



The Planning Inspectorate
 Temple Quay House
 2 The Square
 Bristol
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16th June 2021

Dear Sirs

RE: Appeal reference APP/X5210/W/21/3274819 – 46 Inverness Street, London, NW1 7HB

We refer to the above and your letter of 20th May 2021 confirming the validation of the appeal but that you wait for an Inspector to become available.

Since that time, we have noticed a repetitive error in our submission that we take the opportunity to correct at this early stage. Table 1 commencing on page 7 of the Planning Appeal Statement incorrectly cites Gloucester Terrace rather than Gloucester Crescent on seven occasions. Gloucester Terrace is located within the Paddington area of London and not applicable – we apologise for the error. For ease and clarity, the corrected Table 1 is below with the correct street name shown in bold.

Table 1

Paragraph number of Officer's Delegated Report	Statement within Delegated Report	Response
3.7	<i>The existing single storey structure was historically built as a building ancillary to no.24 Gloucester Crescent and is clearly subordinate to both adjacent terrace houses. It is located at the confluence of Gloucester Crescent and Inverness Streets (as well as both Primrose Hill Conservation Area and Camden Town Conservation Area) and is an important signifier of how the two streets, of differing characters, status and periods, developed historically.</i>	This is strongly refuted. Although 46 was built as an ancillary structure, rather it is an independent one. The view that it was purposefully designed to be subservient to the historic buildings on both sides is more the happenstance of function than the purposeful design of deference. As such it cannot be said, in our view, to meaningfully signify the difference between the two streets. This is reflected in the powerful architectural styles, scales and detailing of the houses in each terrace, not by the



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		single storey, much altered, building between. In its current form, having been used for a number of different functions, it is in fact very difficult to relate it to either building or via its aesthetic appearance, read its true provenance as part of the historic townscape.
3.8	<i>The existing structure is somewhat dilapidated and run-down and there is no 'in principle' objection to a replacement structure provided it does not introduce an additional storey. This low, single storey building reflects the traditional pattern or character that could be expected from a return structure found at the junction of a Victorian development. As such, the gap or break between streets that it provides contributes to the particular architectural character of this part of the Primrose Hill Conservation Area as well as the adjacent Camden Town Conservation Area from which it is clearly visible.</i>	The justification for the added storey rests primarily on its impact on the listed buildings and conservation area in which it stands. For the former, the raised height does not, we believe, cause harm to the legibility of the historic development of the streets and it remains, therefore, readable as a 'return structure'. The gap will remain fully appreciable from the key vantage points on Gloucester Crescent , which rises to the south, and as detailed in the views analysis, all other views are rather oblique. We agree that the gap contributes, but in the balance, have weighed the public benefit of the improvements to 46 against the loss of a small part of the gap view from one vantage point.
3.9	<i>Similar gaps can be seen on other streets nearby and further afield as they are typical of Victorian development. Several examples are provided in the applicant's submission. In some cases these may have been subject to a degree of infilling,</i>	Whether the gap was an intentional designed-in element of the suburban development or not, the key views of that gap and the greenery beyond will remain intact. The purpose of the wider contextual assessment was to



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	<p><i>through the addition of some height – but in every case this is clearly a subordinate extension to the host building that retains a gap rather than a new dwelling house boldly inserted into the streetscene. The applicant's justification for losing the gap is that such gaps are unintentional and accidental, occurring where two roads intersect. However, the Council would argue that these areas are completely intentional and a result of planned development. It is the spaces around the Victorian houses, the spaces between the buildings, which add positively to the historic character and form part of the considered layout of these attractive Victorian developments. Once these planned spaces have been infilled, there is a loss of openness, a loss of views of rear elevations and a loss of appreciation of trees, greenery and distant sky which form an important backdrop.</i></p>	<p>indicate the many changes that had taken place in gap sites adjacent and to demonstrate, at least in part that they had not severely impacted on the legibility of the wider area.</p>
3.10	<p><i>The justification goes on to say that the gap reveals the haphazard and evolutionary nature of the visible rear elevations which do not make a positive contribution to the conservation area. Again, the Council would disagree with this claim and maintain that the visible rear elevations – which in the case of the application site allows views of an apparently intact rear elevation of a listed building – provides a positive contribution to the streetscene and conservation area.</i></p>	<p>It is refuted that the rear elevations of Gloucester Crescent are in some way a set-piece of architectural merit that have not been altered. We concur that visible rear elevations can make a positive contribution and that from vantage points assessed in the views section, these will remain visible with an extra storey to the proposal. Again, on balance with the heritage benefits delivered to the Conservation Area by the development, we view this as</p>



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		justifiable development, which enhances the significance of both conservation areas and improves, fundamentally, the gable ends of each terrace.
3.11	<p><i>The applicant's submission emphasises the dilapidated nature of the building and ascribes this to low significance. This may be true of the building per se, but it is not the actual bricks and mortar of the structure that officers seek to preserve - its importance and suitability for the site is a result of its scale and subsequent delineation between streets. It provides a clear indication of where Gloucester Crescent in Primrose Hill Conservation Area ends and Inverness Street in Camden Town Conservation Area begins. Shoehorning in a building that belongs to neither street not only results in a jarring and uncomfortable form in the streetscene, but serves to erode the distinction of the two streets and conceal the historical pattern of development.</i></p>	<p>We would reiterate that the important properties of the current building will be maintained in the scheme and that the gap site will be legible. The proposed development has not been 'shoehorned' it has been carefully designed in, following extensive assessment and consideration of the listed buildings and surrounding streetscape. The proposal represents a thorough study of how the currently detrimental structure can be sensitively re-purposed as a liveable domestic building that makes a contribution to the area in which it stands. The array of forces acting on the site have been given due consideration against national, regional and local guidance and the harm/benefit equation carefully weighed. We believe the distinction between the two streets will remain intact by virtue of the new building, which mediates between them, but which is also unashamedly new in style.</p>



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3.12 & 3.13	<p><i>The gap also provides a break in the built urban form where it is possible to see trees located in the back gardens of properties on Gloucester Crescent. Of Inverness Street, the Primrose Hill CAS reads, 'This is a wide road that forms a transition from the lively urban character of Camden Town to the more sedate leafy character of the Conservation Area'.</i></p> <p><i>Therefore, the principle of additional height in this location is strongly resisted owing to the erosion of the gap, an important signifier of the transition between different streets and historic pattern of development; and the concealment of the adjacent listed rear elevation and loss of leafy views, features intrinsic to the character of the Primrose Hill Conservation Area.</i></p>	Dealing with both of these paragraphs together and as previously stated, in the key views, the gap will remain legible with the added benefit of lessening the amount of visible gable end.
3.14	<p><i>The form of the proposed dwelling comprises a middle projecting section (to match the existing building line) and two 'wing-like' sections which are set back closer to the building lines of adjacent buildings and allow for the incorporation of two front lightwells. Due to the extremely constrained plot, there is no scope for the building to be pushed back to align with the building line established by the Inverness Street terrace which means that most of the front façade is hard up against the pavement.</i></p>	These fluctuations in the plane of the façade were explored and evolved in response to Council's commentary on the scheme, the lightwells in particular. The scale of the adjacent buildings was a substantial factor in the working up of the current design. Of paramount concern was the issue of the building line and how the new building addresses Inverness Street. The composition of the facade of the new building has been orchestrated to reference and respond to, the historic buildings on either side of it.



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		This modulation is a sensitive and responsive design solution to the problem and is put forward as a conservation-led response to the challenge of softening the relationship between building and street.
3.15	<i>Although the existing building projects forward of the two adjacent buildings, its single storey scale allows for a more comfortable relationship with the street; however, increasing the height to two storeys results in a very intrusive and dominant building that has no regard to the pattern of development in the surrounding area. The projecting building line, when combined with the additional height, also serves to obscure the view west from Inverness Street towards Inverness Street identified in the Primrose Hill CAS as significant.</i>	<p>We would disagree with the view that height, per se, has primacy in regard of intrusion or dominance. Massing, comparative scale and volume are at least equal considerations and these have not properly been assessed by the Council. The articulated design by senior conservation architects at Purcell has mitigated the volumetric relationship between the proposed development and its neighbours and they remain dominant in a number of important, and in some cases subtle, ways. In essence, Purcell's design is a contextual modern building, which takes lines, design cues, ratios and materialities from the important buildings around it.</p> <p>The final point is not clear, but we would presume the council means the buildings of Gloucester Crescent from Inverness Street. If that is so, it is not agreed and therefore conclude that the important views of the villas on the western side of the road remain intact.</p>



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3.16	<p><i>The depth of the building is limited to that of the existing structure - there is no curtilage beyond. The result is a very shallow building that appears shoehorned into its site with no breathing space on either side. This has the effect of overcrowding and overwhelming both neighbouring buildings. This would be unacceptable if the adjacent buildings were to be non-designated heritage assets; however, given their listed status, the impact is even more severe.</i></p>	<p>Although the buildings on either side are listed, significance assessment of each one concludes that the gable end elevations are the least important of each and are in essence, detrimental as blank end walls within the conservation area. Both are of impressive Victorian scale and cannot be overwhelmed by a building that is not only not as tall, but which has all the other designed-in mitigating factors explained above. Far from overcrowding these buildings, the proposed new house makes sensible and sensitive use of a site that is currently detrimental to the significance of the conservation area.</p>
3.17	<p><i>In terms of detailed design, the unadorned, block form of the design is a clear contrast to its more ornate and elegant neighbours. The large expanses of brick and proportions of the fenestration does not relate to the neighbouring buildings with their white rendered ground floors and more vertically proportioned windows. The design appears to be justified by the modern infills seen elsewhere along Inverness Street whilst the choice of brick has been chosen to match the extension to the Cavendish School further down the road. Corresponding to the character of the wider area is not sufficient for this extremely sensitive site in between two</i></p>	<p>Purcell has not relied on the modern buildings elsewhere on the street to justify the proposals, but rather argued the articulation of the facades, height, massing and palette of materials, in reference to the listed buildings and the conservation area. Layered on that, there was of course a considerable amount of design effort to respond to the wider context. As above, this has been evolved as a contextually modern piece of conservation architecture, not as an obvious reflector, or competitor, to the surrounding buildings. Taking certain design cues and evolving them into an architecture of addition</p>



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	<i>listed buildings in a conservation area.</i>	remains at the core of Purcell's approach when designing in any historic environment and those principles are in evidence in the rhythm, set-backs and building lines of the proposed house.
3.18	<i>An assessment and evaluation of the scheme needs to be carried out in accordance with the requirements and tests within chapter 66 and 72 of the NPPF 2019 regarding any impact and level of harm caused to the significance of designated heritage assets, i.e. the adjoining listed building and the surrounding and adjacent conservation areas.</i>	The Heritage Assessment and Heritage Impact Assessment conducted by Purcell looked in substantial and thorough detail at the surrounding context and evaluated the scheme against all relevant national, regional and local planning policy guidance. The contextual understanding of the area surrounding the site was also addressed in a study of relatable 'gap sites' within both of the conservation areas.
3.19	<i>NPPF para 192 requires that those assessing applications take account of 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.' Para 193 states that, 'When considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation', and para 194 states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from</i>	As previously stated, the desirability of sustaining the heritage assets, both physically connected and in the surrounding historic built environment context, are what lies behind the need to improve the current situation on the site.



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	<p><i>development within its setting), should require clear and convincing justification'. Substantial harm to a grade II listed building of any grade should be exceptional. Where the harm to a designated heritage asset is 'less than substantial', para 196 advises that 'this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'</i></p>	
3.20	<p><i>The existing low single storey structure has an important role to play in the significance of the two adjacent Grade II listed properties, as it indicates how the two historic streets have developed and provides them with breathing space. Infilling this area with a two-storey structure conceals the distinction between the two streets to the detriment of the setting of two listed buildings. The proposed building also projects beyond the listed side entrance of no.24 Gloucester Crescent and the flank wall of no.44 Inverness Street, overwhelming the buildings and creating an awkward junction between the two forms.</i></p>	<p>This is a subjective and arguable view of the proposed development and its future legibility within the conservation area and wider streetscape. New architecture that responds, and is subservient, to earlier forms, even with a shared materiality, will always be clearly legible as such. The distinction between the two streets will remain aesthetically intact precisely because of the variables in scale, rhythm and architectural style that distinguish the buildings on Inverness Street from those on Gloucester Crescent. As noted in the Heritage Assessment, the buildings on Inverness Street, display a considerable variety, particularly when considering the length of the street from the junction with Arlington Road. The mixture of scales, from large scale on either side at the junction to the smaller domestic</p>



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		terraces on both sides towards Gloucester Crescent , alters again to the expanse of render that is on the side elevation of No24. This constitutes a considerable upping of the scale between these two, the proposed dwelling will mediate whilst being subservient to both. Far from being an 'awkward junction', this new, considered approach represents a considerable amount of conservation effort and is the result of the careful and appreciative study of the heritage assets on either side. The manner in which the current building acts in any way as a facilitator in keeping the historic forms visible, is an accident of development and due to the scale, particularly that of Gloucester Crescent , and the legibility of the adjacent buildings it allows. This can be replicated despite the addition of another level.
3.21	<i>The applicant's Heritage Impact Assessment concludes 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</i>	Purcell would stand firmly by the assessment of the current building detracting from the conservation area. The virtue of its scale and the resultant visibility it affords of the rear elevations of Gloucester Crescent and the greenery beyond, do not, in our view supersede, in heritage terms, it's anomalous nature at street-level. The defining characteristic of this end of the street



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	<i>deteriorated state of a heritage asset (including Conservation Areas). Whilst not designated as making a positive or negative contribution to the conservation area by the Primrose Hill Conservation Area statement, officers consider the structure makes a neutral contribution. Its scale and submissive appearance is appropriate for its location and crucially does not detract as would the proposed development.</i>	is residential and the current building, is akin more to a commercial remnant than an additional or ancillary part of a dwelling. This scheme seeks to amend that.
3.22	<i>It is considered that the harm here to designated heritage assets is 'less than substantial'. This applies to the adjacent Grade II listed buildings, no.24 Gloucester Crescent, no.44 Inverness Street, the Primrose Hill conservation area and the Camden Town.</i>	We would concur and conclude that the less than substantial harm is fully justified in the Heritage Statement, in answer to the pre-application commentary from Camden and evident for the reasons given above.

Since the submission of the appeal on 11th May, we note the relevant appeal decision on 17th May 2021 of Appeal A: APP/X5210/W/20/3261840 Land adjacent to Jack Straws Castle, North End Way, London NW3 7ES, which is also in Camden. In addition to confirmation that the Council cannot demonstrate a housing land supply, there are several applicable similarities to the assessment and conclusion by that Inspector to our reasons for refusal and subsequent appeal at Inverness Street. These similarities are in relation to the effect of the proposals on the listed building and the character and appearance of the Conservation Area. As such, we enclose this appeal decision and respectfully request that this is taken into account during the consideration of our appeal – due to the dates, it was not possible for this to be part of the original submission.

We look forward to receiving confirmation that an Inspector has been allocated and confirm that this correspondence and enclosure has also been sent to the Appeals Team at Camden.



Yours faithfully



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Enc.