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22nd October 2014

Ref: EP/CLD14-1086
BY EMAIL AND LETTER

Dear Ms Ryan,

RE: LPA REFS: 2014/5995/P & 2014/6187/L – ST JOHN'S CHURCH, DOWNSHIRE HILL, NW3

We act on behalf of [REDACTED]

[REDACTED] the freehold occupiers of The White House (Keats Grove), 1 Keats Grove, 2 Keats Grove and 3 Keats Grove, respectively, and are instructed to register their formal objection to the above applications for a single storey extension to St John's Church, NW3, and the provision of additional caretaker's accommodation.

Accordingly, we can confirm that our clients strongly object to the proposed extension to the Grade I Listed Church, on the following grounds:

- Examination of Significance and Impact;
- Impact of the Proposals on the Grade I Listed Building;
- Impact on the Hampstead Conservation Area; and
- Increased Pressure for Car Parking.

As such, we now turn to address these matters under their respective headings below.

a. Examination of Significance and Impact

Paragraph 132 of the National Planning Policy Framework states that the more important the heritage asset, the greater the weight should be on its conservation. This is echoed in Paragraph 128, which states that:

"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."

St John's Church is a Grade I listed building. Grade I listed buildings make up only 2.5% of the total listed building stock nationally, and are considered to be of exceptional, sometimes international, significance.

The building dates from 1818-1823 and is attributed to William Woods, a prolific and important builder in London during the early 19th Century. The listed building description for St John's details its

pure classical style and detail, and its symmetrical form (our emphasis). It should be remembered that the setting of the building, as a planned churchyard, also contributes to its significance.

On the basis of the relative significance of the Church and its setting, and the nature of the works proposed, it would be expected that a full and expert Heritage Statement would be provided with the application, describing in detail the significance of the building, and the impacts of the proposed works on that significance.

Instead, the applicant has provided two pages of significance assessment within the Design and Access Statement, which concentrates on the social and community values of the Church. Where the architecture is examined, the focus quite rightly is on the simplicity and symmetry of the existing building. However, beyond a timeline of alterations intended to support the argument for further change, the detailed development and history of the building is not given.

The single page within the Design and Access Statement devoted to impact assessment does not address policy considerations at all. Instead, a set of principles has been used to which the answer is in each case 'yes' – with little explanation of the actual impact on the building or its significance as defined within the listed building description, the significance assessment, or the definitions within policy.

The assertion for instance that "the accretive addition (the traditional way churches develop) reflects the multiplicity of building shapes and forms in Keats Grove, some of which variously exhibit extensions of similar volume and eclectic character" shows no consideration whatsoever of the architectural significance of the Grade I listed building in its own right. There is no recognition or examination of the setting of the building.

We do not consider this level of information to be sufficient to allow determination of the Listed Building Consent application for a major addition to a Grade I listed building.

b. Impact of the Proposals on the Grade I Listed Building

As stated above, St John's Church is a Grade I listed building, one of a limited number of historic buildings considered to be of '*exceptional interest*'. Much of its significance is derived from its symmetrical form, austere classical style, and the survival of interior features.

It is noted that previous works (2004-2005) to create an undercroft containing the existing caretaker's flat, and other facilities, necessitated reduction in ground levels which changed the setting of the Church.

Concurrent works made changes to the interior of the building, including the pews mentioned in the listed building description. Whilst it is recognised that these works included repair and some element of restoration of the building, and have provided space for increased community uses, they have also substantially detracted from the significance and setting of the building.

Historic buildings can sustain a certain amount of change before they begin to lose their significance. It is arguable as to whether the previous works resulted in damage to the significance of the Church – in our professional experience, we would consider that this was undoubtedly the case.

What is clear is that the new works being proposed will result in further erosion of the significance of the building, further damage to its albeit changed setting which is exacerbated by the loss of a mature tree and a reduction of 'church yard' space, and further change from the plan form of pure, classical symmetry by the addition of an inappropriately linked building.

Despite the argument within the Design and Access Statement that the extent of historic change should mean all future change is allowable, the continued damage to the architectural and aesthetic significance of St John's Church is wholly unacceptable.

Historic buildings suffer from incremental changes. We are already firmly of the view that St John's Church has been altered to, and potentially beyond, the limit that its significance, and setting can accommodate.

The addition of the proposed extension decimates any residual contribution to significance made by the setting to the south of the building, detracts from the architectural and aesthetic significance of the historic building, and the ability of future generations to understand and appreciate this significance.

Furthermore, we consider that any perceived additional need for expanded use or services at St John's can already be appropriately accommodated within the existing undercroft (which when built provided substantial extra space within the Church), such that there are no public benefits to the proposal, which would outweigh the more than "substantial harm" to the significance of the designated heritage asset.

c. Impact on the Hampstead Conservation Area

St John's Church is within Sub-Area 3 of the Hampstead Conservation Area. The Conservation Area Statement (CAS) describes the predominant character of the Sub-Area, noting the use of stucco, harmonious building styles and types, and the fairly open character of the residential areas and their gardens.

The retention of open space and boundaries is noted as a particular design issue within the CAS. The CAS emphasises the need to protect existing open space and its boundaries where possible; the existence of a church yard at St John's Church should be considered as a strong open space in a prominent area on the corner of Downshire Hill and Keats Grove.

It follows that the loss of open space in this area will be compounded by the visibility of the proposed structure (with glass roof), from vantage points along the south of Downshire Hill, and from Keats Grove.

The CAS also gives guidance on the acceptable form of extensions. Extensions should be subservient, but also seek to retain historic plan forms. They should not disrupt the character and appearance of historic buildings within the Conservation Area. We consider that the proposed extension will disrupt the architectural character and plan form of the Church, and of the Conservation Area as a result.

d. Increased Pressure for Car Parking

The Camden Development Policies Document (2010), sets out the Council's Parking Standards for New Development within Policies DP18 and DP19, and advises of the existing parking stress that affects the Borough.

The explanatory text at Paragraph 19.4 states that:

"Development that will reduce the amount of on-street parking or add to on-street parking demand will be resisted where it would cause unacceptable parking pressure, particularly in areas of identified parking stress".

The provision of a single storey side extension to St John's Church to facilitate additional church meetings and services will result in an intensification of the existing use of the premises, and an associated increase in demand for car parking spaces. No visitor or cycle parking is proposed by way of the extension, such that the increased vehicle numbers associated with the additional visitors will exacerbate existing on-street parking stress on both Downshire Hill and Keats Grove, which do not currently benefit from Parking Zone Control on Sundays.

Therefore, the proposal is contrary to Policies DP18, and DP19 of the Camden Development Policies Document (2010).

e. Other Matters

Consultation

We note that a single site notice was displayed in respect of the application, located away from the application site, where it may have been misinterpreted as a notice for an alternative address, by local residents. Furthermore, whilst pre-application discussions were held by the applicant with the Local Planning Authority, no community engagement or discussion was undertaken ahead of the application submission with neighbouring residents.

The National Planning Policy Framework, at Paragraph 189, explains that Local Planning Authorities have a key role to play in encouraging applicants to engage with the local community before submitting their applications.

We have subsequently referred to the London Borough of Camden's Statement of Community Involvement (SCI) (Revised 2011), which states that the Council will:

- Wherever possible, give enough time for people to be consulted; and
- Help local people to be involved by consulting them in a variety of ways using a variety of mediums, and by ensuring appropriate access arrangements are in place.

Furthermore, Paragraph 2.1 of the SCI explains the benefits of involving local communities when considering planning applications, as the people that are most affected by development in their areas.

Given the potential impact of the proposal on the character of the Grade I listed building and Hampstead Conservation Area, it is considered that a single site notice located away from the site is not a sufficient means of providing adequate notice to all local residents. Whilst we appreciate the Officer assigned to these applications is likely to be very busy, we do believe that in the interests of the local residents (and in accordance with the SCI), consideration should be given to placing one or more notices on the actual site, which would subsequently give those residents likely to be affected by the proposals (and whom may not be aware of them), further time to respond.

We note that there are railings on two boundaries of the church yard, and a notice board serving the church itself, which would be wholly appropriate for the display of said notices.

Pressure on local infrastructure

We also note that local residents have raised concern over the impact of the proposed extension on existing infrastructure arrangements, namely the local drainage system.

The applicant proposes to dispose of both additional surface water and foul sewage through the mains sewerage system, which is likely to lead to overcapacity of the system, increased risk of failure, and the need for emergency maintenance, to the detriment of neighbouring occupiers.

Refuse Disposal

The Camden Core Strategy (2010), Development Policies Document (2010), and Supplementary Planning Guidance (CPG1 –Design 2014), all provide reference to the need for appropriate waste storage facilities in all new development.

Policy CS18 of the Core Strategy (2010), and Policy DP26 of the DPD (2010) require that all development includes facilities for the storage, recycling and disposal of waste, particularly for proposals that will increase the amount of waste generated on site.

Given the nature of the proposed extension, it is anticipated that a noticeable increase in the demand for waste storage facilities will be witnessed (above and beyond the existing position), by way of the intensification of the existing use of the premises.

As such, we understand that the proposals do not incorporate areas to store and aid the collection of waste, nor have arrangements been made for the separate storage and collection of recyclable materials, which is likely to lead to an unacceptable and unsightly level of waste stored outside of the premises and which will continue to cause further detriment to the amenity of the locality.

In light of the above, and for the reasons given, we respectfully request that these applications (LPA Refs: 2014/5995/P & 2014/6187/L), be refused

We hope that our comments will assist in your determination of this application, and we would like to be informed should the case come to Committee. Please contact Ela Palmer (0203 725 3852) or Claire Day (0203 435 4214) of this office in the first instance should you have any questions or to notify us of any changes to or progression of the application.

Yours sincerely,



Ela Palmer BA MSc IHBC
ASSOCIATE, HERITAGE

cc.



Mr J Malet-Bates – Hampstead CAAC
Ms H Walker – LB Camden Conservation and Urban Design Officer