

Dear Sir / Madam,

Comments on the Local Authority's appeal statement

Thank you for your letter dated 05/11/14 and the opportunity to comment on the responses of Camden Council to our client's appeal. Below, we provide our observations in relation to the relevant paragraphs contained in the objectors' responses.

2.1 & 6.1

The local authority believes that the scheme is "incongruous in design terms as the historic fabric of the positive contributor would be fundamentally distorted as a result of the alterations undertaken" (Para 5.2). In other words, the 'incongruity' is a function of the 'historic fabric' of the building, with the importance of the historic fabric being based on the history of the site.

They believe this is a material concern that outweighs the positive contribution the scheme in other aspects of planning policy.

No evidence has been put forward by Camden which clearly demonstrates a historical significance of the building and/or its use as a dairy factory. On the contrary, it seems that the local authority's belief in the historic significance of the site comes from a blue plaque on the front façade of the terrace. The local authority have mistakenly identified the blue plaque which was purchased by the Primrose Hill Business Centre for marketing purposes as a genuine English Heritage commemoration plaque (see picture and invoice appended to this document) in the absence of any other evidence.

So the degree to which Camden may consider the proposal 'incongruous' is significantly tempered by there being only limited, if any, historical significance to the building, and consequently, there is no ground for this aspect of their objection.

2.3

The Concise Oxford Dictionary (8th Edition, 1991), defines a mews as 'a set of stabling round [sic] an open yard or along a lane, now often converted into dwellings'. Whilst there may have been other such 'cul-de-sacs' emanating from and to the north of Gloucester Avenue, none of these are or were contiguous with the forecourt of Number 110, onto which only two separate buildings are adjoining. Indeed, only one of these 'faces' the forecourt itself, the other being a terrace typical of the street, facing on to the road itself. This is far from a configuration of a set

of buildings which surrounds and faces on to a common yard or lane, which would normally be considered as a mews. The forecourt has never been named as a separate 'street', 'yard', 'mews' or anything else.

The local authority cites the rear of Gloucester Avenue connection to the neighbouring mews as a reason for describing the site as a 'mews'. The rear buildings of 110 Gloucester Avenue have always been entirely independent from the neighbouring site and have never been used as a mews.

2.4

It is unclear to us why Camden asserts that "the application site is the *only* property noted in the Conservation Area Character Statement as a positive contributor on the basis of its character and its historical importance". The property is one of many upon which this factor is conferred. Indeed, Utopia Village is also identified as a 'positive contributor' (p24), and yet was recommended by officer for planning consent to convert to residential.

5.0 The reason for refusal

5.1

The proposed heights of ridges and eaves relate to the neighbouring developments that have been granted planning permission. Please see drawing 339 164, contextual elevation.

5.2

The proposed roof changes (ridge orientation) was discussed and considered acceptable: The sketched issued by the Planning Officer (09.05.2014) clearly indicate the proposed orientation of the roof. Only the heights of ridge and eaves were criticised.

6.0 Comments on the appellant's grounds of appeal.

6.1

See under 2.1 & 6.1, above.

6.2

See under 2.3, above. The appellant regards it necessary to stress this point, because the local authority has labelled the site as a mews building as a means to apply requirements and restrictions which are not applicable in this case.

The existing building comprises of the following floors: Lower Ground floor, Ground floor and first floor. The first floor - though consisting of a smaller area - has fully usable full height space, full access via a staircase and a window. It is clearly an existing floor, for which an extension is proposed.

6.3

We agree that because the site is “within the Primrose Hill Conservation Area, any extensions and alterations to have to be handled in a very sensitive manner”, and believe that this has been addressed fully in our design. We respectfully suggest that the local authority’s contrary view is based upon erroneous information, as we have outlined in Paras 2.1 (& 6.1) and 2.3 above.

6.4

It is our understanding that, whilst other attributes may also play a role, the impact of a proposed development within a Conservation Area is largely assessed by views from the public realm. Whilst we agree that the roofscape is an important attribute of a Conservation Area, for the local authority to effectively to assert that the visibility from the public realm is not an important factor is contrary to current approaches to design within Conservation Areas.

6.5

The proposed heights of eaves and ridge relate to the neighbouring developments which were granted Planning Permission.

During the brief time period made available by the Local Authority for discussion sketches were issued indicating equal or proportionate slopes, steps in the eave levels and different materials regarding the second floor extension. Different routes of negotiation were suggested, but the Planning Officer explained that the allocated time for negotiation had been used up. He made clear that no more meetings would be possible.

It is regrettable that it was necessary to take the application to appeal.

The local authority and the applicant seem to be in agreement with regards to the majority of the scheme. We believe that the key areas of disagreement relate to the treatment / height of the rear façade facing the railway tracks and differentiation of the two buildings to the rear of the site. The reason for this disagreement seems to be perceived relevance of the buildings to the rear in terms of their historic fabric and cultural significance.

The historic significance of the building to the rear of Gloucester Avenue is not as great as the local authority believes. Given this, we believe the treatment of the elevation facing the railway tracks is a suitable response to the scheme's contextual, economic and cultural constraints.

Given the overall volume is acceptable in principle, the applicant would be happy to accept conditions to be imposed relating to the request for further information to be submitted regarding the differentiation of the two buildings to the rear in terms of their detailing and the materials used for the new extension.

The Planning process has delayed the renovation of the buildings to the rear, allowing the buildings to further deteriorate and threatens the economic viability of the business centre. Given the net material benefit of the scheme to the local area we would respectfully ask the Inspectorate not to refuse the application but to grant the appeal including conditions as required.

Yours faithfully

John Cox
for Form London Limited