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Via Planning Portal only

29 June 2023

Dear Sir/Madam

33 FERNCROFT AVENUE, NW3 7PG

PLANNING & LISTED BUILDING CONSENT APPLICATION UNDER THE TOWN & COUNTRY PLANNING ACT 1990 AND PLANNING (LISTED BUILDING & CONSERVATION AREAS) ACT 1990.

EXTERNAL ALTERATIONS INCLUDING THE REMOVAL OF WINDOWS TO THE FLANK ELEVATION, REPLACEMENT AND ALTERATIONS TO EXISTING WINDOWS AND DOORS TO FRONT, SIDE AND REAR ELEVATIONS, REPLACEMENT OF BALUSTRADES TO THE REAR BALCONIES, REMOVAL OF PROJECTING PELMET ON THE REAR ELEVATION, REMOVAL OF CONCRETE LINTELS AND REPLACEMENT WITH BRICK ARCHES ON THE REAR ELEVATION, REMOVAL OF RENDER TO REAR ELEVATION AT LOWER GROUND LEVEL AND REINSTATEMENT OF BRICKWORK.

Please accept this covering letter as an accompaniment to this Planning and Listed Building Consent application for proposed external alterations to 33 Ferncroft Avenue, NW3 7PG ('the site'). This letter provides a summary of the site and the proposed development. For the avoidance of doubt, this Planning and Listed Building Consent application does not concern the use of the building. This application is submitted alongside an application for a Certificate of Lawful Development relating to the proposed use of the building and a Listed Building Consent application for the proposed internal works.

Please find also enclosed a completed application form, a full set of existing and proposed plans and a Design & Access Statement.

The Site

The site is located on the south side of Ferncroft Avenue and shares its rear boundary with West Heath Lawn Tennis Club. The site is within Redington Froggal Conservation Area and the Redington and Froggal Neighbourhood Plan Area. The application building is a Grade II listed building.

The listed application building is a two-storey semi-detached property with living accommodation in the basement and attic. The property has been subdivided into four flats, of which only two are occupied and the remainder are vacant due to their state of disrepair. The listed building is described in greater detail later in this letter.

The Proposal

This application seeks planning permission and listed building consent for various internal and external alterations to the property. The description of development can be best described as follows:

'External alterations including the removal of windows to the flank elevation, replacement and alterations to existing windows and doors to front, side and rear elevations, replacement of balustrades to the rear balconies, removal of projecting pelmet on the rear elevation, removal of concrete lintels and replacement with brick arches on the rear elevation, removal of render to rear elevation at lower ground level and reinstatement of brickwork.'

For full details of the proposed development please refer to the supporting Design & Access Statement and the submitted plan drawings.

Planning History

Application site:

On the 24th of July 1969, planning permission was approved (ref: 7290) for the conversion of dwelling house into five self-contained flats. Construction of dormer window to side elevation and formation of additional window openings in flank wall.

On the 2nd of September 1970, planning permission was approved (ref: 9266) for the conversion of a dwelling house into 4 self-contained flats and one self-contained maisonette, the formation of one window opening in the flank wall at ground floor level and the construction of a terrace at the rear of the second floor, The conversion providing eleven habitable rooms.

On the 7th of May 1973, planning permission was refused (ref: 16417) for the construction of an open terrace at 1st floor level on the roof of the ground floor bay window at the rear of No. 33.

On the 20th of December 1973, planning permission was granted (ref: 17815) for the construction of a partly screened terrace at first floor level on the roof of the ground floor bay window at the rear of 33.

On the 16th of June 1981, planning permission was granted (ref: 32335) for the conversion of existing basement into additional habitable room for ground floor flat.

On the 20th of June 2005, listed building consent was granted (ref: 2005/1739/L) for the internal alterations involving the demolition of existing walls, formation of new openings and walls in association with the re-configuring of internal layout to existing first floor flat.

On the 11th of February 2010, planning permission was granted (ref: 2010/0087/P) for the change of use from two self-contained flats (Class C3) at lower ground and ground floor levels into a single flat including extension at basement level.

On the 11th of February 2010, listed building consent was granted (ref: 2010/0092/L) for the internal alterations and works including extension at basement level as part of conversion from two flats at ground and lower ground levels to single flat.

Design and Heritage Impact

Statutory Constraints

— Planning (Listed Buildings and Conservation Areas) Act 1990 —

Section 16 (2) states *'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'*.

Section 66 (l) states *'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or of any features of special architectural or historic interest which it possesses'*.

Section 72 (l) states *'In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'*.

Policy Context

Section 12 of the NPPF refers to well-designed places. Paragraph 130 (c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Section 16 refers to the historic environment and requires consideration as to whether the proposal sustains and enhances the significance of heritage assets, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset (paragraphs 199-203). Paragraph 202 confirms that where a proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.

Policy D1 of the Camden Local Plan (CLP) requires development to be of the highest architectural and urban design quality, and to have particular regard to design and visual impact and to the context within which it is placed, and the contribution it makes to the landscape qualities of the area. The aim of this policy is further reflected in London Plan Policy D4 (Good Design) and the guidance within the Redington/Frognaal Conservation Area Character Appraisal & Management Plan (2022). Specific guidance in relation to extensions and alterations to existing properties and achieving good design is further provided in the 'Home Improvements' (2021) and 'Design' (2021) Camden Planning Guidance (CPG).

CLP Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and Listed Buildings. These aims are further reflected in London Plan Policy CH1 (Heritage Conservation and Growth) and the Redington/Frognaal Conservation Area Character Appraisal & Management Plan (2022).

Redington Frognaal Neighbourhood Plan (RFNP) Policy SD2 requires new development to preserve or enhance the green garden suburb character and appearance of the Conservation Area. RFNP Policy SD4 requires development to complement the distinctive character of the Redington Frognaal area whilst RFNP Policy SD6 requires the retention of architectural details in existing buildings, such as windows, which contribute positively to the character and appearance of the area, to be retained or where removed, reinstated.

Identifying the heritage assets

From an assessment of historic environment databases using a search area of 100m from the application site, the following heritage assets were identified –

- 33 and 35 Ferncroft Avenue – Grade II Listed Building – List Entry No. 1078345
- 26 and 26A Ferncroft Avenue – Grade II Listed Building – List Entry No. 1078344
- Redington Froggnal Conservation Area

Assessment of character and heritage significance

This section has regard to *Historic England's Conservation Principles, Policies and Guidance (2008)* which provides guidance on heritage values and significance.

-- Redington Froggnal Conservation Area --

From an assessment of Redington/Froggnal Conservation Area Character Appraisal & Management Plan (2022), the special architectural or historic interest and character of the conservation area is based broadly on the following factors –

1. Landscape Infrastructure - characterised by smaller front gardens and extensive rear gardens, many containing mature trees, streets often have grass verges and are lined with trees, notably veteran plane trees, planted when the streets were first laid out;
2. Townscape Characteristics - including residential dwellings set back behind small front gardens or front courts, with low front walls or hedges, some large-scale mansion blocks, significant variation of building scale; and
3. Architectural Characteristics - common features on buildings reflecting the time of construction in late C19 and first half of C20, which are stylistically diverse but predominantly draw on Queen Anne Revival and Arts and Crafts influences.

As confirmed within the Redington/Froggnal Conservation Area Character Appraisal & Management Plan (2022), Ferncroft Avenue has a variety of property styles and materials, but with similar scale and degree of set-back from the road, with front walls and hedges.

Ferncroft Avenue is a straight road, with mainly three and four storey semi-detached properties and detached villas. Mature London Plane street and garden trees are an important part of the character. Properties have combinations of red brick, plain tile, render, tile hanging, and timber windows, some with small panes. There is considerable variation in properties, including Dutch gables, bay and dormer windows, open porches, and brick quoins.

Front boundaries to residential properties include red brick, hedges and volcanic rock walls. The Heath Lawn Tennis Club and the concrete top of Kidderpore Reservoir to the south of the site is the only significant open area in the conservation area. The Redington/Frogna Conservation Area Character Appraisal & Management Plan (2022) confirms that some harm has been caused by replacement timber fences to site frontages and loss of front boundaries and front gardens to hard surfaced parking areas.

There are numerous Grade II listed buildings within the conservation area and one Grade II* listed building which is the Church of St Luke. There are also numerous other buildings of architectural and/or historic interest which are locally listed.

The above assessment confirms that the significance of Redington/Frogna Conservation Area is principally derived from the illustrative value of the historic fabric which allows people to perceive the area as a visible link between the past and present, and the aesthetic value of the landscape, townscape and architectural characteristics which provokes sensory stimulation.

- 33 and 35 Ferncroft Avenue -

33 and 35 Ferncroft Avenue is a grade II listed building (List Entry No. 1078345), which was first listed in January 1999 and described as follows –

'Pair of semi-detached houses. 1902. By CHB Quennell; built by GW Hart. Red brick. Tiled gabled and hipped roofs with tile-hung gabled dormers and overhanging bracketed eaves. Symmetrically designed pair. 2 storeys and attics. 3 windows each. Projecting gabled outer bays with further projecting bays forming bay windows through the ground and 1st floor with hipped half roofs; tripartite sashes and narrow sashes to cheeks; gables with acroteria. Entrance bays, slightly projecting on angle of outer and central bays, have round-arched porches with sash windows above. Central bays at ground floor continue line of entrance bays with tripartite sashes under penthouse roofs having a stone coped parapet at the line of the party wall. 1st floor corresponding tripartite sashes with the party wall roof parapet continuing onto the wall as a stepped corbel. INTERIORS: not inspected.'

The significance of this listed building is principally borne out of the illustrative value of its historic fabric, associative value with the influential architect CHB Quennell and the aesthetic value of the Queen Anne Revival architectural style and symmetrical design. The symmetry of the building frontage has been preserved, although the symmetry of the overall planform and fenestration has been disrupted by later extensions and alterations to No. 33 as demonstrated through the planning history. The open space immediately south of the site is a positive contributor to the setting and significance of the listed building.

– 26 and 26A Ferncroft Avenue –

26 and 26A Ferncroft Avenue is a grade II listed building (List Entry No. 1078344), which was first listed in January 1999 and described as follows –

‘Detached house and attached former coach/motor house now converted to a dwelling. 1898, coach/motor house possibly later. By CHB Quennell; built by GW Hart. No.26: red brick with tile-hung 1st floor. Tiled hipped and gabled roofs with overhanging bracketed eaves, tall brick chimney-stacks and dormer with small gable. Asymmetrical design. 3 storeys. 3 windows plus single storey 2-window right hand bay. Left hand gabled bay with canted bowed bay sash windows to ground having entablature lintel which continues across the facade on columns and 1st floor with pulvinated lintel and cornice and tile-hung apron. 3rd floor Venetian type sash window in gable with short lengths of moulded cornice at angles to appear as a broken pediment. Central entrance bay with porch formed by entablature and columns with enriched capitals and cast-iron and glass hood; part-glazed panelled door with overlight. To right, a tripartite sash with corresponding sash at 1st floor and single sash above porch. Single storey bay has 2 sashes with gauged brick flat arches, a brick modillion cornice and blocking course. No.26A: red brick. Tiled hipped and gables roofs with overhanging eaves and eaves cornice extending across the gabled left hand bay to form a pediment. Asymmetrical design. 2 storeys. Irregular fenestration of 2 windows. Former vehicle entrance in gabled bay converted to a window and entrance with central casement above having relieving arch in pediment with arrow slit window above. Right hand bay with segmental-arched window appearing behind a C20 window and staircase leading to 1st floor entrance with porch formed by entablature carried on a column; 3-light 1st floor window. INTERIORS: not inspected. (British Architect: 2 September 1898).’

The significance of this listed building is principally derived from the illustrative value of its historic fabric, associative value with the influential architect CHB Quennell and the aesthetic value of the Queen Anne Revival architectural style and elaborate design.

Assessment of the proposals impact upon the character and appearance of the area and significance of the identified heritage assets

The proposal involves only one alteration to the principal elevation, which is the lowering of the window sill at the lower ground floor level. By virtue of the nature of this alteration and given that No.33’s lower ground floor is not visible within the street scene, there would be no material impact upon the character and appearance of the area. By virtue of the minor nature and positioning of the other proposed alterations, as discussed below in relation to the

impacts upon the significance of the listed application building itself, there would be no material impact upon the character and appearance of the area. Accordingly, the proposal preserves the special character and appearance of the conservation area and the setting of the nearby listed building 26 and 26A Ferncroft Avenue.

Impact of the external alterations on the listed building at 33 Ferncroft Avenue

1. Removal of four windows to the flank elevation - a number of openings/windows have been added to the flank wall overtime, as demonstrated through the planning history. These windows are not part of the original fabric, and the openings would be filled in with red brick to match the external facing walls. These alterations would therefore respect the original design of the property.
2. Replacement of windows and doors - the proposed development would replace the existing modern casement windows with traditional painted timber sash windows (conservation area style) to match the predominant window design on the listed pair of semi-detached properties. All windows would be replaced with double glazed painted timber windows to match the existing windows. The external door replacements to the rear elevation would match the design of the existing. These alterations would therefore respect the original design of the property.
3. Lowering of sills – the four sills to be lowered (x1 to the principal elevation and x3 to the rear elevation) are for the purpose of increasing natural light within the property to improve the quality of the internal environment. The proposed lowering of sills is minimal and therefore has a negligible impact upon the external appearance of the property. These alterations would therefore respect the original design of the property.
4. Enlargement of two rear openings - the proposal would enlarge two existing openings on the rear elevation of the property, located at lower ground and upper ground floor level. By virtue that the rear gables of the pair of semi-detached properties are not symmetrical and not read together in any event, together with the fact that the enlargement would be modest, it is contended that this element of the proposal would preserve the special architectural and historic interest of the listed building.
5. Replacement of balustrades to the rear balconies - the timber balustrades to the rear balconies would be replaced with cast iron balustrades which is a higher quality and more traditional material that would better respect the integrity and elaborate design of the listed building.

6. Reduction of rear dormer width – by virtue that the reduction would be modest and the adjoining property, No.35, does not have a symmetrical dormer on its rear elevation, this alteration would have a negligible impact upon the appearance of the listed building and would preserve its special architectural and historic interest.
7. Removal of projecting pelmet on the rear elevation – this is a modern addition the listed building. This alteration would therefore better respect the original design of the listed building.
8. Removal of concrete lintels and replacement with brick arches on the rear elevation – the concrete lintels are a modern and unsympathetic addition to the listed building. The brick arches would match No.35's and would better respect the integrity and elaborate design of the listed building.
9. Removal of render to rear elevation at lower ground level and reinstatement of brickwork – the render is a modern addition to the listed building which is not sympathetic to the historic fabric of the listed building. The reinstatement of brickwork to match the rest of the building would better respect the original design of the listed building.

Overall, it is considered that the proposed external alterations are sympathetic to the listed building and would result in a finished design that would better respect the original appearance and historic fabric of the listed building. Therefore, the proposed external alterations preserve the identified heritage values of the listed building and thus would not result in harm to its significance.

The applicant also seeks to highlight that the external rear staircase is to be retained as part of the proposal, which is one of the original features of the building designed by Quennell. Most other properties have demolished this staircase and built conservatories or modern rear extensions here instead, including the adjoining property No.35 (ref: 2017/1468/P).

Impact on Amenity

CLP Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. Further guidance is provided in CPG Amenity which sets specific standards of development.

By virtue of the nature, scale and relationship to neighbouring properties, the proposed external alterations will not result in adverse impacts upon the amenities of neighbours with respect to daylight/sunlight, privacy and outlook.

Summary

As demonstrated within this letter and supporting documents, the proposed external alterations are considered to have an acceptable impact on the character and appearance of the listed building, the surrounding conservation area and neighbouring amenity. The proposal would not result in any harm to the significance of the identified heritage assets. The development is in accordance with the relevant Development Plan policies, and it is therefore respectfully requested that planning permission and listed building consent is granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the application but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

Stuart Minty
Director
SM Planning