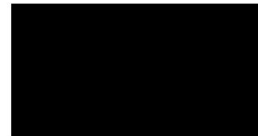


Date: 16th July 2018
Our Ref: 18.5127

Charlotte Maynell
Planning Department
Contact Camden Reception
5 Pancras Square
London
N1C 4AG



Dear Charlotte,

Re: Objection to planning application “installation of new roof above existing conservatory to ground floor flat” at No 22 Avenue Road, London NW8 6BU – ref 2018/2252/P

We write to you on behalf of a neighbouring resident with direct views of the proposed works. We object strongly to the proposal, and support the objection also made by the Conservation Area Advisory Committee (CAAC), highlighting the poor quality design of the proposal, and in particular the choice of materials.

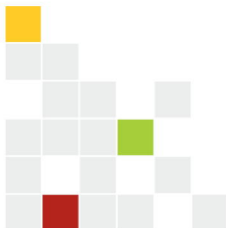
As officers will be aware, the application site is within the Elsworthy Conservation Area, and so the proposals will directly impact upon a designated Heritage Asset. The National Planning Policy Framework (NPPF) states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (Paragraph 134).

More broadly, the NPPF advises that sustainable development includes the need to replace poor design with good (paragraph 9), that planning should always seek to achieve high quality design (paragraph 17) and that overall the government attaches great weight to the importance of the design of the built environment.

This guidance is echoed at local level, with Camden Local Plan Policy D1 Design advising that the Council will seek to secure high quality design, and that this includes the requirement for the materials of proposals to be of quality, and to compliment local character and appearance.

The application site is noted by the townscape plan supporting the Elsworthy Conservation Area as being a negative building that detracts from its overall quality and appearance. It is also noted by paragraph 6.70 as being “somewhat dominant” in the streetscene. The need therefore to ensure that any works to this building at the very least preserve or enhance the character and appearance of the Conservation Area is particularly significant.

Whilst the application site is noted for its negative qualities, in its favour is its current use of materials which do indeed reflect those of the surrounding area – and as per policy requirements. The use of red stock brick, a black tiled roof and timber framed windows are all reflective of the primary materials used in the area, as identified by paragraph 3.13 of the Conservation Area Statement.



The application relates to an apartment block originally granted permission in 1984 – ref 8401577. This was then extended in 1989, ref PL/8804367/R1, and it is the roof of this extension that is the subject of the current planning application. The 1989 approval included a condition requiring external works to be carried out in materials that match those of the existing building, to ensure that the external appearance of the building was satisfactory. Whilst much has changed since 1989, the qualities of the Conservation Area and the need for its protection has not. The requirements of this condition are therefore as relevant today as they always were – and perhaps these have even been amplified by ever growing demand for new development.

The application is to cover the glass roof with fiberglass over a plywood frame. The fiberglass is to be grey coloured, to match existing leadwork. The use of fiberglass does not reflect any of the existing materials within the existing host property, but also of any neighbouring properties. The proposed materials therefore are alien to the area, and fail to comply with Local Plan Policy D1 Design – specifically part e).

Furthermore, the submitted Design and Access Statement provides no justification for the proposed materials in heritage or design terms, other than to advise that it will improve heat retention, provide privacy and be less susceptible to damage than the existing glass roof. None of these points relate to how the proposals meet the legislative requirements to preserve or enhance the quality of the Conservation Area.

Whilst the improved energy performance of the roof may be of some benefit, no evidence is actually provided demonstrating that this is the case. The suggested privacy benefits appear spurious, as they relate to incidental views at obscure viewing angles. Finally, the use of toughened glass to provide safer environments is well established, and in itself no justification for the proposed use of a fiberglass.

The proposed fiberglass roof is therefore a low quality proposal, made of materials that are alien to, and that do not reflect those of the host building or wider Conservation Area. The host properties dominance in the street amplifies the need for any new development proposals seeking its alteration to enhance its appearance, and so lessen its already negative impact upon it. Policy D1 “Design” of the Local Plan advises that the Council will resist development that fails to take opportunities to improve the character and quality of areas. Camden Local Plan Policy D2 Heritage echoes the NPPF, advising that proposals that cause less than substantial harm to designated Heritage Assets will be refused planning permission unless they can outweigh this harm in wider public benefits.

There are no public benefits to this proposal, and so we respectfully ask that the current planning application is duly refused planning permission.

Yours sincerely



Adam Wilkinson BSc, MRTPI
Associate Director



Boyer