

14th March 2018

Planning Advice and Information Services

FAO: Mr Ben Farrant
Planning Solutions Team
London Borough of Camden
2nd. Floor, 5, Pancras Square
c/o Town Hall, Judd Street
London, WC1H 9JE

Dear Sirs,

**Re: Planning Permission Application 2018/0263/P and Listed Building Consent 2018/0931/L
for 3A, Mornington Crescent, London, NW1 7RH.**

We received a copy of the Design and Access Statement (D&AS) together with a brief note in our letter box in mid-February, 2018. Since we are both temporarily overseas at the moment, strongly object to the proposed alteration of the next-door property and feel that the comment area allocated in your planning notice may be insufficient, we have decided to put our comments formally in writing. For ease of reference, we have followed, where appropriate and in the first instance, at least, the format of the D&AS, we have then followed with the Heritage Statement (HS) and the Basement Impact Assessments (BIA) in the same order as the 19 parts included in the Planning Application.

THE DESIGN AND ACCESS STATEMENT

1. Introduction and Background

We have been the freehold owners of 4, Mornington Crescent, London, NW1 7RH since December, 1993 and are aware that the buildings in the Crescent are both listed and within a conservation Area.

We are concerned that the proposed extension and reconfiguration are completely incompatible with the character of the building and its listed and conservation status. We have never known the property to have had an extension at the rear other than which currently exists and there are no indications on the rear wall that there has ever been one at Ground Floor level although the rear wall has been resurfaced in its entirety at some time. We have no desire to inhibit Mr and Mrs Sebastian's wish to revive and upgrade their family home but would venture to suggest that an extension which increases their existing livable floor space by more than 30% ie. from a total of 72.8 Sq. M in the existing overall floor plan to 94.4 Sq M in the proposed plans (less stairs, hallways, patio's etc., in both cases) to be somewhat excessive. The insertion of "a much needed" third WC (to the best of our knowledge, there used to be a WC in the Lower

Ground Floor Bathroom/cupboard) in the property would also appear de trop in a flat housing only three people and might be environmentally indefensible. The possibility, according to the proposal plans, of having a minimum of eleven seats in the new Kitchen and Dining Room also appear somewhat excessive given the paucity of actual residents. We also believe the walls forming the balustrade up to the void above the Lower Ground Patio to be original garden walling by their form and not part of an earlier demolition.

Whilst, at this stage, we are unable to comment on the quality of the design proposal, we could not disagree more with the proposition that it respects and complements the host building and its listed status. It does neither. This structure would be totally at variance with the construction, materials and design of the original building. We agree that the current property does not fulfil all current Building Regulation Standards but being almost two hundred years old one could hardly expect it to!

2.1 Description

Essentially, No.3 Mornington Crescent has the same configuration as our property at No.4 as we suspect do the vast majority of premises in the Crescent. Access to the gardens at the rear is generally through a door at the Ground Floor level with a step or steps to the external ground surface. All the doorways we have seen are quite narrow and short but this on its own should hardly present a problem to redesign. We have never had a particular difficulty with the garden doors even to the extent of getting sizeable gardening equipment and a wheelchair through into the garden. As we stated in the last sentence of para 2 above we agree that a portion of external garden wall was "kept to form a balustrade to the patio below" as shown in the first photograph entitled "Existing rear elevation".

2.2 Planning History

Planning applications at 3, Mornington Crescent.

1. We are unable to comment on the conversion of 2 & 3 Mornington Crescent into flats since we are unable to access the planning applications on the London Borough of Camden (LBC) Planning Website. We are aware, however, that no two storey rear extension was ever built on the site at that time.
2. We did not comment on the 2007 application since this was solely an internal refurbishment.

We would point out that applications for planning proposals provided by TwistinArchitecture are neither relevant nor similar.

1. Application No. 2007/5235/L 6a, Mornington Crescent. Internal alterations only.
2. Application No. 2015/2042/P 5, Gloucester Crescent. Completely different type of building. It would appear that the Ground Floor could only be used for storage. Changes rendered site habitable and open for use.
3. Application No. 2007/5823/L 54, Gloucester Crescent. Again, completely different structure and neighbouring houses already had extensions.

4. Application No. 2013/2908/P 69, Arlington Road. Different type of building. Extensively damaged in 1940. Already had a rear extension.
5. Application No. 2014/6767/P 13, Arlington Road. Extension already in situ. Alterations to rear openings only.
6. Application No. 2015/3065/P 27a, Burton Street. Extension is single storey lower ground rear infill only.

Only one of these applications applies to Mornington Crescent and this was solely for internal alterations. All the remaining applications are some distance from Mornington Crescent for different types of structures two of which already had extensions and one had neighbouring houses with similar extensions. Burton Street would appear to be of a different character altogether.

However, we did note one application somewhat nearer to home which was refused.

Application No. PEX 0001054

LEX 0001055 1, Mornington Crescent. Erection of glass conservatory extension over existing open roof terrace.

Both refused on 12.02.2000.

2.3 Pre-Planning Advice

Since we had no knowledge of the pre-application nor of meetings and advice from Council planning and heritage officers, we are unable to comment on this. However, since most of what follows in the D&AS under this heading appears to be either conjecture or hyperbole serving the design teams propositions, we feel constrained to comment lest these are taken as factual. We will, however, reserve these comments to the main body of the proposal.

3. Proposal

3.1. Massing and Volume

The "slightly enlarged format" would in fact increase the existing usable space in 3A by over 30%. (See 1 para 2 above) The proposed extension will be visible not only from the adjacent buildings and windows but also from the rear of 1, Mornington Crescent, the higher floors in the Amptill Estate, Regent's Park Estate, parts of Park Village East and possibly HS2, when it is finally built, and even the upper floors of Greater London House. Hardly virtually invisible!

There would appear to be no practical purpose to the 1.2m gap to the boundary wall between No.'s 2&3 save to accommodate the new staircase which would, in turn have no use except for permitting easy access to the site for building purposes. Other buildings in the crescent only permit access to the gardens from the Ground Floor and no one surely wants to roll out of bed into the garden. The use of the staircase as a fire escape is surely spurious given that there are escape routes from the Lower Ground Floor through openings in the rear of the building, the front and up to the Ground Floor if necessary.

We could not object more strongly to the increase of height by "6 courses of brick" or at least 18 inches or 425mm to the party wall between our property at No.4 and 3A. A closer examination of the "Axo view" would suggest that the actual proposed roof will be even higher. Four of the five rear rooms at No.4 are bedrooms including the Basement and the Ground Floor. The Ground Floor bedroom of No.4 is already one of the coldest rooms in the house because the higher portion of the garden wall as it now stands prohibits the sun from warming it for only very short portions of the day. I have to use this bedroom because my handicap prevents me from using the staircase. Lack of sunlight and cold can only serve to aggravate my condition. The Basement of No. 4 is let by ourselves to a tenant who suffers from Diabetic Glaucoma which means that she has to avoid being in direct sunlight. The shaded nature of our rear patio is thus ideal for her since she has to work by night but she also has to sleep by day. Will she be able to with the noise of construction and will we be able to relet the increasingly darkened Basement when she departs? The trellis work and the bucolic appearance of the foliage has long been a bone of contention between our neighbours and ourselves due to further blocking of light and its nuisance value.

Despite the "excessive (sic) research which has unearthed "nothing detrimental", common sense would leave us to believe that the exposing of walls with unknown foundations and which have in all probability not seen the light of day in nearly two hundred years may very well have some very undesirable results.

We would consider that the design constraints rather than being due to "the original house" are largely self-inflicted on themselves by the designers.

3.2. Layout

We would venture to suggest that with proper and judicious internal alterations the existing flat would prove quite adequate to meet the needs of a growing family. It is not as if the internal dimensions of the flat are overly small. The addition of a third WC is hardly a necessity and we have never had any health or safety issues using the present access to the rear garden. The damp issues in the Basement are common to all the houses in the area and are readily solved with proper tanking. The final paragraph is merely self-congratulatory puff by the designers and not worth commenting on.

3.2.1. Ground floor

We would point out that the 'closet wing' type extensions in the crescent are not "poorly envisaged and executed". They are simply old. They are functional and have no more detrimental impact on the buildings design and historic assets than this new proposal - and at least they match for the most part in brickwork and style.

The "existing access" is hardly a problem for a brickwork solution but is likely to be far more so for large concrete beams and glass panels.

The Design Team appear to believe that size and width are not a problem but when combined with excessive height as in this case, there is an aesthetic requirement which when combined with the practicalities render this a non sequitur. Their desire to "limit the disruption to the building's fabric" and to "expose the rear brick wall internally" to preserve the whole elevations to be seen without obstructions is

a nonsense. Who is to see the internal brick walls unless they are in the flat or stand in the garden and we suppose that we must assume that the new extension will be invisible?

We have already commented on the "much needed" ness of the WC but would imagine that some of the other residents in the building might object to the loss of some stair space and opening the front door with the knowledge that there will be a hidden WC just over the threshold.

3.2.2. Lower Ground Floor

We have already commented that the Ground Floor extension will only result in the extension of one bedroom. The adjacent staircase has no practical use in reality and will have absolutely no benefit as regards the functionality and flow within the house as a whole or, indeed the Basement. As for the additional fire escape, this is **not** Grenfell Tower but a Basement and Ground Floor flat with adequate means of escaping a fire.

As for the "limited effect" this proposed extension will be supposed to have, we hesitate to quote HRH Prince Charles but this will be "a monstrous carbuncle" if ever there was one! We have already pointed out that the supposed invisibility of this project is pure fiction. We would wish to point out that the drawing of the "proposed extension" under 3.3 is simply part of this fiction. Mansard windows on all the buildings have been omitted and the angles between No.3 and No's 2 and 1 have been considerably widened to make them look much further away. While it is true that some of the windows directly above Flat A are from the stairwells and corridors, the remaining three on the right hand side are from habitable rooms. We have already remarked on the four bedrooms in No.4 which are adjacent to or above this proposed extension and on the number of buildings/facilities which overlook it.

3.3 Appearance, Materiality & Context

A massive waste of paper replete with Designer's "Puff" and hyperbole. Our comments above particularly the second paragraph of 3.2.2. stand. In reality, there is no valid reason why this extension could not be completed in brick to match the existing structure, if, indeed, it should be built at all. The desire to have "high quality glazing elements, and a thin, elegant fair-face concrete element gently touching the original brick wall" if not manifestly ridiculous, is purely a present day designer fashion statement much as the Victorians rushed to install "closet wing" type extensions. At least, the Victorians had a valid purpose for extending.

3.4. Sustainability

We do not see the erection of hoardings, a minimum of three to four months build time and noise, dirt, dust as ensuring "minimal discomfort to the neighbours". In the last few years this area of LBC has had excavations for new sewers/water mains, the on-going internal refurbishment of Greater London House and the never-ending turmoil of HS2. We really have no need of and further disruption - particularly of the completely unnecessary variety.

3.5. Access & Amenity

We have already commented on the supposed access issues to the garden. We were of the belief that a ruling had been made regarding the ecological desirability of maintaining natural grass areas where possible. Is re-paving really justifiable?

3.6. Flooding & Surface Water

No comment on flood risks. We are unable to see from either the plans or the drawings how rain water will be collected and connected to the manhole access to the sewer.

3.7. Landscape & Foliage

Anything which keeps the current foliage from extending into the Garden, Basement, blocking the view and reducing the available light can only be welcomed.

4. Planning Policy Compliance

We are not conversant with Camden Local Plan 2017 Policies D1 and D2 and given the relatively short amount of time we have had to study this proposal, we thought it better to study the actual proposals as submitted and leave comment on whether or not they are compliant to the experts at LBC.

However, we can see nothing in the Design Teams statements which have not been proclaimed ad nauseam in the D&AS.

THE HERITAGE STATEMENT

On an initial reading of the Heritage Statement (HS) we were inclined to believe that it could have more appropriately begun with "Once upon a time..." It then proceeded from item 7.0. on to become a design concept paper simply to reinforce the blurb and hyperbole of the D&AS. That said, however, the actual historical part was quite well researched and written.

We noted that Mornington Crescent was Grade 11 listed on 14th. May, 1974 and designated a Camden Conservation Area on 11th. November, 1986. On 15th. March, 1973 ie. before the crescent was listed, a planning application was made to cause inter alia the erection of a two storey extension to No.2. This was never built although planning permission was given with the proviso that " All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building". If that were the case in 1973, how much more pertinent is it today? Also the HS author states that a careful examination of the 1972 plans "showing a rear addition at ground floor which has subsequently been removed." It should be noted that the area on the plan is actually labelled "basement". We also felt that the photograph at Fig. 6 was not accurate and that there was not much point in showing Arlington Road as "surroundings" Page 9 Fig.2.

ITEM 5. THE SIGNIFICANCE OF THE SITE is not enhanced by the author's personal comments ie. 5.5 "much reduced complexity and attractiveness", "eroding the quality of the facades" 5.7. "a pleasing rhythmic pattern", 5.11 "detracts from the overall historic character" etc., etc. The author has entirely restricted her comment on the visibility of the proposed extension to ground level and even then, the last two sentences are simply untrue. It will be plainly visible from the rear, from the street at ground level if one is tall enough and from the neighbouring/adjacent upper windows if you are not. We have also mentioned previously that it will be plainly visible from neighbouring high rise blocks and from across the railway lines particularly with the demolition of the railway maintenance sheds for HS2.

ITEM 6. PLANNING POLICY CONTEXT. It is our belief that according to the outline of Camden Local Plan D1 para. 7.2. at HS Page 45 para 6.8. meets none of the requirements. Page 47. Camden Planning Guidance, Para4.10. plainly ignores the first 5 points, particularly No.5 which prohibits causing "a loss of amenity to adjacent properties with regard to sunlight, daylight"etc., We have already pointed out the detrimental effect of the proposed structure to the already problematic situation regarding heat and light at No.4. Points 4.11 and 4.12 are also ignored in that nowhere in the design statement or anywhere else are we given any indication of the height of the proposed extension. There have undoubtedly been many alterations both internal and external to the buildings in Mornington Crescent in general and to No. 3 in particular since the area was first built up in 1820. " By the mid 20th. Century, however, the layout had evolved to a footprint similar to that which survives today..." Very much has been made of the projecting "Element" which was allegedly demolished in 1976. Let us lay that canard to rest once and for all. It was **not** demolished after 1976, nor were any additions made after 1974. We have been in contact with a previous owner of flat 3A who lived there from 1976 until 2003 and who can attest to this. The status quo should therefore be maintained at the date of listing ie. 1974 in our opinion.

ITEM 7. THE ASSESSMENT OF THE PROPOSALS. This reads very much like the D&AS and contains much of its verbiage and inaccuracy. These have been refuted by ourselves elsewhere.

ITEM 8. CONCLUSION. Again, largely puff and spin : "the front and rear garden setting of the building will be maintained." It could hardly be otherwise since the entire project only involves a " rear extension"!

BASEMENT IMPACT STATEMENT

BY Croft Structural Engineers

We understand that this is purely an initial assessment and it certainly looks like one. Have we indicated the correct building in Fig.1? We think it looks like No.2! Stage 3 mentions "visual inspections of adjacent properties". We would appreciate knowing when and how it proposed that these inspections will take place. Page 26 para 4 mentions "risk of movement in neighbouring property". Which one? Page 29 mentions the installation of a pumping system. Has any account been taken of the amount of noise that this will produce? Do they expect that much water when the ground water table is at 7M?

We are informed that work will take place between 08.00hrs. and 17.00hrs. daily and that the noise will be " reduced and muffled by works being taken underground" Our tenant at No. 4. Basement has perforce to sleep during the day time. Not much rest for her then! The erection of an 8ft. hoarding around the works will undoubtedly provide "security to the site". What about the neighbouring premises? We would

suggest that such a hoarding will only serve to entice and assist those with bad intent. Page 33 suggests that the local impact will be minimised. How? With Construction Traffic, Loss of Parking Places, Noise, Dust and Dirt, the local impact will be greater than for HS2.

APPENDIX A. STRUCTURAL CALCULATIONS. It would appear that one (which one is not disclosed) of the internal height measurements will be 2,800mm. That is surely higher than the internal measurement of the rooms in the present building which is of an age when tall interiors were the norm!

APPENDIX B. CONSTRUCTION PROGRAMME. Apparently it will take 7 months to monitor adjacent structures both before and after construction. We would suggest that it may take considerably longer. Enabling Works, Basement Construction and Superstructure are to take six months. It is obvious that from the size of the project that the residents of No. 3A will have to move out of their accommodation during the progress of the works. It is unlikely that we of the adjoining and neighbouring properties will have the same privilege and will have to remain in situ throughout the entire project. We do hope that they will realise that 12 people will be completely inconvenienced for the whimsical desires of three.

APPENDIX C. STRUCTURAL DRAWINGS. The Ground Floor Plan Height is "to be confirmed by the architect". That is nice to know. Could this be because he will make the height as tall as he believes he can get away with?

APPENDIX D. CONSTRUCTION SEQUENCE. Phase 1 "Demolish the existing rear retaining wall" - Not our half. Builders should be warned to expect Court Action before this takes place.

STRUCTURAL MONITORING STATEMENT. 1. Risk Assessment. Removal of load-bearing walls - again, not ours. Building movements are not expected to be excessive - any movement on our property will be regarded as excessive. We shall wish to appoint our own Party Wall Surveyor and Structural Engineers.

ASSET SEARCHES. We have no comment.

BASEMENT IMPACT ASSESSMENT FACTUAL REPORT

By Maund Geo-Consulting

We noted that this was an "Assessment only - No guarantee of accuracy or completeness". Nice to know! We noted also on The Exploratory Location Plan Page15 that No.3A lies somewhere between No.'s 1 and 5. No.'s 2 and 4 did not rate a mention! At 5.4 M the Ground water evidenced "slow seepage." Could this possibly be the reason that No.3A has damp problems in areas of the Basement and general basement dampness in the immediate area has resulted in lower sale prices? N.B. At this stage, No.4 has no evidence of damp in the Basement due to correct management.

SECTION DRAWING. Foundation exposure showed 70mm. of concrete footing. "Extent not proven on neighbour's side". Perhaps not now, perhaps not ever?

There was also no explanation of the Geotechnical Laboratory Test Results. This may be alright for a Geotechnical Engineer but it is only a series of unintelligible charts to the layman. Perhaps that was the whole idea!

Conclusion

We remain astounded that people who have lived in our neighbourhood for the last four years are prepared to submit their neighbours to over six months of disruption and discomfort while they move away simply to secure a few square meters of extra space. For many reasons, including those which we have expressed above, this proposal is completely unsuitable. It is our considered opinion that not only planning permission but also listed building consent should not even be considered in this instance.

With apologies for the length of this but it is, at least, shorter than the applications.

Yours sincerely,

A black rectangular box redacting the signature of M.I.S and T.V. Finnerty.

M.I.S and T.V. Finnerty