

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/5075/P	Richard Simpson for Primrose Hill CAAC	15/11/2019 12:53:41	COMMENT	<p>ADVICE from Primrose Hill Conservation Area Advisory Committee</p> <p>6 November 2019</p> <p>46 Inverness Street NW1 7HB 2019/5075/P</p> <p>The Advisory Committee would wish to acknowledge that it has had extensive pre-app discussions on this proposal, and that our concerns have been substantially addressed.</p> <p>We do not object to the proposed house in principal. Our comments address three points.</p> <ol style="list-style-type: none"><li>1. The gap between the new building and the porch to no. 24 Gloucester Crescent (Listed) has been a matter of particular concern. We welcomed the gap, its width and height, as shown on application drawings 202 rev A, 210 rev A, and 222 rev A. But this is not shown consistently in drawings (for example the CGI). Given the importance of this gap we wish it to be stated that drawings 202 rev A, 210 A, and 222 rev A are the approved version.</li><li>2. The choice of brick: this has also been a matter of long-standing debate. The Committee has consistently preferred a darker brick to a lighter brick. We acknowledge that the brick used at the Cavendish School extension fits well in the street, but it is a larger building. We request that approval of the brick, and of the pointing form and colour, be reserved by condition for approval when sample panels can be assessed on site.</li><li>3. The Committee has welcomed the design in principal. Following careful discussion, we request that the window opening to the dining area at ground floor be extended, in the form of a panel of recessed but solid brickwork, to the first floor. This would follow the pattern of recessed bays established in the other openings to the front elevation, and would modify the blank wall above the ground floor opening. We would be happy to review sketches urgently.</li></ol> <p>Richard Simpson FSA Chair</p>

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2019/5075/P	Sarah Hill	22/11/2019 09:44:28	OBJ	<p>I am very concerned about this proposal and wish to object to the application on the following grounds.</p> <ul style="list-style-type: none"> <li>✦ The building is far too big for this small plot. We think it should remain a one storey building (or at least in external appearance a one storey building as seen from the perspective of the rear of 24 GC, and also the street). That is the only way of (a) keeping the building appropriately subordinate to number 24 Gloucester Crescent and 44 Inverness Street (see below), (b) preserving the important gap and view between Gloucester Crescent and Inverness street, and (c) not having an unacceptable degree of overshadowing and massing against the rear of number 24.</li> <li>✦ The proposed building is a 2 storey building plus basement. This would create an unacceptable degree of overshadowing and massing from the perspective of the rear of 24 and the courtyard</li> <li>✦ The courtyard and rear of 24 Gloucester Crescent currently enjoys light and sun. The light survey provided as part of the application does not show the impact of light through the year. It looks inevitable that amenity at the rear will be significantly impacted in early, mid or late summer in particular. Our light expert agrees. This is not shown by the applicant's light survey which needs to address this.</li> <li>✦ We welcome and appreciate the effort to reduce the impact on number 24 by having no glazing at the rear of the new building and by sloping the rear roof of the new building to lessen the sun impact. However, the overall height of the new building means that there is still an unacceptable level of massing and overshadowing at the rear of number 24. If planning permission were to be granted, it would be necessary to make the absence of glazing a permanent requirement in any build on this plot as any glazing (even if frosted) on the back wall would give an unacceptable feel of overlooking to number 24. We also agree that a sloping roof of the kind proposed is a reasonable approach in principle to lessening the impact on number 24 (if the style of the building is otherwise in keeping), but this needs to be accompanied by a significant reduction in the overall height of the building.</li> <li>✦ The proposed building spoils the line and architectural impact of the portico at number 24. This is one of a pair and an important part of the Crescent.</li> <li>✦ A window at ground floor level in 24 Gloucester Crescent is completely obscured by the proposed building.</li> <li>✦ The proposed building and the construction process (drilling, excavation etc) pose risks to the adjacent structure of number 24, which is a vulnerable end of terrace.</li> <li>✦ The proposed building blocks up an important gap between Gloucester Crescent and Inverness street. This is visible proceeding north down Gloucester Crescent, where there is a break showing the trees, which accentuates the beauty of the curve of Gloucester Crescent. All this would be obscured.</li> <li>✦ The proposed building is not in keeping. The fact that there are other modern brick buildings elsewhere in Inverness Street does not justify this style of building on this site between the two listed terraces on Gloucester Crescent and Inverness Street.</li> <li>✦ The projection forward from the line of the existing Inverness Street buildings is ugly and intrusive. The existing projection is not an issue with a stuccoed one storey building. The proposed building represents an intrusion of a wholly different order.</li> <li>✦ We support the designation of use as residential. We do not agree with the suggestion that there is current A3 (restaurant) use. The building has not been used as a restaurant for over 20 years. Its last use was an A1 retail outlet but that was approximately 10 years ago.</li> <li>✦ The process of construction will be a blight to number 24 Gloucester Crescent. It is hard to see how the lower 2 floors of number 24 will be inhabitable during the construction. This is exacerbated by the fact that the attempt to squeeze too large a building onto this small and sensitive plot means that the construction is likely to take far longer than would be usual for the construction of a building more suitably sized for the plot. It is also exacerbated by the absence of any external space for the building to store equipment etc during the</li> </ul>

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				construction phase. ✦ We also object on the grounds set out in the report written by Hollins Planning and which sets out other problems with the building and the construction of it.

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2019/5075/P	Jonathan Jarman	22/11/2019 10:17:08	OBJ	<p>20 November 2019 Dear Sir/Madam,</p> <p>PLANNING APPLICATION 2019/5075/P- THE DEMOLITION OF THE EXISTING DERELICT BUILDING LAST USED AS A RESTAURANT (USE CLASS A3) AND THE REPLACEMENT WITH A TWO-STOREY PLUS BASEMENT RESIDENTIAL PROPERTY.</p> <p>THE SITE: 46 INVERNESS STREET, LONDON NW1 7HB</p> <p>We write to make representations on the above proposal, on behalf of our clients who own No. 25 Gloucester Crescent.</p> <p>The Site and Proposed Development</p> <p>The site, which is located on the north side of Inverness Street, is occupied by a single storey white rendered building on a small plot of 32sqm and is tightly contained by the neighbouring properties of 24 Gloucester Crescent and 44 Inverness Street. Whilst it is not a listed building, nor has it been particularly well maintained, it does fall within the Primrose Conservation Area and makes a neutral contribution to the character and appearance of the street.</p> <p>It is also located next to a terrace of Grade II listed buildings (Nos. 40, 42 and 44) which are architecturally significant due to their historic and architectural form. Opposite the site are the further listed buildings of Nos. 37 to 43 Inverness Street and also No.23 Gloucester Crescent, which also add to the significance of the street. Any development of the site therefore needs to be sensitive to their settings, as required under the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>We also note that the application follows the submission of a similar proposal in 2015 under application 2015/0493/P which was withdrawn. The proposed development currently under consideration would be an evolution of that design and also follows pre-app discussions with Officers. A summary of the advice given is set out on pages 5 and 6 of the Planning Statement and although we acknowledge that this application seeks to address the issues raised, strikingly, the listed officer comments are not small in number and are predominantly negative.</p> <p>We set out our own assessment below.</p> <p>Principle and Design</p> <p>Camden's Local Plan, Policy H1, acknowledges that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households, including making use of sites which are underused or vacant. However, this is not at any cost and sites also need to be acceptable in all other respects, as assessed against the other development plan policies, unless material planning considerations allow otherwise.</p> <p>Amongst the other policies, the Council's states under Policy D1 that they will seek to secure high quality design in development. This is also a key objective of the National Planning Policy Framework (NPPF), which states that:</p> <p>'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.'</p> <p>Whilst we acknowledge that the proposal has a different design to the withdrawn application from 2015, which</p>

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presumably it seeks to improve on, its entirely brick façade would still be at odds with the white render at ground floor level, which currently follows a continuous line from the corner with Gloucester Crescent and adjacent terrace, breaking up that visual feature. At two storeys in height, it will also emphasize the projection of the building forward of the main building line, which is also out of keeping with the existing form of the street.

Indeed, anything beyond the existing height would not be appropriate for the application site. It should therefore continue to appear as a single storey building to be subordinate to the listed buildings on either side and maintain the break between the two terraces. Consequently, the proposed dwelling will represent a contrived form of development on a site that is not capable of accommodating development that is much beyond what is already there.

The limitations of the plot will also mean that no outdoor amenity space is to be provided for the future occupiers, in conflict with Policy D1 which requires residential proposals to include outdoor amenity space. This is justified by the Applicant by the proximity of Regentis Park, however that does not overcome the lack of private amenity space, including the lack of space for simple provisions such as bikes or bins.

The small area available for the building also means that the living space is not well formed and also provides little outlook for the occupants. Indeed, it would not be possible to add additional windows at the rear without causing harm. The tightness of space is also aptly demonstrated by the need to have a spiral staircase, which serves to save space, but is not particularly practical nor does it promote lifetime home principles. Combined with the lack of external amenity space, the lack of outlook will add to the less than optimal living conditions. Design is of course subjective and therefore in the interests of fairness, we would ask that the Council put the application in front of its Design Review Panel, to enable the design to be professionally critiqued.

#### Basement

The proposal also includes a basement level, which are assessed against Local Plan Policy A5, which states that the Council will only permit basement development where the proposal would not cause harm to:

- a. neighbouring properties;
- b. the structural, ground, or water conditions of the area;
- c. the character and amenity of the area;
- d. the architectural character of the building; and
- e. the significance of heritage assets.

Although it is noted that a Basement Impact Assessment has been prepared for the Applicant which seeks to reassure the Council that it can be safely constructed, it is clear that the small and confined nature of the site will make this a complex engineering operation. There is therefore a risk that neighbouring properties, which would need to be underpinned, could be damaged as a result of the basement.

Furthermore, no detailed analysis seems to have been taken in respect of potential impacts from noise and vibration during the construction phase. Indeed, given the challenging nature of site, there is likely to be a long period of disruption to neighbouring amenity during the construction phase. Given the proximity of the neighbouring buildings, the potential of damage to those properties is heightened and therefore these impacts need to be more fully considered.

We would therefore urge the Council to request additional information from the Applicant on the effects of the proposed development on the neighbouring properties and for safeguards to be put in place that can be controlled through planning conditions.

#### Heritage

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Section 86 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on the local planning authority to have special regard to the desirability of preserving any listed building or its setting, including any features of special architectural or historic interest which it possesses. In addition, Section 72 states that special attention shall be paid to the desirability of conservation preserving or enhancing the character or appearance of Conservation Areas.

Local Plan Policy D2 also reflects the above requirement.

In assessing the proposal, a Heritage Impact Assessment has been prepared and submitted as part of the application. It has found that the existing building detracts from the character and appearance of the conservation area and the setting of listed buildings and should be replaced. It then goes on to argue that the proposed development would be an enhancement.

However, the building is not beyond repair and as made clear by the NPPF, neglect is not a material planning consideration in considering the deteriorated state of a heritage asset (including Conservation Areas). In our opinion, the existing building makes a neutral contribution to the character and appearance of the conservation area. Indeed, whilst it may not be in prime condition, it is in keeping with the character and appearance of the area and does not materially detract from it.

The proposed dwelling on the other hand will contrast with the more traditional form of the neighbouring properties, and by projecting forward of the main building line, will appear overly prominent in the street scene. Whilst the current single storey wall of 46 Inverness Street does already step forward of the building line, its scale does not look out of place, whereas a 2 storey addition would look incongruous within its setting. It will also impact on views of the side entrance to No.24 which is a significant part of the listed building, as mirrored of the other end of the terrace.

The existing building also provides an important transition point between Inverness Street and Gloucester Crescent, including a gap between the two terraces, which also offers views of trees within the back gardens. As acknowledged in the Heritage Impact Assessment:

'This is the key view from the public realm that identifies the significance of the gap as bringing both light and green space into the streetscape'

The erosion of this gap and views to trees behind will also have a detriment impact on the character and appearance of the Conservation Area and this is another consequence of the proposed building being too high.

Accordingly, there would be harm to the setting of the neighbouring listed buildings and the proposal will detract from the character and appearance of the Conservation Area.

#### Neighbouring Amenity

Protecting neighbouring amenity is also an important planning consideration and due to the orientation of the plots and proximity of buildings, the addition of a second storey on the site is of particular concern. The gardens of no. 24 and 25 Gloucester Crescent will be particularly affected, noting that the garden at 24 well end up being enclosed on three sides by development of more than one storey. The reduction in outlook for both 24 and 25 will create an unwelcoming sense of enclosure in those gardens.

Given the orientation of the site, the amount of direct sunlight received by both gardens will also be affected. This is defended by the Applicant on the basis that the BRE Guidance on sunlight states that only 50% of the garden needs to receive 2 hours of sunlight on the 21st March (the Equinox), however we would point out that this is only guidance and does not necessarily reflect the true impacts. Certainly, we understand from our client that the gardens at both 24 and 25 do receive direct sunlight at certain times of the day and year.

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Indeed, this is reflected in the Applicants Daylight and Sunlight Report. However, it looks likely that the impact on the gardens will be more severe at other times of year, in particular in the summer when the gardens currently receive more sun than at 21 March. Therefore, to be able to more fully understand the potential consequences of the development on this issue, our client has sought advice from Delver Patman Redler (Chartered Surveyors). For your information, we enclose their letter which highlights potential shortcomings with the computer analysis undertaken. As per their recommendation, we would request that the Applicant be required to commission an appropriate measured survey and provide an updated report with more accurate results. We would also ask that the Applicant be asked to provide a drawing showing the actual course of shadow on for every month between March and September to allow a balanced decision to be made. As it stands, there remains concerns that the further erosion of sunlight received by 24 and 25 Gloucester Crescent will lead to a significant reduction in amenity. We know from our client that they are very concerned about this due to the amount of time they spend in the garden to paint and for general well-being.

Summary and Conclusions

Whilst the Local Plan identifies a need for additional housing within the Borough, this should not be at any expense and development proposals still need to comply with the Councils policies on design, heritage, amenity, etc. In this case, the site is severely constrained by its size and proximity to other buildings but is also in a sensitive area in terms of its heritage value. These combine to make the site less suited to redevelopment. Indeed, the proposed development is not in keeping with the character and appearance of this part of the street and will introduce a prominent building that is at odds with the prevailing form in terms of height, scale, and siting. The resulting proposal is a contrived form development that seeks to develop a site which is not suitable for the scale of development being proposed. The tightness of the site will also mean that the proposal will offer no external amenity space or areas for important incidentals like bike and bin storage. This is then amplified by the limited internal space and poor outlook from the proposed property. Neighbouring amenity will also be harmed through the loss of outlook and sunlight to the gardens.

It also includes a basement which is likely to be difficult to construct and would require significant engineering works to safeguard neighbouring properties. The risks to those properties from the construction, including potential impacts from noise and vibration have not been fully assessed.

The result of the above is that the proposal will also fail to preserve or enhance the character and appearance of the Conservation Area and will harm the setting of nearby listed buildings. As no public benefits have been put forward that outweigh that harm, the proposal is unacceptable in this respect.

In considering the above, the proposed development fails to accord with the Councils Development Plan policies and no material planning considerations weigh in favour of the development.

Our client therefore wishes to object to the planning application.

Yours faithfully  
BELL CORNWELL LLP  
Jonathan Jarman  
Senior Principal Planner

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2019/5075/P	Richard Simpson for Primrose Hill CAAC	15/11/2019 12:54:04	COMMENT	<p>ADVICE from Primrose Hill Conservation Area Advisory Committee</p> <p>6 November 2019</p> <p>46 Inverness Street NW1 7HB 2019/5075/P</p> <p>The Advisory Committee would wish to acknowledge that it has had extensive pre-app discussions on this proposal, and that our concerns have been substantially addressed.</p> <p>We do not object to the proposed house in principal. Our comments address three points.</p> <ol style="list-style-type: none"><li>1. The gap between the new building and the porch to no. 24 Gloucester Crescent (Listed) has been a matter of particular concern. We welcomed the gap, its width and height, as shown on application drawings 202 rev A, 210 rev A, and 222 rev A. But this is not shown consistently in drawings (for example the CGI). Given the importance of this gap we wish it to be stated that drawings 202 rev A, 210 A, and 222 rev A are the approved version.</li><li>2. The choice of brick: this has also been a matter of long-standing debate. The Committee has consistently preferred a darker brick to a lighter brick. We acknowledge that the brick used at the Cavendish School extension fits well in the street, but it is a larger building. We request that approval of the brick, and of the pointing form and colour, be reserved by condition for approval when sample panels can be assessed on site.</li><li>3. The Committee has welcomed the design in principal. Following careful discussion, we request that the window opening to the dining area at ground floor be extended, in the form of a panel of recessed but solid brickwork, to the first floor. This would follow the pattern of recessed bays established in the other openings to the front elevation, and would modify the blank wall above the ground floor opening. We would be happy to review sketches urgently.</li></ol> <p>Richard Simpson FSA Chair</p>

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2019/5075/P	Alistair Redler	22/11/2019 09:57:36	OBJ	<p>Dear Sirs  Re: 2019/5075/P - 48 Inverness Street, London NW1 7HB</p> <p>[REDACTED] neighbours to this planning application properly at 46 Inverness Street. My clients have concerns about the impact on daylight &amp; sunlight to their properties as identified in the Waldrams Report and submitted with the planning application.</p> <p>The first issue is that the Waldrams report identifies that the computer analysis has not been based on accurate &amp; detailed survey information. It has been based upon a generic 3D survey model with relevant details such as the elevational information of the adjoining properties, including window sizes and positions, have been estimated from brick counts and photographs. We would therefore request that the applicant be required to commission an appropriate measured survey and provide an updated report with more accurate results.</p> <p>Secondly, the applicant has undertaken a shadow analysis showing the impact on the gardens to my clients' properties. The report claims compliance with the sunlight standards, primarily because the levels of direct sunlight to the gardens are already so low, that any changes would be incapable of being recorded, in the case of no. 24, or would be within the required standards in the case of no. 25. However, whilst the Building Research Establishment guidelines give recommendations for assessing shadows to gardens and amenity areas on the basis of how much of the garden is free from shadow on 21 March, planning policy in the London Borough of Camden does not simply rely on that. In a dense urban area such as this, it is important for members of the Planning Committee to be able to understand the real impact on sunlight to gardens. For these houses any sunlight that is received by the gardens is of particular value, in making the garden an attractive place for occupants to make use of. It is not sufficient for the committee to only be shown the area of permanent shadow on 21 March when it is clear that the gardens currently receive much better levels of direct sunlight throughout the summer months, and at a level that makes the gardens pleasant sunlit spaces for the occupants to make practical use of. Without an analysis showing the real additional shadowing that will result in other months, especially late spring, summer and autumn months, the real impact on amenity cannot be understood.</p> <p>The application site is a low level building located directly to the south of these gardens and the direct sunlight in the middle of the day will pass over the site to the gardens in Nos 24 &amp; 25 Gloucester Crescent. This is a historic feature of the immediate area that reflects the close proximity of the application site to the houses at the rear, where there is no rear garden to provide a natural separation and allow access of daylight and sunlight. There is currently direct sunlight through that existing gap between 10am and 2pm. In the spring and autumn the new building will clearly obstruct the sun and cast a shadow across both gardens due to its height and proximity to No24. In the summer the sun may be high enough to direct light part of the garden of No25 but the proposed building will be tall enough to cast a substantial shadow on the garden of No24. This is a substantial adverse impact.</p> <p>I therefore request that the applicant be asked to provide a drawing showing the actual course of shadow for every month between March, and September. This will show the transitory shadow, and will identify where sunlight can actually be received in the garden, in order that a fair &amp; balanced decision can be made about whether the increase in shadowing that will be caused can be considered to be an acceptable loss of amenity or not.</p> <p>Yours sincerely  Alistair Redler BSc FRICS  Senior Partner</p>

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2019/5075/P	David and Susan Gentleman	21/11/2019 19:08:25	OBJ	<p>I am writing to state our concerns about the proposed development of 46 Inverness Street. There are several points in the proposed plan we would like to object to:</p> <ol style="list-style-type: none"> <li>1) Having lived at this address for nearly fifty years we have relied on our small back garden for the amount of sun it has during the warmer months. I use it for drying and the necessary exposure to sunlight and its open views of the sky over Inverness Street. Although the planned building is not full height, it will considerably interrupt the above.</li> <li>2) This whole terrace, like much of the area, is subject to movement and subsequent cracks. Many years ago we employed a well-known surveyor, Roger Oakley, who said our proximity so near to the end of the terrace would inevitably lead to movement. The thought of basement digging so close to us at 25 and number 24 Gloucester Crescent and 44 Inverness Street is highly worrying.</li> <li>3) The actual design of the proposed property does not fit in with its two adjoining properties and the present size of gap between the two listed terraces should be kept.</li> </ol>
2019/5075/P	Clare Taylor	23/11/2019 23:05:30	PEITINOBJ E	<p>I am a neighbour in Inverness Street and wish to object to this application on the following grounds.</p> <ol style="list-style-type: none"> <li>1. The proposed building is unattractive and out of keeping with the rest of the terrace in Inverness Street and Gloucester Crescent. Unlike the single story building it is proposed to replace it has no stucco, and is just brick. The windows are not appropriate in type.</li> <li>2. The house is too massive for the site, replacing a small structure with a 3 storey house (inc basement). It is also too far forward up to the pavement, and not in line with the adjacent terrace. Whilst this looks in keeping with the existing small building, it looks totally wrong in the pictures of the new build on the application.</li> <li>3. The new building is in a gap which must be a source of sunlight in the gardens of the houses in Gloucester Crescent, especially as the terrace in Inverness Street faces SE. It is not permitted surely to block sunlight from the neighbours garden to this extent?</li> <li>4. The interior only shows a spiral staircase which I do not believe complies fully with building regs or fire regs.</li> <li>5. The windows are only on the front, and not on the back or sides, which again I believe is non compliant.</li> </ol> <p>All in all I think this proposal is not the right way to use this small space in Inverness Street and should be changed.</p>