



Mr A Tucker
The Planning Inspectorate
Temple Quay House, 2 The Square
Bristol
BS1 6PN

15 April 2024

Dear Mr Tucker,

GLOUCESTER LODGE, 12 GLOUCESTER GATE AND 12 & 13 GLOUCESTER GATE MEWS, LONDON, NW1 4HG

Planning appeals ref: APP/X5210/W/23/3331072 and APP/X5210/Y/23/3331076: Submission of additional information

On behalf of the appellant Mr Mansour Namaki, we are writing to enclose information that the appellant would like to be considered by the Inspector as part of the above appeals. The following information is submitted:

- a) Gloucester Lodge - Response to Camden Council's comments regarding overheating (XCO2);
- b) Link Lower Ground Floor Plan: Drawing No. GL-MAK-XX-LG-DR-AR-PJ2999;
- c) Link Section B: Drawing No. GL-MAK-XX-ZZ-DR-AR-PJ3201; and
- d) Link Section F: Drawing No. GL-MAK-XX-ZZ-DR-AR-PJ3204.

Background

The appellant lodged the appeals on the basis that the Council had failed to determine the planning application and application for listed building consent for the link within the statutory timeframes. When lodging the appeals, the appellant did not know what the Council's decision would have been on both applications and if the applications were to be refused, the reasons for refusal. This was acknowledged in the appellant's Statement of Case (para. 1.12) where the appellant reserved the right to comment on the Council's decisions on how they would have determined both applications if the appeals had not been made.

The Council advises in their Statement of Case that they would have refused the listed building consent and planning permission for the proposed link. The planning permission would have been refused for two reasons. The first reason for refusal relates to the Council's view that the proposed link would be harmful to the character and appearance of the adjoining heritage assets. This reason for refusal is fully addressed in the appellant's Statement of Case and the Heritage Statement that accompanied the planning application.

The second reason for refusal relates to the Council's assertion that *"the proposed link, by reason of the failure to apply the cooling hierarchy and its design which incorporates a high proportion of glazing with no openable windows or external shading and is reliant on venting heat to the existing house, would increase the risk of overheating of the host property..."*.

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At no point in the consideration of the planning application did the Council provide any comment on the matters raised in the second reason for refusal. The purpose of the submission of the additional information is to respond to the matters raised by the Council in their second reason for refusal in advance of the hearing session on 1st May 2024.

Response to the Council's suggested second reason for refusal

The appellant did in fact apply the cooling hierarchy to the proposed link and the submitted scheme includes solar control measures such as reducing the glazing g-value, introduction of fritted glass and the introduction of internal blinds on the south facing roof up to the apex (refer to the XCO2 Energy, Sustainability & Overheating Statement April 2023).

Following receipt of the Council's Statement of Case and the proposed second reason for refusal, the design team has revisited the overheating strategy for the link. Whilst it is their considered opinion that the submitted arrangements would be perfectly satisfactory, some small improvements are now tabled. In addition to the measures originally proposed, the improved strategy utilises the courtyard door on the ground level to provide daytime ventilation to the space. An additional internal door between the link and host property at lower ground floor level is proposed to ensure that the spaces can be thermally separated, ensuring no additional heating risk to the host property. Finally, discreet ventilation grilles on either side of the bespoke glazing are proposed to allow greater levels of natural ventilation to the space. Full details of this revised strategy are included within the submitted XCO2 note.

The XCO2 note concludes:

"Whilst The Link is a circulation space for which mandatory overheating criteria does not apply, following the implementation of these mitigation measures, the space is able to achieve compliance with the optional CIBSE TM59 criteria by meeting an average internal temperature of < 28°C for < 3% of annual hours."

The proposed amendments should therefore overcome the Council's concerns regarding increasing the risk of overheating in the host property by providing an increased level of passive ventilation to the link.

The proposed additional internal door to the host property and the ventilation grilles are shown on the amended submitted drawings. These very minor amendments to the scheme will result in no material difference from the submitted scheme either to the external appearance of the proposed link or to the impact of the proposals upon historic fabric. The unique, innovative and exceptional design of the link will be maintained.

Wheatcroft Principles

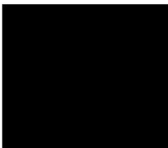
The proposed addition of the internal door and ventilation grilles do not alter the applications to any substantial degree and the proposals would not be so changed that to grant permission/consent based on the revisions would not deprive those who should have been consulted on the amendments the opportunity of such consultation. We believe that the additional information thus satisfies the Wheatcroft Principles.

The information has been provided to the Council.



We trust that the above and the attached will be taken into consideration at the appeal hearing and questions relating to the submitted information can be addressed at the hearing. However, if you have any queries in the meantime please do contact me or my colleagues Rose Adams and/or Jill Bell.

Yours sincerely



Roger Hepher
Executive Director