

David Peres Da Costa

From: Harry Howat <[REDACTED]>
Sent: 06 February 2024 20:49
To: David Peres Da Costa
Cc: Alex Neal; Katie Hughes
Subject: RE: Land to the west of Argyle Square - 2023/4791/NEW – welfare cabins
Attachments: Pruning Specification- Install of welfare cabins.pdf; RE: Belgrove House - CMP/Tree Protection Condition

Follow Up Flag: Follow up
Flag Status: Completed

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Hi David,

Following the objections lodged against the welfare accommodation planning application adjacent to Argyle Square, we have sought to respond to the queries/concerns raised.

For ease of review and consolidation, I have taken all the responses and grouped them into separate topics to which we have responded and provided additional information. NB: Responses are provided below in **green**.

I appreciate there is a lot of information and responses to review, but we wanted to ensure that all queries/concerns were responded to in sufficient detail.

Any follow-up questions once reviewed, please let me know. NB: I am now on leave, returning on Tuesday 13th February, so please keep my colleague Alex copied into all correspondence

Regards,

Harry

Design

Comments

- Negative impact on the setting of the surrounding listed buildings and Argyle Square. Harms the significance of the designated heritage assets.
- Cabins block long views throughout the square, including views of and from 36-42 Argyle Square (Grade II Listed).
- Against Policy D2 of Camden's Local Plan – "development will not be permitted if it results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm."

Responses

It is proposed that the welfare accommodation is in-situ for a temporary period of 3 years only whilst construction works are on-going at nearby Belgrove House. Discussions relating to the location and size of the welfare cabins have been on-going directly with Camden in recent months. Within the submitted Construction Management Plan (Construction Phase) (pursuant to Schedule 2, Clause 2.1.1 of the Section 106 Agreement for the Belgrove House

development), the proposed location of the welfare accommodation for main construction works has been set out and been confirmed through on-going discussions with Camden.

In addition, the approved Detailed Arboricultural Pruning Specification (pursuant to Condition 15 attached to planning permission ref. 2020/3881/P at Belgrove House) confirms that **“to facilitate construction works, the installation of temporary welfare facilities is required along Argyle Square.”** This statement also provides confirmation of the proposed location of the welfare cabins (Image 1 & Appendices). I have attached the statement for your reference. During the determination of these details, you will recall discussions with yourself and Laura Dorbeck relating to the size of the welfare accommodation were on-going prior to the subsequent determination (attached for your reference). As you will note, it was initially proposed for the welfare cabins to be double stacked. However, in conjunction with the on-going CMP discussions, the cabins were reduced to a single-storey.

In addition, the additional security presence, additional CCTV monitoring and lighting associated with the welfare accommodation will provide additional public benefits by contributing to the improvement of anti-social behaviour within the vicinity of Argyle Square.

Amenity

Comments

- The proposed cabins are located opposite to 36-42 Argyle Square and are having a clear detrimental effect on the amenity of these listed buildings and their occupiers.

Loss of Light/View

Comments

- Friends of Argyle Square hired Rights of Light Surveyors Waldrums and Solicitors RWK Goodman to assess the impact of the welfare cabins on the surrounding building's right to light.
- Originally the double decker welfare cabins were proposed. This was reduced to a single height after the Rights of Light Surveyors established that the obstruction caused a significant actionable injury to the adjacent buildings. The right to light calculations were re-taken by each parties Rights of Light Surveyors based off proposed drawings.
- However, following measurement of the built welfare cabins it was clear that the dimensions that Mace provided were inaccurate and that the erected cabins were substantially taller and closer to the terrace than Mace had previously stated.
- The Rights of Light Surveyors analysed the loss of light caused by the erected welfare cabins and found that actionable injuries to the right to light occurred to the basement rooms in nos. 36-37, 38-39, 40, and 41-42.

Responses

Mace appointed Hollis in June 2023 to act on behalf of Mace to undertake the initial rights of light ('RoL') analysis of the modular accommodation options. Hollis engaged with Waldrums to start proactive discussions, including meeting them on-site to do light measurements on 19th July 2023 and therefore agree a baseline. Simultaneously to this they also started working up the initial model from the drawings provided by our two potential modular accommodation providers.

The initial analysis showed injuries to two properties, shown below.

Building Name	EFZ Total (sq ft)
36-37 Argyle Street	12.19
38-39 Argyle Street	19.52
TOTAL	31.71

Following the initial analysis a query was raised by the neighbours as to whether the full height of the bases had been considered; upon review it was found that the model needed to be updated to raise the cabins by 70mm to take into account the final height of the cabins as per the drawings. This resulted in a slight revision of the injuries, but no additional properties affected.

Building Name	EFZ Total (sq ft)
36-37 Argyle Street	12.79
38-39 Argyle Street	20.86
TOTAL	33.65

Following the installation of the cabins, the RoL surveyor met with James from Waldrums on site to do a full measure of the accommodation to ensure that the model was accurate. This resulted in some further minor modifications:

- Distance to the cabins from the Argyle Square property elevations was 8.5m. On site measurement showed c. 7.5m. Once adjusted, this change had a small effect on the results.
- Hoarding was not factored into original model. It is smaller in height than the cabins, albeit slightly closer to the adjacent elevation at c. 7.18m. This did not have a material effect on the light.

The below shows the final injuries to each property based on the agreed analysis between Hollis and Waldrums.

Building Name	EFZ Total (sq ft)
36-37 Argyle Street	36.52
38-39 Argyle Street	42.73
40 Argyle Street	42.37
41-42 Argyle Street	37.22
TOTAL	158.84

The above gives an overview of the process followed to date however it is worth noting that RoL is not a planning matter and therefore is not relevant to the current planning application. The Applicant is reviewing the RoL position separately and are in contact with the adjoining owners via our surveyor.

Noise

Comments

- These buildings are of increased vulnerability to noise due to the windows generally being single glazed. Double glazing cannot be installed due to these buildings being Listed, and secondary glazing cannot be installed on ground and first floors due to wooden shutters.
- Construction is supposed to be limited to 8am to 6pm during the week and 8am to 1pm on Saturday, but the noise actually starts at least a half an hour early and finishes a similar amount late. This will increase when the construction starts in earnest and involves more workers.

Responses

Site working hours are 08:00 – 18:00 (Monday – Friday) and 08:00 – 13:00 (Saturday, if required. The site is not opened by security and traffic marshals until 08:00 so works cannot commence before this time. Only Mace management are permitted on-site after 18:00 carrying out close-out safety checks and hot-works cooldown inspections.

The security guard arrives at 06:45 to prepare the accommodation setup and the operatives arrive from 07:00. The site accommodation is open until 19:00. If any works are overrunning, Camden are notified (OOH noise notifications, Camilo Casto Llach and Gordon Hamilton) and also call in / knock on doors to inform neighbours personally, as per concrete pour overrun on Friday 3rd November.

Mace have also moved swiftly to respond to any complaints / issues raised by neighbours or Camden in relation to noise, as per response to Allen Gillespie on 14th November. Mace have also carried out letter drops to local businesses and residents ahead of each occasion when we have had abnormal loads routed under police movement orders delivered to site (off road before 06:00 deliveries). Regular emails are also sent to neighbours regarding any known weekend working, OOH deliveries or OOH works by utilities companies in relation to service diversions associated with the project.

Light Pollution

Comments

- The Belgrove House redevelopment has involved extensive red and white lights that have caused considerable light pollution.
- Various works have been undertaken to try to reduce this level of lighting with mixed results, and the red light in particular remains unacceptable, both to the terrace's interior and exterior.

Responses

Following an emailed enquiry by Allen Gillespie into the reason for hoarding lighting and how long the lights are on for, Mace reviewed the installation method to see if we could reduce the impact of the lights on the surrounding properties. Andy Griffiths (Mace) also received an email from Cllr Simpson on Friday 15th December to which Mace responded with our proposal for minimising the amount of light omitted.

Following the Cllrs' email, the shrouds were completed to the site accommodation perimeter on Tuesday 19th December. It was agreed internally that this had made a notable difference in reducing the impact of the light omitted on neighbouring properties and we ordered further materials to enable shrouds to be installed over light fittings on Belgrove Street, Argyle Square and Crestfield Street which have also now been completed. Mace have formed a timber shroud around the fitting so that light is predominantly omitted from the side that faces the oncoming traffic (top, bottom and two sides shrouded) which has resulted in the overall light omitted being greatly reduced. Please see photos below.

Before

After





In response to the query of the colour of the hoarding lights and whether they could be removed, below is a response received by Mace from Camden's Streetworks team:

"Hoarding must be sufficiently lit between the official hours of darkness (half an hour before sunset to half an hour before sunrise). This also includes times when visibility may be reduced, for example during bad weather such as heavy fog. During the winter months lighting becomes even more important due to the dark, wet weather and related reduced visibility. Hoarding lighting helps to improve visibility for road users and pedestrians, and reduces safety risks during the hours of darkness. Lighting can also act as a deterrent against intrusion as well as making an area feel safer at night. In order to meet current legislation requirements, lamps must be lit continuously and shine a red light to the road."

Access to Public Gardens

Comments

- The Western pedestrian entrance to the square is often blocked or locked, preventing access to and from the square.

Responses

Mace have confirmed that the above comment is not correct – please see photo below:



Transport

Comments

- The welfare cabins have resulted in the loss of 18 resident parking spaces. There has been no clear warning of suspension of the remaining bays around the square, which has resulted in numerous PCNs for those with Residents parking permits.
- Camden are able to send alerts for parking suspensions, and Appendix C shows a screenshot of the current notices, but four of the current five notices are "Location not yet reviewed" so that is no help at all.
- The signs put up on lamp posts only give one full working days' notice to move a resident's car which means that one would have to check the car every alternate day to ensure that no parking suspension notices had been applied, which is just not practical or reasonable.
- The hotel businesses depend upon daily collection of linen, which was previously carried out by lorries parking directly outside the hotels. The removal of the parking bays has led to the hotels using laundry trollies to transport the linen along the pavement to Argyle Street.

Responses

Throughout the development of the CMP, Mace have been in direct discussions with Camden's Transport team to agree/submit on Temporary Traffic Regulation Order ('TTTO') for the suspension of parking bays relating to the installation of the welfare accommodation. Full details of the parking bay suspensions have been provided within the submitted CMP. A full breakdown of the timeline of discussions with Camden relating to the TTRO has been attached.

Lack of Consultation

Comments

- The first we knew about the proposed welfare cabins was when Tim Le Sage, Mace Operations Director, asked to see Friends of Argyle Square on 26th May 2023. He told us what Mace were proposing regarding the cabins and we discussed alternative locations of which there were apparently none.
- He also said that they had the go ahead from Camden for the proposed location, although it is now clear that this was only an informal understanding at best. He also said that a photograph of Argyle Square trees would be printed on the side of cabins to maintain the view from the west terrace, and he provided a visual of this.

Responses

Mace and Camden have been having on-going discussion relating to the CMP and the site welfare since February 2023. A full breakdown of the timeline of discussions with Maxim Lyne and Camden Officer relating to the CMP/site welfare accommodation has been attached.

Inadequate Investigation of Alternative Options

Comments

- During this meeting it was explained by Andy Griffiths of Mace that “off-site options were not viable as potential local venue owners didn’t want to lease their properties for construction workforce welfare facilities”.
- There were no details provided about exactly what options had been explored, in relation to who had been asked and details of their refusal.
- I note in the Construction Management Plan for Belgrove House there is a plan that identifies important “Receptors”. It is interesting that this fails to identify residential properties, such as 40 Argyle Square, which is a family house where the health and welfare of the permanent residents should be properly taken into consideration.
- Why exclude this from the initial research; and then use the location immediately opposite this building as a site for welfare accommodation?
- Why not make use of space within the basketball court to the north of Argyle Square, opposite the building site? It would mean that this recreational facility would be out of use for three years, but why should this inconvenience be more significant than the inconvenience to residents for the same period of time?
- Has there been any discussion regarding the possibility of using some of this public space for the welfare accommodation?
- And why is the application for three years? This is a long time for something “temporary.” Why can’t the welfare accommodation be moved back to the Belgrove House building site at a much earlier opportunity, ie before the building is finally fitted out?
- Use of the pavement on the north side of Argyle Square was ruled out with the words “no space for accommodation” but how much effort went into exploring the possibility of a gantry? A gantry was used along Tavistock Place when the redevelopment of LSHTM took place. The space available was extremely narrow. The pavement still provided access to pedestrians.

Responses

Within the submitted CMP, evidence is provided of the alternative locations for the site welfare accommodation to be situated and reasoning why these locations were not viable. This extract is provided below. This was first presented at the Construction Workers Group (‘CWG’) meeting on 28 June 2023 and discussed at the F2F meeting held on 05 July 2023. In response to the option of locating the accommodation within the park / basketball court, this was discussed very early on in the process, however it was discounted by Camden’s Streetworks and Parks Teams.

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