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**File Code:**

Planning Appeal\_135 Arlington Road –  
LBC Comments\_240418

**Date:**

18<sup>th</sup> April 2024



Dear Nadia

**RE: Planning Appeal - 135 Arlington Road – Fabric Improvements – Applications 2023/1183/L and 2023/0803/P**

**Response to Camden Planning Statement and Third-party Representations**

Further to your letter dated 12<sup>th</sup> April 2024, forwarding The London Borough of Camden statement and a third-party representation I respond below where I have commented in detail on the points Camden have raised, taking them in order of their response statement:

***LBC: 'That the roof light can only be seen from aerial views and therefore the implication is that it cannot cause harm (page 2).'***

Although we have been over this before, just to reiterate: Georgian style buildings were designed so that the street parapet mainly hid the view of the slate roofs beyond. That is the case with this property and in combination with the flanking party walls and their associated chimneys, any decking located within the centre of the roof plan will not be seen. Even if the stainless-steel balustrade were to be seen as a line, would this really be any different / worse than the plethora of aerials that perch along this terrace?

In any event, neither the planning or design officer has visited the site to enable them to make an informed judgement.

As previously stated, the house was bought from a developer builder and completely stripped out. The roof was rebuilt in 1999 as was all of the interior including a new British Gypsum loft access hatch. The roof hatch has therefore already been widened and moved since the 1840's plan form.

The proposed access does not 'formalise' access to the roof. The proposed access to the roof is from a freestanding, removable piece of shelving that also acts as a hit and miss staircase allowing access to the roof rather than using a retractable ladder. This piece of furniture could be installed without permission from LBC.

***LBC: 'A further document entitled Comments on Conservation Officer Feedback EMRYS 23<sup>rd</sup> October 2023'***

It is suggested that the replacement of a single glazed window in a Grade II property to double glazed windows is extremely rare. From my experience of working as an Architect in Camden for 40 years, this is not the case - especially to the rear of properties (which is what we are talking about). In this particular house, the ground and basement rear windows and door are already double glazed.

The world is trying to respond to climate change and I believe Camden's heritage department should be as well.

I would agree that it is more difficult and expensive to fit double glazed panes where you have 'lamb's tongue' glazing beads. When they are present, it is still possible to add thin set double glazed panes with glass spacers that are gas filled. However, in this case we don't have that. We have a non-original spring action sash window with ovolo window beads. Therefore, the replacement with more traditional heritage sash units (albeit double glazed) should be welcomed.

I find it difficult to believe that there are no mansard extensions to listed buildings in Camden. However, that is not the point. The issue is that staircases / ladders do carry up to the roof in Grade II Listed houses. For example, we are working on a house built in 1720 at 40 Great James Street and it has a ladder stair access to a loft space.

Therefore, this argument that we are 'formalising' access is a theoretical construct because it has been happening from way back and still continues to do so today.

***LBC: 'Summary'***

The reason why Camden still do not know how visible anything will be is because they haven't (at the time of writing) visited the site.

***LBC: 'Conclusion'***

Camden quotes the Listed Building Act 1990, where it says:

*'...The effect of the proposal is to cause less than substantial harm to the special architectural and historic interest of the listed building and to have the potential to cause harm to the setting of neighbouring listed buildings...'*

I do not consider these proposals to exert harm on this Grade II listed building nor cause harm to its neighbours.

***LBC: Third-Party Representation.***

I have read the objection made by 141 Arlington Road. I neither understand the objection nor recognise any relevance to this application

**The Decision Process**

When this appeal was submitted on the 22<sup>nd</sup> December 2023, new planning and listed building applications were submitted to LBC on the same day. The drawings within the new applications are the same drawings that I submitted as part of this appeal as design options for consideration by The Inspector.

However, it should be noted that Camden only confirmed the registration of this second application in an email on the 28<sup>th</sup> February 2024. The email confirmed that the application would be back dated to 22<sup>nd</sup> December 2023 and it requested an extension for the application to be determined to the 29<sup>th</sup> March 2024. I agreed to this.

At the time of writing, these two applications have still not been determined - 2023/5443/P and 2023/0700/L.

Being charitable rather than cynical, I would hope it is because Camden are waiting for PINS to complete its assessment of this appeal. In that spirit, I would therefore request that the Inspector considers these two current applications as a material fact within this appeal because as stated above, they are the same drawings submitted as part of this appeal as alternate design options for consideration by The Inspector.

### **In Conclusion**

This application will not harm either the building or the neighbouring buildings. These proposals will only further improve a listed building that has consistently been improved upon since the 1840s when it was built. They will make a positive contribution to the environment by improving the fabric for the winter months and allowing natural cooling during the summer months.

The benefit far outweighs any perceived harm.

Yours sincerely



Director  
for and on behalf of Emrys Ltd.