

PRIMROSE HILL PRIMARY SCHOOL

DESIGN & ACCESS AND HERITAGE STATEMENT

ROBERT LOADER ARCHITECT

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ROBERT LOADER ARCHITECT PRIMARY SCHOOL 2

DOCUMENT PRODUCED BY

Robert Loader Architect

FOR THE LONDON BOROUGH OF CAMDEN WITH:

Maccreanor Lavington: Masterplanning Architect

Price & Myers: Structural Engineer

Bailey Garner: Building Consultant

This document is a combined Heritage Statement and Design and Access Statement as recognised by Planning Practical Guidance in:
Conserving and enhancing the historic environment/ Decision-taking: historic environment/ para 012, "In cases where both a Design and Access Statement and an assessment of the impact of a proposal on a heritage asset are required, applicants can avoid unnecessary duplication and demonstrate how the proposed design has responded to the historic environment through including the necessary heritage assessment as part of the Design and Access Statement."

1.1 SUMMARY

- 1.1 The first phase of Primrose Hill Primary School was built in 1884-85 with substantial expansions in 1889 and 1915. The proposals in this application are to adapt and extend the existing buildings for early years children, and particularly, the introduction of two year-old provision into the Caretaker's house.
- 1.2 The School is listed Grade II and located in a conservation area. Therefore the re-organisation, infilling and addition will need to take full account of its architectural and historic significance.
- 1.3 Primrose Hill Primary School was previously named Princess Road or Princess Terrace School(s) These names may appear on documents and drawings included in this report. The existing Resource Centre & Nurture Class was originally named the School-keeper's House, but the term Caretaker's House is generally used here.
- 1.4 This report is prepared by Robert Loader. He is accredited by the RIBA Conservation Register, and has recently been involved in the conservation and upgrading of the listed Alexandra Priory School for LB Camden.

- 1.5 Masterplanning proposals for the school were developed in early 2016 by Maccreanor Lavington Architects, which provided a strategic overview for the re-organisation of the existing school, and the introduction of new facilities. These proposals have been further developed by Robert Loader Architect, and are now the subject of planning and listed building consent applications. This report provides an assessment of the conservation aspects of the proposals, measured against the principles embodied in national and local conservation policies.
- 1.6 The application scheme is the result of deliberation by the design team, plus discussions with the London Borough of Camden Planning and Conservation officers. During the evolution of the scheme various preparatory studies have been undertaken:
- Initial appraisals to establish the preferred location and layout of the new facilities within the buildings.
- Pre-application submission, discussion and response with LB Camden Planning and Conservation officers.
- 1.7 The benefits of the proposal scheme include:
- Introduction of additional Early Years provision (2-year old).
- Improved use of internal teaching spaces by the addition of a buffer zone.
- Improved use of other playground level teaching areas by the installation of an open canopy in front of classrooms. Removal of ad hoc awnings.
- 1.8 The discussions which have already taken place with LB Camden during the development of proposals indicate that from the planning policy point of view the most critical issues are:
- The relationship of the new Buffer Zone to the composition of the existing building.
- The impact of the new layout on original or significant fixtures.
- The impact of the lateral extension of the Caretaker's house.
- The impact of installing an extended terrace onto the roof of the existing playground shelter.
- The impact of the extension of the Caretaker's house on the neighbour in Waterside Place.

2.0 EDUCATION STATEMENT

2.1 TWO-YEAR OLD PROVISION IN CAMDEN

From September 2014, the government has extended the offer of free early education and childcare for two-year old children. Evidence shows that regular, high quality early education has lasting benefits for the social, physical and mental development of all children, and helps prepare them for school. There is a statutory duty on Camden to provide all eligible two-year olds with this high-quality early education, regardless of their parents' ability to pay. The expansion of government-backed early education and childcare increases the number of children eligible for this service, and Camden has been working with a range of childcare providers to meet the increased demand for places.

In order to meet the need for spaces Camden will also need to increase provision at some primary schools. Since 2015, council officers have been working with schools to identify where they could also expand their provision for two-year olds, to ensure the council meets its statutory obligations. Following extensive discussion and feasibility studies with several Camden schools, Brecknock and Primrose Hill Primary Schools have been identified as viable candidates for this project (additional spaces are also being provided at Netley Primary School, for which a planning application has previously been submitted).

In order to contribute to Camden's statutory offer, these additional places must be ready for use by January 2017. Based on the short timescale and available funding – plus the constrained nature of existing school sites - the Council has agreed a programme of refurbishment and remodelling of existing nursery classrooms at Brecknock and Primrose Hill schools as opposed to provision of new-build accommodation. Works must commence on site during summer 2016 if additional spaces are to be delivered in time.

David Walter

Senior Project Manager LB Camden

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3.1 DEVELOPMENT OF THE AREA

- 3.1.1 Lord Southampton's land around Primrose Hill was sold for development by auction in 1840 and 1841. The land was sub-divided by broad roads with the expectation that large villas would be built over the area. The lots on and beside Primrose Hill were bought by the Crown for public benefit, which further raised expectations for the development value of the area. However, the proximity and expansion of the railway to the north had a dramatic effect on the environmental quaity of the area, and development tended to be terraced housing of lower value.
- 3.1.2 The site of Primrose Hill School was Lot no. 240, and the Ordinance Survey shows this still undeveloped in 1873. Most of the area was filled in by the late 1840s, and it is not clear why the school site remained unbuilt until the site was acquired for the School.

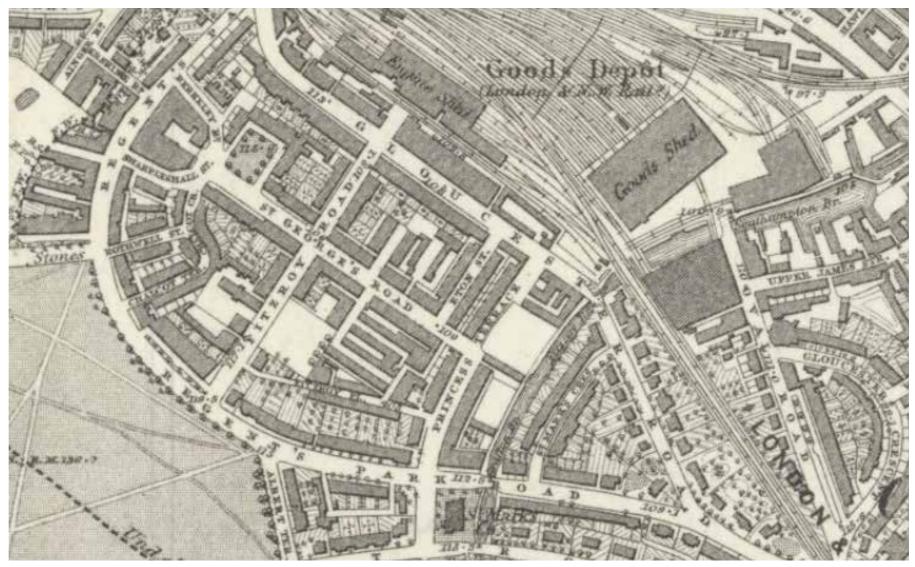


Fig 3.1. The 1873 OS map shows the school site still undeveloped. Only one other plot of land in the area on Fitzroy Road also remains empty.

3.2 THE SCHOOL BOARD FOR LONDON & E.R. ROBSON

3.2.1 The School Board for London was established by the Elementary Education Act of 1870 to provide universal free primary education. Its first tasks were to identify the scale of the need, and the approach to fulfilling that need. ER Robson was appointed as architect in 1871, though the first twenty buildings were procured by competition from a variety of architects with a record of school building. After 1873 the design of schools was taken in-house, and the design carried out by Robson and his unofficial partner, JJ Stevenson. The influence of Stevenson is diffcult to guage, but he was a proponent of Queen Anne (or 'Free Classic') in his own work, and would justify it on economic and practical grounds.

In 1874 Robson published *School Architecture*, where he commented on one of the more successful results of the early School Board competions, Basil Champney's Harwood Road School in Fulham (opened 1873). There is some evidence in his writing of the influence of that building:

"The style in which the building has been thought out is a quaint and able adaption of old English brick architecture to modern school purposes. Apart from the opinion, which may be termed that of fashion, because of its temporary nature, but which runs for the moment headlong after the favorite style, even when carried out in the most tasteless and unmeaning manner, this building must be regarded as possessing decided architectural character. The war between the rival styles has raged so long that we are in some danger of forgetting the existence of certain broad first principles common to the great architecture of all times and countries, and which are certainly never absent from the more conspicuous and representative examples. Amoung these first conditions of architecture must be ranked a regard for good form, good proportion, good grouping and, above all, good architectural character and good colour ... The design in question must rank as thoughtful and artistic work, whatever may be our individual preference as to style."

Robson was also aware of the possiblilities that a large programme of building could have on London:

"Among so large a number of new school houses, some are fortunate in being placed in positions where they can be easily seen and it becomes of some importance to consider what style is most suitable ... "

Gothic was quickly and easily rejected:

"A building in which the teaching of dogma is strictly forbidden, can have no pretence for using with any point or meaning that symbolism which is so interwoven with every feature of church architecture as to be regarded as its very life and soul. In its aim and object it should strive to express **civil** rather than ecclesiastical character."

Robson concluded that there was no practical alternative to building in brick, and in that case, "The only really simple brick style available as a foundation is that of the time of the Jameses, Queen Anne and the early Georges, whatever some enthusiasts may think of its value in point of art. The buildings ... are invariably true in point of construction and workmanlike feeling. Varying much in architectural merit, they form the nucleus of a good modern style."

Susan Beattie summarised the overall character of London Board Schools (and Primrose Hill School precisely):

"Usually, they are of three lofty storeys, their height emphasised by the thin brick pilaster strips that frame the tall white painted sash windows. The steeply pitched red-tiled roofs are enlivened by delicate lanterns and pretty stonecoped gables carrying one of Robson's rare concessions to pure decoration - the stone plaques with their flower reliefs that became one of the hallmarks of the early schools. Other small enrichments were the familiar title plaques and, occasionally, a wall panel in bas-relief of Knowledge strangling Ignorance, from a model designed by Spencer Stanhope. Robson was otherwise dependent solely on his materials and the bare necessities of planning to introduce variety and interest into what might have been a bleakly functional structure. Thus the decorative possibilities of the white sash windows and their repeating rhythms, the soaring chimneys and spirelets and the colour contrasts of yellow bricks with red brick dressings, white stone plaques, copings and cornices, were all expoited. So, too, were the opportunities for interesting formal compositions that the flexible plan afforded, with its simple units of hall, classrooms and cloakrooms on each storey. Herman Muthesius, the eminent critic of English architectuure at the turn of the 19th century, wrote of the early Board schools in 1900: "With the most basic means available for buildings regarded as nothing more than utilitarian, they successfully combined architectural distinction with good, honest construction. Their essential charm is in the grouping of their

Robson resigned from the Board in 1884 to return to private practice. Later works include the People's Palace on Mile End Road and the Royal Institute Galleries in Piccadilly. He was succeeded by TJ Bailey who had been Robson's chief draughtsman since 1873.

building nasses which is always interesting without being contrived".

Beattie indentifies the School Board's concern for architectural values in this quotation from its Final Report, published in 1904:

"The policy of the School Board has always been to give these buildings, as public buildings, some dignity of appearance, and make them ornaments rather than disfigurements to the neigbourhoods in which they are erected ... It was found that the difference of cost between bare utilitarianism and buildings designed in some sort of style and with regard for materials and colour, was rather less than 5 per cent. At the same time, the ornamental appearance may be secured either by richness of detail, or by a dignified grouping of masses; it is the policy of the Board, while studying, in the first instance, suitable arrangements for teaching, not to set aside the dignity and attractiveness of buildings, which the Board have always felt should be a contrast to their poor surroundings."

The School Board for London was wound-up in 1904, and school provision taken over by the London County Council. Nevertheless the final major extension in 1914 was carried out as a harmonious grand addition to the original building.

3.3 DOCUMENTED PHASES OF BUILDING DEVELOPMENT

- 3.3.1 Despite its apparent unified composition, the current appearance of the Primrose Hill Primary School is the result of several phases of incremental development, some anticipated, and some not.
- 3.3.2 Drawings for the Primrose Hill Primary School are kept in the London Metropolitan Archive and Camden's Local Studies Archive in Holborn Library. These are the sources for most of the material that establish the chronology presented below.
- 3.3.3 The earliest drawings for the school are that of the School-keeper's House, which are signed ERR and dated May 25 / 83. They show the house without the basement and street level extensions that now exist.
- 3.3.4 The next year a substantial set of of drawings for a new school were signed by ER Robson on January 30, 1884. These show proposals for an incomplete cruciform plan that comprising the north-east and central sections only. A future extension is indicated to the south-west.
- 3.3.5 In 1889 TJ Bailey (Robson's successor at the SBL) signed off drawings on the 7th June for the extension to the south-west corner. There are some changes to the original 1884 design.
- 3.3.6 Drawings are prepared in 1901 for a new single-storey hall in the western quadrant facing the street. These are signed off by TJ Bailey on December 2.
- 3.3.7 In 1914 proposals for 'Enlargement' of the school are prepared. This comprises the last major extension of the main building to the south-west as well as the shelter in the boys' playground on the north-east boundary. The single storey hall proposed in 1901 is extended upwards and an adjacent house is demolished. The drawings are signed off on the 16th November.
- 3.3.8 Drawings for 'Reconditioning' dated 1939 show extensive works and additions to the School-keeper's house. These include the front bay window, side entrance porch, front basement extension and rear extension.
- 3.3.9 A set of drawing dated 26 March, 1969 prepared by the GLC ILEA Architecture Department show proposals for new sanitary facilities in the playground level undercroft and in a new annex at the south-west end. Photos dated 9.6.71 show this work newly completed.
- 3.3.10 A planning application (ref 2003/0113L) for infilling part of the undercroft with a classroom was approved in 2003.
- 3.3.11 Recent works (ref 2010/5656P) include internal changes to the layout of the School-keeper's house, the front gate and paving in the front area.

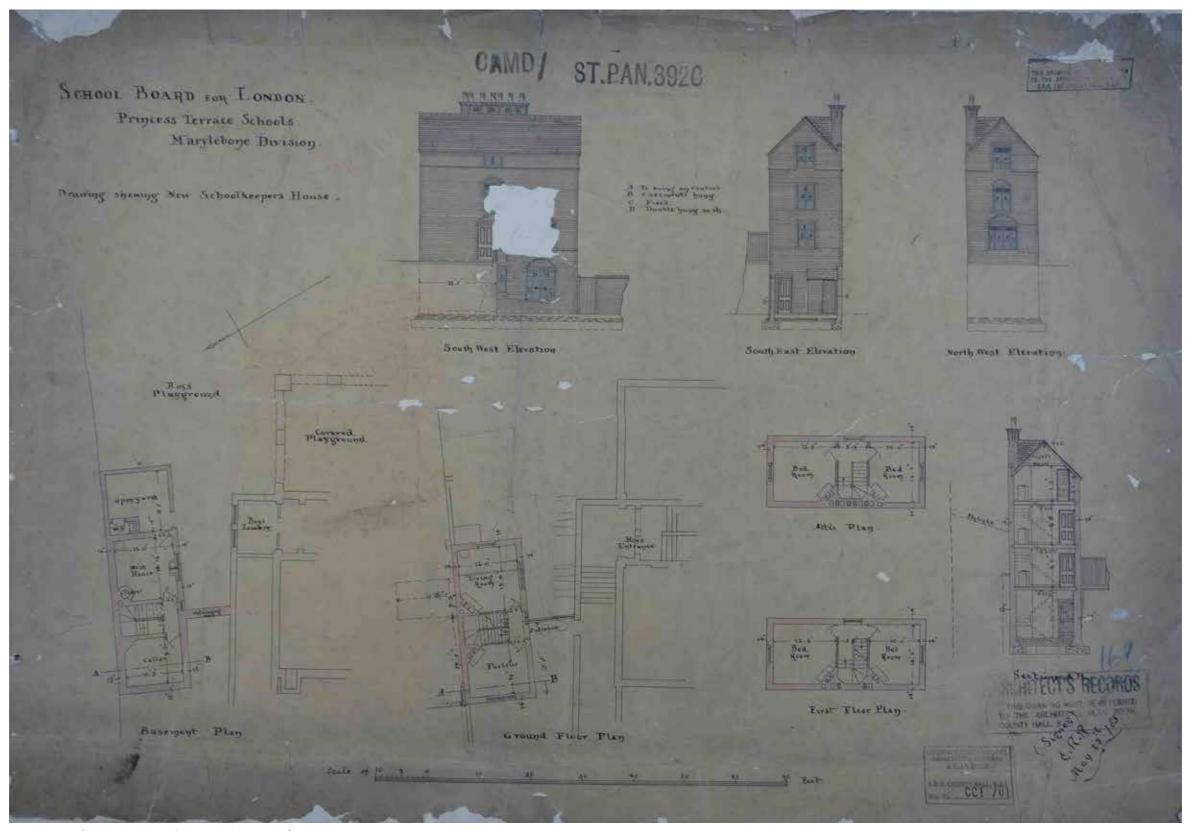


Fig 3.2. Drawing for the School-keeper's house, dated May 25th / 83.



Fig 3.3. Proposed elevation to the playground for the first phase of construction of the main school building dated Jan 30 1885.

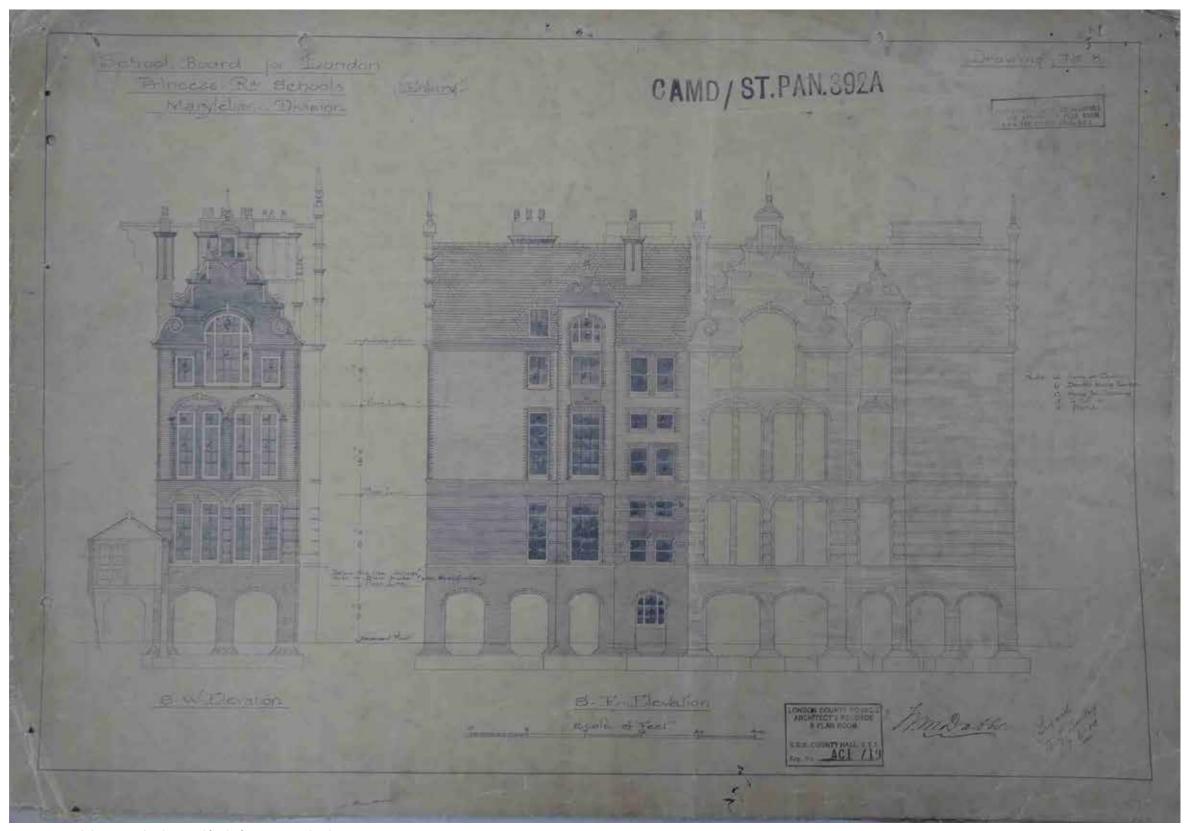
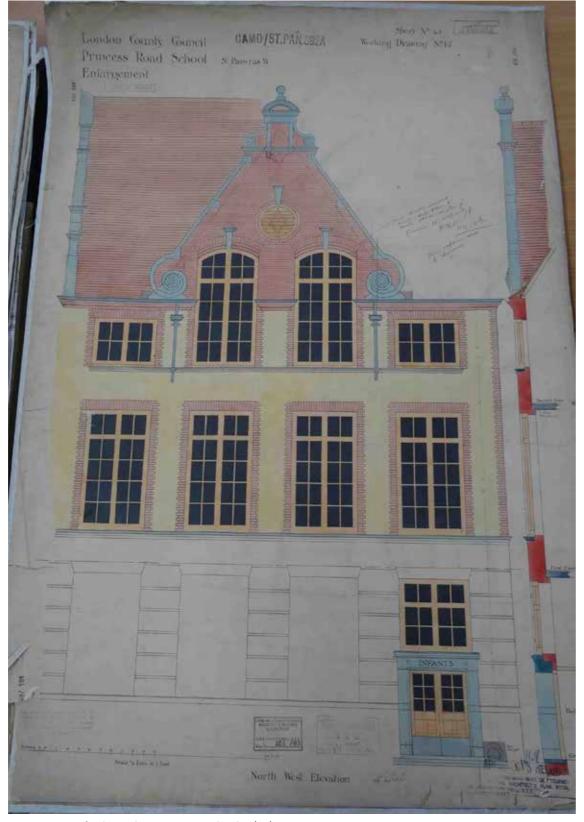


Fig 3.4. Proposed elevation to the playground for the first extension, dated 7-6-89.



Fig 3.5. Drawing for the proposed single-storey Hall, dated Dec 2/01.



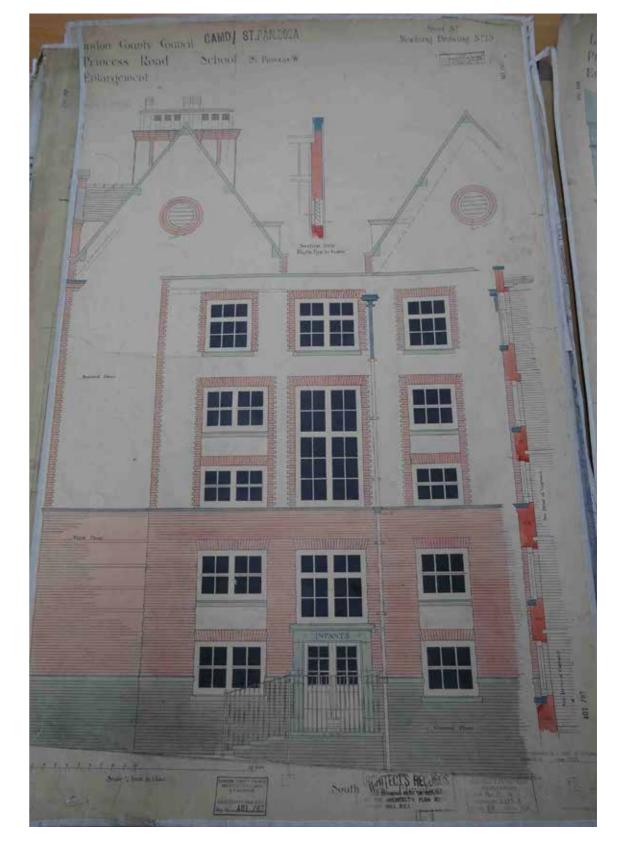


Fig 3.6. Drawings for the south-west extension, dated 16/11/14.

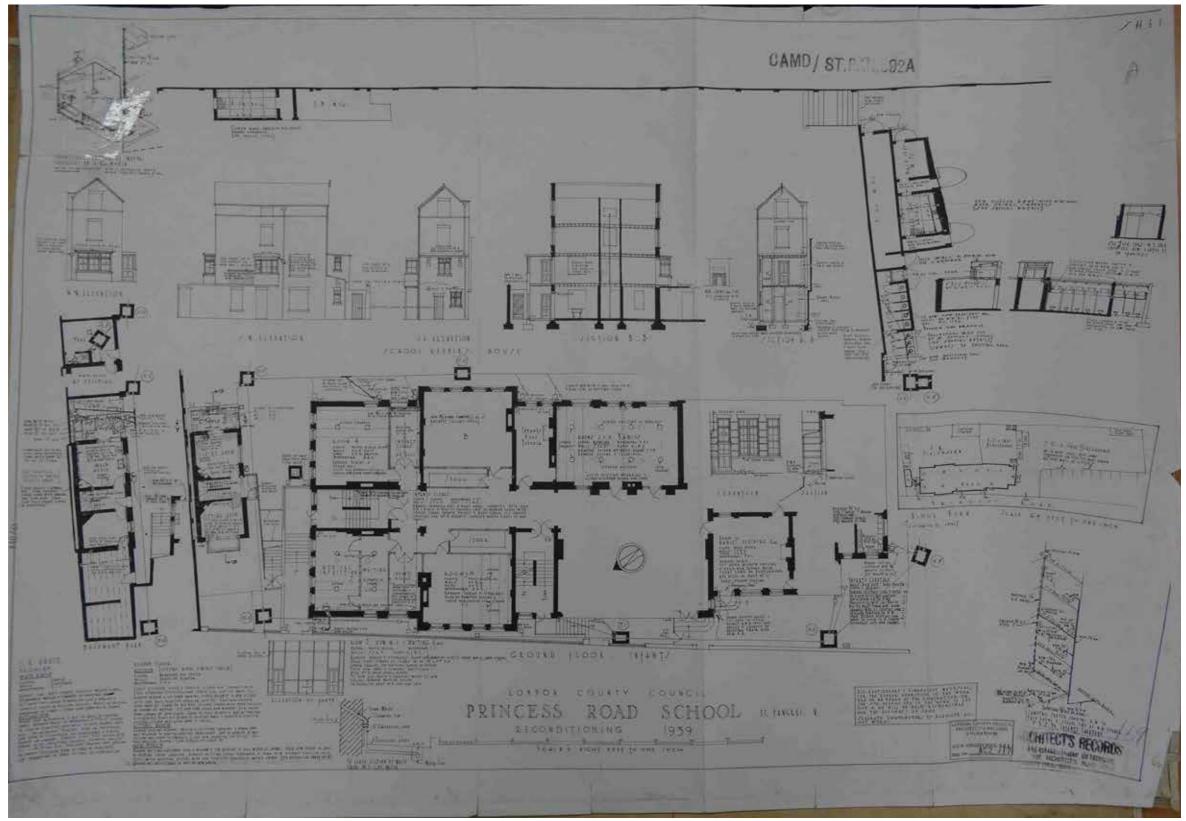


Fig 3.7. General Arrangement Plan for Reconditioning, dated 1939.

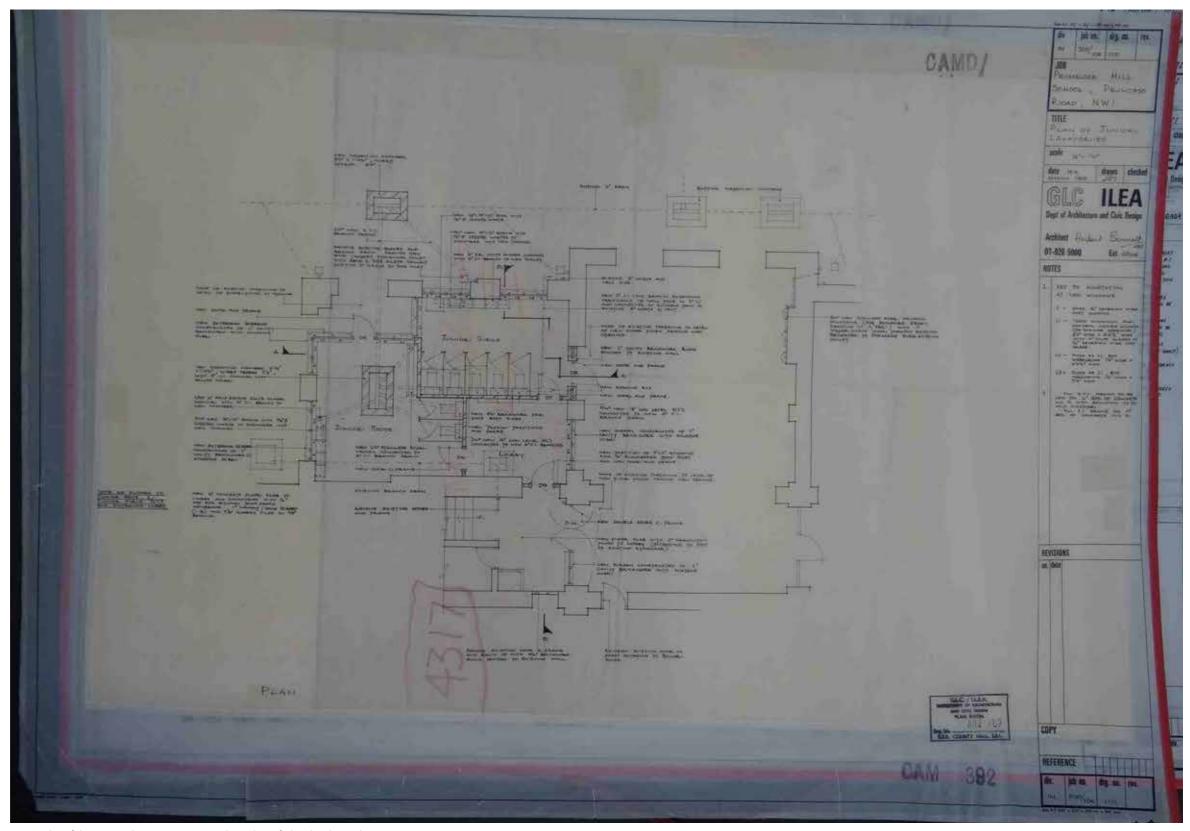


Fig 3.8. Plan of the proposed Junior Lavatories in the undercroft dated 14th March, 1969.



Fig 3.9. Photo of the Junior Boys toilet in 1971. The room has been sub-divided since.



Fig 3.10. Photo of the Junior Boys toilet in 1971. The urinal has been removed and the room sub-divided since.



Fig 3.11. Photo of the Junior Girls toilet in 1971. There are now fewer cubicles.



Fig 3.12. Photo of the external appearance at the completion of work in 1971. The current appearance is similar.

3.4 DESCRIPTION OF THE MAIN SCHOOL BUILDING

- 3.4.1 Princess Street School (Primrose Hill School) was originally conceived as a cruciform plan building. The drawings produced in 1884 show just over half of the cruciform built in a first phase, and an outline of future provision (such as Babies Room) to follow. The plan included a transverse central corridor that initially connected the boys' and girls' staircases, but could later be extended as necessary. This organising principle was carried through in the substantial additions of 1889 when the cruciform was completed, and later in 1914 when a large extension was constructed to the south-west.
- 3.4.2 Until recent decades the school retained a mostly open undercroft, which was designated on the plans as, Boys / Girls Covered Playground.
- 3.4.2 Like most Board Schools, Primrose Hill benefits from high ceilings and large windows (especially on the upper level). Although the classrooms are single aspect, the emphasis on the quality of sunlight and ventilation was typical of the period when similar designs for hospitals were being developed to reduce impure air and miasma.
- 3.4.3 The limited means available to the School Board was used to maximise the effect of the buildings. The roof-line of Primrose Hill is highly elaborated when seen from a distance. However, at close distance, the ground level entrances are, in comparison, squashed low and understated.
- 3.4.4 The polychromatic brickwork at Primrose Hill is very effective, and reflects Robsons repeated promotion of this technique for school buildings on limited budgets. The undercroft at playground level is in hard Staffordshire Blue engineering bricks. Above that is one floor in red brickwork and then two floors in predominantly yellow London stocks with red brick detailing around windows. At roof level is some Portland Stone for the exhuberant copings, and red brick again for the main extent of gable wall.
- 3.4.5 Within the building the floor constructions are clinker concrete spanning between deep steel beams.

3.5 THE CARETAKER'S HOUSE

- 3.5.1 According to drawing dates the Caretaker's House was built a year before the main school building. Although the drawings were carried out by the School Board, it has no visual relationship to the main building, nor any of the architectural quality, but is resolutely utilitarian.
- 3.5.2 The charm and qualities of the Caretaker's House that are noted in the Conservation Area Statement are due to the alterations drawn up in 1939 which include the side porch and the front bay window. The rear extension is also of this period, but, in contrast to the front of the building, the sanitary uses contained in it did not merit any architectural effort that is to say, the existing rear extension is a poor addition to an ordinary building.

3.6 THE PLAYGROUND SHELTER

3.6.1 A foundation drawing issued to the Clerk of Works shows new foundations for the playground shelter included in the 1914-15 works. No drawings of the superstructure have been found. It is a simple structure with four slim cast iron columns supporting steel beams and an arrangement of timber joists supporting the roof deck. The principal timber beams cantilever over the steel beams with a molded termination.



Fig 3.13 Primrose Hill School from the Pirate Castle.

3.7 ASSESSMENT OF SIGNIFICANCE

3.7.1 In order to analyse the impacts of any proposed works at Primrose Hill School it is important to have an understanding of the building's significance as a whole and in its component parts. The aim of an assessment of significance is to establish an appropriate conservation strategy for the building in question, in particular by identifying areas where only minimal changes should be considered, as well as areas where changes might be beneficial.

3.7.2 In statutory terms, the significance of the Primrose Hill School has been recognized by is listing at Grade II in May 1974 (List Entry Number: 1139081). Like many listings, the description attached to the statutory notice gives only a brief description and reasons about why the School is judged to be significant.

3.7.3 There may be some ambiguity as to whether the Caretaker's House is listed or not. It is not mentioned in the listing description, and, for planning purposes it has a separate address (no. 42) and a separate access gate from the street. In the Conservation Area Statement of 2001 it is noted as an unlisted building that makes a positive contribution to the area. Although it now seems to be a contiguous part of the school that shares the same grounds at playground level, this might not always have been the case.

3.8 SIGNIFICANCE VALUES

3.8.1 In 2008 English Heritage published Conservation Principles, Policies and Guidance in which it sought to clarify the criteria by which buildings and sites should be assessed. Their guidance proposes four different values that contribute to the significance of a building or place, which are:

- Evidential value: that it yields primary evidence about the past. This applies to archaeological deposits, but also to other situations where there is no relevant written record.
- Historical value: that it illustrates some aspect of the past, and thus helps to interpret the past; or that it is associates with an important person, event or movement.
- Aesthetic value: this may derive from conscious design, or from the work of a craftsman; alternatively it may be the fortuitous outcome of the way a building or place has evolved.
- Communal value: the symbolic role of a building or place, or the way a building contributes to the identity of a place.

The first of English Heritage's values (archaeological deposits etc.) has little application here but the other three do, and provide the basis of the assessments which follow.

3.9 AESTHETIC VALUE

3.9.1 Primrose Hill School does not receive extensive attention in the building histories. Pevsner summary extends to only four words: "With nice curly gables". Andrew Saint's description in his 1991 unpublished report on London Board Schools is even briefer and pithier: "Forthright, gabled, jolly."

3.9.2 Rather its significance lies in being one of the better and most prominent exampes from the School Board for London. Primrose Hill was listed in 1974 following Susan Beattie's survey and report on London Board schools in 1972 for the GLC Historic Buildings Board. In her report Beattie sub-divided the periods and styles under various headings based on the Chief Architect and his time in the role: eg, 'Early Robson', 'Classic Bailey', etc. Primrose Hill sits under 'Late Robson', and is briefly described: "3 storeys, assymetrical plan, the principal bays surmounted by a variety of stone-coped Dutch gables."

3.9.3 The brevity of comments indicates that the architectural quality of the building, though immediate and powerful when confronted in the street, is less significant than the historic and communal values of the overall programme of work of the School Board.

3.10 HISTORIC VALUE AND COMMUNAL VALUE

3.10.1 The historic and communal values of the School Board buildings are too intertwined to be able to give separate commentaries. The 1958 article in the Architectural Review by David Gregory Jones gives an excellent summary of the historic significance of the programme of school building, and the effect of this programme on London:

"Robson's achievement ... lay firstly in his incisive analysis of his objectives, his ready understanding of the challenge which new social demands had placed before him; secondly, in his prompt understanding that designers such as Champneys and Stevenson had hit upon a stylistic approach that might be developed in answer to this challenge; thirdly, in the superb confidence and virility with which he and his staff carried through the development of the style, giving power and sometimes grandeur where its originators could only achieve charm; and, lastly, in the truly Victorian drive with which he pushed a vast programme of work to completion with architectural standards of the very highest order maintained throughout ..."

"By sheer Victorian ruthlessness the L.S.B. achieved a far higher degree of standardisation than most education authooriteies have achieved since the last war. Although the L.S.B. schools vary from very plain building to the greatest elaboration according to the openness of their sites, it cannot be said that, in practice, Robson was over-anxious about tailoring each school to suit its locality. The positive result of this is that these buildings, strong on personality, do a very great deal to set a stamp of unified character on the hodge-podge of Victorian London ..."

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4.1 LOCATIONS OF THE SCHEME DESIGN





Recent example (2003) of window arch converted to doorway (left-hand door).

New Buffer Space to be constructed in front of existing openings.

New doors and windows installed in archways.

4.1 LOCATIONS OF THE SCHEME DESIGN



Location of proposed rear extension to the rear of the Caretaker's house.

Shelter structure to be strengthened to form terrace. Store room to be removed.

New stair to be added to the rear.

4.1 LOCATIONS OF THE SCHEME DESIGN



View from the street of the Caretaker's House and main building. The gates (2011) are to be adapted for ramped access).



View from the playground between the main building and Caretaker's House/ playground store.

4.2 THE UNDERCROFT RECEPTION CLASS & BUFFER SPACE

- 4.2.1 By combining the two existing reception classes into a single class in the existing open undercroft and WC area, it will be possible to move the Year 1 classes down to playground level into the two Reception classes. This will free space further up in the school to be dedicated for separate science rooms for older children.
- 4.2.2 The two existing classrooms were inserted into the open undercroft in 2003. The infilling of these covered play areas is certainly the most significant change to occur in this part of the school. There are clear and sound reasons to locate early years classrooms with direct access out to play areas.
- 4.2.3 The buffer space is an insulated, but unheated space which gives environmental benefits to the inner teaching space. This is especially the case in older buildings where walls have poor thermal performance. The Buffer Space is the main entrance route where coats and boots are deposited and stored before entering the classroom. It provides an air-lock to the outside, and removes items from the heated space that do not require to be heated. Depending on the weather it can also be used as a semi-enclosed overspill play-space.
- 4.2.4 The outside of the buffer space is clad in dark grey Eternit fibre-cement panels. The colour of the panels relates to the dark brick on the lower level of the main building, and can be used as informal blackboards. Above the locker level, the buffer space is mostly glazed with timber-framed windows, and exposed, unpainted timber studs and roof joists. The roof projects over the windows to provide shelter from rain and sun.
- 4.2.5 The open canopy is a simple construction of timber joists spanning across a framework of steel posts and beams. The structure of the canopy is set away from the main building, and the lead flashing tucked into the brickwork is the only connection to the main building. The level of the rear gutter is carefully set so that the new structure does not cross the curve of the highest arch, and also that the flashings are tucked into horizontal brick joints only, and do not cut accross arching bricks.
- 4.2.6 The colours of the metalwork on the new canopy and buffer space follows that of the metalwork on the existing playground shelter: black columns and white beams with black fascia trims.

4.3 THE TWO-YEAR OLD PROVISION

- 4.3.1 The background rationale and process for locating the new two yearold provision at Primrose Hill School are set out in sections 1.5 and 2.1 above.
- 4.3.2 The Caretaker's House sits apart from the main School, and offers a smaller, more intimate environment than the scale of the main building with direct and separate access from the street.
- 4.3.3 It is proposed to link the front and back rooms by removing the existing lobbies (constructed 2011) and installing magnetic hold-open devices on the doors that are released by fire alarm. The walls under the staircase will be removed for baby-only access.
- 4.3.4 A new extension is to be constructed to the rear of the building for changing, WCs and lockers. A canopy partially covers an elevated outdoor play area located on the roof of the existing playground shelter.
- 4.3.5 The new extension is constructed in similar materials to the Reception buffer space on the main building. These are dark grey fibre-cement Eternit cladding panels, with timber-framed windows above locker height. The posts and guardings around the terrace play area are white steel and the overhead fascia is black.

4.4 PROPOSALS FOR IMPROVED ACCESS

4.4.1 Two Year-old Provision. Currently, there is no step-free access to the street level front entrance of the new 2 year-old provision. These proposals include for the removal of the 190mm step from Princess Road, and the installation of a ramp up to the level of the main deck over the basement. The existing gates will be retained, but with the left-hand leaf fixed shut. The right hand leaf will be extended down to the new level to match the existing metalwork. A buggy store is located on the forecourt before approaching the very restricted entrance area.

4.4.2 Undercroft Classrooms. Doorways from the current Reception (future Year 1) classes have one or two steps up to the outside play area. It is proposed to lower the outside ground level and remove the thresholds upstands. New extended doors will be similat to existing. The new canopy will assist with problems of weathering commonly associated with level thresholds.



Fig 4.1 The stepped entrance and recent gate (2011) to the Caretaker's house.

Fig 4.4 View from Waterside Place of the rear of no. 46 Princess Road and the north-east side of the



Fig 4.2 The step on the right-hand side is to be removed, and bars on the right-hand leaf extended down. The original post is to be retained.



Fig 4.3 Internal view of steps up out of an existing Reception class.

4.5 NEIGHBOURLY ISSUES

4.5.1 The immediate neighbour to the north-east of the Caretaker's house is no. 46 Princess Road. There is a ground floor extension to the rear of the house, which also provides an upper level terrace. If lines are drawn from the centre of the glazed doors in the lower opening, they are obstructed in plan and elevation by the existing rear extension to the Caretaker's house. When these lines are copied to the proposal drawings there is a marginal, but not significant increase in the reduction of light to that opening.

4.5.2 The pre-application advice suggested that a privacy screen a minimum of 1.8m high above the terrace level should be installed. This has been included in the proposals.

4.6 MASSING OPTIONS FOR THE NEW EXTENSION

4.6.1 The placement of the new accommodation is restricted by the structure and layout of the School-keeper's house and the adjacent playground shelter. At a site meeting with Sarah Freeman of LB Camden Conservation it was suggested that the composition of the rear extension to the proposed two year-old changing area and WCs could be improved by moving the facilities further along the rear boundary wall to minimise the lateral extension. These are illustrated opposite.

4.6.2 The layout in the current application shows a 3.6m long corridor between kitchenette and terrace. A short wide corridor is preferred for improved space usage internally, and to minimise impact on the neighbours externally. The extension projects laterally, but no further than the 1939 entrance porch in the middle of the house.

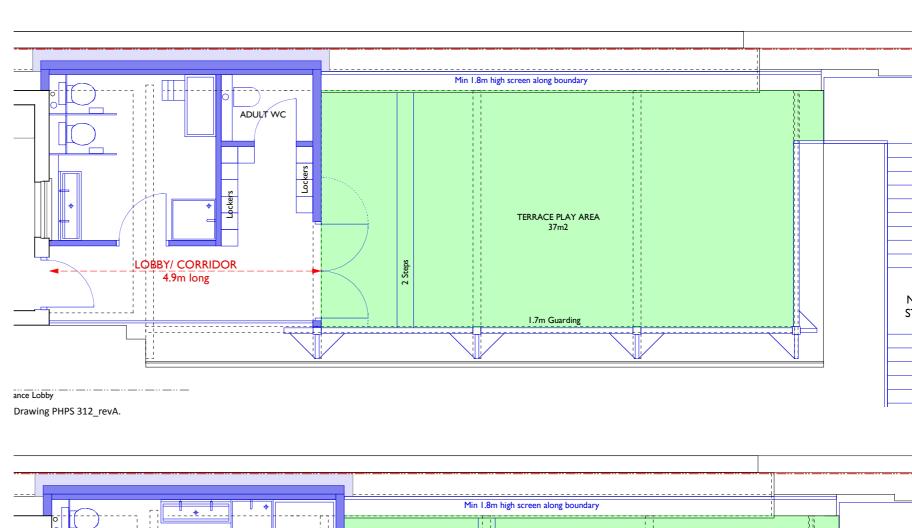
4.6.3 Drawing PHPS 312_revA shows a proposed rear extension that is limited in width to match the existing house.

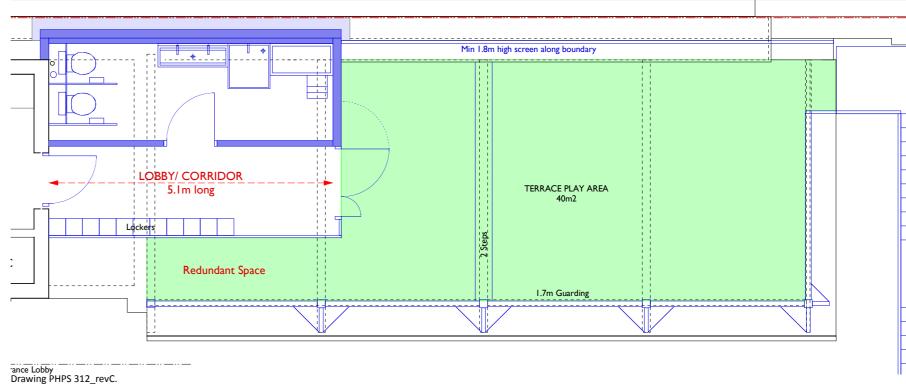
- The adult WC is relocated to back of the new extension.
- The length of the access corridor between the kitchenette and terrace is extended by 1.3m to 4.9m. The corridor is narrower.
- The length of the extension along the boundary wall is similarly increased.

4.6.4 Drawing PHPS 312_revC shows a proposed rear extension that is narrower than the existing house.

- The adult WC remains in the proposed location.
- Access towards the terrace is through the existing window location.
- The length of the access corridor between the kitchenette and terrace is extended to 5.1m.
- Access into the changing room/ WCs is poor with a dangerous door swing.
- There is a strip of difficult-to-use space beside the corridor.

4.6.5 After examination of the implications of altering the position of the extension it was concluded to retain the original proposals.





4.7 ALTERATIONS TO THE FABRIC OF THE MAIN BUILDING

Historic material to be removed from the main building comprises:

- 4.7.1. The toilets areas installed in 1971 in the undercroft. This comprises removal of the WCs, basins, cubicles, brick enclosures, floor, external brick spandrel panels, windows and doors.
- 4.7.2 The lift cupboard at the bottom of the north stairs. The enclosure of this cupboard is believed to be original, but the door is poorly fitting and believed to be installed later when the lift was removed. At upper levels the lift shaft is used for servicing ducts. The door will be retained on site for reuse elsewhere.
- 4.7.3 Removal of an original window and brickwork below to form access to the playground. The brickwork under the window is recessed so a new opening is relatively easy to make without disturbing the existing bullnose facing bricks. In 2003 an adjacent window was converted to a doorway from the Reception Class. The new bullnose bricks were specified as Ibstock Atlas Smooth Blue bricks. This new access route includes reopening a blocked up doorway at the bottom of the central stairs.



Fig 4.5 A recent photo of the undercroft WCs. The fixtures, floor and brick partition walls are to be



Fig 4.7 The original window to be converted to an open doorway.



Fig 4.6 The lift enclosure and door proposed for removal. The door $% \left(1\right) =\left(1\right) \left(1\right)$ appears to be a later addition as it is poorly fitting with ad hoc hinges.



Fig 4.8 An adjacent dropped window converted to a door using lbstock Atlas Smooth Blue bull-nosed

4.7 ALTERATIONS TO THE FABRIC OF THE MAIN BUILDING

- 4.7.4 Murals painted in the existing undercroft may not be age-appropriate for the new Reception class. They are to be removed by non-abrasive means (eg, Doff steam) or overpainted.
- 4.7.5 The pink paint over the Staffordshire Blue engineering bricks is to be removed by non-abrasive means (eg. Doff steam).

4.8 ALTERATIONS TO THE 1939 CARETAKER'S HOUSE

Historic material to be removed from the Caretaker's House comprises:

- 4.8.1.The WC and enclosure located in the 1939 rear extension are to be removed and a new opening is to be formed in the rear wall.
- 4.8.2 Lobbies to the stairwell on the upper street level floor are to be removed. These were constructed in 2011. Doors will be relocated each side of the stair and held open by electromagnetic stays until a fire alarm sounds.

4.9 ALTERATIONS TO THE 1914 PLAYGROUND SHELTER

Historic material to be removed from the shelter comprises:

- 4.9.1. The parapet wall to the yard by the Caretaker's house.
- 4.9.2 The secondary timber roof members will be removed and replaced. The engineers, Price & Myers have confirmed that conversion to use as a roof terrace requires that increased loads are allowed for. This will involve the use of new paired steel channels each side of the existing retained primary joists. The steels will also cantilever out to extend the playground above. A Structural Statement from Price & Myers is enclosed in the appendix.



Fig 4.9 Painted walls in the undercroft are to be removed by non-abrasve means or overpainted.



Fig 4.11 The paint on the exterior wall by the Buffer Space is to be removed by non-abrasve means.



Fig 4.10 Painted walls in the undercroft are to be removed by non-abrasve means or overpainted.

4.10 IMPACT ON THE LISTED BUILDING

4.10.1 The NPPF and LB Camden policies for carrying out alterations to a listed building require that the proposals be justified in two ways: first, by demonstrating that the significance of the building and its setting have been properly understood (NPPF core principle), and secondly by balancing the gains and losses, and justifying the need for change (NPPF paras 131-134).

4.10.2 The Historic England Good Practic Guide 3 requires an evaluation that balances harm with benefits.

4.10.2 The original layout of the existing School has proved itself robust to change and expansion, but did not allow for early-years classes to be located at playground level. The move towards colonising the lower floors with direct access from playgrounds is important in educational practice, and has been implemented at Primrose Hill in recent years. This is generally a successful strategy, and the new Reception class continues in these proposals.

4.10.3 The assessment of significance of the listed building in Chapter 3 concluded that the most significant aspect of the School is found in the aesthetic value of its great height, bulk and architectural detail at high level.

4.10.4 The new canopy and buffer space are to be located at the base of the listed School, and so have an impact on the listed building. In this respect, they can be seen as a further elaboration in the access and use of the ground level classrooms and playground shelters. The doorways to the Year 1 and Reception classes are protected from sun and rain, and provide greater flexibility of use according to the weather. However, the scale of the school is so great that, like the existing clutter and ad hoc awnings at the base of the building, these new shelters will be hardly noticed against the main bulk. The main interest in the elevation of the School is the elaboration at high level, which draws the eye upwards.

4.10.5 Losses in original or historically significant fabric are small. The harm done to the existing buildings is balanced by the overall public benefits for increased educational provision.

4.11 THE IMPACT ON THE SETTING OF THE LISTED BUILDING

4.11.1 The rear extension and terrace behind the Caretaker's house are raised one level above ground. They are limited in width to match the side entrance porch added in 1939, and in height to match the rear extension, also from 1939. While it is not possible in this application to propose the complete demolish the 1939 rear extension, the new arrangement follows the line of columns introduced in 1901 when the retaining wall was removed.

4.11.2 The Caretaker's House and playground shelter are considered as a curtilage structure on the site of a listed building. The Historic England Good Practice Guide 2 advises that curtilage Structures (in this case, the Caretaker's House) should be considered in proportion to their significance. Section 3.5 above has concluded that the significance of the original Caretaker's House and its later rear extension is low. In this respect the significance of the proposed extension is in its effect on the main School building. The new extension will be related in appearance to the new buffer space and canopy located against the School. The proposed rear extension to the Caretaker's House will form part of two related structures around the rear playground.

4.12.3 The other curtilage structure, the playground shelter, has a degree of interest in its structure. In this case, to form the new terrace, the response is to utilise the principal elements of structure, and to insert new strengthening steels and timbers that sit elegantly and discretely over the original beams.

4.12 THE IMPACT ON THE CONSERVATION AREA

4.12.1 The guidance for rear extensions contained in paragraphs PH25-29 of the Conservation Area Statement is largely intended for extensions of terraced houses. The Caretaker's House is a singular building in Princess Road, set back between two prominant buildings, and often in shade. There is an unusually deep and narrow, angled space with a storey-height drop in level between the house and the main school building. Because of this unusual view, and the later addition of a side entrance porch, we consider that the proposed side extension will read as a further elaboration of the architectural features on that elevation of the Caretaker's House.

4.12.2 We would therefore argue that the impact on the Conservation Area will be neutral.

4.13 OTHER CONSIDERATIONS

4.13.1 The canopies and buffer zone are lightweight structures with minimal foundations. No new underground drainage works are proposed, so there is no question of archaeological interest being disturbed by these proposals.

ROBERT LOADER ARCHITECT PRIMARY SCHOOL 25

4.14 CONCLUSIONS

4.14.1 The assessment of scheme design summarised in this chapter has been based on the English Heritage Conservation Principles (2008). Paragraph 131 sets out the three criteria for assessing projects involving listed buildings as follows:

4.14.2 Criterion 1: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

Further demands are being made of educational buildings to accommodate increased provision.

These proposals brings changes: -

- The conversion and extension of the Caretaker's house to provide additional 2-year old provision.
- The introduction of a new classroom to the undercroft of the main building, and,
- The construction of a new canopy and buffer zone along the south-east facade of the School.

The school will continue to provide an increasing range of educational services to the community, and managed and considered growth will be implemented.

4.14.3 Criterion 2: the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality.

The proposals will expand the provision of learning services at the School for the benefit of the local area.

4.14.4 Criterion 3: the desirability of new development making a positive contribution to local character and distinctiveness.

The proposed extension to the Caretaker's house will be located within the grounds of the School and will sit well behind the iron railings along Princess Road.

4.14.5 This report concludes that the positioning, massing and appearance of the three main components of the scheme are, on balance, justified. The detailed development of the proposals will need to proceed with care in order to maintain the character and integrity of the School buildings. The gains of increased educational provision for the community, and a a viable and enhanced use of the existing building outweighs the loss of the open undercroft space and arches, and small losses on original fabric elsewhere.

APPENDIX

A.1 List Entry Descriptions

- A.2 Pre-Application Response from LB Camden
- A.3 Structural Engineer's Statement
- A.4 Bibliography
- A.5 Record of Consultation Meetings
- A.6 Outline of National, Regional and Local Heritage Policy

and Guidance

A1. LIST ENTRY DESCRIPTIONS

The building was listed in on 14th May, 1974 (1139081):

Details

CAMDEN

TQ2883NW PRINCESS ROAD 798-1/75/1350 (East side) 14/05/74 Primrose Hill Infants School (Formerly Listed as: PRINCESS ROAD Primrose Hill Junior & Infant School)

GV II

Board School, now an Infants School. c1885. By ER Robson. For the School Board for London. Red brick ground floor (rusticated) and gables; 1st and 2nd floors, yellow stock brick. Stone and red brick dressings. Tiled roofs, steeply pitched with scroll enriched gables terminating in pedimented features. Flemish Renaissance style. 3 main storeys with attics and basements. Long building with irregular fenestration. Central gabled bay of 4 windows; to left, narrow 2-window gabled bay, wide, projecting step gabled 2-window bay and 2-window bay step gabled on return; to right, recessed 5-window bay, gabled above 3 left windows and on return, 2-window recessed bay. Plain stone surrounds to entrances. Mostly transom and mullion effect flush framed windows with gauged brick flat arches. Windows extending into gables, segmental-arched with keystones. Left hand, stepped gable bay with ground and 1st floor windows in shallow round-arched recesses. INTERIOR: not inspected.

The playground walls, railings and gates were listed on 14th May, 1974 (1139082):

Details

CAMDEN

TQ2883NW PRINCESS ROAD 798-1/75/1351 (East side) 14/05/74 Playground walls, railings and gates to Primrose Hill Infants School (Formerly Listed as: PRINCESS ROAD Playground walls & gates of Primrose Hill Junior & Infant School)

GV II

Playground walls and gates. c1885. By ER Robson. For the School Board for London. Yellow brick perimeter walls with pilaster strips on slightly projecting plinth. Playground with cast-iron railings and 3 stone gateways enriched with pedimented features inscribed "Infants", "Girls" and "Boys"; wrought-iron gates.

Date: 4 April 2016 Our Ref: 2016/1444/PRE Contact: Tania Skelli-Yaoz

Direct Line: 020 7974 6829

Email: Tania.Skelli-Yaoz@camden.gov.uk

Mr Rob Loader 30 Walkerscroft Mead London SE21 8LJ



Dear Mr Loader,

Re. Planning Pre-application advice meeting ref. 2016/1444/PRE Primrose Hill Primary School, Princess Road, London NW1 8JL

Re: Option 1: creation of undercroft unit; Option 2: proposed rear extension to rear of Caretaker's House, strengthening of roof to form terrace and new stair added to the rear; Option 3: house conversion

I refer to our pre-application meeting held on 23rd March 2013 about the above proposal.

You have submitted a short statement with attached drawings of your proposal for the above site to include extensions and alterations at the lower ground and ground floor of the school site. At the meeting you have presented your proposal in more detail with some background and history on the current use and the potential development of the site.

Subsequently, I have assessed your proposal while consulting our Design & Conservation internally. In this letter I aim to advise you on the key issues regarding your proposal and on key consultation channels.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It cannot be held to prejudice formal determination of any planning application we receive from you on this proposal

The proposal includes a single-storey lightweight extension to the rear of the school building to provide for semi-outdoor play for 2-year olds, associated internal alterations at lower ground level, a small extension to the south-east corner of building at lower ground floor level and extensions and alterations to the caretakers house on the north-east end of the site.

I can confirm that the site is a grade listed II building and lies within the Primrose Hill Conservation Area. The site lies within a residential area and is closely wrapped by residential properties to its north, east and west.

Key issues: the main issues for consideration with your proposal are land use, conservation, amenity and transport.

Land use

The extensions and alterations to the existing school to provide for the new statutory requirements for 2-year olds is considered acceptable in principle and complies with policies CS5, CS10 and DP15.



Development Control Planning Services London Borough of Camden 5 St Pancras Square

Tel 020 7974 4444 Fax 020 7974 1975 www.camden.gov.uk/planning

London N1C 4AG

Design & Conservation

You submitted a pack of drawings and information and outlined you proposal on site. I have explained that the submitted information is limited but the site visit was helpful. The feedback below is based on the combination of the above and is assessed against policies CS14, DP24 and DP25.

A2. LB CAMDEN PRE-APPLICATION RESPONSE

- Further historical information is required to be able to understand the evolution of the built form and uses at lower ground floor level of the main building and the cast iron structure within the playground area to the rear of the former Caretaker's House.
- A Heritage Statement should be submitted to support the proposals, demonstrating how this evidence has informed the design development. The Heritage Statement should include information about
 - o the significance of the listed building, including any contribution made by its setting
 - o the principles of and justification for the proposed works; and
 - o the impact of the proposal on the significance of a heritage asset and whether any harm is caused to the significance of the heritage asset.

The statement should indicate:

- o the sources that you have considered;
- o the expertise that you have consulted; and
- o the steps that have been taken to avoid or minimise any adverse impacts on the significance of the asset.
- The only document formally submitted is the Outline Proposals Document, which includes a summary of the proposed works and proposed demolition plans. Further plans and elevations were shown by the architect on site (23/03), however as these have not been submitted formally as part of the pre-application the comments below are based on the site discussions and the Outline Proposals only.
- It was noted on site that there were some inaccuracies on the proposed plans relating to the size of some openings; these should be rectified, based on the principle that the size of original openings within structural walls should be maintained.

Internal alterations and extension to the main building

- There is no objection to the removal of modern internal partitions (these should be clearly identified with the Heritage Statement), however full justification will need to be provided for the removal of internal historic brick structural walls. Unless the loss of historic walls can be fully justified, they should be retained within the proposed internal reconfiguration.
- The timber cupboard located close to the internal staircase should be retained as it appears to be of some historic interest.
- A single storey lower-ground floor extension to the rear is acceptable in principle, subject to further detailed justification for the proposed size and extent of the additional space required and to the design being of a high quality that complements the special interest of the main building.
- Careful consideration will need to be given to the proposed detailed design of the extension and its relationship with the existing building. It is not clear whether the proposed structure will be of a lightweight or more solid appearance, it is also not clear how the design and materials relate / respond to the special interest of the Grade II listed building
- It is noted that the proposed extension will cover the two projecting bays and a further bay to the north-west, which causes some concerns about the quality of the external north-facing space created outside the remaining two bays to the north-west, and about how the extension sits with the wider rear elevation of the main building.
- It was discussed on site that the roof of the extension is proposed to slope towards the building; the treatment of the junction with the new building and proposed gutter arrangement will need to be carefully considered, as will the encasing of the original downpipes.

Proposed alterations and extensions to the former Caretaker's House

- It is noted that there are existing extensions to this building, resulting in a piecemeal appearance. There is a two-storey brick extension, set in from the side extension of the main building by a single brick. The lateral brick wall running parallel to its rear elevation appears to be historic, and lies adjacent to a cast-iron structure running along the north-west playground wall, which also appears to be of some significance. Further research may be able to shed some light on the history of these structures and establish the relative significance of the different elements.
- Notwithstanding the above, it is clear that the existing situation presents an
 opportunity to improve the piecemeal appearance of former extensions, and
 create new external playspace on the roof of the existing cast iron structure.
 Rather than adding further piecemeal extensions, the design should seek to
 rationalise the existing situation, preserving elements that are of special
 interest, and should be a high quality addition that is subservient to the former
 Caretaker's House.
- The proposed replacement of the modern store within the cast iron structure is acceptable in principle subject to detailed design.
- There is concern that the proposal to extend the building line to the level of
 the timber entrance porch located to the side elevation of the House could
 result in an overly bulky appearance. Detailed justification will be required for
 the proposed size and extent of the additional space, and consideration
 should be given to alternative design solutions.
- Due to their close proximity, the proposed alterations and extensions should also consider the relationship of design and materials to the proposed lowerground floor extension to the main school building.

Amenity

As advised on site, my primary concern lies with regards to the impact on the amenities of residents at Waterside Place, and in particular those closest to the boundary with the school. I mentioned that a daylight and sunlight report may be required to assess the impact of loss of this on the properties at 46-60 Waterside Place. I am also concerned about potential overlooking that may be caused from the proposed roof terrace to the rear of the Caretakers' House and suggested that this would have to be addressed with a 1.8m privacy screen along the boundary and clear illustrative drawings to show what sightlines may remain following its installation.

However, in accordance with the conservation advice below, this is subject to the detailed design of the extensions to this part of the site including high-quality materials and design to any such privacy screen. Therefore, the proposal does not comply with policy DP26 in its current form but could be acceptable subject to revisions.

Transport

Due to the nature of the site and the scale of the proposed works it is likely that a Construction Management Plan (CMP) will be required. Please could you liaise with the Transport Team (Steve Cardno) in advance of submitting your application and submit a draft statement CMP with your application. This is in accordance with policy DP21.

Other

The proposed extension should demonstrate that it achieved high energy efficiency goals in terms of materials, insulation and emissions, in the interest of sustainability and compliance with policy DP22.

I understand that no trees are proposed to be affected as part of your proposal.

A2. LB CAMDEN PRE-APPLICATION RESPONSE

To summarise, the above considerations are in light of the building's grade II listed status and its location within a CA. The proposal requires additional supporting information, design justifications and revisions to some elements as well as responses to the amenity concerns and some transport documentation.

Planning obligations:

Building Control Service

For further information about this separate process and any implication it may have the configuration of the project in planning terms please contact Nassar Rad on 020 7974 2387 or Nasser.Rad@camden.gov.uk

Supporting information

Please be aware it is you responsibility to compile the necessary documentation in accordance with the requirements of the national and local list. Details are available at:

http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation-requirements-/

Consultation channels:

The applicant is strongly encouraged to engage locally prior to a planning application being submitted. The list below is a recommendation for local groups that you may wish to notify or consult on your proposals in advance of submitting your application.

Local groups: the Primrose Hill Conservation Area Advisory Committee (CAAC).

Electronic submission

Please submit your application via the planning portal at:

http://www.planningportal.gov.uk/planning/

I hope this advice is useful. This response represents an initial view of your proposals based on the information available to us at this stage which is limited. Please be aware that addressing these matters does not necessarily mean that the application will be approved and is without prejudice to the assessment of any future application and the final decision of the council.

If you have any queries about the above letter or the attached document please do not hesitate to contact **Tania Skelli-Yaoz** on **020 7974 6829**.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Tania Skelli-Yaoz Planning Officer (Mon-Wed)

Telephone: 020 7974 6829

A3. STRUCTURAL ENGINEER'S STATEMENT

PRICE&MYERS

Consulting Engineers

37 Alfred Place London WC1E 7DP 020 7631 5128 mail@pricemyers.com www.pricemyers.com

Robert Loader Architect 30 Walkerscroft Mead London SE21 8LJ

19 April 2016

Ref: 25118

Dear Robert,

Primrose Hill School Refurbishment: Replacement of existing shelter roof for play area

As part of your proposed scheme of works, our view is that the structure that forms the existing shelter is insufficient in its current state to permit loads associated with a children's play area.

It is therefore recommended that the existing roof structure (above the main structural timber beams) be replaced with timber floor joists and plywood (in addition to architectural finishes) to ensure it is capable of supporting the required loading.

Yours sincerely, for Price & Myers

Matthew Fraser Structural Engineer mfraser@pricemyers.com









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LONDON NOTTINGHAM CIXEORD

Price 3 Myers LLP is a Limited Lability Partnership registered in England and Yalles No. 00305888 Registered Office ST Alfred Place London WOTE TOP

A4. BIBLIOGRAPHY

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A5. RECORD OF CONSULTATION MEETINGS

23.03.16 A site visit with LB Camden Planning and Conservation took place to introduce the project at an early stage to Camden Planning for feedback. Robert Loader (Conservaion Architect), Tania Skelli-Yaoz (LB Camden Planning) and Sarah Freeman (LB Camden Conservation) attended.

04.04.16. Robert Loader and Sarah Freeman discussed proposals by telephone.

A6.1 PLANNING POLICIES AND GUIDANCE

A6.1.1 This section summarises the national and local planning policies and guidance that are relevant when proposing changes to a listed building and conservation area.

A6.1.2 At the national level these are principally the National Planning Policy Framework (NPPF) and the Historic England guidance in 'Conservation Principles' and the Good Practice Advice. At the regional level the relevant document is the London Plan. At the local level, it is Camden's Core Strategy Policy, Development Policy and Planning Guidance.

A6.1.3 The common theme that runs through the guidance is that applications to alter a listed building should demonstrate an understanding of the significance of the building, that the impact of proposals on the building is based on that understanding, and that any harm to the building is balanced by other benefits.

A6.1.4 All the policies and guidance discussed here have been referred to during the evolution of the application scheme, and they form the background for the assessment of the scheme in Chapter 7 of this report.

A6.2 THE NATIONAL PLANNING POLICY FRAMEWORK

A6.2.1 NPPF Core Planning Principles

At the heart of the NPPF are twelve core planning principles. That relating directly to conservation states that planning should:

 conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

A6.2.2 NPPF Chapter 12 Conserving and enhancing the historic environment

Guidance on conserving and enhancing the historic environment is mainly contained in paragraphs 126-141 of the NPPF. The most relevant paragraphs that apply to the current listed building consent application are set out below. Paragraph 131 of the NPPF states:

In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

And Paragraph 132:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional.

And Paragraph 133:

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site;
 and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

And Paragraph 134:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

A6.2.3 Guidance to the definition of 'substantial harm' is given as follows in the NPPF Planning Practical Guidance, para 017:

Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

A6.3 HISTORIC ENGLAND GOOD PRACTICE ADVICE

A6.3.1 The Historic England Good Practice Advice documents have replaced the PPS 5 Practice Guide, and provide guidance on weighing-up the proposals that affect a listed building. From Guide 2 the most relevant paragraph is:

Curtilage structures

15 Some buildings and structures are deemed designated as listed buildings by being fixed to the principal building or by being ancillary within its curtilage and pre-dating 1 July 1948. Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (ie the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance. Listed buildings designated very recently (after 25 June 2013) are likely to define curtilage definitively; where this is (or is not) the case will be noted in the list description.

A6.3.2 Guide 3, The Setting of Heritage Assets sets out a 5-staged approach to proportionate decision-taking and assessing the impact of development on the setting of heritage assets. Steps 3 and 4 are most relevant to this application:

Step 3: Assessing the effect of the proposed development on the significance of the asset(s)

22 The third stage of any analysis is to identify the range of effects a development may have on setting(s) and evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s). In some circumstances, this evaluation may need to extend to cumulative and complex impacts which may have as great an effect on heritage assets as large-scale development and which may not only be visual.

Step 4: Maximising enhancement and minimising harm

26 Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development liable to affect its setting are considered from the project's inception. Early assessment of setting may provide a basis for agreeing the scope and form of development, reducing the potential for disagreement and challenge later in the process.

27 Enhancement (See NPPF, Paragraph 137) may be achieved by actions including:

- removing or re-modelling an intrusive building or feature
- replacement of a detrimental feature by a new and more harmonious one

- restoring or revealing a lost historic feature or view
- introducing a wholly new feature that adds to the public appreciation of the asset
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset, or
- improving public access to, or interpretation of, the asset including its setting

28 Options for reducing the harm arising from development may include the relocation of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements. For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement, and design quality may be the main consideration in determining the balance of harm and benefit.

A6.4 ENGLISH HERITAGE CONSERVATION PRINCIPLES

A6.4.1 In 2008 English Heritage published Conservation Principles, Policies and Guidance in which it sought to clarify the criteria by which buildings and sites should be assessed, and to define the type of change that may be acceptable.

A6.4.2 The guidance suggests that there are four different values that contribute to the significance of a building or place, which are:

- Evidential value: that it yields primary evidence about the past. This applies to archaeological deposits, but also to other situations where there is no relevant written record.
- Historical value: that it illustrates some aspect of the past, and thus helps to interpret the past; or that it is associates with an important person, event or movement.
- Aesthetic value: this may derive from conscious design, or from the work
 of a craftsman; alternatively it may be the fortuitous outcome of the way
 a building or place has evolved.
- Communal value: the symbolic role of a building or place, or the way a building contributes to the identity of a place.

The assessment of significance is usually an amalgam of these different values.

A6.4.3 The types of change (Ie, alteration or demolition), which may be acceptable, taken in light of the significance of the building or site. In paragraph 149:

Changes which would harm the heritage values of a significant place should be unacceptable unless:

- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an over-riding public policy objective or need;
- b. there is no reasonable practicable alternative means of doing so without harm;
- c. that harm has been reduced to the minimum consistent with achieving the objective;
- d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering:
- its comprehensive significance
- the impact of that significance, and
- the benefits to the place itself and/ or the wider community or society as a whole.

A6.4.4 In effect the paragraph above lays down similar terms for the justification of change to those given in paras 131-134 of the NPPF, but in wording that is relevant to the present case.

A6.5 REGIONAL PLANNING GUIDANCE

A6.5.1 London Plan Policies. The relevant policy in the London Plan is 7.8 Heritage Assets and Archaeology, and taking in paragraphs 7.29 to 7.32.

A6.5.2 The London Plan guidance for making planning decisions states that:

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed onsite, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

A6.5.3 Relevant paragraphs:

7.31A Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.

7.31BWhen considering re-use or refurbishment of heritage assets, opportunities should be explored to identify potential modifications to reduce carbon emissions and secure sustainable development. In doing this a balanced approach should be taken, weighing the extent of the mitigation of climate change involved against potential harm to the heritage asset or its setting. Where there is evidence of deliberate neglect of and or damage to a heritage asset the deteriorated state of that asset should not be taken into account when making a decision on a development proposal.

A6.6 LB CAMDEN'S CORE STRATEGY & DEVELOPMENT POLICY

A6.6.1 Camden's Core Strategy Policy CS14, Promoting high quality places and conserving our heritage states:

The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

- a) requiring development of the highest standard of design that respects local context and character:
- b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens; c) promoting high quality landscaping and works to streets and public spaces; d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible; e) protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.
- A6.6.2 Camden's Development Policy DP25. Conserving Camden's heritage gives more detail on the approach towards heritage assets and design:

Conservation areas

In order to maintain the character of Camden's conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas; b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

Listed buildings

To preserve or enhance the borough's listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention; f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- a) not permit development that it considers would cause harm to the setting of a listed building.

A6.6.3 The most relevant paragraphs of DP25 state:

Conservation Areas

25.3 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the existing. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration. The Council will consider the introduction of Article 4 Directions to remove permitted development rights for the removal or alterations of traditional details where the character and appearance of a conservation area is considered to be under threat.

25.4 Historic buildings in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving – preserving their special interest and ensuring their long term survival. For detailed advice on energy saving in historic buildings and conservation areas visit the English Heritage website and our Camden Planning Guidance supplementary document. Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment.

25.5 The value of existing gardens, trees and landscaping to the character of the borough is described in DP24 – Securing High Quality Design, and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees and/or garden space where this is important to the character and appearance of a conservation area. DP27 – Basements and lightwells provides further guidance on this issue where landscaping may be affected by basements and other underground structures.

Listed Buildings

25.12 The Council has a general presumption in favour of the preservation of listed buildings. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in Policy HE7 of PPS5.

25.13 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building. The matters which will be taken into consideration in an application for alterations and extensions to a listed building are those set out in Policy HE7 of PPS5.

25.14 Where listed buildings are being altered for the provision of access for people with disabilities, the Council will balance their needs with the interests

- of conservation and preservation. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs, and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions, and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.
- 25.15 The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it often can extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement.
- 25.16 Proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group. Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing and secondary glazing, more efficient boilers and heating/lighting systems, and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.

A6.7 LB CAMDEN'S PLANNING GUIDANCE 1 DESIGN

- A6.7.1 Camden's Planning Guidance 1, Design, contains Camden's guidance on towards conservation areas, listed buildings and sustainable re-use, and the application of Core Strategy Policy CS14 and development Policy DP25 Conserving Camden's Heritage. The most relevant paragraphs are listed below:
- 3.7 We will only permit development within conservation areas, and development affecting the setting of conservation areas, that preserves and enhances the character and appearance of the area (see Planning Policy Statement 5 (PPS5), policy HE8).
- 3.15 Conservation area statements, appraisals and management plans help guide the design of development in conservation areas and we take these into account when assessing planning applications.
- 3.17 A listed building is defined in the Planning (Listed Buildings and Conservation Areas) Act 1990 as a structure or building of special architectural or historic interest. These are included on the Statutory List of Buildings of Architectural or Historic Interest managed by English Heritage. Listed buildings are identified as heritage assets within the LDF and the Council is required to assess the impact that proposals to a listed building, or within their setting, may have on the historic significance of the building.
- 3.18 Listed buildings are graded according to their relative importance as either Grade I, Grade II* or Grade II. Grades I and II* are considered of outstanding architectural or historic interest and are of particularly great importance to the nation's heritage. The majority of listed buildings (about 94% nationally) are Grade II. However, the statutory controls on alterations apply equally to all listed buildings irrespective of their grade and cover the interior as well as the exterior and any object or structure fixed to or within their curtilage.
- 3.20 Most works to alter a listed building are likely to require listed building consent and this is assessed on a case by case basis, taking into account the individual features of a building, its historic significance and the cumulative impact of small alterations. The listing description is not intended to be exhaustive and the absence of any particular feature in the description does not imply that it is not of significance, or that it can be removed or altered without consent. Listed status also extends to any object or structure fixed to the listed building, and any object or structure within its curtilage which forms part of the land. You should contact the Council at the earliest opportunity to discuss proposals and to establish whether listed building consent is required.

- 3.21 Some 'like for like' repairs and maintenance do not require listed building consent. However, where these would involve the removal of historic materials or architectural features, or would have an impact on the special architectural or historic interest of the building, consent will be required. If in doubt applicants should contact the Council for advice.
- 3.22 In assessing applications for listed building consent we have a statutory requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. We will consider the impact of proposals on the historic significance of the building, including its features, such as:
- original and historic materials and architectural features;
- original layout of rooms;
- structural integrity; and
- character and appearance.
- 3.23 We will expect original or historic features to be retained and repairs to be in matching material. Proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them.
- 3.24 Applications for listed building consent should be fully justified and should demonstrate how proposals would affect the significance of a listed building and why the works or changes are desirable or necessary. In addition to listed building consent, some proposals may also require planning permission. These applications should be submitted together and will be assessed concurrently.
- 3.26 Some works that are required in order to comply with the Building Regulations (e.g. inclusive access, energy efficiency) may have an impact on the historic significance of a listed building and will require listed building consent.
- 3.29 We recognise the role that the historic environment can play in reducing the impact of climate change. For example, reusing existing buildings could avoid the material and energy cost of new development. There are many ways to improve the efficiency and environmental impact of historic buildings, for example improving insulation, draught-proofing and integrating new energy-saving and renewable-energy technologies. We will seek to balance achieving higher environmental standards with protecting Camden's unique built environment (in accordance with LDF Core Strategy policies CS13 Tackling climate change through promoting higher environmental standards and CS14 Promoting high quality places and conserving our heritage) and PPS5 policy HE.1.

A6.8 PRIMROSE HILL CONSERVATION AREA STATEMENT

- A6.8.1 The Conservation Area Statement identifies 42 Princess Road (the Caretaker's House) is an unlisted building that makes a positive contribution to the area. It does not identify the Caretaker's house as a listed building.
- A6.8.2 1-10 Waterside Place, just to the north of the school, are identified as 'negative buildings'.
- A6.8.3 The Conservation Area Statement gives guidelines for new development and alterations. The relevant paragraphs are set out below:
- PH10 In all cases, existing/original architectural features and detailing characteristic of the Conservation Area should be retained and kept in good repair, and only be replaced when there is no alternative, or to enhance the appearance of the building through the restoration of missing features. Original detailing such as door/window pediments and finials, porches, ironwork (window cills, railings), timber framed sash windows, doors, tiled footpaths, roof slates and tiles, decorative brickwork, timber shopfronts, where retained, add to the visual interest of properties. Where these features have been removed, replacement with suitable copies will be encouraged.
- PH11 The choice of materials in new work is important and will be the subject of control by the Council. Original, traditional materials should be retained wherever possible and repaired only if necessary. Generally routine and regular maintenance such as unblocking of gutters and rainwater pipes, the repair of damaged pointing, and the painting and repair of wood and metal work will prolong the life of a building and prevent unnecessary decay and damage. Where replacement is the only possible option, materials should be chosen to closely match the original. Generally the use of the original (or as similar as possible) natural materials will be required, and the use of materials such as concrete roof tiles, artificial slate and PVCu windows would not be acceptable.
- PH12 Original brickwork should not be painted, rendered or clad unless this was the original treatment. Such new work, whilst seldom necessary, can have an unfortunate and undesirable effect on the appearance of the building and Conservation Area. It may lead to long term structural and decorative damage, and may be extremely difficult (if not impossible) to reverse once completed. Re-pointing should match the original mix and profile as it can drastically alter the appearance of a building (especially when "fine gauge" brickwork is present), and may be difficult to reverse.
- PH24 Planning permission may be required for the formation of roof terraces. It is advisable to consult the Planning Service to confirm if this is the case. The creation of high level balconies where they will be visually intrusive or result in partial removal of the roof will be resisted. The enclosure of roof terraces should be constructed in metal set back behind the parapet and the access to the terrace should be designed to relate to the main building.

- PH25 Extensions and conservatories can alter the balance and harmony of a property or of a group of properties by insensitive scale, design or inappropriate materials. Some rear extensions, although not widely visible, so adversely affect the architectural integrity of the building to which they are attached that the character of the Conservation Area is prejudiced.
- PH26 Rear extensions should be as unobtrusive as possible and should not adversely affect the character of the building or the Conservation Area. In most cases such extensions should be no more than one storey in height, but its general effect on neighbouring properties and Conservation Area will be the basis of its suitability.
- PH27 Extensions should be in harmony with the original form and character of the house and the historic pattern of extensions within the terrace or group of buildings. The acceptability of larger extensions depends on the particular site and circumstances.
- PH28 Rear extensions will not be acceptable where they would spoil an uniformed rear elevation of an unspoilt terrace or group of buildings.
- PH29 Side extensions will not be acceptable where they are unduly prominent, unbalance the composition of a building group, or where they compromise gaps between buildings through which views are afforded of other properties, rear gardens, mature trees, or the Regent's Canal.
- PH30 Conservatories, as with extensions, should be small in scale and subordinate to the original building and at ground floor level only. The design, scale and materials should be sensitive to the special qualities of the property and not undermine the features of original building.

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