunity to address this.

“d. is of sustainable and durable construction and adaptable to different activities and land uses;”

The application does not address the land usage at the back and what the proposal will be for the development

“e. comprises details and materials that are of high quality and complement the local character;”

Not enough details are provided and when provided such as roof slate it doesn't state what type of slate, man made slate, Spanish slate, Welsh slate.....

“f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; “

Clearly not taken this policy into account with residents rubbish, recycling and the design of the front elevation of the building with two sets of stairs that provides a poor access route and has a negative impact on the street view that is awkward at best with two set of stairs and aesthetically unpleasing obscuring part of the front bay window.

“h. promotes health; “

As above, the development taken amenity away from flats and has flats with poor amenity, poor lighting, very dark bedrooms, privacy issues (overlooking) poor access, difficult staircases to access and poor ventilation all leads to unhealthy living

“i. is secure and designed to minimise crime and antisocial behaviour; “

The bicycle storeroom could be a potential hot spot due to lack of information and will have poor visibility from the flats on the bicycle area.

“j. responds to natural features and preserves gardens and other open space;”

Both front and rear elevation will detract the natural features of the building by the current proposed development. The garden will be simply cut away and most of the remaining garden space will be built on. The garden has been virtually completely taken away for potential future development.

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"k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,"

As above the garden is utilised for a development.

"l. incorporates outdoor amenity space;"

The flats currently have great amenity space that has been completely taken away or scarce at best. The building has one of the biggest gardens in West Hampstead about 20/30 x 100 Foot and what is left for the garden flat seems as a slice of 9" foot patio area that will be dark and enclosed.

"n. for housing, provides a high standard of accommodation; and "

The current design for the reasons above provides very poor accommodation for the residents.

"o. carefully integrates building services equipment. "

The design has not incorporated any building services equipment.

Policy D1 finishes with "The Council will resist 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. "

The Design and access statement

Sadly this statements is full of errors or simply misleading or lack of understanding of the area character, layout and policies.

"Many of the existing neighbours have rear gardens at ground level and small rear balconies at 1st and second floor level" – Not correct as most properties do not have balconies on second level.

"The building is located in close proximity to multiple green parks including Cholmley Gardens, Maygrove Peace Park & Hampstead Cemetery within 5 minutes walking distance." Well Cholmley Garden is private. Maygrove Peace Park is 5 minutes only if you drive and the current aim these days is not to encourage people to drive furthermore and no public parking is available near that park. Surely Hampstead Cemetery is not a green park?

"The three lower properties at the site will have their own amenity space directly connected to their internal living areas" - The first floor flat will be from the bedroom to the terrace.

"Within West Hampstead there are also multiple recreational spaces within walking distance of the site including Hampstead Heath. The Heath boasts a vast area of recreational space and sports fields and is located within 350m of the site." – Sorry the heath is 1 mile away (1600m away not 350m away) and if multiple why name one.



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“Though the proposed properties are currently not easily accessible from street level, the design will attempt to comply with the Approved Document M of the Building Regulations as well as with life time home requirements. This applies to door widths, corridor widths & comfortable stair design to DDA requirements” – The stairs to the basement is too narrow, the main hallway at entrance level was made narrower to gain more space for the garden flat and the top stairs doesn't comply with part K of building control. The current design made no attempt to comply but on the contrary the design made things worse by changing the existing stairs to the top flat, making the corridor narrower and making a narrow staircase to the basement flat.

“The proposal is for 4 dwellings with 2 - 3 bedrooms per unit which is in accordance with policy DP5 regarding the mix of units. Each of the doors have been carefully considered in terms of CPG2 to allow for appropriate ceiling heights, minimum internal room dimensions, daylight levels to internal rooms etc.”

CPG2 does not address any of the following issues appropriate ceiling heights, minimum internal room dimensions, daylight levels to internal rooms. Interim Housing CPG however does address these issues under section 4 Residential development standards. When one goes through the list of requirements in IH4 it becomes very clear the plans do not comply with the guideline's requirements. Daylight was not considered, and it states the following “The applicant must ensure that the levels of daylight and sunlight that enter habitable rooms comply with BRE standards and that the report for ‘Daylight and Sunlight’ is submitted with the proposal”. The minimum room dimension does not comply and refers to the Department for Communities and Local Government Technical housing standards – nationally described space standard, for example ground floor and basement flat third bedroom needs a minimum of 2.15m wide (“2 - 3 bedrooms per unit” as stated above) and these bedrooms do not comply if considered as bedrooms. However the list goes on with items not complying such as stacking, amenity, climate change mitigation, amenity to neighbours etc.

Furthermore it was addressed above the ceiling heights don't work in the top flat and the entrance to the basement flat. The basement ceiling height doesn't comply with the mayor guidelines SPG 2.3.44. The internal configuration is poor and daylight levels are not satisfactory at all due to poor design.

With regards to policy DP5 the application has very similar units and even the design statement states this “The application offers, in total, 4 no. two bedroom units of contemporary design” however DP5 has other policy which this application does not comply with

“5.13 A number of elements of good design are particularly relevant to considering the mix of dwelling sizes appropriate to a specific development proposal. The mix selected should achieve efficient layouts, in terms of the ratio of internal dwelling space to communal circulation space, and in terms of the proportion of the internal dwelling space that is usable. Where schemes include a number of floors, homes should be arranged to minimise noise disturbance, avoiding situations where bathrooms, living rooms and kitchens are directly above or below bedrooms. Homes where all windows face a single direction should also be avoided, especially in the case of large homes.”

Well all the living rooms for the exception of the basement are above a bedroom, two of the kitchens are above bedrooms, the ground and first floor flat have bathrooms above bedrooms. This issue could be addressed but the drawings show floor thickness of about 20cm thick which does not allow for proper insulation of airborne sound and impact noise between the flats making it a very poor design for tenants.

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Conclusion

The current three flats have great amenities, with outside space and parking. The new proposal reduces these amenity spaces considerably from flats where people would want to call home with great quality/standard of living to flats that will provide short term accommodation or short lets. The top flat will have no outside space and the garden flat will have a patio. Two of the flats will be larger with even less living space previously by combining the kitchen into the living room into one. No consideration of considering the quality of space and amenity or the aesthetic of the building. Lack of thought on how people should feel walking with rubbish in the street. The application is not sympathetic, lack of architectural design to front and rear that will harm the appearance of the building. The flats are simply chopped up with lack of any thought. For all the errors, lack of design and amenity I believe this application should be refused. No house in Hillfield Road or in west Hampstead has two set of staircases in the front elevation.

From 3.1 “ The Council aims to champion innovative architecture and high quality design to ensure that all these considerations are addressed. We believe that a well designed built environment will help to inspire pride in Camden as a place to work and live.” This application simply contradicts many aspect of Camden policies and aims.

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