



Kristina Smith

Planning Officer
Regeneration and Planning
London Borough of Camden

5 Pancras Square
London N1C 4AG

Date: 27 June 2018
Ref: 91 Regents Park Road

Dear Kristina Smith,

91 Regents Park Road

Please find attached materials to support a revised application for the above development.

We have revised and substantially reduced the scale of the proposed scheme in light of planning officer comments and in response to further engagement with the Primrose Hill Conservation Area Advisory Committee (PHCAAC).

Whilst these changes do not go as far as recommended, we feel they are a substantive response that results in a scheme that now fully accords with policy and guidance.

The following comments were received in response to our first application.

- Officer comments (e-mail from Kristina Smith to Alexander Martin dated 15th January 2018)
- Further comments from Mr Richard Simpson the Chair of PHCAAC dated 7 February 2018.

We address the points raised under the headings below with further amplification in the attached revised Design and Access Statement and an Addendum.

The Addendum explores in some detail the particular circumstances of the site and the substantially lower impact of the revised development on the setting.



Amendments

We have made the following amendments to the scheme:

- Reduced the scheme by 1-storey to reduce the overall massing and retain more of a gap and view of the “historic rear elevation”
- Introduced a ‘book-end’ flanking gable wall with a pitched slate roof and dormers to the front and rear
- Removed the glazed link
- Retained the existing configuration on the existing Laundromat shop front.
- Matched the same fenestration proportions and similar detailing on the front facade so that it reads more laterally as a subordinate extension of the main corner building.

Overall scale and height of the proposed rear extension

Comment

Officers consider that the addition of further storeys over and above the existing ground floor level is considered unacceptable. The existing Laundromat reads as a rear garden infill structure and marks the transition from the primary street to the secondary street, thus maintaining the hierarchy of street pattern and allowing the pattern of development to be understood, as per the opposite side of the street. The proposed extension would mask this relationship and compete for dominance with no.91. It is not a subordinate addition as required by design guidance (CPG1).

The advisory committee notes that the application property is recognised in the Primrose Hill Conservation Area Statement as making a positive contribution to the character and appearance of the conservation area where the importance of the building, and especially the side elevation to Erskine Road, is given special recognition as one of ‘Two prominent corner buildings [which] define the entrance to Erskine Road’ (Statement p. 18).

The advisory committee also notes that this prominence and significance partly depends on the scale of the main building, but also on the contrast with the low building to the rear, that is, in the case of 91, the single-storey ‘laundry’ building. This significance is enhanced by the parallel massing of the building facing on Erskine Road, no. 89 Regent’s Park Road, which, too, has a single-storey building to the rear. This pattern is significant in the character of Erskine Road the entrance to which is ‘defined’ (Statement p. 18) by these two facing buildings.

The committee further notes that significance is further enhanced by the distinctive massing of the north side of Erskine Road, where the neighbouring building to the application site is also a single storey ‘lodge’, with the substantial former organ



factory (currently being restored) beyond. This pattern of lower and higher massing is also characteristic of the conservation area. It also contributes to a sense of openness, which is an important element in the character of the conservation area.

Response

There is much larger than the usual gap of approximately 23.4m between the rear of No. 91a and three-storey industrial Leeder House building facing Erskine Road. The proposed rear extension No. 91a will narrow the gap, although a substantial gap will remain.

The independent heritage appraisal by Donald Insall Associates (4.2.2) accepts that the extension would obscure the rear of No.91 and will reduce the visibility of the rear elevations of Nos.93-95 Regent's Park Road. However, it concludes that;

'these rear elevations make only a modest positive contribution to the Conservation Area, whilst the proposed extension would provide an enhancement through good design;'

This remaining gap will still be one of the largest and most generous in the area.

The remaining gap will continue to allow views to the greater part of the rear elevations of Nos.93-109.

The attached DAS Addendum examines the nature of the gap and the impact of development, particularly section 2.1.

The eastern and western sides of Erskine Road are dissimilar in terms of the character, form and height of buildings and the continuity of the street wall.

The eastern side, including the flank of No. 91a, is far more irregular with a predominant commercial/industrial character.

The west side of Erskine Road is residential in character with only a narrow gap between Lemonia restaurant and the dwellings. At the northern end, there is no gap whatsoever.

No 91 contain a bold pediment feature facing Regents Park Road and an equally bold and richly detailed pediment facing Erskine Road. This points to the equal importance of the two facades with the Erskine Road elevation in no way inferior or of lesser importance. The significance of the corner, referred to in the conservation area statement and highlighted by the CAAC, is exemplified by the boldness of scale and richness of detailing of this corner. The proposed rear extension and the



modest scale of the Erskine Road elevation in no way detract from the dominance of this corner. The proposed gradual stepping up in height from the single storey substation up to the pediment of the main building is considered an appropriate urban design response.

Maintaining views of the rear elevation of Nos. 91-109 from Erskine Road.

Comment

Officers considered that the loss of the highly visible, historic rear elevation of the positive contributor is not supported. Neither is the loss of the gap, which, as stated, allows the street development pattern to be interpreted, and neither is the loss of views through this gap, giving an openness that is an important characteristic of the conservation area.

Response

The rear elevation is highly visible as a result of the uncharacteristically wide gap between No 91 and buildings to the rear. It is an overstatement to say that this view will be 'lost' or even significantly diminished. The remaining gap will be twice as wide as the equivalent gap at the north end of Erskine Road.

The independent heritage appraisal prepared by Donald Insall Associates (page 36) concludes that:

'The proposals would result in a meaningful gap being retained and views across the rear of the terrace would be maintained over the roof of the single-storey substation adjacent to No.91a. Restricting the view of these mediocre elevations would cause minor harm, which would be mitigated by good design.'

Two medium-sized Birch street trees that sit immediately in front occlude the view through the gap to the rear of No. 91.

The rear elevation of No.91 is much plainer than its street-facing façades and is largely a plain blank brick wall. It is even reasonable to speculate that the uncharacteristic absence of window openings on most of the rear elevation was in anticipation of a rear extension.

The established layout pattern includes gaps on corners (as the conservation area statement recognises). However, this is far from a universal pattern.



The gap is typically created or maintained where the rear of a dwelling meets the flank elevation of an adjacent dwelling. The pattern breaks down (or was never originally present) in commercial development nor at the interface between commercial and residential development.

The treatment of the street corner is typically defined by the following scenarios:

- 1.) In some cases the street corner is formed by a continuous street wall of two and sometimes three-storey development.
- 2.) In other cases, the gap has been in-filled by later development.
- 3.) In some instances, it is clear that there was never a gap as part of the original development pattern.

The mixed residential and commercial character of the area is an important part of its historical development. This distinction is recognised in the conservation area statement (area 3).

Retrospectively imposing a historic residential inner suburban residential pattern upon a mixed commercial area will erase this more complex urban morphology.

Detailed Design

Comment

Offices considered the detailed design was at odds with the historic environment with large and stark fenestration and an incongruous glazed link. The mansard roof is not characteristic of the area.

Response

The rear extension has been completely remodelled. Traditional glazing, window frames and architraves have been added to the openings to match the host building.

The mansard has been removed and the roof remodelled with a pitched slate roof and dormers facing Erskine Road. The rear 'book-end' gable wall has been remodelled with a pediment that faithfully follows the treatment of the main building.

The glazed link has been removed.

The existing configuration on the Laundromat shop front has been retained to match the same fenestration proportions and similar detailing on the front facade so that it reads as a subordinate extension of the main corner building.



The proposed rear extension now faithfully replicates the forms, characteristics, details and materials of the original building.

The approach now fully accords with conservation area policy PH27, which requires that 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.

Roof Dormer

Comment

Officers considered that the dormer is insufficiently subordinate and an unsympathetic addition to the roof slope that will be prominent in views from Erskine Road.

Response

The independent heritage appraisal prepared by Donald Insall Associates concludes: (page 36)

'Introduction of a dormer would be barely perceptible, it would be obscured behind the gables of No.91 and the proposed extension and so the impact on the Conservation Area would be neutral.'

The proposed dormer follows in the pattern of development of similar sized full width dormer extensions to neighbouring properties along the terrace block Nos. 93-109. The dormer is set in by approximately 1.1m from either side of the gable walls and is proportioned similarly to those in adjoining properties, relative to its plot width.

There is already planning permission in place for a dormer extension to No. 91 Regents Park Road, so the principle of such an extension in this location has already been approved.

Policy tests

Comment



The CAAC advise that the proposal would also constitute a rear extension to the main building, and as such falls to be assessed under the policy guidance for rear extensions in the PHCA Statement, PH25-27 at p. 33, which makes clear that some rear extensions 'can adversely affect the architectural character of the building to which they are attached', so prejudicing the character of the CA (PH25); such extensions in most cases should be no more than one storey high (PH26); and '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' (PH27). The PHCAAC advises that the application goes against all these tests.

Response

It is worth considering the full text of the guidelines.

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.

The proposed rear extension has been substantially reduced in height and the roof form has been remodelled, further reducing the overall bulk and scale. The design and appearance of the extension have been revised so that it faithfully reflects the design and appearance of the host building. The architectural integrity of the building has been maintained in accordance with guideline PH25.

Guideline PH26 cannot be read as a prohibition on extensions above a single storey. In all cases proposals must be judged on their merits, in the particular circumstances, and whether they enhance or result in harm to the conservation area. Guideline PH27 highlights the fact that the 'acceptability of larger extensions depends on the particular site and circumstances'. It is therefore crystal clear that the guidelines must not be interpreted literally, but applied to the particular site and circumstances.



No.91 is a corner building in a historic mixed commercial area. There are many examples of developments 'turning the corner' with a lower, but nevertheless substantial building form on the rear flank elevation.

Public benefits

The Donald Insall independent heritage appraisal of the first application scheme concludes that overall no harm is caused to any of the heritage assets identified in the study. The scheme has nevertheless been substantially revised.

This must all be weighed in light of the significant public benefits arising from the scheme including (paragraph 20 of the NPPF):

- The heritage benefit of reinstating the original appearance of No.91 Regent's Park Road through the removal of render and repointing of the brickwork.
- The heritage benefit of removing detracting elements from the façade of No.91, including surface-mounted services and cabling.
- The wider public benefit of providing additional homes within the borough.

Amenity

Comment

Officers considered the extension would have an overbearing and unneighbourly impact on the rear windows of the nearest residential property at No. 93 Regent's Park Road.

The Advisory Committee notes its concerns at para. 6 of their December advice on the amenity of neighbours.

Response

The overall height and massing of the rear extension has been substantially reduced. Any overbearing effect will have been reduced proportionately.

Legal Agreement

Comment

Officer's considered that there were a number of concerns that should be addressed by way of a planning obligation.



Response

We agree to enter into an agreement to provide forth the following:

- An affordable housing contribution.
- Submission and approval of a Construction Management Plan (where this cannot be secured by way of a planning condition).
- Highways contribution.

Sustainability

Comment

Officers request submission of a sustainability plan/energy statement.

Response

Please find attached a sustainability plan/ energy statement.

Yours sincerely,

Alexander Martin

Partner

Attachments

DAS

DAS Addendum

Sustainability Statement

Construction Management Plan Pro forma

cc



Zam Kesh

David Jen/Alexander Martin, Alexander Martin Architects