

5 Rochester Terrace NW1 9JN

Camden Borough Council
16 October 2014

Re: **2014/5476/P** and **2014/5486/P**

I am writing on behalf of South Kentish Town CAAC. We responded to the application 2013/5689/P, and Gill Scott was included in correspondence to CAACs from the applicant indicated as 29 July 2014. This fell over the holiday period and we are now able to provide further response.

Two parallel applications have been made, and the Design and Access statements do not clearly indicate the differences. I am assuming they are similar in intent, and these objections cover both applications.

The site falls within Camden Broadway Conservation Area, and directly adjacent Regents Canal conservation area – which is not recognised in any of the documentation. South Kentish Town CA has supported the creation of Camden Broadway CA in 2008, since this historic area had been badly served by recent buildings and conversions – including the poor conversion (with dreadful basements) of the modern block, formerly a shop and restaurant, at 158-164 Royal College Street. Importantly, the brick and stucco mid-19th century terrace on the west side of Royal College Street, has been saved by the conservation area protection, and 152 is critical in maintaining the planned integrity from the north of College Street bridge up to Camden Road

Regents Canal Appraisal and Management Statement, 2008, identifies College Street Bridge as a building that makes “*an important contribution to the character and appearance of the Conservation Area*”. No 152 forms the north east corner of College Street Bridge, with Bayham Street and the canal towpath. It is also the first in a terrace set out in the early nineteenth century, with detailing which the adjacent properties continue to present, for example in the shop corbels.



and in the slate pitched roofs and side chimney breasts



The Regents Canal CA Statement:

Roof Extensions

The canal is framed along part of its length by terraces of housing, the rear of which are visible from the canal towpath. The terraces generally date from the early to mid 19th century and their prominent rooflines and rear elevations form a characteristic element in the conservation area. The roof forms of historic canal-side buildings are visible in views and vistas along the canal and also contribute to the canal's character. Roof extensions which fundamentally alter the roof form of buildings where visible from the canal will not normally be permitted, although each proposal will be considered on its own merits.

The proposal for 152 entirely hides the roof lines of 154-156, rather than complementing them, with an extra storey roof terrace and a back extension staircase.

The extra upper storey, adjacent to three-storey Victorian buildings, creates a panorama-view pent-house with flat roof. While a similar style was used in the new development on the south west side of College Street bridge, built on the former canal goods yard, this is not acceptable for the terrace of 152-156 which, in the Conservation Officer's words should "*respond to and reinforce the classical facades of the adjoining 19th Century terrace*".

The Regents Canal CA Statement says:

Rear Extensions

Rear extensions should be as unobtrusive as possible and should not adversely affect the character of the building or the conservation area. The proposal's general effect on neighbouring properties, the setting of the canal and the conservation area will be the basis of its suitability.

Within the terrace or group of buildings what is permissible will depend on the original historic pattern of extensions. Rear extensions will not be acceptable where they would spoil a uniform rear elevation of an unspoilt terrace or group of buildings, particularly when the elevations concerned are clearly visible from the canal.

The rear extension proposed in the scheme is very obtrusive – it has both extra bulk from the staircase extension and also extra glass windows. This is not the historic pattern of low back extensions for these buildings – whatever the configuration allowed for 158-164, which was built before the Camden Broadway Conservation Area was introduced. Nos 154-156 are buildings which can be seen from the canal, and the proposal will spoil this view.

Materials and external design

Pre-application advice from the Council in the Conservation correspondence:
Officer: *The design needs to respond to and reinforce the classical facades of the adjoining 19th Century terrace. I would recommend uncomplicated scheme which has a simple palette of 1 or 2 materials. ...window details; brick work; at the base much like a window architraves; brick arches and stucco base found on typical 19th Century terraces.*

The scheme proposes a complicated design which is not in keeping with the adjacent Victorian buildings, which have a simple front entrance and side stairs. The scheme proposes an add-on back staircase, with a towering row of plate windows above two doors. Additional to this, the further proposed back extension has not kept to advice of “1-2 materials ... brickwork” but includes metal, glass, Reglit and timber for the side wall for Bayham Street. Nineteenth century buildings terrace buildings in this part of London had unfenestrated sides, and simple brick walls along the back garden (possibly with an entrance for access). This proposal would significantly affect the alter the view from the canalside.

Basements

Both adjacent early nineteenth century shops (154, 156) have small under-street basements with grills for lighting, entered internally. Beneath shops, these would be small, built perhaps for storage (and possibly animals) but not habitation. There is currently no basement at the site of no 152.

The proposal in the application for a down staircase to a studio flat is unacceptable. The guidance planning from Camden about lightwells in 2012 was:

2012: CPG4 – “advises that the creation of lightwells in front of shopfronts tends to have a negative impact on the appearance and functionality of our shopping parades. They create barriers between the public and private realm and reduce the ability of customers to look into the respective shopfronts. This guidance is a material consideration that we must have regard to when making decisions on individual planning applications.”

The guidance has been upheld in decisions in further along the parade towards Camden Road, and should be adhered to also for 152.

Since the side pavement has no light, and the back extension ‘lighting’ is apparently through the floor from the above room, the basement should not be included for habitation in the scheme.

Refuse storage and cycle parking.

The Council has well established and important policies and practice for applicants in these areas, which should be properly addressed by the scheme – putting the cycle parking within the ‘shop’ floor area, with entry from Bayham Street, is an entirely unsatisfactory solution, and putting the refuse into the basement fails Camden’s roller-bin arrangements.

Trees

Regents Canal Appraisal and Management Statement, says: *“Beyond College Street Bridge (Royal College Street) is one of the largest open planted sections to the canal, the steep bank rising up from the towpath with trees at the top of the bank forming a valuable visual containment.”*

The application minimalist Tree Protection Plan, for which no detail is given in questions in the D&A Statement, is dated October 2013 but was put on the site only on 15 October, just one day before closure of consultation. It observes *“To the East of the entrance to the shop there is an established tree within the existing pavement and located approximately 4 metres from the site boundary (see drawing 489-07-G). There are no other trees on or near the site.”* That drawing is not provided, but both D&A statement pictures and drawings show a pavement tree nearby in Royal College Street to the northwest side of the site. Moreover, the D&S Statement, in describing the setting, ignores the proximity of trees and embankment of the Regents Canal, which the Conservation Appraisal and Management Statement specifically mentions. The applicants have not paid sufficient attention to the existing significant tree environment within the two Conservation Areas.