

**ADVICE from Primrose Hill Conservation Area Advisory Committee**  
12A Manley Street, London NW1 8LT

20 January 2021

**10-12 St George's Mews** 2020/5654/P

Objections.

**Air-conditioning:** strong objection.

1. We note that Camden's Local Plan at CC2 provides for adapting to climate change, and that since the adoption of the Local Plan Camden Council has formally recognized the climate crisis. The PHCAAC recognizes addressing climate change as a fundamental issue in the larger conservation of our Area, its preservation and enhancement. In broad terms CC2 requires, for all new development, at 8.41, 'All new developments will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design', at 8.42, 'Active cooling (air conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy', and at 8.44 'The Council will require all schemes to consider sustainable development principles from the start of the design process and include these in their Design and Access Statement and/or sustainability Statement.' We note that this last section applies to 'all schemes'.

2. We note that the applicant, while applying for consent for air-conditioning, and assessing noise issues, has failed to provide the CC2 assessments and reports required by the Local Plan.

3. We note the proposed blocking of windows – reducing passive cross-ventilation – while we note that the lack of proposed floor plans raises questions about how the floors would be used. Other statements (applicant's letter) suggest the floor plans remain unchanged.

4. It is of the gravest importance that these issues are given full weight, and in the absence of the required assessments, the application should not be approved.

**Elevational treatment:** objection

5. We object to the proposed changes, principally to the windows. The aspiration seems to be to change the character of the building by the elevational proposals. The applicant states (Brochure p. 6) that the building 'now stands out of character with the immediately surrounding area in terms of both use and architectural features' commenting that the local area is predominantly made up of Victorian terrace houses. But this is not 'out of character', it is a significant distinction. The Mews itself is distinctive and within the Mews that distinctive character is the result, in part, of the variety and informality of forms. The rebuilding of this site, after the Second World War, is part of the history of Primrose Hill. The Mews is not a street, and this distinction is significant in the wider character and appearance of the conservation area. The windows should be part of a less formal elevation, part of an elevation clearly subservient to the houses on the streets. The windows consented in the previous application (2018/1994/P) are more appropriate here. The heavy, cornice-type, string line at first-floor level is also inappropriate on the same grounds. We would be happy to review a revised design.

**Use:** comment

6. The applicant states (Brochure p. 6) that the building 'now stands out of character with the immediately surrounding area in terms of both use ...'. The PHCAAC wishes to comment that it is a high priority of the Committee and the local community, that employment uses are retained in the conservation area. We fully supported the Council's Article 4 Direction limiting permitted development conversions from office to residential use on this site and others in the conservation area. The mixtures of uses and the survival of employment uses is fundamental to the character and appearance of the conservation area. There should be no loss of employment use and no change to residential use on this site.

**Construction Management Plan:**

7. The extent of the work involved in realizing this application would depend on the state of the existing structure. The applicant's covering letter (p. 2) states 'The existing building, built circa 1950, is in particularly poor condition and in need of a full refurbishment. The building has large structural cracks in the lintels and brickwork, and displays evidence of crudely-executed repairs using bricks that are a different colour and texture, with mortar that does not match'. The comment on large structural cracks suggests that the extent of work on the front façade alone may be extensive.

8. But if the work proves to be less extensive, what is critical is the very narrow access, through an opening on to Regent's Park Road, using a footway cross-over in this very busy shopping street, and using the mews which is shared access for vehicle and pedestrians. This access and the safety issues it raises, make a legally enforceable Construction Management Plan essential in this case.

9. We note, and object to, the external lighting proposed (item 11 proposed front elevation). The Planning Inspector's decision dismissing the appeal on such lights at 31 Edis Street (APP/X5210/C/18/3219531) 4 November 2019, is a material consideration. Lighting should be placed within the recess to the entrance doors (recess suggested by the shadow casting – no plan having been provided).

A handwritten signature in black ink, appearing to read 'Richard Simpson', with a horizontal line extending to the right.

Richard Simpson FSA  
Chair