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Sent: 02 April 2023 08:44
To: Planning Planning; Dawn Allott; Derek Gomez; Tuhinur Khan
Subject: CAAC Consultation Comments Received

Camden Council

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Application ref.

2023/0160/P

Site Address

10 St Mark's Crescent London NW1 7TS

Development Description

Excavation of basement; erection of replacement single storey rear extension with terrace above; replacement of windows; installation of rooflights and other associated works.

Planning officer

Nathaniel Young

Advisory committee

Primrose Hill

Advisory committee

Please send your comments by:

2023-04-02T00:00:00.000

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Objection

Do you have any comments or consider that the proposal is harmful to or does not preserve the character and appearance of the conservation area?

please see attached pdf file for PHCAAC's strong objections. Thank you

Do you want to attach any files?

Yes

Attach files

PHCAAC Advice 10 St Marks Crescent 2023 0160 P March 2023 .pdf

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PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE
12A Manley Street London NW1 8LT

15 March 2023

10 St Mark's Crescent NW1 7TS 2023/0160/P

Strong objections

1. Rear extension

1.1 We object strongly to the proposed changes to the rear extension. The rear of the houses backing on to the Canal in St Mark's Crescent are clearly visible from the publicly accessible towpath. This public walk is a popular aspect of the Conservation Area and brings the Regent's Canal into visible connection with the subsequent original building of Primrose Hill, including St Mark's Crescent. The relationship between the rear elevations of the houses, including no. 10, and the gardens and Canal with the canted bay windows is important and has already been harmed by the present extension. But the present structure at least has the character of a light-weight conservatory style construction. The current proposal introduces an alien set of details, in particular the heavy fascia which sits forward of the glazing and gives excessive weight to the appearance, further harming the original relationship of rear elevation to rear garden.

1.2 But the 'rear-extension' is also now proposed to enclose the side elevation of the house (see existing and proposed lower ground floor plan, with existing and proposed side elevation Y1, and Design and Access Statement Isometric to para 6.0). The drawings show the existing side elevation which has modest scale of doors and windows. These forms are a key characteristic of these houses, where the formal elements of the paired houses, with their symmetrical relationships, and range of classically derived forms, are moderated by the domestic character and scale of many details, including, as here, the detailing to the flank wall to the lower ground floor. This architectural fusion is one of the key elements of the character and appearance of the conservation area. The side elevation is clearly visible from the street, where it frames views to the rear garden and the Canal. The projecting structure now proposed, with its out-of-scale fenestration, would substantially harm the character and appearance of the conservation area.

2. Roof

2.1 The simple sloping roof is visible in long views from both St Mark's Crescent (Regent's Park Road end) and from Regent's Park Road itself beside the Canal bridge, where the roof of no. 10 St Mark's Crescent forms the conclusion of a group of substantially unharmed roof slopes. Policy guidance PH18 in the *Primrose Hill Conservation Area Statement*, current SPD, specifically states that alterations to roofs are 'unlikely to be acceptable' where 'The property forms part of a group or terrace which remains largely, but not necessarily completely, unimpaired.' We note that there is one existing rooflight on the roof, but it is placed to do minimal harm, whereas the proposed rooflights would visibly disrupt the simple form of the surviving roof which is important to the character and appearance of the house and the group of which it is a part.

3. basement and front area

3.1 Historic development, possibly from before designation of the conservation area in 1972 has included the loss of the front gardens which were once characteristic of these houses. The areas between the main house front elevation and these front gardens were relatively narrow. We are

strongly opposed to the further loss of effective planting space in these front spaces. The loss is harmful ecologically, but also harms the domestic green space which provides a characteristic frame for these houses. Again this is part of the architectural palette which created the character and appearance of the conservation area.

3.2 We are strongly opposed to the proposed basement under this front garden. We note Camden's Local Plan Policy A5 at 'h', which requires that a basement should 'not exceed 50% of each garden within the property' and at 'l' which requires that a basement 'be set back from neighbouring property boundaries where it extends beyond the footprint of the host building'. The proposal goes against both these criteria which support the preservation of the character and appearance of the conservation area.

3.3 We question the impact on adjoining structures. We support neighbours' concerns that the Ground Movement Assessment by Chelmer did not include a site walkover (Report p. iv) or a site investigation (Report p. 3 para 1.1). We urge a rigorous questioning of conclusions based on such an approach. The stability of the group of houses of which no. 10 is a part has to be a major concern in terms of the preservation of the character and appearance of the conservation area.

4. CMP

4.1 The Advisory Committee fully supports the need for a Construction Management Plan in developments of this type in the conservation area.

4.2 The problem of the scale of St Mark's Crescent needs to be taken into full account in the effective operation of a CMP. We note that two Planning Inspectors have expressed scepticism about the effective operation of a CMP in Kingstown Street, another narrow road in the PHCA.

4.3 On the appeal on 34 Kingstown Street (APP/X5210/A/09/2104256 and APP/X5210/A/09/2104294), in her decision letter of 12 October 2009 at paras 13-16, the Inspector noted that 'Kingstown Street is so narrow, numerous other dwellings are so close, and the appeal site is so restricted, that almost all work must inevitably spill out onto the public street causing unreasonable disruption to the lives of others.' These problems added weight to her dismissal of the appeal. On the appeal on 10 Primrose Hill Studios, in his decision of letter of 17 January 2022 paras 43-45 (APP/X5210/W/20/3265608 and APP/X5210/Y/20/3265609), the Inspector noted problems associated with construction traffic due to the 'the narrow and constrained configuration of Kingstown Street'. He also stated that the proposed development at 10 Primrose Hill Studios would be contrary to Local Plan Policy A1 (which seeks to manage the impact of development and protect the amenity of communities and neighbours, considering factors including impacts of the construction phase) if no appropriate mechanism were implemented to ensure the enforceability of a CMP.

5.0 The proposals would neither preserve nor enhance the character and appearance of the conservation area.

5.1 The Advisory Committee objects strongly to the application.



Richard Simpson FSA
Chair