

QUILICHAN CONSULTANCY

The Old Manse, High Street, Stockbridge, Hampshire, SO20 6EX

1st September, 2020

Dear Mr Peres Da Costa

23 Ravenshaw Street, Camden - 2020/2936/P

I am replying further to your e-mail of 18th August in which you told me that ‘officers’ had decided that this application could never be remedied by way of discussion and revision. As I said in the email, your officers’ statements fly in the face of the findings of the inspector at the appeal.

If indeed your principal objection is that the density is too high, the inspector found no fault with a higher density. May I remind you also that he found no problem with the principle of development and redevelopment.

Front entrance walkway glass section

You say officers do not like the glass treatment of the entrance, but you do not say why. Instead you put forward an impractical suggestion that would compromise the basement bedrooms’ layout and reduce lighting levels quite significantly to no apparent end. The proposed chequered glass section of the walkway is a perfectly viable solution. IQ Glass, a leading manufacturer, has confirmed that it is perfectly well able to manufacture robust, sandblasted and slip proofed panels that would serve the property well. The glass sections are located further back from the pavement. Closer to the pavement is conventional Victorian tile the design of which will be very much in keeping with the traditional Victorian tiled paths common to Ravenshaw Street and the wider area; the attached PDF shows numerous examples.

I would also point out that your LPA has previously approved a larger (6m²) and completely clear glass entrance walkway at 33 Holmdale Road (2013/0680/P) just 400m distant. It was considered of such significance that it’s not even mentioned in the officer’s report, even once. Consequently, along with the overall lightwell design I am satisfied that this fully answers the inspector’s findings and therefore it should remain as it is.

‘Victorian outriggers’

I now turn to your and the officers’ concerns about the rear and the ‘Victorian outriggers’. You say that *‘some of the nearby precedents ...are considered harmful’*. In what way are they ‘harmful’? To what or whom do they cause unacceptable harm? Do you mean harm to

the appearance of the rear elevations of the neighbouring buildings? The inspector objected to a departure from this idiom, which was the admitted bulk of the previous design. The application's rear elevation design now fits almost unnoticed into the existing pattern of development, reflecting and meshing seamlessly with the pattern of existing rear elevations and roofscapes; the extant built environment surrounding the site is what it is, not some idealised version of it. Are officers saying that they would prefer that the rear appearance of the whole of this part of Ravenshaw should be different; that they wish that parts of it, the extensions and dormers etc., as they present themselves, were simply not there? This is an untenable and unsupportable argument in planning law and practice. What this present design has done is to make the rear appearance of No.23 virtually indistinguishable from its neighbours. You seem to suggest that elements of the design that help the building blend in so well are harmful.

It begs the question, why have you not opposed all the development of the rear of this part of Ravenshaw Street that you seem to now view as so unwelcome? It is not an answer to say that all this was done with PD rights, because PD means, literally, 'permitted' development. If you as Camden LPA don't like the concept and practice of PD rights, I suggest you make representations in the appropriate quarters, but meanwhile you cannot with reason object to this application on those grounds.

How do the outriggers in this application run counter to 'current guidance'? You have offered no explanation.

I do not know what is meant by *'the rear projections do not read as subservient additions to the proposed outriggers'*. How is this a reason for refusal? It seems to me that the proposal melds extremely well with the neighbouring structures, and the whole is a unified rear such that neither people on a train, nor the residents of the somewhat distant apartment blocks could possibly object. It is useful to recall the wording of the inspector's decision letter with regard to the previous design: *'Taken as a whole, the development would fail to comply with CLP Policy D1 which requires all development to respect local context and character.'*

This proposal does exactly that. It is designed to respect, in the sense of not standing out from or being seen as different from and harm in any unacceptable manner the local context, which can mean nothing other than the neighbouring appearance of adjoining buildings; and character, which can only mean design and appearance. But this is what you say the officers object to. Essentially you seem to be saying that officers do not like some features of the adjoining buildings, therefore as the proposed elevation seems to be of a similar design and character, it too meets with their disapproval. That is not a reasonable argument in the light of your own policy.

You state that the rear is still too large and the scale and mass are excessive. This is a bald statement of opinion, but has no explanation accompanying it. The scale and mass of this proposal mirrors the scale and mass of its neighbours, where extensions have been permitted, and where the appearance of the rear 'terrace' does indeed give the appearance of a 'jumble'. But that is the local context, which has been brought about by the use of PD rights in some cases, and your authority's permissions in others. However, the fundamental question is this 'Why is this scale and mass harmful?' To what interest does it present unacceptable harm? I

have no answer from you to that.

Minor Amendments

Attached to this letter you will find revised rear elevation drawings and accompanying plans. They show minor amendments to the previously white rendered rear outrigger – the material having been changed to brick and the roof removed, lowering the impact of the balcony. A change of cladding material to the smaller section of the roof dormer is also put forward; the standing seam metal cladding having been changed to tile in light of officers comments.

These are very minor amendments made response to your officers' comments. No other changes are seen as necessary. The amendments are minor, made in response to your officers' observations and as such should be regarded as positive improvements that decrease the apparent massing and use more vernacular materials. Given their minor nature and lack of public or private realm visibility, these changes cannot be said to compromise the consultation process and are so insubstantial as to not warrant a new application. I will point out, furthermore, that in the previous application to this a number of changes were made to the front facade at officers' request, (including changing the bay windows from grey to white) none of which were regarded at the time as substantial and indeed went unremarked by the planning inspector.

'Quantum of Development'

Instead of employing euphuistic phrases, if you have a substantive, policy-based argument that the scheme constitutes over-development, please state what it is.

Box Dormer

I have dealt with the second floor box dormer in a previous e-mail. However, to further illustrate the point that this feature poses absolutely no material harm to either neighbouring amenity or the character of the area please see the attached PDFs.

s106

You will find attached a PDF containing a scan of the previously agreed s106 and an identical copy of it in the MS Word format. If you would be good enough to address the following items (primarily contribution sums) marked in red and revise them accordingly, I can be sure to have the s106 agreed and get copies signed by all parties in good time for an appeal, should this be necessary:

Front and back title page Camden ref. numbers.

- 1.8 Preamble
- 2.1 "Affordable Housing Contribution"
- 2.6 "Basement Approval in Principle Contribution"
- 2.9 "the Construction Management Plan Implementation Support Contribution"
- 2.12 "the Development" - Document Schedule
- 2.13 "the Energy Efficiency and Renewable Energy Plan"
- 2.14 "the Highways Contribution"
- 2.19 "the Planning Application"

- 2.21 "the Planning Permission"
- 2.26 "the Sustainability Plan"
- 5.2 Ref Number
- 5.6 Ref Number
- 5.7 Ref Number and Bank Details
- 6.1 Ref Number
- 6.4 Monitoring fees

If you see anything amiss please let me know.

Finally, I repeat that were this application to be refused, and refused without any further discussion, on my client's behalf, I will appeal and make an application for substantial costs.

Yours sincerely

Roger Tym