Adam Greenhalgh

**Development Management** 

London Borough of Camden

Town Hall Judd Street

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## Dear Mr Greenhaigh

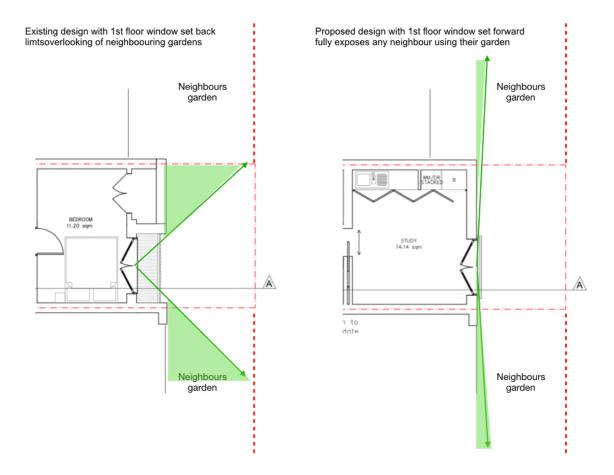
## Applications 2021/3382/P and 2021/3378/P regarding 17 Jeffreys Place NW1 9PP

I hope the twin applications 2021/3382/P and 2021/3378/P will be refused because taken together they amount to the demolition and reconstruction of one house in a terrace of 1970's townhouses described as making a positive contribution to the special character and appearance of the Jeffreys Street Conservation Area. 12-19 Jeffreys Place form a unity exemplifying a 50 year old modernist approach to urban living which is worth conserving as a whole. Proposals to demolish such buildings should be assessed against the same broad criteria as proposals to demolish statutorily listed buildings (PPG 15, paragraphs 3.16 - 3.19). The Jeffreys Street Conservation area statement specifically cites 12-19 Jeffreys Place as examples of unlisted buildings which make a positive contribution to the special character and appearance of the area. Applications 2021/3382/P and 2021/3378/P would result in the piecemeal reconstruction of one house in the middle of what otherwise remains an architecturally coherent terrace.

## 2021/3378/P specifically disregards the following planning guidance

1 Camden Planning Guidance "Amenity" (2021 section 2.2 page 4) extensions should be carefully designed to avoid overlooking.

The current proposal greatly increases overlooking of neighbouring gardens without offering any mitigation. The existing set back at first floor level reduces the overlooking of neighbouring gardens and we have mitigated the overlooking by the existing (set back) balconies by changing the garden layout and using plantings. These efforts will be nullified if the proposed first floor extension and addition of a Juliet Balcony is permitted.



2 Jeffreys Street Conservation area statement (2003) specifically UDP Policy EN31, JS 19 page 24 advises "Rear extensions should be as unobtrusive as possible and should not adversely affect the character of the building or the Conservation Area. In most cases such extensions should be no more than one storey in height.

The proposed extension at ground and first floor at No 17 make a two story extension radically altering the appearance of what is currently a uniform rear elevation to the terrace 12-19 Jeffreys Place. JS21 confirms rear extensions will not be acceptable where they would spoil an uniformed rear elevation of an unspoilt terrace or group of buildings

3 The drawings accompanying the proposal are not compliant with Local area Requirements for planning applications 2018 in that they fail to highlight structures to be demolished (p5) and offer no structural engineering information explaining the means of structural support (p16).

The plans presented effectively create a blank space at ground floor level and imply the remaining four floors are to be supported by some undisclosed means from the Breeze Block party walls of the adjacent properties. These seem quite unsuitable to sustain greatly increased structural loads not considered in the original design.

4 Camden Planning Guidance section 5.5 states "a CMP will be expected assessed on a case-by-case basis, where the construction process has a significant impact on adjoining properties. Particular 'on-site' issues arising from large scale demolition in sites with restricted access through narrow residential streets; "

It is clear that the demolition and subsequent construction proposed at 17 Jeffreys Place would have a serious impact on the neighbouring properties and narrow residential streets

yet no mention appears in the application of the need for a construction management plan. Despite the scale of demolition and reconstruction proposed the application ignores several guidelines in the Jeffreys St conservation area statement specifically JS2 (Within the Conservation Area total or substantial demolition of a building will require Conservation Area Consent), JS3 (The Council will seek the retention of those buildings which are considered to make a positive contribution to the character or appearance of the Conservation Area) and JS4 (All applications should show clearly the extent of demolition works proposed).

5 The application flouts CPG 1 (2015) section 4.7 p31 which advises replacement doors be designed to match the dimensions, proportions, joinery details, panelling and glazing of the original. The application removes the existing front door and garage door layout common to the terrace 12-19 Jeffreys Place and replaces it with a folding arrangement out of keeping with the original design and degrading the positive contribution the terrace currently makes to the special character and appearance of the area.

## 2021/3382/P specifically disregards the following planning guidance

- 1 Camden Planning Guidance "Amenity" (2021 section 2.2 page 4) roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking. The proposal to extend the second floor balcony beyond its current set back and to develop a third floor balcony will expose all the gardens of Jeffreys Place/Jeffreys Street to intrusive overlooking.
- 2 The application proposes a dormer in contravention of CPG 1 (2015) section 5.11 which requires that roof dormers should sit within the roof slope and appear as an extension to the existing roof whilst the existing roof form is maintained. The proposed dormer dominates rather than being subordinate in size to the roof slope being extended and fails to retain any area of the existing roof slope.

The proposed dormer is shown adjacent to and projecting above the party walls. There is no indication of how rainwater will be collected and drained from the flat sections of the dormer or the glass "conservatory" proposed for the flat section of the existing roof. Indeed the proposed arrangement will shed rainfall onto the neighbouring properties potentially casing damp and other structural deterioration to adjacent buildings.

The proposed roof alterations appear to be unacceptable under section 5.8 of CPG1 because of its adverse affect on the skyline of a complete terrace unimpaired by alterations or extensions.

3 Jeffreys Street Conservation area statement (2003) specifically UDP Policy EN31 JS 24 advises roof extensions which fundamentally change the roof form are uncharacteristic of the Conservation Area. The introduction of roof additions of this nature is unlikely to be acceptable due to the adverse affect on the skyline.

Specifically JS22 advises Conservatories such as the glass structure proposed for the roof of 17 Jeffreys Place should be small in scale and subordinate to the original building. Conservatories at high level will not be permitted. Despite this clear advice the application includes a large glass box well above the existing roof line and quite unlike any other roof

in the terrace.

Similarly JS25 advises dormers or 'velux' type windows at the front will not be allowed where a cluster of roofs remain largely unimpaired. No other building in the terrace 12-19 Jeffreys Place has velux type windows on its front roof

I hope the council agrees this application fails to respect Camden's Planning Guidance to the detriment of the Jeffreys Street Conservation area and will refuse the applications 2021/3378/P and 2021/3382/P

Yours sincerely

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