

69, Dobson Close,
LONDON.
NW6 4RU

FAO: Jennifer Dawson,
5 Pancras Square
London
N1C 4AG

Tuesday 14th July 2021

Dear Jennifer Dawson,

RE: 2021/2418/P

FOR: Residential Extension - erection 1 storey rear extension at ground level with external steps. Include - 2x roof lights, double doors with glazing and new windows.

AT: 54 Dobson Close, London, NW6 4RU

I write to voice strong objection against this planning application. The proposed development will result in adverse impact upon neighbours' amenity and local character through inappropriate massing and scale, particularly owing to the loss of garden area. I have outlined these below; effort has been made to separate each material concern, however please note that there is overlap between them.

The proposed development therefore exhibits poor design, and as such, this application should be refused by the Local Authority without undue delay. If, however, it is the decision of the council to allow permission, I request that conditions be considered, also outlined below.

Material Planning Considerations

Increased / Inappropriate Massing & Scale

The proposed development, by reason of its increased mass and subsequent dominance, will have an unacceptable harmful impact upon residential amenity and the character of the surrounding area. The extension represents a considerable increase in volume, impacting on the limited amenity area in the rear garden zone in the neighbourhood.

This contradicts the following planning policies.

- NPPF - 6, 12.
- National Design Guide - C1-41; I1-52; I2-55, B2-66,67
- Camden Local Plan 2017 - 7.2, 7.5, 8.9
- Design - Camden Planning Guidance Jan21 - 2.9

Environmental Impact

The applicant has not sufficiently considered the environmental impacts of the proposed scheme, specifically in regard to the garden that is set to be built upon. As part of the London Plan 2021, green spaces are to be encouraged and retained, and furthermore private gardens are defined as providing public amenity.

I note from the Building for Life guidance that gardens are encouraged to be at least 50% of the overall property footprint; the proposed extension would reduce it below this. This would reduce both future occupier and neighbourhood amenity and also contradict the Camden Local Plan (2017) that requires the protection of gardens wherever possible.

The loss of green amenity area contradicts the following planning policies.

- NPPF - 122
- Building for Life - 12
- National Design Guide - B2-130
- London Plan - Ch.4: 4.2.10
- Camden Local Plan 2017 - A3:c); 7.23
- Home Improvements - Camden Planning Guidance Jan 2021 - 5

Poor Design

Subsequent to the increased massing and the loss of amenity (particularly in loss of garden area), the proposed development can be considered to be of a poor quality. Achieving high-quality development is one of the key facets of national and local planning policy and of ensuring sustainable, high quality places.

This is well-established in the following policies.

- NPPF - 122:d), 124, 132
- Building for Life - 5, 12
- National Design Guide - C1:40; I1:51, 52; I2:55; B2:66, 67, H2: 129.
- Camden Local Plan 2017 - 7.1

Other Considerations

I further wish to note that, while Hilgrove Estate is not residing within a conservation area, the property in question is part of a development with architectural merit, exhibiting excellent post-war 1950s design. The proposed extension is not in keeping with this character.

Requested Conditions

Because of the excessive upscaling proposed by the development, I request that the total depth of the extension be no more than 3m.

In order to preserve the architectural merit of the existing building, I request that the existing back wall should not be removed, and that the new extension should not be keyed into the existing brickwork.

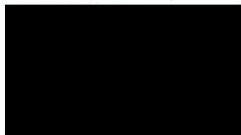
To mitigate against loss of green space that a green roof be required.

Summary

I trust the above has more than sufficiently outlined the multiple, evident issues with this proposed development, and demonstrated to the Council that the harmful impacts that will be caused by this development will significantly outweigh any purported benefits. It is therefore respectfully requested that this application be refused.

Yours Sincerely,

Mr. R. Savage



Appendix: Relevant National and Local Planning Policies

NATIONAL PLANNING POLICY

NPPF

2. Achieving Sustainable Development

12: Achieving well-designed places

122. Planning policies and decisions should support development that makes efficient use of land, taking into account: d) the desirability of maintaining an area's prevailing character and setting (including residential gardens)

124. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interest throughout the process.

127. Planning policies and decisions should ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting;
- f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

130. Permission should be refused for 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, taking into account any local design standards or style guides in plans or supplementary planning documents.

Building for Life

5 Character

Does the scheme create a place with a locally inspired or otherwise distinctive character?

We recommend that you avoid

Using the lack of local character as a justification for further nondescript or placeless development.

Ignoring local traditions or character without robust justification.

6 Working with the site and its context

We recommend

Being a consideration neighbour. Have regard to the height, layout, building line and form of existing development at the boundaries of the development site.

12. External storage and amenity space

We recommend

Thinking carefully about the size and shape of outside amenity space. It is a good idea to ensure that rear gardens are at least equal to the ground floor footprint of the dwelling.

National Design Guide

C1: Understand and relate well to the site, its local and wider context

40. Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- **The existing built development, including layout, form, scale, appearance, details and materials;**
- **Local heritage;**
- **Landform, topography, geography and ground conditions;**
- **Landscape character, drainage and flood risk, biodiversity and ecology;**
- **Access, movement and accessibility;**
- **Environment - including landscape and visual impact, microclimate, flood risk, noise, air and water quality;**
- **Views inwards and outwards;**
- **The pattern of uses and activities, including community facilities and local services; and**
- **How it functions.**

Others are non-physical, such as:

- **Social characteristics, including demographics;**
- **Economic factors; and**
- **The aspirations, concerns and perceptions of local communities.**

41. Well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it. This is proportionate to the nature, size and sensitivity of the site and proposal. A simple analysis may be appropriate for a small-scale proposal. Baseline studies covering a wide range of topics are likely to be required for a larger scale development.

I1 Respond to existing local character and identity

51. Local identity is made up of typical characteristics such as the pattern of housing, and special features that are distinct from their surroundings. These special features can be distinguished by their uses and activity, their social and cultural importance, and/or their physical form and design. Most places have some positive elements of character, particularly for their users. These can help to inform the character of a new development.

52. Well-designed new development is influenced by:

- **An appreciation and understanding of local vernacular, local or regional character, including existing built form, landscape and local architectural precedents;**

- The characteristics of the existing built form;
- The elements of a place or local places that make it distinctive; and
- Other features of the context that are particular to the area;

This includes considering:

- The composition of street scenes, individual buildings and their elements;
- The height, scale, massing and relationships between buildings;
- Views, vistas and landmarks;
- Roofscapes;
- The scale and proportions of buildings;
- Facade design, such as the degree of symmetry, variety, the pattern and proportions of windows and doors, and their details;
- The scale and proportions of streets and spaces;
- Hard landscape and street furniture;
- Soft landscape, landscape setting and backdrop;
- Nature and wildlife, including water;
- Light, shade, sunshine and shadows and
- Colours textures, shapes and patterns.

I2 Well-designed, high quality and attractive

55. Well-designed places contribute to local distinctiveness. This may include:

- Adopting typical building forms, features, materials and details of an area;
- Drawing upon the architectural precedents that are prevalent in the local area, including the proportions of buildings and their openings;
- Using local building, landscape or topographical features, materials or planting types;
- Introducing built form and appearance that adds new character and difference to places;
- Creating a positive and coherent identity that residents and local communities can identify with.

B2 Appropriate building types and forms

66. Well-designed places also use the right mix of building types, forms and scale of buildings and public spaces to create a coherent form of development that people enjoy. They also adopt strategies for parking and amenity that support the overall quality of the place.

67. The built form of well-designed places relates well to:

- The site, its context and the opportunities they present;
- The proposed identity and character for the development in the wider place;
- The lifestyles of occupants and other users; and
- Resource efficiency, climate change mitigation and adaptation.

H2 Homes and buildings

129. Well-designed buildings are carefully integrated with their surrounding external space. All private and shared external spaces... are high quality, convenient and function well. Amenity spaces have a reasonable degree of privacy.

132. Private amenity spaces including both gardens and balconies enhance visual and outdoor amenity. They can also provide a degree of privacy and separation for living areas from adjoining public space.

London Plan

Chapter 1: Good Growth

1.2.6 As London develops, the Mayor's Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50 per cent green cover across London, will be important to help London become a National Park City

Chapter 3: Design

Policy D6; Housing quality and standards

F Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private outside space

9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

Policy D6; Housing quality and standards

3.6.9 Private outside space should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony.

Chapter 4: Housing

4.2.10 Impacts on existing biodiversity or green space, as a result of minor housing developments, should be minimised and mitigated through measures such as returning hard standing to green space, the installation of green roofs and green walls, or the provision of landscaping that facilitates sustainable urban drainage in order to achieve the principle of no net loss of overall green cover

Annex 3: Glossary

Green cover

The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens.

Camden Local Plan 2017

Policy A1: Managing the impact of development

We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- d. require mitigation measures where necessary.

Protecting amenity

6.3. 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 or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

Visual privacy and outlook

6.4. A development's impact upon visual privacy, outlook and disturbance from artificial light can be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbours. Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

Sunlight, daylight and overshadowing

6.5. Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice 2011). Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

Construction Management Plans

6.12. Disturbance from development can occur during the construction phase. Measures required to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan.

Policy A3 Biodiversity

The Council will protect and enhance sites of nature conservation and biodiversity.

We will:

- c. seek the protection of other features with nature conservation value, including gardens, wherever possible;

Design

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.

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;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- j. responds to natural features and preserves gardens and other open space;
- 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,
- l. incorporates outdoor amenity space;

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.

Local context and character Local context and character

7.2. The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- character, setting, context and the form and scale of neighbouring buildings;
- the character and proportions of the existing building, where alterations and extensions are proposed;
- the prevailing pattern, density and scale of surrounding development;
- the impact on existing rhythms, symmetries and uniformities in the townscape;
- the composition of elevations;
- the suitability of the proposed design to its intended use;
- inclusive design and accessibility;
- its contribution to public realm and its impact on views and vistas; and
- the wider historic environment and buildings, spaces and features of local historic value.

7.5. Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials.

Sustainable design and durability

7.7. The Council expects development to be sustainable in design and construction.

Development should be consistent with the policies set out in section 8 of this plan on sustainability and also consistent with Camden Planning Guidance on sustainability.

7.8. Design should be durable in construction and where appropriate should be flexible and adaptable for a range of uses over time, a quality known as robustness. Robustness is influenced by factors including the size and shape of rooms, points of access and the depth of floorplates. The overall quality of a building is also a consideration as buildings with character and charm are more likely to be retained and adapted.

Responding to natural features and preserving gardens and open space

7.20. Development within rear gardens and other undeveloped areas can often have a significant impact upon the amenity and character of an area. The Council will resist

development that occupies an excessive part of a garden and where there is a loss of garden space which contributes to the character of the townscape.

Amenity space

7.23. Private outdoor amenity space including gardens, balconies and roof terraces, can add significantly to resident's quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space. Please refer to Policy A2 Open space for the Council's approach to ensuring that new open space is provided in development. The Council also requires that the residential amenity of neighbours be considered in accordance with Policy A1 Managing the impact of development.

Climate change mitigation

'Be lean'

8.9. Proposals should demonstrate how passive design measures including the development orientation, form, mass, and window sizes and positions have been taken into consideration to reduce energy demand, demonstrating that the minimum energy efficiency requirements required under building regulations will be met and where possible exceeded. This is in line with stage one of the energy hierarchy 'Be lean'

Home Improvements - Camden Planning Guidance Jan 2021

2.1.1 REAR EXTENSION

- Consider the installation of green roofs/ walls and/or solar panels. Biodiverse green roofs with a substrate depth of 100mm are preferred rather than sedum roofs, as they provide a greater biodiversity value. For further information about the installation of a green roof, see CPG on Energy efficiency and Adaptation.
- Respect and duly consider the amenity of adjacent occupiers with regard to daylight, sunlight, outlook, light pollution/ spillage, and privacy;
- Ensure the extension complies with the 45 degree test and 25 degree test as set out in the Amenity CPG - or demonstrate BRE compliance via a daylight test;

5. GARDENS

It is acknowledged that not everyone in Camden has access to a garden, but for this particular reason those who have should be mindful of the benefits that private front and rear gardens can bring to the wider community.

- They form part of the semi-public domain as they are overlooked from adjacent buildings and the streetscene and contribute greatly to the outlook of occupants;
- They contribute to the character of an area in terms of the relationship between buildings and spaces and the resulting openness or sense of enclosure;
- Play a significant role in maintaining the Borough's green infrastructure and biodiversity. See CPG Biodiversity;

Design - Camden Planning Guidance Jan 2021

2.4. This guidance applies to all development, whether involving new build, conversions, refurbishments, extensions or alterations. However, the implications for a proposal will vary greatly depending on the nature of the site, the proposed use, the scale of development, its interaction with surrounding sites, and existing buildings and structures on the site, including listed buildings.

2.6. Camden is committed to excellence in design. The Council is working with its partners to promote design excellence and improve public buildings, landscaping, open spaces and the street environment.

2.9. In order to achieve high quality design in the borough we require applicants to consider buildings in terms of:

- context
- height
- accessibility
- orientation
- scale and massing
- siting
- functionality and layout
- detailing
- materials