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Your ref:
Our ref: CMW/CWA/pl/1334
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Ms Tessa Craig
Planning Department, LB Camden
Town Hall
Judd Street
London WC1H 9JE.

BY EMAIL ONLY: tessa.craig@camden.gov.uk

Dear Ms Craig,

SITE AT 33 INVERNESS STREET, LONDON NW1
APPLICATION REF: 2017/6217/P

This practice acts for the Cavendish School, the site of which, at 31 Inverness Street, adjoins the above property. The school objects to the above householder planning application for the 'erection of front infill extension at second, third and fourth floor and mansard roof with front and rear dormer windows'.

The grounds of objection relate to the harmful impact of the proposed extensions on (i) the character and appearance of this part of the Camden Town Conservation Area (and the immediately adjacent Primrose Hill Conservation Area), and (ii) the potential for noise transmission from the school's adjacent plant room into the proposed roof level bedroom. Each of these matters is addressed below.

Preliminary comments on application documents

The Design & Access Statement (DAS) which accompanies the planning application does not provide sufficient analysis of the scheme's impact on heritage assets or the extent of compliance or otherwise with the Council Conservation and Design Guidance. For example, the statement fails to note that the adjacent terrace at 37 to 43 Inverness Terrace is statutorily listed grade II. Paragraph 128 of the NPPF is quite clear that *'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected.....the level of detail should be proportionate to the assets' importance and no more than sufficient to understand the potential impact of the proposal on their significance.'*

(i) Impact on heritage assets

Existing Context

The application property is the most easterly residential building on the south side of this part of Inverness Terrace. Its use, design, scale, age and character are associated with the listed residential

terrace at 37-43 Inverness Terrace which is located on the other side of the narrow access to the backland commercial site at number 35. To the east of the application site, the scale and character of the street changes, with slightly taller buildings and a mix of commercial and institutional uses.

The application property has been subject to extension and remodelling over the years but its restrained mid-nineteenth century character survives in both its overall form and its architectural detailing. It is a property which makes a positive contribution to both conservation areas. A recessed side extension at first and second floor levels was added in the early years of this century but this element is successfully subordinate to the host building because of its recessed position, lower parapet height, and respectful detailing. A very low and partially obscured roof extension has also been added but this has not harmfully altered the property's original character. The building's elegant style and verticality have survived these changes, and there would appear to be limited scope for further works, in particular to its front elevation.

Policy Context

Camden Local Plan Policies D1 and D2 lay down a strong expectation of high standards of design in new development including that within conservation areas or within the setting of listed buildings.

The Council's Design Guidance (CPG1) states, at paragraph 4.10, that extensions should:-

- be secondary to the building being extended, in terms of location, form, scale, proportions, dimensions and detailing;
- respect and preserve the original design and proportions of the building, including its architectural period and style;
- respect and preserve existing architectural features, such as projecting bays, decorative balconies or chimney stacks;
- respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space.

Para 4.16 of CPG1 says that side extensions should be '*set back from the main building*'. Paragraph 5.8 sets out the circumstances where roof extensions are likely to be unacceptable including where a building is higher than neighbouring properties.

The 'Camden Town Conservation Area Appraisal and Management Plan' states that the conservation area retains many diverse historic rooflines which it is important to preserve. Fundamental changes to the roofline, insensitive alterations, poor materials, intrusive dormers, or inappropriate windows, can harm the historic character of the roofscape and will not be acceptable.

Impact of Proposed Extensions

The proposed extensions would fundamentally and harmfully alter the appearance of the property. Rather than being a subordinate feature, the side 'infill' extension above ground floor level would align with the front elevation and would be full-height. The use of the glazing would add to the prominence of the extension which would unsympathetically dominate the façade, and would introduce a treatment not found on the front elevations of other period properties in the street. It would harmfully contrast with the rhythm of the conventional window arrangements of adjacent and nearby properties. In all these respects, the proposal would be in direct conflict with the requirements of CPG1.

The mansard extension would result in the property being well over one storey higher than the listed terrace to the west, and its glazed section would form a crude projection towards the adjacent school building. It should be noted, however, that the proposed roof extension would be located much closer to the street frontage than the existing plant room on the roof of the school building which is set far back so as to limit its visibility from the street. The mansard would therefore be a prominent feature which would be taller than the apparent height of the school building, and substantially higher than the neighbouring listed terrace.

The glass infill would also have the potential to create considerable light pollution during the hours of darkness in a way which would not be characteristic of a residential street where buildings have conventional fenestration.

The applicant's justification for these works appears to be based solely on the presence of the recently constructed Cavendish School classroom building to the east. The school's new building, which is located on a wider plot adjacent to the taller Camden House, replaced an open gap in the street which, historically, had been occupied by buildings.

The applicant's DAS suggests that the junction between the application property and the school building is important in that it signifies a point where the character of the street changes. This is correct but this is not considered to be a justification for seeking to unite number 33 and the school building. This would 'blur' rather than reinforce the contrast, and would undermine the distinctive visual qualities, scale and function of each building. The existing recessed frontage of part of number 33 not only reflects the subordinate nature of the side extension but also successfully marks the interface between these two parts of the streetscape.

It is also noted that a previous proposal to construct a mansard extension on the application property was refused at appeal in November 2000 (LBC ref: PEX0000389). The Inspector noted that the mansard roof, which would have been smaller than that currently proposed, *'would introduce a discordant feature out of keeping with the elevational treatment of the neighbouring listed buildings both when viewed from directly in front of the appeal property and, more particularly, when approached from a north-easterly direction'*. This important view along Inverness Street towards Gloucester Crescent is also noted in the Primrose Hill Conservation Area Statement.

Subsequent to the appeal, the Council again refused planning permission for a mansard extension on 18th August 2004 under reference 2004/2371/P. The reason for refusal cited the harm which would arise to the character and appearance of the host building and the conservation area, and to the setting of the adjacent listed buildings.

The side and roof extensions would therefore overwhelm the host property, to the clear detriment of the building itself and to the wider street-scene including the nearby listed terrace.

For all the above reasons, the school considers that the proposed side and roof extensions extension would harm the character and appearance of the host property and both conservation areas, and the setting of the listed buildings. As such, the proposal is considered to be in conflict with the development plan, including Camden Local Plan policies D1 and D2, and the advice set out at section 12 of the NPPF (in particular paras. 128, 131 and 132). The scheme also conflicts with the clear and detailed advice on extensions as set out in CPG1.

(ii) Potential for complaints against the school

The school is concerned that the proposal would introduce habitable residential accommodation (a bedroom) at roof level close to the school's roof level plant room. This could give rise to complaints from residential occupiers against the lawful operation of the school's heating and ventilation equipment.

Other matters

Without prejudice to the above objections, if the Council decides to grant planning permission, the school would strongly urge the authority to require the applicant to prepare and implement a Construction Management Plan (CMP) which would limit the impact of building and related works so that the noisiest works took place during school holidays. The CMP would also need to address the significant health and safety issues arising from works in the vicinity of the adjacent school entrance at 31 Inverness Terrace where pupils arrive at and collected from the school.

The Cavendish School therefore urges the Council to refuse planning permission for this proposal on the grounds of clear conflict with adopted planning policy, as stated above.

If the application is to be considered by the Planning Committee, please advise me in advance of time and venue of the meeting. In any event, I would be grateful to be advised of the Council's decision on this application as soon as it has been issued.



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