

**From:** planning, North London <northlondonplanning@environment-agency.gov.uk>  
**Sent:** 18 December 2014 12:02  
**To:** Planning  
**Subject:** 2014/6903/P - 32 Lawn Road

Jonathan

Thank you for your email dated 15 December 2014. We have assessed this application and have identified flood risk as the only constraint at this site.

You should be using our [Flood Risk Standing Advice](#) (FRSA) to determine if we need to be consulted directly on an application regarding flood risk. This site is in Flood Zone 1 and is under a hectare. Therefore cell F5 of the consultation matrix applies and you did not need to consult us.

The main flood risk issue at this site is the management of surface water run-off and ensuring that drainage from the development does not increase flood risk either on-site or elsewhere.

We recommend the surface water management good practice advice in cell F5 is used to ensure sustainable surface water management is achieved as part of the development.

Surface water runoff rates and volumes from the site must be managed in accordance with the [London Plan](#) (July 2011) - which sets higher standards than the NPPF for the control of surface water run-off. Policy 5.13 - Sustainable drainage (page 155) of the London Plan states that "development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible" in line with the drainage hierarchy.

If you have identified drainage problems at this site through your Strategic Flood Risk Assessment or Surface Water Management Plan, you may want to request a formal Flood Risk Assessment from the applicant in line with [Flood Risk Assessment Guidance Note 1](#).

If you have any further questions about the above development or about our FRSA, please contact me.

Kind regards

**Candice Albon**

[Major Projects Officer - North London](#)

Environment Agency | South East | North East Thames | London

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🏠 Ergon House, Horseferry Road, London SW1P 2AL

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[REDACTED]

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**From:** tara kingsley [REDACTED]  
**Sent:** 18 December 2014 21:23  
**To:** Planning  
**Subject:** Planning Application Consultation Ref 2014/6903/p

Dear Sir Madam

Planning App Number: 2014/6903/P + 2013/7471/PRE + 2014/1524/PRE  
Planning App Address: 32 Lawn Road, NW3 2XU

My name is Tara Kingsley. I live at 1 Garnett Road. My contact details are as follows Mob: [REDACTED]  
/ Email: [REDACTED]

I object to the application on the following basis:

The plans submitted are far too dense for the the area and the environment. 32 Lawn Road is at the end of a residential street which already has two significantly large tower blocks on it. The local area already struggles to cope with the congestion and demands of the existing residents. To add potentially a further 70+ dwellings would have an extremely negative impact on traffic and parking, pollution and will no doubt increase the existing bottleneck around the local streets during key rush hour times. It will also have a significant impact on the local Fleet school demographic as it will be at the top of the catchment postcode for the school meaning that even less existing long standing local residents will be able to get into the school as they will fall further down the postcode list as a result of this development. This in turn will increase congestion as parents of these children will be forced to get into their cars in order to travel to schools as they will no longer be able to walk there kids to the local school,

The development also doesn't take into account public rights of way which currently exist in-between the community centre and the workshop block. In addition should there not be an underground parking facilities for the new residents incorporated into the design to replace existing parking facilities which have been lost? We already struggle to park outside our homes. The prospect of an additional 70+ vehicles trying to find a space on the streets to park in the evenings is of great concern.

From an aesthetic point of view I really do think that if we are to endure this development, that it should be sympathetic to the design of the surrounding area which is a conservation area. Apart from the ugly tower blocks and the Isokon building there are no other buildings of more than 4 storeys that I am aware of. Surely the design should be sympathetic to this and not be allowed to go up higher than this?

Unfortunately as it currently stands the proposed development offers absolutely nothing for existing local residents - no community space, no replacement of community parking, removal of community mural, impact on services. It's being designed to maximise on profit and has not taken into account any of the concerns of previous consultations with residents.

I therefore really do think that planning should be refused and developers should be asked to reduce the size in order to lessen the negative impact on the entire community surrounding it.

Yours sincerely

Tara Kingsley

## **PALGRAVE HOUSE TENANTS AND RESIDENTS ASSOCIATION**

**To:**

Planning and Built Environment  
London Borough of Camden  
For the attention of: Jonathan Markwell, Planning Officer



**From:**

Rosaleen Owens,  
Chair, on behalf of  
Palgrave House Tenants and Residents Association  
12 Palgrave House  
Fleet Road, London NW3 2QJ

**Ref:**

Planning Application: 2014/6903/P  
Proposed development at:  
32 Lawn Road  
London NW3 2XU

19th December 2014

### **Comments and Proposals, Ref: Planning Application 2014/6903/P**

Dear Sir /Madam

I am the elected Chair of **Palgrave House Tenants and Residents Association** (the TRA), which is an active TRA registered with LB Camden. The TRA has elected officers and a committee, all being residents of Palgrave House. The views in this letter were confirmed at a TRA meeting held on 18th December 2014, and this letter has been signed off by the TRA's officers. (NB: Palgrave House is very close to the proposed development.)

In summary, this is a letter of support for the proposals, with some reservations.

**First, three points about consultation:**

1. On consultation by the Council in the form of letters sent to local residents about this Planning Application and the 21 day consultation period, dates etc. We are perplexed by the "Neighbours List" published on the Council's application website. It appears that various flats in blocks near the site are not included by the Council on the list for the issue of consultation letters. To clarify, please confirm that consultation letters have been sent out by the Council to **all** flats in Palgrave House, Cayford House, Du Maurier House and Garnett House; to all flats at no. 90 Upper Park Road; to houses at 84/86/88 Upper Park Road; and to all flats at 1-16 Park Dwellings. If not, the TRA considers that the Council has inadequately consulted local residents about the Planning Application. If that's the case, the TRA formally requests that the 21 day consultation period be re-started by the Council, with new letters issued to all the above residents near the site. **Please confirm back to me on this point.**

2. On consultation carried out during the Pre-Application Consultation stage, individual residents of Palgrave House were in touch with the Applicant on design issues and design development, and attended public meetings and exhibitions. Comments were submitted by e mail to the Applicant.

3. More recently, the TRA has taken the initiative to engage with the Applicant on the subject of off-site landscaping and other off-site works. There is now an on-going dialogue about these works between the TRA and the Applicant. The TRA is currently making inputs to the Applicant and their Landscape Architect regarding the design of off-site works. This process is on-going and therefore runs in parallel with consideration of the Planning Application by the Council. **The TRA requests that this on-going process is taken on-board by the Council whilst considering the Planning Application, so that all the proposed off-site works will be included in the approved works for the development.**

#### **Background:**

Palgrave House is owned by Camden Council. It contains 56 flats and is a typical 1960s tower block on 15 storeys. There are four flats per floor, except the ground floor. Half of the flats (28 no.) face due west and look towards the development site. The living rooms and bedrooms in the west facing flats look towards the site.

Residents in Palgrave House are understandably concerned about the proposals and the effects of the development on their homes. Palgrave House is **8m** from the site boundary.

Residents feel the loss of the Community Centre and land from their estate (ie the development site, sold to the Applicant by the Council), and we are aware of the scruffy environment in which we live. The current poor condition of parts of Palgrave House and the immediate external area is due to lack of investment by the Council.

It is noted by the TRA with real disappointment that no part of the **£11.2m** paid to the Council by the Applicant for the site in March 2014 is being re-invested in the Council owned homes around the site. The TRA thinks this is unjust and short-sighted on the part of the Council, considering the lack of investment over the years.

#### **Planning gain:**

The TRA considers it is **very important** that the Council (as Planning Authority) secures appropriate off-site landscape improvement works and other off-site renovation works to form part of this development, as "planning gain".

The TRA is aware that the Applicant has a contractual obligation to provide new landscaping in the courtyard at Garnett House. Also, the TRA supports CABE's position that the development should not be considered in isolation, ie that off-site areas must be re-designed and improved to extend the quality of the development beyond the boundary of the site. To this end it is the TRA's view that the off-site areas described in this letter must be renovated and/or re-landscaped to a high standard by the Applicant (at the Applicant's expense), **to satisfy CABE's requirements.**

The requirement for off-site improvement works is highlighted in the letter from CABE to the Applicant dated 19th September 2014, reproduced on **page 42 of the Applicant's Design and Access Statement**.

An area of off-site land referred to by CABE for improvement is the strip running north/south, just outside the eastern boundary of the development site. It contains the public footpath and open area between Palgrave House and the development site. It stretches from Lawn Road (opposite The Stag public house) southwards to the beginning of the full width carriageway in Upper Park Road, just to the south of the courtyard entrance to Garnett House. It also includes the turning head next to Palgrave House (which the proposed development relies on for service access and turning), plus associated approach areas and various paved and landscaped areas. It also includes part of the area behind railings in front of Palgrave House.

It is important to the TRA that all this land is properly re-landscaped, including new high quality external lighting, hard and soft landscaping, planting, trees, fencing, gates, signage and other features. All details need to be agreed with the TRA and other stakeholders.

**When the designs for off-site works have been agreed, the TRA wishes to see the off-site works approved by the Council as an integral part of the development.**

The TRA also wishes to see the off-site works carried out by the Applicant as part of the construction of the development, not carried out afterwards by LB Camden or another party. By this means, integrated on and off-site landscaping and other renovation works will be carried out to a uniform high quality standard, delivered as part of the development. **By this means the requirements of CABE will be achieved.**

In addition, the TRA has recently agreed with the Applicant that various building renovation works will be carried out by the Applicant (at the Applicant's expense), eg the refurbishment of the internal ground floor entrance and lobby of Palgrave House. This work is included so that the design standards of the new development are not seen in stark contrast to this much neglected entrance lobby, which is next to the new development and visible from the public area mentioned above. **(NB: The ground floor internal and external areas of Palgrave House are in worse condition compared to other Camden owned blocks in the vicinity. This has been the case for some considerable time.)**

The proposed renovation works to the entrance lobby include replacement of wall and floor tiling, the installation of a new ceiling and lighting, re-decoration, new signage, renovation and re-decoration of the front and rear entrance doors and screens, works to the soffit of the overhang outside the front door, new vinyl flooring in the lifts, and various other items. Also, within the context of the off-site landscaping works, various works have been agreed in the close vicinity of Palgrave House including the tidying up of external paving, new external paving to various areas, new railings and gates, soft landscaping, planting etc.

**The TRA requests that the building renovation works to be carried out by the Applicant are also taken on board by the Council, to be secured within the planning process alongside the off-site landscaping works.**

The off-site works described above are being designed now by the Applicant's design team for further discussion with the TRA in the early part of 2015.

The TRA assumes that all the off-site works (ie landscaping and the renovation works) will be the subject of a legally binding **SECTION 106 AGREEMENT** between the Applicant and Camden Council; or secured via some other mechanism that is legally binding on the Applicant.

#### **Design of the Development:**

The TRA considers that the proposed design is of high quality, designed by good Architects. Also, we have read the views of CABI regarding the design, with their various comments and proposals. On the whole, the TRA agrees with CABI's views, and the TRA thinks that the Architects have tackled their task on this constrained site in an imaginative way.

The TRA likes the proposed materials for the exterior of the building and thinks that, from an architectural point of view, a building along these lines will make an attractive addition to the local environment. The proviso being that the development includes generous high quality landscaping, both on and off-site, and other off-site works. (As described above.)

As mentioned in our opening paragraphs, the TRA supports the development, with some reservations. There are concerns that the new building is too high and too close to Palgrave House.

Some residents are concerned that the height of the new building reduces sunlight and daylight to flats on the west side of Palgrave House, at lower floors. Some residents are concerned that the proximity of the new building to Palgrave House will result in overlooking into flats on the west side, at lower floors.

On these points, the TRA requests that the Council discusses our reservations with the Applicant to assess if it's necessary to make any adjustments to the design on these aspects. **The TRA is content for the Council to come to its own views on these points with the Applicant.**

#### **Roofs:**

Because of the height of Palgrave House and Cayford House relative to the proposed new building, many residents will look down on the roofs of the new building.

The TRA therefore requests that the roofs are designed in an attractive way with appropriate detailing, so that they are attractive to look at from above. Unlike many buildings, the roofs on this one should be designed with as much care as the elevations, because all of these external surfaces will be viewed.

For example, it is noted that there will be photovoltaic arrays on the roofs, which sit on metal brackets. The TRA requests that the brackets, runners and other associated equipment are hidden under attractive roof finishes. (Perhaps pebbles?)

### **Demolition and Construction:**

On demolition and construction, the residents and the TRA are aware that they face at least 2 years of demolition and construction work, right on their doorsteps. This will be noisy and disruptive, and the TRA requests that the Council imposes strict conditions on the Applicant by way of a binding and detailed **CONSTRUCTION MANAGEMENT PLAN**. Amongst other issues, this Plan must cover the Health and Safety of residents and the public.

Importantly, the TRA thinks it would be very intrusive and disruptive for residents in Palgrave House if all the demolition removals and construction deliveries take place at the turning head next to Palgrave House. The TRA thinks this would be intolerable, especially for residents in the lower floors of Palgrave House and nos. 84/86/88/90 Upper Park Road.

Also, the TRA requests that a condition be imposed on the Applicant saying that Saturday working on the site is banned for the duration of the demolition and construction period. Many local residents live **very** close to the development site, and will be significantly affected by the works. **We need peace and quiet at weekends!**

### **Parking and Deliveries:**

The TRA agrees that the proposed development must be "car free"; ie there will be no provision for on-site car parking within the new development, and no residents of the development will be issued with CA-B (CPZ) parking permits, as a permanent arrangement.

There will be additional car parking in the local area close to the site. This is because the local CA-B residents parking scheme allows un-restricted on-street parking after 6.30pm on weekdays and at weekends (except Saturday mornings). Visitors to the new development will arrive by car and park in the CA-B parking bays during those un-restricted times.

There will also be delivery vehicles to the new development. This service traffic will include evening deliveries of food shopping and non-food goods. Delivery vehicles will also use local CA-B parking bays Lawn Road and in Upper Park Road, close to flat entrances.

To assist with these problems, the TRA requests that the Council considers extending the hours of parking control in the area to 8pm in the evenings (as in the Hampstead CPZ).

### **Traffic:**

The TRA has particular concern about the proposed use of empty gaps in the existing on-street parking layout in Lawn Road for new parking spaces. The Applicant proposes that the gaps be filled with **3no. disabled on-street parking spaces**.

Lawn Road is a busy two-way street, but this section of Lawn Road is not wide enough for two-way traffic to pass. There is also a bend in Lawn Road next to the site, so visibility ahead for drivers is restricted in both directions. Under these circumstances, at present, the gaps in the parking bay layout are used as essential passing spaces for two-way traffic, where visibility ahead is restricted by the bend.



Without sufficient passing spaces, Lawn Road will cease to function. The TRA predicts serious congestion and difficulties for car drivers using Lawn Road in both directions under those circumstances. Vehicles will be forced to reverse in the roadway in Lawn Road under difficult circumstances, and/or there will be gridlock.

The TRA requests that a solution is found in Lawn Road to deal with these concerns.

**Closing of Right of Way:**

The TRA has no objection to the proposal to close the existing footpath/right of way across the development site. The footpath/right of way currently passes along the rear of the dis-used community centre building.

**Trees and Tree Preservation Orders:**

The design and landscape proposal ignore the 4no. Tree Preservation Orders (TPOs) on the development site. The design assumes that all four protected trees will be felled to locate the new building as proposed.

The TRA is willing to accept the loss of the four protected trees, providing that the new landscaping and tree planting on and off-site is generous, to adequately compensate for the loss of the protected trees. To achieve this, all the landscaped areas must include a mixture of new semi-mature and mature trees (not saplings).

***In Conclusion...***

As Chair of the TRA, I confirm that the inclusion of comprehensive high quality hard and soft landscaping and building renovation works as described above, fully integrated on and off-site and appropriately secured within the planning process, will be viewed by residents and the TRA as helpful and constructive responses to our concerns.

In these circumstances, when granting planning permission for the development, the TRA considers it essential that the Council secures "planning gain" as proposed above, to enhance the surroundings and the local environment, and to comply with the requirements of CABE.

On behalf of the TRA, I request that the Council takes account of all the TRA's comments and proposals contained in this letter, when assessing and determining the Planning Application.

Yours sincerely

**Rosaleen Owens**

Chair, on behalf of Palgrave House Tenants and Residents Association

[REDACTED]

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**From:** Richard Ferraro [REDACTED]  
**Sent:** 20 December 2014 17:59  
**To:** Markwell, Jonathan; Planning  
**Subject:** Planning Application: 2014/6903/P

**To:** Planning and Built Environment, London Borough of Camden  
For the attention of: Jonathan Markwell, Planning Officer  
[Jonathan.Markwell@camden.gov.uk](mailto:Jonathan.Markwell@camden.gov.uk) and [planning@camden.gov.uk](mailto:planning@camden.gov.uk)

**From:** Richard Ferraro BA(Hons) DipArch ARB RIBA FRSA, Architect.  
28 Palgrave House, Fleet Road, London NW3 2QJ

**Ref:** Planning Application: 2014/6903/P at 32 Lawn Road, London NW3 2XU

20th December 2014

I am writing on the subject of the planning application for a new residential development at 32 Lawn Road, NW3 2XU. I live in Palgrave House which is next to the site of the proposed development. I support the planning application, with some reservations. Concerning details, I agree with all the points made in the letter submitted recently to the Council about the planning application by the Palgrave House Tenants and Residents Association.

Yours sincerely  
Richard Ferraro