

19 New Court

London

NW3 1HD

28 January 2015

Dear Mr Tulloch,

I am writing to comment on the redevelopment of **6 Streatley Place** proposed by **Living Architecture, LLP** in its Planning Application 2014/7778/P to LB Camden. I am a resident of New Court estate.

Despite the inadequate and erroneous information in the Planning Application, it is clear that the proposed development would have a significant and permanent impact on the neighbourhood. Like others who have commented publicly, I consider that the proposed building is inappropriate and unsympathetic in terms of scale, form, details and materials, particularly as it is in a conservation area and immediately adjacent to New Court, a Grade 2 national heritage asset.

I fully appreciate the benefits that the beauty of modern and innovative architecture can generate but, in my opinion, the proposed building as depicted is unattractive and intrusive. It may well enhance the quality of life of the owner of the hotel and its customers but there is a risk this will be at the expense of people living nearby and the many tourists exploring Streatley Place by foot.

It is not clear from the planning application to what extent Living Architecture has consulted with Genesis Housing Association, the owner of the New Court estate. Detriment to New Court amenities would have a negative effect on the value of GHA properties. Despite potential impact on all residents of the estate, only a few households in New Court were consulted by the developer.

Possible risks to the community include;

Loss of natural light and sunlight

Overlooking and loss of privacy

Artificial light pollution, particularly at night

Noise, especially at night

Loss of biodiversity

Damage to the quality of children's play area amenity

Damage to the integrity of heritage assets

New Court flats and part of the communal gardens of the estate would be exposed to the risks above.

Living Architecture has not provided accurate spatial and visual representations which would help the public assess the context and consequences of the proposed development, eg 3D modelling to show visual alignment, and rendering to create photorealistic simulations.

Due to the height and aspect of New Court Block A, direct sunlight from mid-morning to early evening in the communal gardens is restricted to the area between the western end of Block A and Streatley Place, and a narrow corridor of light running parallel to the front of Block B.

The sunny, secluded area at the end of Block A (pictured below) is a popular spot for quiet activities away from the rest of the communal garden, which is used for more boisterous games by the children and has a public right of way defined by the path from Lutton Terrace to Streatley Place. This bit of the garden is also particularly popular with small birds, bees and butterflies, attracted by the variety of shrubs, herbs and flowering plants that we are able to grow there.

If the natural light and sunshine bathing this area is impeded there will be a severe loss of amenity for all residents of New Court and the Streatley Place neighbourhood, as well as for the numerous pedestrians who use Streatley Place.

The comparison of pre and post development images below (from Living Architecture's Design & Access Statement) is alarming, as it appears that the new building, will overshadow New Court gardens and a substantial portion of the Streatley Place neighbourhood throughout the afternoon. Living Architecture will blight the heritage assets it seeks to showcase for its customers.



View of the site from the gardens of Strealey Flats



View up Strealey Place towards Back Lane



View up Strealey Place showing relation of proposal to existing site condition.



View up Strealey Place towards the site

Camden publishes detailed planning guidance which sets out its policies and requirements for information to be included in planning applications where relevant. Living Architecture's Planning Application does not include this information, for example

(i) A Daylight and Sunlight Report assessing the impact of the development in line with the Building Research Establishment's "Site layout planning for daylight and sunlight: A guide to good practice", which should include accurate data on the vertical sky component, average daylight factor both before and after the proposed development, annual probable sunlight hours received in an average year etc

Refs: *Camden Policy DP26 Managing the impact of development on occupiers and neighbours;*

Camden Core Strategy CS5 Managing the impact of growth and development

Camden Core Strategy CS14 Promoting high quality places and conserving our heritage

Camden Planning Guidance CPG6 Amenity

(ii) Data and information in line with the general principles taken from the Institution of Lighting Engineers, *Guidance Notes for the Reduction of Obtrusive Light (2005)*. Camden requires details about the number of lights; likely lux output; the height of the lighting and the area to be lit and a plan or plans showing layout of the lights, including orientation of the beams of light; lighting levels, lumen details, lamp type, wattage; control systems including types and location of sensors, and times lighting will be on;

Refs: ***Camden Policy DP26 Managing the impact of development on occupiers and neighbours;***

Planning Policy Statement 23 (PPS23) Planning and Pollution Control;

Camden Planning Guidance CPG6 Amenity

I have further concerns about the planning application:

1. Is the developer aware of the mains water issues in the immediate area? It has been necessary to build an electric pumping station in New Court to boost water pressure. As well as ensuring sufficient flow to the upper stories of the flats, this provides access to a water supply by emergency fire services as the estate is not accessible to fire engines. New Court Block A does not have fire escapes and it is essential that it is protected from fires spreading from adjoining properties (eg along fences and walls), and also from any reduction in water pressure which would reduce water flow to any of the flats.
2. As part of its radical alterations to the character of the site, significantly increasing the height and volume of the existing buildings, Living Architecture intends to “prop, underpin and partially reconstruct” the boundary wall with New Court Block A. It is not clear from the planning documents what this will involve and how high any walls or hedges will be immediately adjacent to the boundary line of 6 Streatley Place and New Court.
3. The Planning Application seeks the site’s change of use from Business (Light Industrial) to Commercial. That is, from **B1(c)** land use class “*for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit*” to **C1** land use class “*Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels)*”

Under recent revisions to the NPPF, if the Planning Application and change of use to C1 is approved, my understanding is that the owner of 6 Streatley Place will additionally be granted permitted development rights to change land class use of the hotel to a state funded school or a nursery providing childcare without needing to apply for planning permission. I doubt if anybody in the neighbourhood would welcome this. Further proposed revisions to the NPPF and land use classification will also allow change of use from a hotel to a residential dwelling under permitted development rights.

Changing the use from B1(c) would be contrary to the policies set out in the London Plan and associated Supplementary Planning Guidance, and also LB Camden's development policies and core strategy

The London Plan SPG 3 Land for Industry and Transport states:

To implement London Plan Policies 4.1 and 4.4, this SPG seeks to protect viable industrial sites that can accommodate small industrial units and managed workspace suitable for start-ups and for small and medium sized enterprises (SMEs) including those self-employed in the industrial, creative and related sectors. The majority of space suitable for SMEs may be in undesignated 'other industrial sites', highlighting the importance for boroughs to carry out research through ELRs to guide policy and development

LB Camden's planning framework documents also assert that it will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use. For example, DP13 states

The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and

b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time. Where a change of use has been justified to the Council's satisfaction, we will seek to maintain some business use on site, with a

higher priority for retaining flexible space that is suitable for a variety of business uses.

Camden's Core Strategy CS8 states

The Council will secure a strong economy in Camden and seeks to ensure that no-one is excluded from its success and support Camden's industries bysafeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers.....and recognise and encourage the concentrations of creative and cultural businesses in the borough

One of the London Plan's recommended economic tests for retention of industrial land is whether it offers potential for the provision of industrial units for creative, knowledge-based, high technology and Small and Medium Sized Enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area"

Regarding the change of use of the site and loss of employment space, Living Architecture does not appear to have provided any of the economic justification or evidence as detailed in Camden CPG 5.

Living Architecture has an opportunity here to enhance its reputation by retaining the historic legacy of the land and transforming it into a truly innovative and productive enterprise providing high quality workspace and social benefits. Judging by data in Camden's employment land reviews, this would not require the erection of a three-storey building to generate the commercial returns required by the landowner.

Refs. London Plan Policy 4.1

London Plan Policy 4.1 Developing London's economy ;

London Plan Policy 4.4 Managing industrial land and premises;

London Plan Supplementary Planning Guidance: Land For Industry And Transport

Camden's Development Policy DP13 Employment sites and premises

Camden's Core Strategy CS8 Promoting a successful and inclusive Camden economy

Camden's Planning Guidance CPG 5 Town centres, retail and employment

For the reasons above, and the significant issues that have been raised by others who have commented, I wish to record my objection to this planning proposal.

Yours faithfully,

DP Davies

19 New Court