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Our Ref: FL10355

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Eimear Heavey
Planning and Built Environment
Camden Town Hall
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Dear Ms Heavey

**Re: Letter of Objection to Planning Application: 2014/4270/P
End Corner Plots at Grafton Road, Lambie Street, Barrington Court, London NW5**

1. We have been instructed by Mr James Marshall to object on his behalf to the erection of new residential dwellings on the three end plots in the Lambie Street Estate, in particular, with regard to plot C which would immediately adjoin his property of 1 Barrington Court, London NW5 4AS. Accordingly, we would be grateful if the following could be taken into consideration in determining the application.
2. Following an assessment of the application documents, a number of two significant issues have arisen with regard to this application including:
 - The design and form of the scheme
 - Loss of outlook

- Loss of community space
- Impact on the existing Copper Beech tree

3. Each of these issues shall be addressed in turn:

Design and Form

4. The Lamble Street Estate was completed in 1954 and was designed by architects Powell and Moya. Barrington Court is one of the only remaining examples of their work. Their work was highly acclaimed, with Philip Powell widely acknowledged as the *“father of humane modernism”*¹. Clearly reflecting this, Powell and Moya were the first to win the RIBA Gold Medal for Architecture as a practice in 1974. The design of the estate is simple and uncomplicated, exhibiting clean lines of development, with communal gardens at the end of the three terraced rows which form part of Barrington Court.
5. The asymmetrical modern design of the proposed developments has not been given sufficient consideration to complement the distinctive character and style of the existing dwellings. The three proposed dwellings are overly fussy and unnecessarily complicated, which would jar with the minimalist form of the existing terraced houses within Barrington Court. Little regard has been given to the existing eaves and ridge levels, which could have been reflected within, and incorporated into, the design detailing on the new dwellings providing visual continuity and visual harmonisation. The typical elevation on page 21 of the Design and Access Statement incorrectly indicates that the proposed eaves level would match the height of the existing buildings. The development would fail to have sufficient regard to the local character and context, as required by Core Strategy policy CS14, and would conflict with not only this policy, but also with Camden’s Planning Guidance on Design: CPG1.

¹ National Portrait Gallery (2014) “Sir Philip Powell (1921-2003). Architect”; <http://www.npg.org.uk/collections/search/person/mp05681/sir-philip-powell>

6. In addition, little regard has been paid to the definitive building line that the existing terraced dwellings provide. All of the three dwellings proposed would step forward of the established front building line, extending the built massing into the currently uninterrupted views along the terraces. Whilst the Design and Access Statement states that the partial reflection of the front building line gives *"a sense of proportion"* (page 5), this will only be appreciated when viewed directly in front of the sites. This cannot be appreciated from angled views along the terrace or from within Grafton Road and from typical views a pedestrian would experience when travelling down the street. This further highlights the scheme's failure to comply with policy CS14.

7. The assertion within the Design and Access Statement that the development gives the *"opportunity to form a new streetscape"* with regard to Grafton Road has not taken full advantage of the opportunity. The development, by virtue of its height and form, will have more of an enclosing effect from this public viewpoint. At present, the existing communal gardens soften the appearance of the flank walls of the existing dwellings and offset the extent of built development within these high density surroundings. The proposed dwellings would remove this soft landscaping and would effectively relocate the flank walls immediately onto Grafton Road, causing extreme detriment to the visual amenities of the locality, and exacerbating the impact through the increase in height in relation to the existing dwellinghouses. The established and distinctive terraced rows, so carefully planned by Powell and Moya, would effectively be hidden from view and the unique architecture concealed from public appreciation. The supporting text to policy DP2 states that housing priority does not override *"the need for development to respect the characteristics of the area and the site or property"*. In this respect, the development would fail to accord with policy DP2.

8. The existing communal garden adjoining 1 Barrington Court is currently enclosed by a low brick wall and railings, which are splayed to soften its appearance within the street scene. The new dwelling to be constructed on this site, Plot C, has been designed with an angular wall junction that takes no opportunity to soften this considerably larger and more imposing built form when viewed within Grafton Road. Not only will a stark flank

wall arise in Grafton Road, this angular detailing will appear harsh and formal within the immediate locality. Unfortunately, the impact of detailing such as this does not appear to have been given proper consideration

9. Our client's primary concern is the physical attachment of the proposed dwelling on Plot C to his own privately owned property. Plot C is the largest of the three plots, yet will accommodate the smallest of the three properties, providing only a one bedroom dwelling. The size of the plot is more than sufficient to provide suitable accommodation for a one bedroom dwelling without physically attaching to our client's property, subject to a more practical design solution. Insufficient consideration has been given to the impact of this physical attachment to the existing dwellings and the fundamental alteration in the visual outlook and context within which these existing occupiers reside and, indeed, originally chose to live within.

Loss of Outlook

10. Our client is currently afforded uninterrupted views to the east from the front of his dwelling. The stepping forward of the proposed dwelling on plot C would result in a sense of enclosure and erode the outlook that is currently enjoyed in one of the most built up areas in the country. Indeed, this adverse impact would be replicated for both the occupiers of No's. 12 and 49 Barrington Court. The impact of this staggered building form would be exacerbated by the increased height of the new buildings, with little offset from the proposed roof forms. The development would fail to improve the experience of the borough by residents, as required in the supporting text to policy CS14.
11. The development would have insufficient regard for the amenities and outlook enjoyed by existing occupiers of Barrington Court, in particular those dwellings at No's. 1, 12 and 49, thereby failing to accord with policy DP26. The communal gardens are a vital soft landscaping relief and contribute to the wider visual amenity of the area making it an attractive place to live. Removal of these key areas in order to prioritise residential

development would not have sufficient regard to factors which initially attracted residents to the area.

Loss of Community Space

12. The three plots may be limited in size, however, they provide vital external public amenity space in a highly populated, high density location. Pockets of green space within the sprawling urban capital are essential for not only softening the mass of built form but also for providing residents with important recreational space. Given the high incidence of flats in the immediate locality, which will have limited or no amenity space, these green areas, however small, are of considerable importance to public wellbeing. In response to policy DP2, it is assumed by the applicant that these spaces are *"left over"* from the original development. To the contrary, the degree of openness afforded by these sites is key to the uniqueness of the estate and its openness should be respected, being set out in CPG1: Design as constituting good design. The contribution of this unique character does not appear to have been afforded appropriate consideration, in conflict with this Planning Guidance document.
13. It is set out in CPG1 that *"existing trees and vegetation are a key component in adapting to climate change and conserving biodiversity"*. The proposed development appears to have insufficient regard for the planning guidance in this respect and the contribution that the three plots make not only to humans but to existing plants and wildlife.
14. On page 29 of the Design and Access Statement, in reference to Core Strategy Policy CS1, the three plots have been labelled as *"currently derelict with little or no amenity value to the community"*. This statement is disputed. Camden Council considered that these three plots were of sufficient importance to the community to award these areas grants not more than a couple of years ago to form a wildflower garden and allotments. The work to the gardens was subsequently undertaken. It would, therefore, seem illogical that public money would have been spent on improving this important community feature, only for it to be removed a couple of years later.

15. Proper maintenance of these gardens would ensure high quality landscaping that was intended in the original design of the estate and would achieve the requirement of policy CS14 in this regard. As such, the removal of this soft landscaping would be detrimental to these community spaces. Core Strategy Policy CS1 states that it will deliver opportunities and benefits that will make Camden an *"attractive place to live, work and visit"*. It is, therefore, questionable that the removal of community gardens would fulfill this assertion.

16. Whilst the policy goes on to require development to make the full use of a site, removing community gardens in such high density surroundings in order to achieve this will not fully comply with the policy as a whole and would ultimately have a detrimental impact on the attractiveness of the area. Paragraph 1.21 sets out that *"the Council will promote the most effective use of Camden's land and buildings while also seeking to improve the quality of our environment"*. The proposed development would not achieve this for the existing residents of Barrington Court and the development, therefore, fails to fully accord with policy CS1 and planning guidance CPG1.

17. The submitted Design and Access Statement has dismissed Plot C, immediately adjoining our client's dwelling, stating on page 4 that due to the Copper Beach tree, it *"does not provide useable amenity space"*. This is disputed. The existence of the tree has no bearing on the usability of this space. The tree itself provides much appreciated shade in the hot summers and there is still ample space around the trunk for recreational use. Unfortunately, it would appear that insufficient regard has been placed on community recreational space and the importance of these soft landscaped areas to those who actually reside in such generally built-up surroundings, in conflict with planning guidance CPG2.

18. It is stated on page 29 in response to policy CS4 of the Camden Core Strategy that the dwellings will be sold on the open market and the money used to regenerate and refurbish the existing estate. A condition is requested, in the event that planning

permission is granted, to ensure that this is carried out and that the money does benefit the current residents who will have suffered from this loss of community space.

Impact on the existing Copper Beach Tree

19. It is acknowledged that the dwelling proposed for Plot C has been subject to a number of redesigns to accommodate the retention of the existing Copper Beech tree, which our client is wholly in favour of retaining. However, the actual reality of maintaining and retaining the tree in situ is questioned. Simple questions such as carrying out pruning arise, however, these do not appear to have been addressed in the Design and Access Statement.
20. The reference on page 20 of the Design and Access Statement to the tree roots and the assumption that the boundary wall being constructed before the planting of the tree may have contained the roots within the plot, is of concern. A tree of such size and age will have roots that have sunk themselves to quite some considerable depth and would more than likely have passed beyond the foundations of the boundary wall, if indeed the wall has any foundations in the first instance. The illustrations in relation to the tree roots appear to show the canopy of the tree being within the confines of Plot C, however, the sites plans show the canopy of the tree exceeding the plot boundaries and as such, it is reasonable to assume that the roots follow a similar pattern.
21. The Arboricultural Report submitted in support of the application states on page 3 that plot C is significantly smaller than the Root Protection Zone of the Copper Beech and the reasonable assumption has been made that the tree has adapted due to its health, however, this does not mean that the roots of the tree have not extended beyond the confines of the plot. It is stated in the conclusion under point 5.1 that "*the trees' root systems have been confined largely to the plot, so for practical purposes these can be treated as the Root Protection Areas*", however, it is prudent to note that until this is fully investigated, unfortunately at construction stage, this cannot be said within any certainty.

22. The pile depths in drawings (3) and (4) on page 20, have been truncated to the depth of the perceived root protection area, falsely providing the impression that tree roots could potentially sink beneath these piles without harm. However, given the age and size of the tree, the roots will have been well established some considerable time ago. Whilst an attempt has been made to be sensitive to the features of the existing site, the reality of the long term maintenance of the tree has been given insufficient consideration, in conflict with CPG1: Design requirements.

Other matters

23. It should also be noted that our client has significant concerns over the impact of the proposed dwelling to be attached to their property on the structural integrity of their home. There appears to be no acknowledgement provided within the documentation as to how the integrity of our client's property is to be preserved and accordingly, at the very least, a structural method statement should be submitted to show serious thought has been given to this significant issue.

Conclusion

24. Having assessed the application documents, the development represents a poorly designed scheme which has insufficient regard for the amenity of existing residents and on the maintenance and retention of the Copper Beech tree which is located within Plot C. The physical attachment of the development to our client's privately owned property is a fundamental concern that does not appear to have been given due consideration.

25. Accordingly, the development proposed would conflict with policies CS1, CS4, DP2, DP26, CPG1 and CPG2. As such, we respectfully urge this application be refused.

26. Our client would like to reserve the right to speak to the Planning Committee in the event that this application is to be determined under such a procedure.

Yours sincerely,

H. O'Connell

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cc: Mr James Marshall