FOURTH FLOOR FLAT, 31, GLOUCESTER AVENUE, LONDON, N.W.1.

A REPORT ON PROPOSALS FOR AN EXTENSION TO THE FOURTH FLOOR FLAT AT ROOF LEVEL, APPLICATIONS 2019/0468/P AND 2019/1216/L

1. INTRODUCTION

1.1 This report has been prepared by Chartered Architect, Paul Velluet, on behalf of the owners of the third floor flat in the application property, in support of their objections to the current applications for Planning Permission and Listed Building Consent submitted by Plainview Planning on behalf of the owner of the fourth floor flat.

1.2 This report has been drafted further to inspection of the application property from street level from Gloucester Avenue, Regent's Park Road and Regal Lane; from careful inspection of the 'as existing' and 'as proposed' drawings and *Planning & Heritage Statement* submitted in support of the applications for Planning Permission and Listed Building Consent*; and with regard to the earlier proposals of 2018 - references 2018/1123/P and 2018/1682/L – and the Council's decisions of the 6th June, 2018 on those applications, and to the relevant national, London-wide and local planning policies and guidance. * Importantly, at the time of drafting this report, it is noted with concern that anomalously the documentation submitted in support of the application for Listed Building Consent – including the application-form - has not been uploaded on to the Council's planning web-site. Accordingly, for the present, and in the absence of any covering letter, it is assumed, until otherwise advised, that the drawings and statement submitted in support of the application for Planning Permission are the same as submitted in support of the Listed Building Consent.

1.3 This report concludes that:

- Even were the proposals acceptable – and we submit that they are not - any decision to approve the submitted applications would be entirely premature in the absence of complete and accurate 'as existing' and 'as proposed' drawings showing the application property.

- The proposed bringing forward of the front wall of the fourth floor flat towards the existing roof-parapet of the property by 1.711 m., combined with its vertical face, would exacerbate rather than mitigate the already unsatisfactory external design of the existing roof-extension and its effect on the original, architectural and historic integrity of the property and the listed terrace of which it forms an integral part, thereby failing to either preserve the particular special architectural and historic interest of the listed terrace or to sustain its particular significance, and harming its particular interest and

significance, contrary to the relevant national, London-wide and local planning policies and guidance.

- The proposed bringing forward of the front wall of the fourth floor flat towards the existing roof-parapet of the property by 1.711 m., combined with its vertical face, would exacerbate rather than mitigate the already unsatisfactory external design of the existing roof-extension and its effect on the character and appearance of the Primrose Hill Conservation Area, thereby failing to either preserve or enhance its particular character or appearance or to sustain its particular significance, contrary to the relevant national, London-wide and local planning policies and guidance.

- That given the above, and the absence of clear and convincing justification for the proposals and potential public benefits that would outweigh the potential harm caused to the significance of the listed terrace and the failure to either preserve or enhance the character or appearance of the conservation area as designated heritage assets, the applications should be refused.

2. THE SUBMITTED DRAWINGS

2.1 Two of the submitted drawings are numbered 4079-00. One is titled 'Site Plan': the other is titled 'OS Map'. Confusingly, the drawing titled 'Site Plan' comes up in the list of drawings on the Council's planning web-site under the number '4079-04'. Even more confusingly, whilst this drawing appears to show the overall property including its garden, it doesn't show the position of the property in the listed terrace of which it forms an integral part, and shows the 'as proposed' roof- plan with the proposed inset terrace at the rear included in the earlier and refused proposals but omitted from the present proposals.

2.2 Referring to drawing number 4079-06 revision A – 'Plan and section of terrace - Proposed, the plan shows the existing roof-parapet and parapet-gutter at the rear of the fourth floor, but the section suggests the absence of any parapet-gutter. Confusingly, in drawing number 4079-01 – 'Plan – Existing' the 'as existing' plan of the fourth floor, show the rear of the flat as vertical wall with no sign of any roof-parapet or parapet-gutter. Similarly, 'as existing' Sections AA and BB in drawing number 4079-03 show the mansard-slope at the rear of the flat seated on top of the existing roof-parapet and omit the existing parapet-gutter altogether. Section CC in the same drawing is also incorrect in respect of the windows in the rear, mansard roof-slope. Finally, both drawings nos. 4079-02 and 4079-07 are also incorrect in showing the ground floor window in the front elevation of the application property as a single 2-over-2 sash-window, whereas, it comprises a pair of 2-over-2 sash-windows separated by a central box-mullion; by showing the proportions of the window-openings at first, second and third floor levels as stretched vertically; by showing the

flat-arched heads of the window-openings at third floor level abutting the band-course of the parapet; and by omitting all the features of the projecting portico.

2.3 Referring to drawing number 4079-02 – 'Elevations – Existing', the head of the central window in the existing, vertical face of the fourth floor flat is shown incorrectly; the windows in the rear, mansard roof-slope and their sub-division are shown incorrectly; and the arches above the window-openings in the rear elevation at first, second and third floor and above the window-openings in the rear projection at the intermediate levels between ground and first floor levels and between first and second floor levels are shown incorrectly – the window-openings have segmental arched heads and not flat arched heads, with the exception of the window-opening in the rear projection at the intermediate level between first and second floor levels, which has a semi-circular arched head. The sub-division of the window within that same opening is incorrectly shown.

2.4 Quite clearly, even were the proposals acceptable – and we submit that they are not - any decision to approve the submitted applications would be entirely premature in the absence of complete and accurate 'as existing' and 'as proposed' drawings showing the application property.

3. THE LISTED STATUS OF THE APPLICATION PROPERTY AND THE TERRACE OF WHICH IT FORMS AN INTERGRAL PART

3.1 The submitted *Planning & Heritage Statement* refers to the listing-entry for the terrace comprising nos. 15 to 31 (odd), Gloucester Avenue and quotes the accompanying description, rightly drawing attention to the error in the listing description in which it is stated incorrectly that no. 16 (sic) has a felted mansard roof and attic dormers, whereas the mansard roof is actually located on no. 15. The listing description is also incorrect in referring to a 'terrace of 9 (sic) houses', whereas the terrace actually comprises ten houses – no. 13 having been absorbed by no. 15. The listing description is further incorrect in stating that the slightly projecting end-houses are nos. 17 (sic) and no. 31, whereas they are nos. 15 (formerly no. 13) and 31. The listing description is also incorrect in stating that the entrance to no. 15 (sic) has been converted to a window, whereas it is the entrance doorway to the original no. 13 (now linked internally to no. 15) which has been converted to a window – the original doorway to the original no. 15 having survived unchanged.

3.2 The listing description is also deficient by omitting any reference to the important fact that the third floor storey of the terrace is contained in an 'attic-storey', in the proper sense, rising above the principal (dentil) cornice and frieze, and by omitting any reference to the architecturally relevant band-course and coping extending along the attic-storeys of nos. (13 and) 15, nos. 21 and 23 and nos. 29 and 31.

3.3 Confusingly, the applicants' consultants have adopted the Council's numbering of the property with the additional, mansard roof-storey (as used in the officers' report relating to the applications of 2018) throughout their *Statement,* namely no. 17, whereas the relevant property is really no. 15.

3.4 In paragraph 2.2 of the *Planning & Heritage Statement*, the applicants' consultants rightly draw attention to the 'relatively consistent ridge-line' of the terrace with the exception of the mansard-roof extension on 'Flat 17' (sic). However, they go on to suggest that the existing extension on 'Flat 31' (sic) 'only alters the roof line marginally', and 'is not readily visible from street level'.

3.5 It is quite clear from viewing the north-western end of the terrace from the large paved area in front of Cecil Sharp House at the junction of Gloucester Avenue and Regent's Park Road and from the footways to either side of Gloucester Avenue further north-westwards, that both the brick end-wall of the original terrace and the chimney-stack on the party-wall between nos. 29 and 31, Gloucester Avenue have been substantially extended upwards to accommodate the existing roof-extension containing the fourth floor flat in no. 31.

3.6 Coupled with the entirely inappropriate vertical, slated face of the existing roof-extension and its equally inappropriate fenestration, the existing roof-extension already has a demonstrably adverse effect on the original architectural and historic integrity of the property and the listed terrace of which it forms part, and on the character and appearance of the Primrose Hill Conservation Area.

4. THE CONTRIBUTION MADE BY THE APPLICATION PROPERTY AND THE TERRACE OF WHICH IT FORMS AN INTEGRAL PART TO THE PRIMROSE HILL CONSERVATION AREA

4.1 Camden Council's *Primrose Hill Conservation Area Statement* locates the terrace comprising nos. 15 to 31 (odd), Gloucester Avenue within Sub-Area 1 of the conservation area – Regent's Park Road South. Within this area, many of the early-to-mid-19th century, terraced and paired villas retain their original roof-profiles - the original, shallow, slated roof-slopes being concealed in part or in whole by the roof-parapets of the front facades.

4.2 Such a distinctive architectural feature as this roof-profile contributes positively to the particular character and appearance of the conservation area, whether or not the top-storeys of the front façades are contained in 'attic-storeys', in the proper sense, rising above the principal cornices and friezes of the facades. The listed terrace comprising nos. 15 to 31 (odd), Gloucester Avenue is one such group, only spoilt by the mansard roof-extension added to the original no. 15, and by the roof-extension added in past

years on no. 31. Any further roof-extensions on the terrace would clearly detract from the original, architectural and historic integrity and special interest and significance of the terrace, and, potentially, from the character, appearance and significance of the area too.

4.3 Anomalously, the listed terrace at nos. 15 to 31 (odd), Gloucester Avenue is incorrectly referred to as 'nos. 15-31 Regent's Park Road' in Camden Council's *Primrose Hill Conservation Area Statement*, but is correctly described, together with nos. 1-10 (consec.), St Mark's Square as 'grand terraces of listed houses with limited stucco detailing. These terraces are four storeys, with basements, and are narrow in width, with two windows to each floor. They are discretely designed to form symmetrical compositions. This symmetry is achieved through variations in form and decoration at the centre and/or ends of the terrace, including projecting sections and arrangement of porches'. On the basis that the listed terrace is embraced under the heading 'Regent's Park Road', then, as the applicants' own planning consultants rightly point out (in paragraphs 5.13 and 5.14 of their *Planning & Heritage Statement*) Policies PH 18 and 19 are relevant in the consideration of proposals for roof-extensions and alterations, where such 'extensions and alterations which change the shape and form of the roof are unlikely to be acceptable'.

5. THE POTENTIAL IMPACT OF THE PROPOSALS

5.1 To consolidate and further extend the existing roof-extension as currently proposed would clearly exacerbate rather than mitigate the already unsatisfactory external design of the existing roof-extension and its adverse effect on the original architectural and historic integrity of the property and the listed terrace of which it forms an integral part and on the character and appearance of the conservation area, thereby failing to either preserve the particular special architectural and historic interest of the listed terrace or to sustain its particular significance, or to preserve or enhance the character or appearance of the Primrose Hill Conservation Area or to sustain its significance.

5.2 Whilst it is recognised that the proposed bringing forward of the front wall of the fourth floor flat towards the existing roof-parapet of the property by 1.711 m. would have a lesser potential effect than the proposed bringing forward of a slated mansard roof-slope by approximately twice that distance, i.e. to the back face of the existing roof-parapet, as previously proposed and rightly rejected by the Council, the bringing forward of the vertical, slated face of the existing roof-extension, even if masked to each side by the existing chimney-stacks, would still have a material effect on the particular special interest and significance of the listed terrace and the particular character, appearance and significance of the Primrose Hill Conservation Area; particularly in views from the large paved area in front of Cecil Sharp House at the

junction of Gloucester Avenue and Regent's Park Road and from the footways to either side of Gloucester Avenue further north-westward.

5.3 The applicant's planning consultants suggest that 'The proposal will not appear out of keeping in the area given it is an extension to an existing flat' and that 'furthermore the nature of the 3+ storey buildings in the area means it will not have a major impact on the street scene and appear out of keeping in any event' (*Planning & Heritage Statement*, paragraph 3.10). Whilst they contend that the proposed extension at roof-level is 'modest in nature and retains the majority of the butterfly roof' and that 'there will be barely discernible visual change from the existing situation and that it will remain a subordinate feature to the main terrace' (*Planning & Heritage Statement*, paragraph 5.11), the applicants' planning consultants clearly concede in the same paragraph that the proposals 'represent less than substantial harm to the listed terrace'. They further imply that harm is effected to the significance of the terrace – be it 'less than substantial' - in setting out potential public benefits which, in their view, outweigh such harm in paragraphs 5.21 to 5.29 inclusive, (drawing upon the relevant policy set out in paragraph 196 of the *National Planning Policy Framework* of July, 2018).

5.4 However, even if such harm is accepted as 'less than substantial', the proposals still fail to preserve the special architectural and historic of the listed terrace, and so are contrary to Section 16 (2) and 66 (1) of the *Planning (Listed Buildings and Conservation Areas) Act, 1990.* Equally, they fail to preserve or enhance the character or appearance of the conservation area, contrary to Section 72 (1) of the *Act.*

5.5 In addition and importantly, Paragraph 194 of the *NPPF* states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration, or from development within its setting), should require clear and convincing justification'. No such 'clear and convincing justification' has been provided in the *Planning & Heritage Statement*, nor have potential public benefits been put forward in the *Planning & Heritage Statement* that outweigh such harm, taking into account the relevant guidance contained in *National Planning Practice Guidance* of April, 2014/February, 2018 (at Paragraph 020, Reference ID: 18a-020- 20140306).

5.6 As rightly identified by the applicants' planning consultants in Paragraphs 4.5 and 4.6 in their *Planning & Heritage Statement* the proposals and their potential effects need to be assessed against the relevant national, London-wide and local planning policies and guidance. In this connection, they cite Paragraphs 189, 193 and 196 of the *NPPF*; Policies 7.4, 7.6 and 7.8 of *The London Plan, 2016*; Policies D1 and D2 of the *Camden Local Plan, 2017*; published *Planning Guidance CPG 1- Design* of July 2015/March, 2018 and *CPG 6 – Amenity* of September 2011/March, 2018; and Policies PH 18 and Policies PH 19 in the *Primrose Hill Conservation Area Statement* of 2000. To these, might be

added Paragraph 194 of the *NPPF* and Policy A1 of the *Camden Local Plan, 2016* – Managing the impact of development.

5.7 In assessing the proposals against the relevant design and heritage related policies and guidance referred to in paragraph 5.6 above, it is considered that:

- The proposed bringing forward of the front wall of the fourth floor flat towards the existing roof-parapet of the property by 1.711 m., combined with its vertical face, would exacerbate rather than mitigate the already unsatisfactory external design of the existing roof-extension and its effect on the original, architectural and historic integrity of the property and the listed terrace of which it forms an integral part, thereby failing to either preserve the particular special architectural and historic interest of the listed terrace or to sustain its particular significance, and harming its particular interest and significance, contrary to the relevant national, London-wide and local planning policies and guidance.

- The proposed bringing forward of the front wall of the fourth floor flat towards the existing roof-parapet of the property by 1.711 m., combined with its vertical face, would exacerbate rather than mitigate the already unsatisfactory external design of the existing roof-extension and its effect on the character and appearance of the Primrose Hill Conservation Area, thereby failing to either preserve or enhance its particular character or appearance or to sustain its particular significance, contrary to the relevant national, London-wide and local planning policies and guidance.

- The top-floor is already a one-bedroom flat – it is not a tiny studio-flat. Under the proposals, it would still be a one-bedroom flat, and so not provide housing for more people.

- That given the above, and the absence of clear and convincing justification for the proposals and potential public benefits that would outweigh the potential harm caused to the significance of the listed terrace and the failure to either preserve or enhance the character or appearance of the conservation area as designated heritage assets, the applications should be refused.

Paul Velluet **27th March, 2019.**

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