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Subject: Fwd: 2021/2291/P and 2021/2904/L - Fourth Floor flat, 31 Gloucester Avenue
London NW1 7AU

Attachments: 31 Gloucester Avenue London N.W.1. Report 9th July 2021.pdf

[REDACTED]

Subject: 2021/2291/P and 2021/2904/L - Fourth Floor flat, 31 Gloucester Avenue London NW1 7AU

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Dear Patrick,

As you may recall I represent the owners of another flat in this property, and write to you now due to grave concerns about proposals by the new owner of the top-floor flat.

We have now been able to review the latest applications, and sought specialist advice from a Listed Buildings expert and Heritage architect, Paul Velluet, M.Litt., RIBA, IHBC, Chartered Architect.

Mr Velluet's report is attached, and we would be grateful if you would share this with your Conservation colleague also.

As you will note, Mr Velluet sets out serious concerns about the current proposals (detailed at 3.1 to 3.7) and issues that need to be resolved about the Listing description (please see 2.1 to 2.3), concluding that it would not be appropriate for the applications to be granted.

Mr Velluet concludes (at 4.1 and 4.2) that: -

- ∞ Given the importance attached to ensuring the highest standards of design and in the alteration of listed buildings set out in Policies D.1 and D.2 of the *Camden Local Plan, 2017*; in Policies PH 18 and PH 19 of the *Primrose Hill Conservation Area Appraisal and Management Strategy, 2000*; and in the relevant guidance on the alteration of listed buildings and on building services equipment contained in Sections 3 and 9 of *Camden Practice Guidance: Design* of January, 2021; and taking account of the Council's requirements in relation to applications for Planning Permission relating to listed buildings and conservation areas set out in Section 3 of *Camden's Local Area Requirements for Planning Applications* of 2018/August, 2020; the current applications as presently submitted do not provide sufficient evidence to demonstrate that the special interest of the application-property will be preserved in accordance with Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 and its significance sustained in accordance with the relevant policies of the *National Planning Policy Framework*.

- ∞ Any decisions to approve the current applications as presently submitted would be premature given the significant omissions and anomalies in the documentation submitted in support of the applications as referred to in this report, and given the need to secure the satisfactory resolution of such omissions and anomalies before the applications may be properly determined after providing adequate opportunity to those directly affected to comment on the additional information.

We would of course want the opportunity to comment on any revisions to the application drawings/documents, and trust that there would be a re-consultation – please confirm.

Certain points made about the proposals of 2019 remain equally applicable to the current applications; for example that 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. The applicant purchased the flat recently, fully aware of its size and other constraints.

Furthermore, you will appreciate the huge disruption that the carrying out of works such as those proposed would cause to neighbours – both in other flats within no. 31 and adjoining. This is particularly so with Working From Home being the “new normal”, and people needing to concentrate on their work all day.

Regards,

Christine Hereward



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31, GLOUCESTER AVENUE, LONDON, N.W.1.

A REPORT ON THE APPLICATIONS FOR PLANNING PERMISSION AND LISTED BUILDING CONSENT FOR PROPOSED 'REPLACEMENT FOURTH FLOOR ROOF EXTENSION WITH ASSOCIATED WORKS INCLUDING REMOVAL OF FRONT BALUSTRADE' AND 'INTERNAL AND EXTERNAL ALTERATIONS ASSOCIATED WITH REPLACEMENT FOURTH FLOOR MANSARD ROOF EXTENSION INCLUDING REMOVAL OF FRONT BALUSTRADE' – CAMDEN COUNCIL REFERENCES 2021/2291/P AND 2021/2904/L

I. 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 – applications 2021/2291/P and 2021/2904/L.
- 1.2 This report has been drafted further to past inspection of the application-property from street level from Gloucester Avenue, Regent's Park Road and Regal Lane; from careful inspection of Winestone Architect's 'as existing' and 'as proposed' drawings, Winestone Architect's *Design and Access Statement* of December, 2020, and Firstplan's *Planning and Heritage Statement* of May, 2021, submitted in support of the applications for Planning Permission and Listed Building Consent; and with regard to the earlier proposals of 2018 and 2019 – references 2018/1123/P and 2018/1682/L and 2019/0468/P and 2019/1216/L – and the Council's decisions of the 6th June, 2018 and 24th July, 2020 and on those applications, and to the relevant national, London-wide and local planning policies and guidance.
- 1.3 The report concludes that:
 - Given the importance attached to ensuring the highest standards of design and in the alteration of listed buildings set out in Policies D.1 and D.2 of the *Camden Local Plan, 2017*; in Policies PH 18 and PH 19 of the *Primrose Hill Conservation Area Appraisal and Management Strategy, 2000*; and in the relevant guidance on the alteration of listed

buildings and on building services equipment contained in Sections 3 and 9 of *Camden Practice Guidance: Design* of January, 2021; and taking account of the Council's requirements in relation to applications for Planning Permission relating to listed buildings and conservation areas set out in Section 3 of *Camden's Local Area Requirements for Planning Applications* of 2018/August, 2020; the current applications as presently submitted do not provide sufficient evidence to demonstrate that the special interest of the application-property will be preserved in accordance with Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 and its significance sustained in accordance with the relevant policies of the *National Planning Policy Framework*.

- Any decisions to approve the current applications as presently submitted would be premature given the significant omissions and anomalies in the documentation submitted in support of the applications as referred to in this report, and given the need to secure the satisfactory resolution of such omissions and anomalies before the applications may be properly determined after providing adequate opportunity to those directly affected to comment on the additional information.

2. THE LISTED STATUS OF THE APPLICATION PROPERTY AND THE TERRACE OF WHICH IT FORMS AN INTEGRAL PART

- 2.1 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.
- 2.2 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.
- 2.3 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.

2.4 The serious errors in the listing of the terrace, in which the application property is located, are most troubling and we urge the Council to pursue these issues (to which attention was drawn in our submission of March, 2019) with Historic England and to seek the correction of the listing-entry and the amendment of the accompanying description.

3. OMISSIONS AND ANOMALIES IN THE SUBMITTED DOCUMENTATION

- 3.1 There is nothing in the submitted documentation clarifying how the re-aligned and sloping front to the existing roof-extension at fourth floor level is to be supported structurally – not least, without disturbing the ceiling of the flat at third floor level directly below. Such clarification is essential in order to assess the potential effect of the proposal on the special interest and significance of the property and to determine its acceptability or the level of harm it may cause to the special interest and significance of the property as a designated heritage asset. The issue is such that it cannot be dealt with properly as a ‘reserved matter’ under conditions attached to any decision to grant Planning Permission or Listed Building Consent, and needs to be resolved before the applications are determined.
- 3.2 There is nothing in the submitted documentation clarifying how the soil-pipe and waste pipe from the proposed bathroom at fourth floor level and the waste-pipe from the proposed new kitchen at fourth floor level is to be routed and connected to the existing soil and waste down-pipes - not least, without disturbing the ceiling of the flat at third floor level directly below. The issue is such that it cannot be dealt with properly as a ‘reserved matter’ under conditions attached to any decision to grant Planning Permission or Listed Building Consent, and needs to be resolved before the applications are determined.
- 3.3 The ‘as existing’ section BB (drawing PL-EX-S01) is wrong. The clearance above the existing staircase leading up to the existing fourth floor from the third floor is shown incorrectly as only one metre in height, whereas it is around two metres in height. The drawing needs to be corrected and re-submitted before the application is determined. The issue is such that it cannot be dealt with properly under conditions attached to any decision to grant Planning Permission or Listed Building Consent.
- 3.4 Confirmation needs to be given that the windows in the proposed dormers in the proposed front roof-slope are vertically-sliding sashes rather than casements. The issue is such that it cannot be dealt with properly under conditions attached to any decision to grant Planning Permission or Listed Building Consent and needs to be resolved before the applications are determined.
- 3.5 The proposed dormers in the proposed front roof-slope are shown with curved tops. This is incorrect for a property of this character and period. Instead, the dormers

should be shown with flat tops. The issue is such that it cannot be dealt with properly under conditions attached to any decision to grant Planning Permission or Listed Building Consent and needs to be resolved before the applications are determined.

- 3.6 The sub-division of the windows in the proposed dormers in the proposed front roof-slope is incorrect for a property of this character and period. Each window should comprise a three-over-three configuration – and not a six-over-six configuration. Similarly, the sub-division of the three-part French window in the rear roof-slope is incorrect for a property of this character and period. Each of three parts of the window should be shown with stiles and top-rails and sub-divided as two panes in width – and not three panes in width. The issue is such that it cannot be dealt with properly under conditions attached to any decision to grant Planning Permission or Listed Building Consent, and needs to be resolved before the applications are determined.
- 3.7 The existing, natural-slate roof-slopes are incorrectly described as ‘tiling’ or ‘grey tiling’ in the submitted ‘as existing’ plans, sections and elevations and in the separate ‘as existing’ drawings contained in the submitted *Design and Access Statement*. The covering of the proposed new roof-slopes is similarly annotated in the submitted ‘as proposed’ plans, sections and elevations and in the separate ‘as proposed’ drawings contained in the *Design and Access Statement*. However, in paragraph 3.3 of Firstplan’s *Planning and Heritage Statement*, it is stated that the intention is to use ‘natural slate’. Confusingly however, in paragraph 6.6 of the same document, reference is made to the proposed use of a ‘dark grey tile’. Given the potential confusion on this critical matter, clarification is essential. The issue is such that it cannot be dealt with properly under ‘reserved matter’ conditions attached to any decision to grant Planning Permission or Listed Building Consent, and needs to be resolved before the applications are determined.

4. CONCLUSION

- 4.1 Given the importance attached to ensuring the highest standards of design and in the alteration of listed buildings set out in Policies D.1 and D.2 of the *Camden Local Plan, 2017*; in Policies PH 18 and PH 19 of the *Primrose Hill Conservation Area Appraisal and Management Strategy, 2000*; and in the relevant guidance on the alteration of listed buildings and on building services equipment contained in Sections 3 and 9 of *Camden Practice Guidance: Design* of January, 2021; and taking account of the Council’s requirements in relation to applications for Planning Permission relating to listed buildings and conservation areas set out in Section 3 of *Camden’s Local Area Requirements for Planning Applications* of 2018/August, 2020; the current applications as presently submitted do not provide sufficient evidence to demonstrate that the special interest of the application-property will be preserved in accordance with

Sections 16 and 66 of the *Planning (Listed Buildings and Conservation Areas) Act, 1990*, and its significance sustained in accordance with the relevant policies of the *National Planning Policy Framework*.

- 4.2 Any decisions to approve the current applications as presently submitted would be premature given the significant omissions and anomalies in the documentation submitted in support of the applications as referred to in this report, and given the need to secure the satisfactory resolution of such omissions and anomalies before the applications may be properly determined after providing adequate opportunity to those directly affected to comment on the additional information.

Paul Velluet, M.Litt., RIBA, IHBC, Chartered Architect

9th July, 2021.