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Development Management
Camden Council
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Our Ref:
Your Ref: 2014/5208/P
Email: paul.lemar@fairview.co.uk

30 January 2015

Dear Ms Carr,

2014/5208/P - 317 Finchley Road, London NW3 6EP
Demolition of existing public house (A4) and erection of seven storey (including basement) building with 158sqm of retail (A1) at ground floor level and 10 flats (C3) above

As owners of the adjacent land to the west, we write to object to the above application. Fairview New Homes Ltd are a leading residential developer that specialises in the regeneration of vacant and derelict brownfield land in urban settings to deliver quality homes that are affordable. We are very familiar with issues arising out of the redevelopment of previously developed land.

Further to our comments dated 15 October 2014, we have now had the opportunity to review the amended plans submitted for application 2014/5208/P, dated 29 December 2014. Our detailed comments below relate to the revised design and our concerns surrounding the incongruous design treatment that is proposed.

While we note that the design approach for the scheme has been revised, the concerns that we expressed in our previous letter in relation to other planning considerations – harm to amenity; lack of amenity provision; access, safety and security; affordable housing and the under-utilisation of land - have not been overcome. In addition to the concerns regarding design set out below, it remains our view, for the reasons set out within our previous comments, that the application is contrary to the aims of national and local plan policy to ensure the efficient use of land, deliver quality design and protect amenity.

Incongruous design treatment

The proposal, even as revised, falls short of the requirement for schemes to be of the highest standard of design in accordance with the NPPF and Camden's policies CS14 and DP24.

The NPPF requires good design stating that Planning should "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings" (paragraph 17). It goes on to explain that "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" (paragraph 64).

Camden is committed to design excellence and a key strategic objective of the borough is to promote high quality, sustainable design. Core Strategy Policy 14 states that *"the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by requiring development of the highest standard of design that respects local context and character"*.

Policy DP24 specifies that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility

The revised elevations that have been submitted for the application (dated 29 December 2014) have been reviewed against these requirements for the highest standard of design. Even with the proposed changes, the development would fall short of the relevant policy tests and appear incongruous in terms of the setting, context and scale of neighbouring buildings.

As we have noted previously, the form, height and massing of the development represents an inappropriate relationship to the adjacent buildings. This would be exacerbated by its failure to respond to the set-back position of the adjacent, single storey station entrance.

The new building will be read in the context of the adjacent terrace at 307-315 Finchley Road which is of a more traditional form and proportions than the proposed development. The eastern-most portion of the proposed elevation would not sit comfortably against the lower height and form of the adjacent building at 315 Finchley Road. From the street scene there would be an excessive step in the height between the two buildings that are either side of Billy Fury Lane. Given its height and form, the proposal would appear over-dominant and incongruous in the streetscene.

Furthermore, the proposed building would serve to enclose Billy Fury Lane which is already a narrow access route, giving rise to a hostile and uninviting environment.

The appearance and detailing of the proposed elevations fails to respect the local context and character of the area. In particular, the design treatment for the principle façade lacks relief and the North East elevation would dominate the adjacent buildings along Finchley Road. The adjacent terrace at 307-315 Finchley Road is richly detailed and broken into distinct elements. By contrast, the proposed development would read as one single block to the detriment of the street scene. In particular, the development fails to provide a visually interesting frontage at street level due to the crude design of the ground floor shop front. This single, wide shop unit is overly utilitarian in appearance to the detriment of the street scene.

The window arrangement for each level is inconsistent and, when read as a whole, would appear as a disjointed muddle of discordant elements. The bland design of the shopfront at ground floor is also reflected in the contemporary design approach that has been adopted at fifth floor. The symmetrical, more detailed fenestration pattern at second, third and fourth

floor levels would sit in contrast to the upper and lower levels. The building's principal elevation appears unbalanced because the symmetry that is proposed for first, second and third floors is not reflected either at ground floor or roof level.

In addition to our concerns set out above, the final appearance for the scheme is unclear and undefined. The lack of details on the drawings makes it difficult to read the proposals - no information has been included to confirm the precise appearance and finish for the windows, doors and external materials and there are no notes that define the quality of the individual elements. This information is necessary to understand the relationship between the constituent parts of the development.

Summary

Having reviewed the revised drawings, we object to the design of the development for the reasons set out above. The elevational treatment proposed for the new building is entirely unsatisfactory and does not offer an acceptable design solution. The development would sit uncomfortably within the street scene. In accordance with NPPF paragraph 64, permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

While these comments relate to the incongruous design proposed, the additional concerns set out in our earlier letter dated 15 October also remain. The site should not be brought forward in isolation of the adjoining land to the rear and side of the former public house building. Particular concerns relate to harm to amenity; lack of amenity provision; access, safety and security; affordable housing and the under-utilisation of land. These have not been overcome by the revised drawings.

The proposal is contrary to the aims of national and local plan policy to ensure the efficient use of land, deliver of quality design and protect amenity. As such, it does not represent sustainable development and conflicts with the NPPF and Camden Policy CS1, CS3, CS14, CS17, DP24, DP26 and DP31.

We trust the above comments will be taken into account during the assessment of the current planning application, alongside those within our previous letter. We would be most grateful to be kept informed of progress. In the meantime, please do not hesitate to contact us should there be any queries regarding the representations made.

Yours sincerely,



Paul Lemar

**Planning Director
FAIRVIEW NEW HOMES LTD**