

P2018/2667/FUL

24.09.18

23 Harberton Rd, N19 3JS

Dear Ms. Robinson

I am writing to you on behalf of WHPARA (Whitehall Park Residents' Association), in connection with the planning application relating to 23 Harberton Road, N19 3JS.

We wish to lodge our objections to this application, and we detail our chief concerns below:

1. As you and your colleagues will be aware not only is Harberton Road in the CA7 Conservation Area, but your **Conservation Area Policy Statement** notes that, along with Whitehall Park and Gladsmuir Roads it has properties of 'exceptional architectural merit' (7.4). Furthermore, it states that although there are no statutory listed buildings in CA7, 'most of the properties on these 3 roads are locally listed' (7.12). In particular, the group of houses which include No. 23 are of note owing to the unique and distinctive stucco mouldings and decorations on the front of these properties, some showing heraldic animals and others floral motifs. They regularly feature in history walks of the area.
2. It is a pity, we feel, that the applicants are unaware of these facts. The Design and Access Statement baldly states that No.23 is 'not listed and is not in a conservation area'. We note that the applicant did not seek any pre-application advice from LBI. This may explain why so many elements of this proposal contravene pretty much all of the recommendations for basement applications in conservation areas which you specify in 3 key documents: **Conservation Area Design Guidelines, Development Management Policy DM2.3** and the **Islington Urban Design Guide**.
3. Our comments and objections are based upon the Design and Access Statement and the accompanying plans. However, we note that you require basement applications within a conservation area to include a **Sustainable Design and Construction Statement** (Basement Development Strategy 7.7.5), which is not included. We have found difficulty in assessing the viability of the proposals as we find the D and A and the plans rather thin and lacking basic information. For instance, how are we supposed to know if the height of the basement meets the legal requirement to not exceed one storey in height and not to exceed 3 metres floor to ceiling height? We can find no dimensions specified anywhere. And how can we assess if the proposal as a whole meets your requirements for scale as specified in **Design Indicator D1.1**: 'a basement and/or other structures should cumulatively occupy less than 50% of the original garden/unbuilt upon area and be smaller in area than the original footprint of the dwelling, *whichever is the less*' (your italics, our underlining as we are concerned that this basement extends both front and back).
4. The proposal will significantly and materially alter the front of the house in order to accommodate an enhanced lower ground floor with a new window, door and steps down, and 2 front lighwells. As you know, this contravenes many planning policies. Here are just a few:
 - a. Your **Basement Development Strategy** states that the key objective for basement in a CA is that 'Development should make a positive contribution to Islington's local character and distinctiveness, be of high quality contextual design and conserve and enhance a CA's significance'. It further specifies:
 - b. 'basements should be proportionate, subordinate to the above ground building element, and reflect the character of its surrounds (7.1.12)'. We would argue that, especially in a

conservation area, this proposal, with its scanty detail, appears to be none of these things.

- c. 8.4 states 'Basements in CAS should be designed to:
 - i. not add visual clutter such as additional railings, rooflights, **lightwells and staircases**
 - ii. protect and enhance gardens, open areas and open aspect
 - iii. maintain and repair prevailing garden level of and area and avoid undue cut and fill outside of the building footprint
 - iv. protect trees and other established planting'
 - v. In our view this proposal flouts 8.4
- d. 'The most discreet location for lightwells will generally be to the rear of the property. They should be modest in scale and located immediately next to the rear elevation' (7.3.2). 'For front gardens, basement design should integrate sympathetically with the existing elevation and front threshold. Where a lightwell will impact on an established front garden or open area that is characteristic of the street or terrace, the majority if not all of the front area should be retained' (7.3.3). **Design Indicator D1.4** is clear that 'lightwells should be modest, discreetly located, and designed to protect and enhance the character and appearance of the area'. Clearly, these proposals do not match any of these criteria.
- e. We have already noted that it is difficult to determine the scope and scale of the proposed additions and extensions; it is equally impossible from the information available to know if the applicants are complying with **Design Indicator D1.8** 'proposals should provide satisfactory landscaping, maximise permeability, biodiversity value and sustainable drainage through provision of soft landscaping and permeable surfacing and appropriate planting'. Perhaps the missing Sustainable Design and Construction Statement might address these concerns?
- f. If we turn to Conservation Area Policy, it is clear that the proposal is deeply unsympathetic to the scale and character of the area. It does not respect the proportions of the houses on Harberton. There is some diversity of style towards the Archway Road end but No 23 was not built with a lower ground floor and to insert one now, thereby destroying the façade, would be a travesty.
- g. We would also seek to have much more detail about proposed materials and design principles. For instance, we can see from the photos included that the existing windows in the house at the back appear to have been changed from sash to uPVC. We have no confidence that the scale, design and materials will be in keeping with the existing property, and suitable for a house in a conservation area, as per LBI's policy.

It is truly one of the worst applications we have ever seen, completely unsympathetic to conservation principles, and would be a blight on the road, not an enhancement. We know how much LBI values heritage and conservation so we are hopeful that you have sufficient grounds to reject this application.

WHPARA