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FINANCE

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CENTRAL MAILROOM  
Registry Support Office - 02

Dear Ms Litherland

**32 JAMESTOWN ROAD, LONDON, NW1 7BY (LPA REF: 2013/8265/P CHANGE OF USE FROM OFFICES (CLASS B1) TO MIXED USE COMPRISING OFFICES (CLASS B1) AND 9 RESIDENTIAL UNITS (CLASS C3 - 4X1, 3X2, 2X3 BED), INCLUDING ERECTION OF NEW FOURTH AND FIFTH FLOORS, PROVISION OF CENTRAL ATRIUM, INSTALLATION AND RELOCATION OF PLANT, AND ALTERATIONS TO JAMESTOWN ROAD AND CANAL SIDE FACADES.)**

#### CONSULTATION RESPONSE

We write with regard to the above planning application and the comments received by the Council throughout the public consultation period. This letter does not seek to respond to every point raised but addresses the broad themes running throughout key third party objections that have been submitted to the Council.

I would note that a number of points made have already been addressed within the application submission. However, I have taken the opportunity to reiterate certain points whilst at the same time providing further clarification/justification as appropriate. Several of the points raised within the consultation responses are not considered to be "planning matters" and hence these points have not been responded to within this letter.

#### Employment

The application does not propose a net loss of office floorspace as a result of the proposals. The proposals will result in an increase in Class B1 office floorspace of 383 sq m GIA, via the reconfiguration of the existing floorspace and as part of the proposed 4<sup>th</sup> Floor extension. The development therefore improves on the provision of employment use in the Camden area, therefore overcoming resident concerns over loss of employment. The increase in Class B1 floorspace was welcomed at pre-application stage by the Council and as part of the previous application.

#### Housing Need and Mix

The need for new housing in London is well-documented and the provision of new residential accommodation is supported by national, regional and local planning policy. The NPPF sets out a number of measures to "boost significantly the supply of housing" and in accordance with paragraph 49 of the NPPF, housing applications should be considered in the context of the presumption in favour of sustainable development.

London Plan Policy 3.3 states that development plan document policies should seek to exceed housing targets. It is therefore considered that maximising existing office development whilst providing new homes to contribute to targets is entirely appropriate.

The proposed residential unit mix was considered appropriate at pre-application stage with feedback highlighting *"The proposed mix is considered acceptable and will include just over 40% 2 bed units which is compliant with policy. Family units are also proposed, this is welcomed."* In addition the provision of residential as part of a mixed use scheme was welcomed by the Council.

Concerns regarding the introduction of residential uses and the proposed mix are considered to be unsustained issues as both the provision of additional Class B1 floorspace and the delivery of housing in the borough, accord with national, regional and local planning policy.

#### Height/Roof Extension

Design development of the scheme has been the result of pre-application considerations and the feedback received during officers' consideration of the previous application, which has led to the submitted proposal. It is considered that the proposals sit comfortably within the context of the Canal area and Jamestown Road, which accords with local, regional and national policy and guidance. The submitted Design and Access Statement prepared by Ben Adams Architect addresses all design considerations in relation to the scheme.

The proposed increase in height is minimal (1.5m); this height increase is set back (along the canal side, Jamestown Road, and between the site and the neighbouring hotel) to ensure minimal visual impact on the canals landscape. The increased set back and reduced height results in the proposed roof extension only being visible in long view and long sight lines.

Following discussions with officers the height of the roof extension was reduced by 600mm from that shown in the previous application and the 5<sup>th</sup> storey set back on the canal side by a further 3 meters, its setback from the building line is now 12meters. The setback has reduced the amount of residential accommodation that could be provided at this level. The Canal and Riverside Trust have confirmed that the set back of the roof extension should ensure on adverse impact no the canal environment.

Furthermore, currently a large quantity of rooftop plant and fixed enclosures occupies the roof storey of Jamestown Road and is located close to the canal building line. The proposals remove this unsightly plant and replace it with a set back lightweight glazed structure. The visual impact of the proposed roof extension is far less obtrusive than the present condition and is also subject to substantial improvement in its architectural treatment.

Residents have raised concerns over the potential impacts to Daylight, Sunlight and Rights to Light. The supporting Daylight and Sunlight report submitted as part of the application fully explores the potential Daylight and Sunlight issues. Flats 1-14 in the Iceworks have been discounted from the daylight and sunlight assessment by virtue of the fact that the Grand Union Canal and Jamestown Road elevations face away from the proposal, whilst the "half-moon" elevation in the middle of the building is obstructed by its own crescent shape effectively shielding the 32 Jamestown Road development. Therefore the windows to this property will not be affected by the development. We feel that this approach remains valid.

We note that objections have been raised by Gilbey House, 38 Jamestown Road. Whilst there may be limited effect on some of the windows on the eastern elevation, particularly those that have views across the Iceworks crescent elevation, any light losses will be well within BRE criteria as set out in the supporting submitted Daylight Sunlight report, prepared by Delva Patman Redler.

#### Building Line and Balconies

The proposed redevelopment of 32 Jamestown Road will maintain the current building line. Therefore, there is no change to the building line presently facing the canal and this matter is not considered to be an issue.

The two projecting balconies which have been proposed are next to the hotel (30 Jamestown Road), not the Iceworks (34-36 Jamestown Road). The balconies will project 1360mm from the façade and are situated circa 20meters from the boundary between 32 Jamestown Road and the Iceworks. Due to their positioning and design overlooking from the Iceworks and vice-versa would not be possible. There is, therefore, no change to

the visual amenity of the Iceworks residents in this regard. The balconies therefore are not considered to be a planning concern.

The 4C Hotel Group has requested a planning condition to be imposed regarding the design of the balconies. The Canal & Riverside Trust have raised no objection to the proposed development but require a commercial agreement with their Estates Team. London & Regional would be happy to accept appropriately worded conditions in these regards.

#### Elevational Treatment

The proposed elevational treatment builds upon comments received during officers' consideration of the withdrawn application and it is considered that the amendments are wholly appropriate. In addition, formal pre-application feedback from LBC supports the proposed elevational expression stating: *"The proposed remodelling of the building's elevations is welcomed and the current design is considered acceptable as it refers to the historic and architectural characteristics of traditional canal side buildings, being more solid and substantial than the previous proposals."*

Furthermore the Canal & Riverside Trust have set out that they consider the design an improvement to the canal side environment.

It is therefore considered that the elevational treatment is wholly appropriate for site and fully responds to the concerns of the previous applications.

#### Noise

All plant is attenuated and housed within an acoustic enclosure. An acoustic report was submitted with the planning application which details the measures taken to ensure that any noise pollution to the adjacent properties is appropriately mitigated. Furthermore the proposals will, result in a reduction of plant noise by replacing the existing plant which suffers from poor acoustic attenuation. The proposed plant equipment will be of a modern specification, correctly housed and attenuated. It is considered that the proposed mitigation measures are adequate and an enhancement on the existing plant situation, therefore noise concerns are not considered to be a valid concern.

#### Highways

##### *Off street Servicing*

The current building layout does not incorporate an off-street servicing area. The vehicular crossover leads to basement car parking with limited headroom of approximately 2.1m. Owing to this headroom and the desire to retain the building structural frame for sustainability reasons it would not make a practical servicing area. In addition, guidance dictates that a vehicle entering and exiting an off-street servicing area has to do so in forward gear. The space required for a turning head or mechanism to turn vehicles would have resulted in a large proportion of the Jamestown Road frontage being dedicated to servicing facilities and would not enhance the building frontage. A transport plan was submitted as part of the planning application which illustrates that the development will not intensify servicing arrangements to the building. Therefore on-street servicing will continue as per the existing situation. The expected numbers of servicing vehicles are not high and would be controlled via a Delivery and Servicing Plan which will periodically be reviewed.

While the comments regarding 10 Jamestown Road are noted, these should be dealt with directly via the parties concerned rather than through subsequent developments by different parties.

##### *Off street parking*

The existing car parking area has not historically been fully utilised which is possibly owing to the high public transport accessibility the building benefits from. The proposed increase in office workers is not likely to use private motor vehicles for the same reason. They would also be limited from parking on the street by the maximum pay and display parking duration.

The residents of the proposed building will not be able to apply for a residents parking permit and would be unable to park vehicles in pay and display parking bays for any significant length of time. The parking beat survey undertaken was to assess the occupancy levels of the on-street parking to ensure that a Blue Badge holder would be able to find a place to park. It concludes it is likely they would be able to park.

#### Construction Impacts

All construction sites create some level of noise, vibration, dust and construction traffic. The 32 Jamestown Road redevelopment is predominantly a refurbishment, which will reduce the impact of all of these aspects. London & Regional Properties will enter into a contract with a contractor who is part of the Consideration Constructors Scheme for the construction works.

It is envisaged that the preparation, submission and approval of a Construction Management Plan will be secured by planning condition or legal agreement if planning permission is granted. In any event none of these issues are a valid basis to refuse the grant of planning permission.

A more detailed breakdown of construction matters are provided below.

#### *Noise*

As the development is a refurbishment, and much of the construction work will take place inside the existing building, noise levels through much of the project will be considerably lower than a typical construction site. The construction activities which are anticipated to be relatively noisy will be cutting and drilling of existing concrete – though it is noted that these would only occur during a relatively small period of the construction programme. It is anticipated that the construction contractor will liaise directly with the adjoining properties to determine the best timing for these noisier construction activities.

London & Regional Properties have held detailed discussions with the adjacent office and hotel regarding construction impacts and agreed signing a building contract in relation to noise based work, in relation to hours, work patterns. In addition it was agreed that the entrances to the site would be kept clean and tidy on a daily basis.

#### *Vibration*

Most vibration during construction is associated with earthworks and foundations. It is planned to make extensive reuse of the existing foundations and basement. It is the aim to avoid any foundation strengthening, and it is therefore aimed to avoid any foundation related vibration.

#### *Dust*

Dust on construction sites is typically an issue during civil works and earthworks phases. As the development is a refurbishment it is not anticipated that there will be any earthworks undertaken. The majority of construction works will be undertaken inside the existing building, which will significantly reduce the likelihood of any dust affecting neighbours. It is also highlighted that the absence of an earthworks phase eliminates the risk of construction vehicles transferring dirt from the earthworks to the public roads

#### *Construction Traffic*

All construction sites have some amount of construction traffic. As this site is a refurbishment, the amount of demolition material and new construction material is significantly reduced. This has a follow-on reduction in the number of vehicle movements required to take this material to and from site. The Transport Statement details that it has been agreed with the London Borough of Camden that a Construction Logistics Plan (CLP) will be produced to examine the highway impact of the conversion and extension work including the number of vehicle trips generated, proposed routes to/from the site and mitigation measures to reduce the highway impact. This will schedule delivery movements to avoid peak periods and where possible contractors will be sought who have joined a best practice scheme such as TfL's Freight Operator Recognition Scheme (FORS).

### Consultation

Residents have set out concerns regarding the level of community engagement. Full details of the pre-submission consultation strategy are set out in the supporting Statement of Community Involvement, prepared by George Cochrane Associates Ltd. In summary, The Applicant has sought to include in this consultation all relevant stakeholders and individuals and has met with Ward Councillors, the Regents Canal Conservation Area Advisory Committee and both the representatives from the neighbouring properties. In addition, public engagement occurred as part of the previous planning application and comments received have been taken into account as part of this resubmission.

London & Regional Properties have met with the manager of the neighbouring Holiday Inn Hotel and the neighbouring office to discuss the construction and the amendments to the design. Agreements were reached in relation to the design of the private amenity space and balconies. The Applicant has also made a commitment that there will be on-going dialogue and liaison in advance of and throughout the construction phase to ensure good neighbourliness. In addition, invitations to meet with residents of the Iceworks were sent.

I trust the information enclosed within the response addresses the comments that have been raised during the consultation period, and that you now have everything you require to complete your report in advance of the 20<sup>th</sup> March Planning Committee meeting.

I look forward to confirmation of receipt, and would be grateful if you could contact me or my colleague Laura Gray (0203 320 8253) in the first instance if you have any queries or would like to discuss.

