

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2015/0493/P	Sarah Stallard	24 Gloucester Crescent London NW1 7DL	19/03/2015 10:07:40	OBJ	<p>I strongly oppose the proposed this planning application.</p> <p>The massing of the proposed design is too large for such a small site and totally out of proportion to the architecture of Inverness Street and Gloucester Crescent, which is in a Conservation Area and the neighbouring listed buildings. Adding another storey to the existing building not only takes away visual amenity, daylight and direct sunlight from the gardens of the houses in Gloucester Crescent but also encroaches significantly on the natural light to the bathroom of the ground floor flat of 24 Gloucester Crescent and the kitchen window of the basement flat.</p> <p>The proximity of the proposed development to the stand-alone porch of 24 Gloucester Crescent is also not appropriate. Both the porches of the properties at each end of this section of Gloucester Crescent should stay as they are, as they are listed buildings, original in their composition and visible in the round. On purely practical grounds the proposals would compromise the ability of the owners of 24 Gloucester Crescent to maintain their own property.</p> <p>The plans, as submitted, do not conform to either the London Plan or Lifetime Homes and would pose a threat to life in the event of a fire. There is also little information regarding the proposed materials which is surprising considering the fact that it is in a Conservation Area. I also cannot see how the current plans conform the current Building Regulations.</p> <p>The plans, as submitted, overlap the property boundary of 24 Gloucester Crescent.</p>

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2015/0493/P	M. Oades	Atomik Architecture Ltd 26 Shacklewell Lane London E8 2EZ	18/03/2015 13:15:19	OBJ	<p>We have been asked by the Reginald Stallard FRIBA and resident of 24 Gloucester Crescent since 1961 to review the planning application for 46 Inverness Street.</p> <p>Whilst, in principle, Mr. Stallard would have no opposition to the proposed change of use of the property, we have a number of serious concerns about the legitimacy and quality of application itself. Please find below our detailed review of the application documents.</p> <p>Design and Access Statement</p> <p>The Design and Access Statement is not to the level of detail that we would expect to see for an application within a Conservation Area. There are a number of statements made that should be questioned as to whether they are indeed factually accurate.</p> <p>Summary</p> <p>The Summary within Design Access Statement makes many sweeping statements about the positive contribution the proposals would have within the area and for the owners. Unfortunately, the detail of the Design and Access Statement and the submission drawings demonstrate that the proposed scheme fails at every level to deliver these aspirations.</p> <p>The claim that the proposed scheme is compliant with Camden CPG2 'high quality housing that provides secure, well lit accommodation that has well designed layouts and rooms' is not supported by the application documents.</p> <p>1.1 Site and Urban Considerations</p> <p>1.1.1 Site Boundary</p> <p>The site boundary is shown incorrectly on Drawings 214/EX/01. The site boundary on the western side of the property should be perpendicular to the entrance lobby of 24 Gloucester Crescent, instead it is shown more perpendicular to the Inverness Street boundary. The issue can be clearly seen when comparing the Land Registry Deeds and both existing and proposed drawings. The result of this is that part of the application places the proposed new building on the land of 24 Gloucester Crescent, which is not acceptable to the owners of 24 Gloucester Crescent. Was the correct certificate signed as part of the application? Certificate B should have been signed if this case. The site boundary is not shown on the larger scale plans which would have made this comparison easier. See below overlay of application drawings showing boundary infringement.</p> <p>We therefore request that the current application be withdrawn and amended immediately to reflect the actual site boundary with no incursion onto the property of 24 Gloucester Crescent and the correct Certificate signed.</p> <p>1.1.2</p> <p>The application documents fails at this point to mention that the site is bounded by two Grade II Listed buildings, not just one. 24 Gloucester Crescent is also a listed building, of which 46 Inverness Street was once part of the curtilage. If 46 Inverness Street was part of the curtilage of either 24 Gloucester Crescent or 44 Inverness Street during the time of listing of either property then the property is arguably listed too and would require a Heritage Assessment, Conservation Area Consent and Listed Building Consent, none of which have been supplied or applied for under this application. Conservation Area Consent and Listed Building Consent should be required as the proposal amends the setting of two listed buildings.</p> <p>1.1.3 Massing</p> <p>The bulk of the massing of the proposed development at two storeys to Inverness Street is unacceptable. A single storey development would be more appropriate to the location and the</p>

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					<p>Conservation Area setting.</p> <p>1.1.4 Relationship to Entrance Lobby</p> <p>The proposed development does not provide a positive contribution to the Conservation Area. The proximity of the development to the Grade II listed entrance lobby and end wall of 24 Gloucester Crescent creates an uncomfortable relationship with 24 Gloucester Crescent. The proposals devalue the aesthetic value of 24 Gloucester Crescent and the terrace as a whole. For purely practical reasons the proposals would compromise the owners of 24 Gloucester Crescent's ability to maintain and conserve their own property.</p> <p>1.1.6 Amenity Space</p> <p>There is no amenity Space included within the submission, which is to the detriment of the scheme.</p> <p>1.2 Past and Present Use of the Site / Land Use</p> <p>1.2.1 Change of Use</p> <p>We have no comment on change of use.</p> <p>1.3 Proposal's Impact on Local Streetscape Character</p> <p>1.3.1 Relationship to the Streetscape</p> <p>The proposals do not adequately address the Conservation Area status of the site, nor does it address the listed building status of each of the neighbouring properties.</p> <p>1.3.2 Relationship to the Streetscape</p> <p>The proposed two storey development steps forward of the building line of Inverness Street – this is not illustrated adequately in the plans. The current single storey wall of 46 Inverness Street also steps forward of the building line of Inverness Street, but due to its scale does not look out of place, where a 2+ storey addition would look incongruous within its setting. The varying nature of Inverness Street is not relevant to the actual context of the proposals, which do not address the more fundamental massing and relationship to the street.</p> <p>1.3.3 Conservation Area Designation</p> <p>In the Primrose Hill Conservation Area Statement for Sub Area 4 – Gloucester Crescent it states that there are no negative buildings 'No buildings are considered to detract from the character of this part of the Conservation Area'.</p> <p>1.3.4 Significant Views</p> <p>There are a number of Significant Views detailed within the Conservation Area Statement that the proposals would severely impact upon. These views are not addressed.</p> <p>1.3.3 Previous Applications</p> <p>We do not understand the relevance of the previous dismissed applications for the site, other than to demonstrate the inappropriateness of the proposed scheme.</p> <p>1.3.4 Primrose Hill Conservation Area Statement – Applicable Clauses</p> <p>Clauses PH1, PH2, PH3, PH4, PH6, PH7, PH8, PH11, PH14, PH15, PH16, PH17, PH18, PH19, PH20, PH36, PH40 are all applicable to this application. None of the clauses are addressed other than PH18 and PH19 which are dismissed without satisfactory explanation.</p> <p>1.4 Relationship with Neighbouring Buildings - Amenities</p> <p>1.4.1 Overshadowing and Daylight</p> <p>A draft of the Sunlight Daylight Report on was submitted as part of the application and does not contain the information required for a full and considered assessment. However, the owners of 46 Inverness Street have provided us with a full copy for review.</p>

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Whatever the Daylight and Sunlight tries to justify in terms of a maximum development envelope, the reality is that the proposals present a significant loss of visual amenity for all the residents of Gloucester Crescent (from 24 Gloucester Crescent upwards with rear gardens that benefit from views, sunlight and daylight through the gap provided between 44 Inverness Street and 24 Gloucester Crescent).

The environment and amenity of the rear garden of 24 Gloucester Crescent is severely compromised by the development. No elevations have been supplied within the Planning Application to show this view for obvious reasons.

There are inaccuracies within the report. For example, there are at least two number of windows in 24 Gloucester Crescent that face within 90 degrees of due South and are not considered for Sunlight within the report – this questions the fundamental legitimacy of the report and its findings.

1.4.2 Construction Impact

The residents of 24 Gloucester Crescent are concerned that the proposed scheme and its basement excavation, if undertaken, could have a serious impact on the structural integrity of their property and the terrace as a whole without the proper safeguards. Concerns are compounded by the owner's intent to undertake the construction project as a self-build scheme.

1.4.3 Outlook from Existing Properties

As stated in 1.4.1 above, the outlook from the rear properties of Gloucester Crescent will be severely compromised by the scheme with obstructed views of a blank wall and pitched roof (not drawn). The Outlook from Inverness Street cannot be assessed as drawings are not provided – other than an elevation, which does not properly show the scheme in context. There are at least 3 significant views detailed in the Conservation Area Statement that the proposals would fall within, none of which are detailed within the planning submission.

1.6.1 Bicycle Storage

There is ample space within the development site to accommodate cycle storage. The proposed layout constrains the ability to store cycles and not the site.

1.7.1 Individual and Shared Amenity Space

There is ample space within the development site to accommodate amenity. The proposed layout constrains the ability to provide amenity and not the site.

1.8.1 Proposed Density

The density of the proposed development will be increased at least by a factor of three.

2.0 Building Design

2.1 Concept

The concept fails to consider at least 50% of the actual context – including a listed building within a Conservation Area.

2.2 Architectural Design

Cezary Bednarski is a respected architect. However the proposals demonstrate little merit as a dwelling house or a positive contribution to a Conservation Area and the architecture of Camden. The layout of the house over three storeys is poor; there are issues relating to accessibility and an arrangement of rooms that would present a threat to life in the event of a fire. We would question what level of input the architect has been able to make in this respect other than his name.

Consideration has been paid to the street elevation, but no other elevations or 'significant views' have been provided to appraise the scheme fully. The relationship of the proposed development to the

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					<p>Grade II Listed 24 Gloucester Crescent and its original porch has not been addressed. In short, the current proposed development is poorly considered and designed.</p> <p>2.2 Materials</p> <p>There is little or no information relating to materials, which is surprising considering the Conservation Area designation.</p> <p>2.3 Lifetime Homes</p> <p>If the site constraints don't allow Lifetime Homes criteria to be satisfied it is worth questioning whether the site is suitable at all for a dwelling. However, we would question whether it is in fact the poor design of the layout which compromises the ability of the site to provide a better dwelling compliant with Lifetime Homes. There is no reason why the proposed dwelling cannot comply with Lifetime Homes and the scheme will be significantly better for it.</p> <p>The owners state that this is a house for them to 'downscale' into. There is plenty of guidance within Lifetime Homes to show how a dwelling can be designed to address the needs of every section of the community, particularly an aging population. We recommend that the owners read this guidance before going any further as it will only benefit any subsequent scheme.</p> <p>2.4 London Plan</p> <p>The size of the proposed dwelling ought to comply with the London Plan for a three bedroom four person dwelling, but it does not. The main reason for failure to comply with the London Plan is the poor layout of the dwelling with a lot of wasted space. Most of the rooms fall short of the area requirements. There is no bathroom to the principle storey and neither bathrooms comply with the London Plan. The proposed dwelling is single-aspect, which is not satisfactory for a dwelling of this size.</p> <p>2.5 Building Regulations</p> <p>Due to fundamental design flaws we cannot see how the proposed dwelling would meet current Building Regulation approval in its current configuration, particularly in respect of fire safety.</p> <p>2.6 Staircase</p> <p>As drawn (see section C-C), the proposed staircase does not work. It does not provide ample head height at the 2nd floor with approximately 1m of head height when the stairs terminates at first floor level.</p> <p>2.7 First Floor</p> <p>At its apex (along Inverness Street) the height of the second floor is excessive. It appears that the Sunlight Daylight analysis has been utilised purely to provide a maximum development envelope.</p> <p>3.0 Environmental Considerations</p> <p>3.1 Energy Reduction</p> <p>The sustainability aims are laudable. However, fundamental flaws in the proposed design will compromise any benefits in the long term.</p> <p>3.2 Health and Wellbeing</p> <p>The quality of the internal environment needs to be questioned. Whilst a daylight and sunlight assessment might state there is ample light, the single aspect nature of the proposed three bedroom development is not mentioned. The basement bedrooms cannot be ideal, nor are they safe.</p> <p>4.0 Selected National and Regional Guidance</p> <p>4.1 The London Plan</p> <p>The proposed scheme fails the first guidance note - The London Plan. It is difficult, therefore, to hold</p>

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					<p>credence with any of the following statements demonstrated by the approach to Conservation.</p> <p>4.2 Primrose Hill Conservation Area Statement</p> <p>The proposed scheme fails to recognise any of the guidance policies detailed within the Conservation Area Statement.</p> <p>Notes on Drawings:</p> <p>The proposed development encroaches onto the property of 24 Gloucester Crescent.</p> <p>The Plans do not adequately describe the proposed scheme. There is no side elevation or rear elevation. There are now views showing the development in context, particularly the impact of the massing on the Streetscape and the significant views within the Conservation Area.</p> <p>The internal layouts are not resolved particularly in terms of vertical circulation and the allocation and layout of rooms.</p> <p>Summary</p> <p>In our opinion the current proposals do not address the fundamental requirements of a 21st century home. The proposals are not of a quality required of a building within a Conservation Area situated between two Grade II listed buildings.</p> <p>The massing and density of the development is excessive and would have a tangible negative affect on the amenity of its neighbours. A single storey dwelling would be more appropriate to this context.</p> <p>There is a boundary issue, which will need to be resolved.</p> <p>The Daylight and Sunlight Analysis fails to take into consideration the South facing windows of 24 Gloucester Crescent.</p> <p>The proposed change of use is acceptable.</p>
