## West End Green Conservation Area Advisory Committee 37 Crediton Hill London NW6 1HS

25 January 2016

Ms Darlene Dike
Planning Solutions Team
London Borough of Camden
2nd Floor
5 Pancras Square c/o Town Hall
Judd Street
London WC1H 9JE

Dear Ms Dike

## Re: Application Number 2015/6629/P - 18 Parsifal Road, NW6 1UG

I am the chair of the West End Green Conservation Area Advisory Committee ("WEGCAAC") and am responsible for coordinating responses to planning applications that impact on the local Conservation Area. We have recently been contacted about this application by a number of local Parsifal Road residents.

Parsifal Road is of particular interest in the Conservation Area, and having previously stood alone as a small self-contained Conservation Area, it was specifically linked to the WEGCA in the 2010-2011 review and is now listed as one of the Character Zones of the Area.

In Section 5.9 of the West End Green Conservation Area Appraisal & Management Strategy Document of February 2011 (Audit of Heritage Assets – Buildings that Make a Positive Contribution) Nos 2-20 Parsifal Road are specifically sited. This section specifically notes that:

These buildings relate to the core reason for the conservation area designation and significance. This is primarily the development at the end of nineteenth and turn of the twentieth century. They have a positive effect on the environment and could be a single building, group or landmark.

In Section 8 (Boundary Changes) it is specifically note that Parsifal Road is already threatened with a 'loss of detail' and that the opportunity exists for 'incremental improvement within' the Conservation Area. This is a clear signpost in our view that developments like those considered in this application are contrary to the Conservation Area strategy principles.

More specifically there are few keys points which I would like to raise with respect to this application.

<u>First</u> off, I want it clearly on the record that no member of the WEGCAAC ever received any notification of this planning application nor have we been consulted on any matter relating to this application. We do as a matter of course receive notices as a designated Consultee but not in this instance. We also understand that the residents in the neighbouring property at No 16 Parsifal Road did not receive any notification.

<u>Second</u>, we remain deeply concerned that yet again, some residents (and their architects/advisers) in the Conservation Area seem to believe that it is an acceptable route to planning permission to do the work first, hope they don't get caught and when they do, submit unacceptable applications for planning permission after the fact.

This application, submitted on 17 December, was only submitted because of complaints by locals that work was being done unlawfully and for a considerable period of time. We have been told by local residents that an Enforcement Notice was issued but there is no record of this on the planning website. The main work to the front of the property, being the new hard surface, the new steps and the completely new French doors, almost all of which was completed long before the application was made, are in clear contravention of Conservation Area principles, especially in light of the fact that these were implemented without planning permission.

The WEGCA Appraisal Document clearly states at Section 72 that:

The Council has adopted an Enforcement Policy for handling complaints of unauthorised development and will investigate and where necessary take enforcement action against unauthorised works and changes of use. <u>In operating that policy special attention will be given to preserving or enhancing the special qualities of the West End Green and Parsifal Road Conservation Area.</u>

This application after the fact completely belies these principles.

Third, the application is incomplete and inaccurate despite requests for further details from your office. There has been no suitable SUDS report provided given the complete re-paving of the frontage. The 'Proposed & Existing' plans show the existing situation as without the French Doors but this is of course totally disingenuous as the work was already completed well before these plans were drawn up for submission. And the Design & Access Statement describes the French Doors, new paving and steps as Permitted Development – but the architect will certainly know that within a Conservation Area the work undertaken must be the subject of a planning application in advance, not after the fact.

Furthermore, the applicant's submissions are entirely insufficient with respect to the requirements of an application in the Conservation Area. Section 7.1 of the Appraisal document – Quality of Applications – clearly states as follows:

All planning and Conservation Area Consent Applications must contain sufficient information to describe the effect on the character of the conservation area including the effect on the local context and setting of the proposal. The Council will not register inadequate applications and will require further information where necessary.

Design and Access Statements accompanying applications will be expected specifically to address the particular characteristics identified in the appraisal including the scale and character of the repeated terraced forms, the prevailing scale, mass, roof line and rhythm created by the historic pattern of development.

Any attempt to compare this application to changes made previously at No 8 Parsifal Road are incongruous as the two semi-detached at Nos 6 & 8 were already considerably different, while in the case of Nos 16 & 18 the properties were previously identical.

There are numerous other issues arising from this ex post facto application including numerous concerns about the lack of any engineering studies for purportedly very extensive (and not permitted) excavation works at No 18 over almost 12 months, and the damage this has been reported to have caused to No 16. We are however principally concerned here with breaches of the Conservation Area principles.

We call on the Planners and the Committee to respect the numerous Conservation Area policies and principles that apply in this case and refuse this application.

( Karry Trachtenberg / Chair

West End Green Conservation Area Advisory Committee