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Ewan Campbell
Development Management
Camden Town Hall
Judd Street
WC1H 9JE

VIA EMAIL & POST: planning@camden.gov.uk

33715/A5/JC/HW

17th January 2022

Dear Ewan,

**RE: OBJECTION TO APPLICATION REFERENCE 2021/4284/P AT 14H AVENUE ROAD,
LONDON, NW8 6BP**

We write on behalf of our client (the owners of the adjacent property at 14G Avenue Road) to express their strong objection to planning application reference 2021/4284/P in relation to the proposed single storey and three-storey rear and side extensions at 14H Avenue Road ('the Site').

Following a review of the submitted plans and documents, our client has significant concerns that the proposed development will have an adverse impact on the local area and neighbouring properties, including their property at 14G Avenue Road. For these reasons our client seeks to object to the proposed development on the following grounds:

- 1) Amenity;
- 2) Design;
- 3) Parking;
- 4) Trees; and
- 5) Flooding.

We provide our comments on each of these concerns in further detail below. We trust that these will be fully considered by the Council when determining this application and from the outset it should be made clear that it is our client's contention that the application should be **refused**.

Objection 1: Amenity

Policy A1 of the Camden Local Plan requires developments to protect the quality of life of neighbours and will not grant planning permission for proposals which result in an unacceptable harm to amenity by reason of visual privacy and outlook, sunlight, daylight and overshadowing, transport impacts, impacts of the construction phase, odour, fumes and dust pollution. The Amenity CPG (2021) and Home Improvement CPG (2021) also place a greater emphasis on developments being designed to protect the amenity of existing residents.

The proposed single storey rear extension would directly abut the shared boundary with our client's property. The Amenity CPG requires applicants to use the 45-degree test to determine whether the daylight of neighbouring properties would be affected by extensions. Our client is concerned that



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the proposed rear extension would breach the 45-degree test and would therefore, have an adverse effect on the daylight entering the ground floor rear principal window of no.14G.

The additional bulk and massing created by the rear extension so close to the shared boundary would also have an overbearing impact on no.14G and would create an oppressive outlook and a sense of enclosure when combined with the existing extension on the opposing shared boundary.

Moreover, the introduction of a solid 1.8m high privacy screen on top of the existing rear extension is also of concern. This would significantly increase the height of this elevation and could cause harm to the amenity of no.14G due to its overbearing impact on their external amenity space.

For these reasons, our client is of the view that the rear extension would cause unacceptable harm to the amenity of residents living in their property contrary to Policy A1 of the Local Plan, the Amenity CPG, Home Improvements CPG and paragraph 130 of the NPPF.

Objection 2: Design

Policy D1 of the Camden Local Plan confirms that the Council will seek to secure high quality design in developments and requires proposals to respect local context and character and preserve gardens, among other design-related criteria. The Policy states that the Council will resist development of poor design and that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

The Design CPG (2021) provides additional design-related guidance. It states that, to achieve high quality design, applicants must consider a range of themes including context, height, scale and massing, siting, materials, and detailing. Regarding context and character, the Design CPG requires development to respond positively and sensitively to the existing context and integrate well with the existing character of a place, building and its surroundings.

Based on the submitted plans our client is concerned that the proposed development would create a dwelling which is of a size that is not proportionate to other properties at 14 Avenue Road and out of character with the local context. The side extensions would also undermine the symmetry of the host building and the proposed glazed link and screen would not be in keeping with the materials and architectural style and detailing of the building and adjacent property.

In terms of private amenity space, our desktop assessment has identified that the single storey side extensions would result in the loss of vegetation, several trees and garden area within the Site.

Policy D1 and A2 of the Camden Local Plan support the protection of green infrastructure and seek to protect green spaces including gardens. The supporting text for Policy A2 at paragraph 6.37 says:

"Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area."

Providing guidance on how to apply these policies the Design CPG states that all development should seek to maximise opportunities for taking a holistic and integrated approach to greening and landscaping. Paragraph 4.38 states:

"Front, side and rear gardens make an important contribution to the townscape of the Borough and contribute to the distinctive character and appearance of individual buildings and their surroundings. Gardens can be prone to development pressure and their loss can result in the erosion of local character, amenity and biodiversity and affect their function in reducing local storm water run-off."

Paragraph 4.41 goes on to state:

"Planning permission is unlikely to be granted for development whether in the form of extensions, conservatories, garden studios, basements or new development which

significantly erode the character of existing garden spaces and their function in providing wildlife habitat."

As set out above, extending the property to the side would require the removal of vegetation and several trees within the garden area of the Site. The loss of these landscape features would erode the character of the existing garden and harm the suburban character of the surrounding area. The Home Improvements CPG states that applicants should consider incorporating greenery within the design of extensions to mitigate the loss of green infrastructure. No replacement tree planting is proposed as part of the development to mitigate the loss of the greenery on the Site. As such, the loss of landscape features resulting from the proposals would cause harm to the character of the Site and surrounding area.

Overall, the proposed development will not add to the overall quality of the area and is not in keeping with the style and size of other properties at 14 Avenue Road. Furthermore, the proposed extensions will result in the loss of vegetation, trees and garden space and no replacement planting is proposed to mitigation this loss. As such, the proposals are contrary to Policies A1 and A2 of the Camden Local Plan, the Design CPG, the Home Improvement CPG and paragraph 130 of the NPPF.

Objection 3: Parking

Policy A1 of the Camden Local Plan resists development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network.

Parking provision at 14 Avenue Road is limited and we understand no.14H currently only has access to one parking space in the shared parking court. It is our firm view that increasing the size of the dwelling will result in a greater level of car ownership and, given the lack of available parking on-site, this has the potential to displace vehicles onto the highway. As such, our client considers the proposals to be contrary to Policy A1 Camden Local Plan.

Objection 4: Trees

Policy A3 of the Camden Local Plan states that the Council will protect and seek to secure additional trees and vegetation as part of new development. The Tree CPG (2019) stresses the importance of trees for both their amenity and biodiversity value and states a survey of existing trees is to be undertaken where there is the potential for them to be affected by new development. The CPG also recognises that trees are at particular risk of being damaged during construction works.

The submitted Proposed Ground Flood Plan (drawing no. 0542_00_002a) shows that the proposed rear extension overlaps with the tree canopy along the south eastern boundary of the Site. However, our desktop review of the Site suggests the trees plotted on the submitted plans are not accurate. This potential inaccuracy could mislead the Council in their understanding of whether the proposals would have an adverse impact on trees.

As set out above, our desktop assessment suggests there are several trees along the south eastern boundary of the Site that will be lost as a result of the proposed development. There is also the potential for the Root Protection Areas (RPAs) of other trees to be affected by the proposed development. To, therefore, ensure that the impact on trees can be fully understood the applicant needs to prepare an accurate Tree Survey in support of the application.

Our client reserves the right to comment on this Tree Survey. However, our client strongly objects to loss of any trees and vegetation on the Site particularly given that the applicant is not proposing any additional planting as it would harm the suburban character of the area and result in the loss of existing habitats on the Site. For these reasons, we consider the application to be contrary to Policy A3 of the Camden Local Plan.

Objection 5: Flooding

Policy CC2 of the Camden Local Plan requires new developments to be resilient to climate change, and all developments should adopt appropriate adaptation methods such as the protection of existing

green spaces and reducing surface water run-off. As we have discussed above, the proposed side extension will result in the loss of vegetation and garden space on the Site. The loss of this green space and the scale of additional development proposed will increase the impermeable surface area and consequently the risk of flooding which we understand is already an issue locally. As such, we consider the proposals would be contrary to the Policy CC2 in terms of minimising flood risk and reducing surface water run-off.

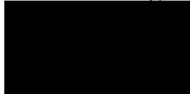
Conclusions

In conclusion, for the reasons set out above, our client **strongly objects** to the development of a single storey and three-storey rear and side extension at 14H Avenue Road.

The proposed development does not accord with the relevant policies of the Camden Local Plan or its supporting guidance and therefore, our client respectfully requests that this planning application is **refused**.

We trust that this letter will be taken into consideration by the Council when determining this application and we request to be notified if the applicant or agent submit any further information. We also reserve our right to speak at Planning Committee against this application should this situation arise.

Yours faithfully,



JORDAN CLARK
Planner