



THE GRANARY  
SPRING HILL OFFICE PARK  
HARBOROUGH ROAD  
PITSFORD  
NORTHAMPTON  
NN6 9AA

Our Ref: 1232  
Your Ref: 2021/0630/P

Ms A Ryan  
Planning Department  
London Borough of Camden  
2nd Floor, 5 Pancras Square  
C/o Town Hall  
Judd Street  
London  
WC1H 9JE

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21 April 2021

Dear Ms Ryan

**PLANNING APPLICATION 2021/0630/P**  
**LOFT EXTENSION – FLAT B, 36 KYLEMORE ROAD, LONDON NW6 2PT**

I write in respect of the above application on a number of points of matter that are outstanding. These are considered in turn below. Supporting this submission, I also enclose the following updated plans:

- Existing floor plans (drawing P21-08.1 Rev C)
- Proposed floor plans (drawing P21-08.2 Rev C)
- Existing and proposed elevations and section (drawing P21-08.3 Rev C)

Within this plan update, confirmation is provided for the rainwater goods at loft level as requested.

**DESIGN**

Thank you for your previous email and the comments on behalf of the Design team. As you would expect we are disappointed with their comments, which appear to be taking an overly prescriptive approach to a site which is not within a heritage area, it would be concealed from public view and is surrounded by a proliferation of various dormer sizes and designs (none of which appear to have windows lining up with those below). It is also interesting that this approach is being taken given Central Government has recently changed the GPDO to seek to allow whole additional storeys. As discussed, it is only as a result of the property being a flat rather than a house that consent is required for the dormer proposed.

Reducing the scale of the dormer beyond that discussed will not create a usable loft area so the Design team's comments cannot be accommodated. I do however provide updated plans reducing the scale towards that as discussed. This provides an extension directly comparable to that at 32 Kylemore

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Road, as approved through a planning application in 2018 (reference 2018/1513/P). This is a material consideration. The design has sought to keep the window and door, and have aligned them as much as possible, given the need to offset from the party walls of the property. It has also now been set further back from the eaves and down from the ridge to create a structure that is entirely set within the roofslope. The flank elevations have been retained as hanging tile to match the approach taken on all the immediately surrounding dormers, and thus offer a degree of consistency.

It is acknowledged that the Council have a new SPD for extensions, but in essence the content of this for loft extensions replicates the approach outlined in the 2015 Design SPD. The key sections for comparison are 2.2.1 within the 2021 document and paragraph 5.11 in the 2015 document. These are assessed below, with comment provided as to the compliance with the guidance by the current scheme.

#### **Subordinate in scale**

##### New

- Dormers should be subordinate in size to the roof slope being extended;
- The position of the dormer would maintain even distances to the roof margins (ridge, eaves, side parapet walls);

##### Old

- a. The pitch of the existing roof is sufficient to allow adequate habitable space without the creation of disproportionately large dormers or raising the roof ridge. Dormers should not be introduced to shallow pitched roofs.
- b. ...They should also be sufficiently below the ridge of the roof in order to avoid projecting into the roofline when viewed from a distance. Usually, a 500mm gap is required between the dormer and the ridge or hip to maintain this separation (see Figure 4). Full-length dormers, on both the front and rear of the property, will be discouraged to minimise the prominence of these structures.

##### Applicant Comment

Both documents note the need to provide subordinate dormer projections, with figure 4 as referred to within the old document specifically showing a box dormer of connected windows as being unacceptable. A comparable image of this is shown in the new document on page 24. The same stance is therefore presented in this regard.

However, in respect of inset distances to the edge of the roof, the old guidance is more prescriptive, with the new document not setting out specific distances, just making the comment that 'even distances to the roof margins' are expected. Given the separate comment about aligning windows (see below), if the only acceptable solution is dormers with no hanging tile infill sections, then the offset is automatically defined by this other statement. The Design team's approach is not therefore logical against the SPD as written. Moreover, the proposed dormer is evenly set in from the margins of the building, aligning with the requirements of the new document.

## **Design and Alignment**

### New

- Design of dormers would consider the hierarchy of window openings in terms of size and proportion, which generally result in smaller dormer windows than the ones at lower levels;
- The type, design and alignment of windows would relate to the ones below;

### Old

- d. In number, form, scale and pane size, the dormer and window should relate to the façade below and the surface area of the roof. They should appear as separate small projections on the roof surface. They should generally be aligned with windows on the lower floors and be of a size that is clearly subordinate to the windows below.

### Applicant Comment

Both documents are setting out the same stance. Smaller windows with correct alignment should be provided. However, historically, the Council have acknowledged that often the various aspects of the design guidance end up presenting conflict with each other and as a result, to achieve an inset from the party walls, windows were often not aligned with the apertures below. This appears to have been the case with all applications approved surrounding the Kylemore Road site, including at number 32 in 2018.

The alignment of the windows in the current proposal is such that in order to allow offset from the flank walls, they do not quite line up vertically with the apertures below. They are however slightly smaller to maintain subservience. Likewise, the door position to allow access to the terrace cannot be aligned with the windows below due to the internal staircase. A pragmatic approach to this needs to continue to be taken, as occurred with the previous design guidance and all other planning applications. The design approach proposed through this application is no different.

## **Proportion of Glazing**

### New

- The proportion of glazing should be greater than the solid areas and dormer cheeks should be of a high quality design and materials;

### Old

Silent on this matter

### Applicant Comment

There are two points to note here. Firstly, although the old document was silent on this matter, there has always been a desire to ensure the windows form the main part of any dormer extension, hence the general inclusion of a couple of apertures in most box dormers. The old design guidance through scale and proportionality therefore covered this matter by proxy.

Secondly, whilst the new design guide makes the comment that glazing should be greater than the solid areas, the mere fact it refers to solid areas again suggests that sections of tile (or other materials) between apertures is acceptable. On this basis, the provision of two apertures (1 x window; 1 x door) with a section of tile between the two 0.8 metres in width offers a comparable width of hanging tile to the door and a section that is smaller than the window. It is only a slither of tile proposed to the side of the gable, allowing the frame of the dormer to be concealed, whilst the dormer extends with 1.2 metres of hanging tile to the side of the door, over the stairs to enable access to the loft area. This width is again comparable to the width of the window so that roughly half the rear elevation is glazed and half hanging tile. The design also allows the structure to be centrally located on the roof, in accordance with the other guidance. This scale of solid to glazing should therefore be considered acceptable.

Again, it is also commensurate to other examples in the local context, including that approved in 2018 at 32 Kylemore Road.

#### **Materials**

##### New

- Dormer materials should complement the main building and wider townscape. Given the existing building stock, the use of traditional materials (timber, lead, hanging tiles) is encouraged;

##### Old

- f. Materials should complement the main building and the wider townscape and the use of traditional materials such as timber, lead and hanging tiles are preferred.

##### Applicant Comment

Both documents are again suggesting the use of the same good quality materials. This includes hanging tile. The proposal therefore accords with this. Moreover again, the suggestion of hanging tile implies that sections beyond the windows themselves are acceptable, as it is more normal to have lead cheeks where it is simply a dormer window proposed. The hanging tile is introduced where there is an element of projection beyond simply the window.

#### **Conclusion on the Design Guides**

In respect of the key elements of the 2015 and 2021 documents, they are largely taking the same approach to dormers. The only notable difference is the additional prescription of offset distances contained within the 2015 document. In this respect the 2021 edition is a less restrictive document. It is therefore illogical that the imposition of the 2021 document therefore removes the ability to provide box dormers. It also reinforces the fact that the consents granted under the 2015 guidance are still material considerations in respect of the determination of current applications.



On the basis of the above, the proposed dormer and its design accords with the both the 2015 and 2021 documents as much as possible. Moreover, it accords to the same degree as other approvals on Kylemore Road, including the extension approved in 2018 at number 32; this forms a material consideration in the determination of this planning application.

#### PRIVACY/NEIGHBOURING PROPERTY'S WINDOW ARRANGEMENT

Notwithstanding the information contained within the Planning Design and Access Statement in respect of the terrace, and the fact that it has been accepted by the Planning Inspector that use of a flat roof does not require consent and thus the issue of overlooking from such spaces should be a mute point. On this basis a 1.1 metre high glass balustrade has been proposed (for safety reasons).

Confirmation of the side facing windows to 38 Kylemore Road was requested, and the photographs are provided below to confirm this. A single window is provided on each floor, believed to serve a kitchen at ground level, a bathroom (obscure glazed) at first floor, and a bedroom at second floor. These photographs were taken from an existing side facing window in the application property (first floor level).



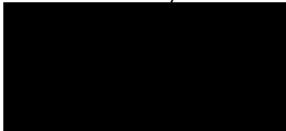
*Photographs of side facing windows in 38 Kylemore Road:  
L – ground and first floor; R – first and second floor*



As illustrated by the photographs above, the ability to see into the neighbouring property's windows is limited. Even with the introduction of a balcony, the potential view towards this neighbouring property will not be increased.

However, should the Council be minded to approve the application on all other matters except loss of amenity to the neighbour (despite the views of the Planning Inspector on this matter), then the applicant would be willing to discuss this matter further to see if there is a solution which the Council would be willing to support.

Yours sincerely



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**Enc.**