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Dear Henry Yeung,

**Objection to the proposed development at Top floor flats of 56 and 58, Parliament Hill,  
London NW3 2TL (Planning application reference 2024/2695/P)**

On behalf of our clients Mrs Hannah Turin and Dr Mr Mark Turin (Basement and Ground Floor, 58 Parliament Hill), and Dr Shamima Rahman and Dr Nicholas John Owen (Middle Floor, 58 Parliament Hill), we are writing to object to the extension and alterations proposed at the top floor flats of 56 and 58 Parliament Hill NW3 2TL ('the site'), as submitted under application reference 2024/2695/P. Based on the points raised below, we request that the application be refused.

Our four clients are the owners and occupiers of the ground floor flat and middle floor flat at 58 Parliament Hill respectively, and strongly object to the extension and alterations in the manner proposed. Together with the applicant (Ms Lee), our four clients are the co-owners of the freehold of the property. The reasons and basis of objection are outlined below.

**Appearance and Heritage Impacts**

The site is within the South Hill Park Conservation Area, designated in 1988. The South Hill Park Conservation Area Statement (2001) provides a detailed assessment of the character of the area, including the following:

*"The Conservation Area is characterised by substantial semi-detached villas, many of which are adorned by decorative window, porch and roof features with entrance steps and complementary*

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*Garden walls. The unique relationship of the dwellings to Parliament Hill and the Heath is also a principal feature of the Conservation Area”*

*“Parliament Hill is characterised by red brick semi-detached villas with prominent front gables, grey slated steeply pitched roofs and stucco surrounds to doors and windows”*

Numbers 56 and 58 are locally listed as a building which makes a positive contribution to the character and appearance of the conservation area, as a particularly good example of the local building tradition. We note that numbers 56 and 58 are somewhat architecturally distinct in the conservation area given their square corner turrets with large corniced eaves in an Italianate style. This gives them increased heritage significance.

The conservation area statement sets out various policies, and in particular Policy SHP15 states that any further extensions in the roof space should respect the Integrity of the existing roof form and that existing original details should be precisely matched.

Local Plan Policy D1 states that the Council will seek to secure high quality design in development. The Council will require that development: (a) respects local context and character; and (b) preserves or enhances the historic environment and heritage assets.

Similarly, Policy D2 confirms that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

In short, there is a clear and strong policy basis that requires development proposals across the borough to be designed to a high standard. In conservation areas, this requirement holds even greater weight, where development proposals should positively contribute to local character, and conserve or enhance these areas of heritage value.

The proposed extension falls well short of these policies and standards. It would be unacceptably incongruous and inappropriate with its surroundings. Its location would be highly prominent. It

would be visible from multiple angles and its visual impact therefore has great potential to cause significant harm to the character and appearance of the conservation area.

The National Planning Policy Framework (2023) (NPPF) makes clear that any harm to the significance of a designated heritage asset (including conservation areas) from development within its setting should require clear and convincing justification (paragraph 206), and great weight should be given to the asset's conservation.

The proposal to raise the height and pitch of the existing pitched roof, and infilling between the two Italianate towers would be highly prominent and out of keeping with the high visual quality of the building and of the area more generally. It would detract from the visual amenity due to its size and profile. The position of the building on the corner with Tanza Road means that it is particularly prominent within the street scene, and potentially from the Heath itself, particularly in winter when the trees are without their leaves. Infilling between the two towers of the building would entirely undermine these architectural features and diminish their heritage significance. What is proposed is a wholesale alteration to the form and massing of the roof which does not respect the building's character.

The proposed box-like addition to the rear would be entirely at odds with the character of the building and the conservation area. Mansards and dormers have been added to many of the neighbouring properties, however these have almost all been done with much smaller conservation dormers, with sash windows of similar proportions to the original windows of the storeys below. The scale and form of the proposed extension is very different to the prevailing features of neighbouring properties in the locality. The proposed materials and glazing are equally unsympathetic, and fall well short of the design standards that must be met for proposed alterations to heritage assets. Given the weight that must be afforded to the protection of these designated heritage assets, there is no justification for the proposed extension that would outweigh the harm it would cause.

The covering letter from SM Planning recognises that the existing properties form part of a symmetrical pair and, in the interest of high-quality design, that this symmetry should be maintained. We welcome this approach but point out that a symmetrical design does not necessarily in itself equate to high-quality design. The applicant says that the enlarged roof “will

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*continue to maintain its subservience to the building. The increase in pitch is very minor and overall is a sensitive alteration which [...] will have a negligible visual impact.*" We dispute this and contend that the increased pitch is obvious and is a jarring and discordant addition which is not in-keeping.

The covering letter states *"the scale and massing of this single storey addition has been designed to appear subservient to the main roof [...] The proposed extension is to be finished in glazing which visually contrasts to the existing building and allows the existing roof form to be appreciated."* Conversely, we are concerned that the large expanse of glazing proposed at the rear is entirely out of character and would visually dominate the rear elevation. Whilst using a contemporary design which contrasts with an historic building can be a suitable approach in some scenarios, this is not appropriate at this site. The prevailing architecture here generally involves smaller conservation dormers with glazing to match the scale of the windows below. The applicant also states that the expanse of glazing, due to its transparency, would *"minimise the perception of the bulk when viewed from the limited vantage points from Tanza Road."* To suggest that the transparent nature of glass means that the extension would be less visible is somewhat far-fetched. The extension would be a stark and obvious addition, highly visible from vantage points on Tanza Road, as well as from many nearby homes which have a clear view of this prominent corner plot.

The proposed windows at second floor level also clash with the style of the sash windows below. Replacing the second-floor windows with matching sash windows would be a positive step to enhance the appearance of the building, thereby contributing to the character of the conservation area.

It is clear that there is no basis in policy to approve this application, and it should therefore be refused on grounds of harm to character and appearance, in line with policies D1 and D2 of the Camden Local Plan 2017 and the relevant parts of the South Hill Park Conservation Area Statement 2001 and the NPPF 2023.

The Camden Design CPG (2021) and Home Improvement CPG (2021) are also relevant to this proposal. The first key message listed in the Design CPG is "Camden is committed to excellence

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in design.” What is proposed at numbers 56 and 58 is far from meeting this standard. For the Council to approve it would be to undermine their own commitment. The CPG makes clear that good design should respond appropriately to the existing context, positively integrating with and enhancing the character and history of the existing buildings and other buildings in the surrounding area. In relation to heritage, the CPG states that the Council will only permit development within conservation areas that preserves and where possible enhances the character and appearance of the area. The Home Improvements CPG states that a successful roof extension would consider the overall roof form of the existing building, adjoining buildings and impact in key views and be proportionate to the roof slope being extended.

The proposed development causes harm to the character and appearance of the area and does not respect the roof form of the existing building, in particular causing harm to the prominence of the Italianate towers on each side of the building. The application should be refused on design and heritage grounds.

There are also concerns regarding the construction impacts of the proposed development. Local Plan Policy A1 focusses on managing the impact of development including during the construction phase and requires Construction Management Plans (CMPs) in certain circumstances. Paragraph 6.13 of the Local Plan confirms that CMPs may be sought for developments with poor or limited access on site or developments that are accessed via narrow residential streets, both of which apply in the case of numbers 56 and 58 Parliament Hill. Camden’s Local Plan also recognises the risk of subsidence in the borough due to increased shrinking and expanding of Camden’s clay base. While not strictly a planning matter covered by policy, the Local Plan does discuss the risk of subsidence and the use of the Burland Scale to describe such risk, in relation to basement developments. We suggest that the same considerations should be made for this substantial roof extension which will put additional load on the building and risk subsidence in this clay-based area.

## **Conclusion**

The proposed development would bring harm to the character and appearance of designated heritage assets (the conservation area) and the street scene more generally. It would be detrimental to the appearance of the host building itself and would not form a subordinate addition.

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These are material planning considerations upon which significant weight should be placed. Indeed, the purpose of the planning system is to ensure that detrimental impacts of developments are fully considered, so that harmful development is prevented, and positive development encouraged. The local planning authority should ensure that due regard is given to all the impacts of a proposed development so that a proper decision is made.

Fundamentally, the proposed development cannot be supported in policy terms. **We strongly object to the proposed development, which the local planning authority should refuse.**

On behalf of our four clients, we thank you for your consideration of these comments. If you have any questions or queries about the comments in this letter, please do not hesitate to contact me at the details above.

Yours sincerely,

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William Avery MRTPI  
WEA Planning