

Application 23/4992 Cannon Hall 14 Cannon Place
Response to Objection dated 18 December on behalf of [REDACTED]

We have been asked by the applicant to respond to Lichfield's objection letter dated 18 December that makes similar points to [REDACTED] earlier objection. This email responds to both. It was first delayed by holidays and then the need to investigate the basis of some of the objections.

Neither expresses an in principle objection to an extended kitchen/conservatory because they say that a reduction of the proposal by 1.25m would be acceptable. But the effect of this would be to require that relocation of the cramped utility room took place somewhere within the house.

This would inevitably result in damage to historic fabric, which the conservation officer required to be minimised. The proposed extension has already been reduced in size by 0.4m and is modest both in absolute terms and compared to the footprint of the house.

Despite these objections, the Council's Conservation Officer later determined: *The reconstruction of the conservatory is generally considered acceptable. The proposed conservatory is slightly deeper than the existing, however it remains a subservient addition and will not detract from the rear elevation any more than the existing. The design and materiality of the extension is more in-keeping with the host building than the existing and is generally of better quality and can therefore be considered an improvement on the existing arrangement.*

[REDACTED] refers to the 1915 Mutual Deed of Covenant. While this is not a planning matter, the proposal does not breach it, as the attached solicitor's letter confirms.

Additionally, we have never previously come across a suggestion that loss of moonlight to a scullery is a valid planning concern.

Lichfield's letter puts forward nine objections, which are considered sequentially below.

Paras 1 and 2 *Additional drawings should be provided which include No. 12 on them so the effect on the significance of this Grade II* listed building can be appropriately considered. This should include a plan, long south elevation showing the relative height of the extension to No. 12 and a section including the garden wall between the two properties to establish the relative height, proximity and whether there would be any physical effect on the wall and eaves...the existing and proposed drawings should be at the same scale or have dimensions included so it is possible to clearly establish the size of the proposed extension as this is not clear from the submitted plans as they are at different scales and orientations*

The proposed building's dimensions could easily be accurately assessed from submitted plans. To assist the objector, the plans have been redrawn at 1:50 scale. These are submitted separately by the architects and are **illustrative material not forming part of the registered planning application.**

Drawing number 010 renumbered EX-00-010
Drawing number 100 renumbered EX-00-100 (Location of cellar 1 has been added)
Drawing number 101 renumbered EX-00-101
Drawing number 102 renumbered EX-00-102
Drawing number 103 renumbered EX-00-103
Drawing number 104 renumbered EX-00-104
Drawing number 200 renumbered EX-00-200
Drawing number 300 renumbered EX-00-300
Drawing number 301 renumbered EX-00-301
Drawing number 302 renumbered EX-00-302
Drawing number 303 renumbered EX-00-303

Removal Drawings are submitted at 1:100 scale. To assist the objector, they have been reorientated on the page at 1:50 with the new drawing number below

Drawing number 105 renumbered DE-00-100
Drawing number 106 renumbered DE-00-101
Drawing number 107 renumbered DE-00-102
Drawing number 108 renumbered DE-00-103 The applicant has carried out a carefully supervised excavation to establish the depth of the cellar to allow the potential effect of the proposal's lightweight structure on it to be fully assessed.
Drawing number 109 renumbered DE-00-104
Drawing number 300 renumbered DE-00-300
Drawing number 301 renumbered DE-00-301
Drawing number 302 renumbered DE-00-302
Drawing number 303 renumbered DE-00-303

Proposed Drawings are submitted at 1:100 scale. To assist the objector, they have been reorientated on the page at 1:50 with the new drawing number below

Drawing number 100 renumbered PL-00-100 (Location of cellar 1 has been added)
Drawing number 101 renumbered PL-00-101
Drawing number 102 renumbered PL-00-102
Drawing number 103 renumbered PL-00-103
Drawing number 104 renumbered PL-00-104
Drawing number 200 renumbered PL-00-200 (Location of cellar 1 has been added)
Drawing number 300 renumbered PL-00-300
Drawing number 301 (Proposed East Elevation) renumbered PL-00-301
Drawing number 301 (Proposed East Elevation - Conservatory) renumbered PL-00-306
Drawing number 302 renumbered PL-00-302
Drawing number 303 renumbered PL-00-303
Drawing number 400 renumbered PL-00-400
Drawing number 401 renumbered PL-00-401
Drawing number 402 renumbered PL-00-402

Para 3 *The application, including the Heritage Statement, does not identify the significance of No. 12 Cannon Place (or the contribution of its setting to this) or the Conservation Area; this is a requirement of para. 194 of the National Planning Policy Framework (NPPF) as both have the potential to be affected by the proposed development.*

As very well established conservation consultants with a particular knowledge of this area, Heritage Architecture were obviously well-aware of the requirements of **NPPF para 200** - *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*

This requires judgement to be exercised about the relevant heritage assets and the proposal's potential impact on them. The significance of No14 is identified at pages 23, 28 and 29 of the Heritage Statement. Heritage Architects' professional opinion was that the impact of this small, well-concealed proposal (sensitively designed to respect the significance of the heritage assets identified by Lichfield's) was obviously trivial. Neither the conservation officer, with whom the client worked closely with, nor Heritage Architecture, share Lichfield's highly subjective judgment.

Nevertheless, to tick the box identified by Lichfield's, Heritage Architecture has prepared the attached short addendum to their report that explicitly considers the heritage impact of the proposals on No12 and the Conservation Area. The objector helpfully provided access to No12 to make sure that judgement is fully informed.

Para 4 *There is a cellar which extends beneath No. 14 but belongs to No. 12 (as shown on the title deeds) and is accessed directly from it. This cellar would be located underneath the area for the proposed conservatory (cellar 1 in the basement plan in Annex 1).*

The objector has helpfully allowed Heritage Architects access to Cellar 1 to establish its heritage significance and depth. It appears that the cellar was once part of No14 and substantial work has already been carried out to it that seriously affects its historic fabric and structure.

Cellar 1 is accurately plotted on the plans below that show the proposal extends over about half its width. The attached structural engineers report shows how the proposal's relatively light weight can be supported on a raft slab without harming the fabric of the cellar.

Para 5 *The Site is within an Archaeological Priority Area but a desk-based assessment has not been included with the application, despite being a validation requirement. 'Camden's Local Area Requirements for Planning Applications' (2020) states that a desk-based assessment is required in line with the requirements of the NPPF for proposals involving "...a new building or disturbance of ground within an Area of Archaeological Potential." It is therefore not possible to establish whether there would be any effects on archaeology and so a desk-based assessment should be provided.*

The proposal is on already disturbed ground, not least because of Cellar 1. Heritage Architecture made a preliminary desk assessment of archaeological potential at application stage and have concluded that it is insignificant. Nevertheless, they have prepared the more detailed assessment attached, which simply confirms their earlier conclusions.

Para 6 *Confirmation as to whether any trees would be impacted.*

The arboricultural report attached assess the effect of the proposal on the nearest tree, a magnolia. It concludes it will not be adversely affected.

Note that its heavy foliage and the copper beech further away already obscures daylight to the scullery window in summer.

The daylight and sunlight assessment carried out of the impact of the proposal on No12 ignored this tree in line with BRE advice and assessed the worst case treating the scullery is a habitable room (which it plainly is not). Even so, the effect of the proposal was found to be negligible. Lichfield's have not criticised the submitted daylight and sunlight study.

Para 7 and 8 *Clarification as to which windows are proposed for replacement and their dates, particularly the westernmost window on the rear elevation. There is likely to be harm to the significance of No. 14 Cannon Place if historic windows are being replaced due to loss of historic fabric. It is not clear from the drawings which windows are proposed for replacement. For example, drawing 302 'South elevation – removals' does not show the westernmost window as removed but the 'Proposed South Elevation' drawing (also numbered drawing 302) states in relation to this window "Slimline double glazing in timber frames to match the style and appearance of the existing." This implies the window is to be replaced but this is not clear due to the conflict with the information on the removals drawing...Multiple drawings share the same drawing number and this further complicates the review of the application material.*

As detailed in the Heritage Statement and written on the elevations, only the replacement windows for the modern dormers and the proposed conservatory are new. Please see p. 73 of the Heritage Statement for details on providing thermal enhancement whilst avoiding harm to existing joinery and mouldings.

Para 9 *The Council should ensure it is satisfied that the revised fenestration at the top (attic) floor of No. 14 would not affect the significance of this Grade II* listed building. This includes as a result of any effect on the appreciation of the hierarchy of floors in the building, the rear elevation, and whether the east and west dormers would be appropriate in views to the building, particularly due to the proposed southern glazing. Even if not highly visible in views, this would change the character of the roofscape of the building and make it appear more cluttered and at odds with the historic role of this floor of the building, reflected in its current simple appearance with generally restrained fenestration. In our view, there is the potential for harm to the significance of the listed building as a result of the fenestration changes to the roof, primarily due to the additional glazing proposed on the east and west dormers. The Conservation Area Statement (p.58) states in relation to roof alterations that "...insensitive alterations can harm the character of the roofscape with poor materials, intrusive dormers, inappropriate windows. In many instances there is no further possibility of alterations." The DAS states the size of the west dormer is being increased to reintroduce symmetry with the east dormer and match its scale, but it is also proposed to increase the size of the east dormer. There is also no evidence in the application that they were originally the same size, particularly as Figure 63 in the Heritage Statement, a drawing from 1932, shows them as different sizes. The Heritage Statement shows evidence of dormers in these locations from at least the late 19th century (Figure 43).*

We understand that the Conservation Officer is satisfied with these matters. The minor adjustments to the side dormers are for critical maintenance purposes. The view referred to by Lichfield in fig.6 will remain unaltered by the proposals, although the inappropriate pantiles will be replaced with slate to be as shown on the historic illustrations.

I would be glad to discuss these conclusions with you.



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