					Printed on:	17/03/2025	09:10:02
Application N	<b>Consultees Name</b>	<b>Recipient Address</b>	Received	Comment	Response		
2025/0569/L	Richard Simpson for Primrose Hill CAAC	12A Manley Street London	15/03/2025 13:07:39	OBJ	PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE 12A Manley Street, London NW1 8LT		
		NW1 8LT NW1 8LT			05 March 2025		
					Basement Flat 24 Gloucester Crescent NW1 7DL 2025/0527/P + 2025/	0569/L	

## Objection.

1. The Advisory Committee noted that it has supported a significant number of new buildings in the conservation area, and has undertaken extensive pre-app consultation with applicants for such proposals. The Advisory Committee regretted, despite the strong guidance at NPPF 41, that it had not be asked to participate in pre-app discussion in this case.

2. The Advisory Committee further noted that it had undertaken extensive pre-app discussion on the proposals for redevelopment of the site (46 Inverness Street) which terminated in the Appeal dismissed 22 November 2021 (ref APP/X5210/W/21/3274819). We worked for a well-designed modern building in this location. The Committee's review of the current application included reference to issues considered by the inspector in that appeal.

## Heritage impacts

3. The main issue for the Advisory Committee is the impact of the proposals on the adjacent Listed Buildings and their settings, and on the character and appearance of the Primrose Hill conservation area. 44 Inverness Street and 24 Gloucester Crescent are both Listed at Grade II. Both present 'end-of-terrace' flank walls to the application site, 24 Gloucester Crescent with a recessed entrance bay to the house.

4. This entrance bay to 24 Gloucester Crescent carries architectural forms reflecting the main, front elevation to the side elevation, which is otherwise substantially plain. The recessed entrance bay is detailed with pilasters forming a short, blind, colonnade with frieze and entablature all conveying the architectural significance of this segment of the larger Crescent, which is a 6-house substantially symmetrical terrace group.

5. The entrance bay is a key element in defining the space which forms the junction between Gloucester Crescent and Inverness Street, an architectural and townscape link between the two groups of adjacent Listed Buildings, and a link which also provides a transition within the character and appearance of the Primrose Hill conservation area. The space and its architecture also help frame a gateway to the Primrose Hill conservation area.

6. The proposed upper ground floor living room/study block would seriously undermine the architectural significance of the recessed entrance bay both in plan and elevation, and of the transitional link space which it helps to define.

7. By the junction and close alignment of the proposed block with the historic entrance bay in

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plan, and with the angled alignment of the proposed block, the proposed block crowds the entrance block, diminishing its architectural significance to both the Listed 24 Gloucester Crescent, its setting, and the character and appearance of the conservation area. This crowding would be apparent from a number of locations, including the street outside the Cavendish School in Inverness Street looking towards 24 Gloucester Crescent.

8. The height of the proposed upper ground floor block would also diminish the status and significance of the entrance bay, as would the emphatic verticality of the fins and fenestration of the proposed block. The height and detail exacerbate rather than mitigate the effect of the proposal on the historic forms and their significance.

9. While recognizing that he was describing a very different building in the 2021 Appeal (cited at para 2 above), the Advisory Committee recalled that the Inspector outlined a basic concern when he wrote (decision letter para 8) '... its imposing form would nevertheless be physically and visually dominant, in many respects inverting the relationship between the site and the listed buildings to either side by becoming the more prominent and eye-catching building in the street scene.'

10. In reviewing the application we note that different application documents show different heights for the upper ground floor block. Drawing no. 2431\_P13\_P1 shows the proposed block lower than the historic entrance bay, dwg no. 2431\_P03\_P1, Elevations 1 and 2, show both blocks at the same height, while dwg no. 2431\_P10\_P1, Proposed view from Gloucester Crescent, appears to show the proposed block as higher than the historic entrance bay.

11. The proposed upper ground floor block would harm the significance of the two groups of adjacent Listed buildings and their settings, it would neither preserve nor enhance the character or appearance of the conservation area.

12. We advise that the ASHP should not be located on the face of the historic entrance bay to no. 24 – further diminishing its significance – but perhaps located on the proposed adjacent north-east enclosure (dwg no. 2431\_P10\_P1 upper ground floor plan).

13. We advise that the whole stretch of the surviving saltire pattern boundary wall to the footway in Inverness Street should be restored to reinforce the visual link to the similar, facing, boundary wall to 23 Gloucester Crecent. We agree that the section of wall proposed to be reconstructed (dwg no. 2431\_P03\_P1, Elevation 1, identified by note 6) should, as proposed, match the adjacent historic wall in materials and details except for the saltire mouldings.

Changes to the internal plan of the Listed 24 Gloucester Crescent.

14. We object to the change to the plan of the front room at lower ground floor (current living dining, proposed bedroom 01). The formation of the proposed shower room would disrupt the plan of this major room in the original plan at this level. On the importance of retaining the footprint and plan form of Listed Buildings in the conservation area we refer to the Planning Inspector's dismissal of appeals at 32A Chalcot Square, London NW1 8YA, decision letter

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**Comment** Response

dated 6 March 2023, refs APP/X5210/W/21/3284632 and APP/X5210/Y/21/3284633.

Standard of accommodation

15. We are concerned that the applicant's daylight and sunlight report by Point 2 states, in its conclusion (at 12.3) 'The proposed accommodation within the site itself benefits from excellent daylighting and sunlight ...'. But this is not what the report states in its 'Internal daylight and sunlight assessment' (at 10) and Appendix 3, where it records (at 10.3) that bedroom 3 'falls only marginally short of the [appropriate BRE] target value (100 lux) for a bedroom', and that bedroom 2 'will achieve 68 median lux', that is only 68% of the appropriate BRE target value. The Advisory Committee is strongly opposed to the approval of below-standard residential accommodation.

We would welcome the opportunity to review a revised scheme.

Richard Simpson FSA, Chair PHCAAC.