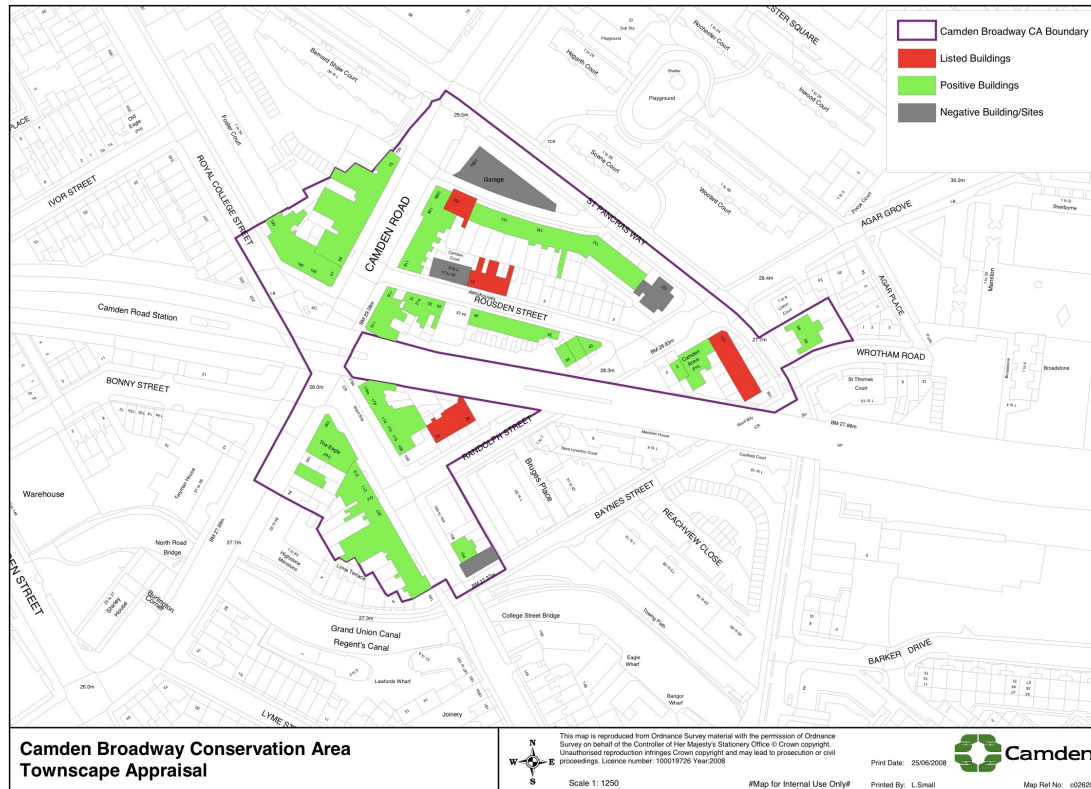


Commentary / objection to proposal 2016/1061/P

The site, 182 Royal College Street, is located within Camden Broadway Conservation Area. The map below shows the boundaries of the conservation area, and highlights the building at 182 Royal College Street as a 'positive building'. The building faces the so-called “Camden Broadway”, a triangular piece of land adjacent to Camden Road Station bounded by Camden Road and Royal College Street and fronted by the buildings nos 180, 182 and 184.



Summary of the special interest of the Camden Broadway Conservation Area

“The Camden Broadway Conservation Area is a small area comprising a mix of commercial and residential uses. Its character can be divided into two distinct types, and is defined by the busy, main traffic routes through the area (Camden Road, Royal College Street and St Pancras Way) which, on Camden Road and Royal College Street support commercial uses at ground floor level, and by the quieter, residential streets which run between these (Rousden Street and Randolph Street), the height, materials and plot layout broadly respect the C19 development of the area. The railway line runs east-west through the conservation area and its twin supporting bridges are a major presence in the area. (p.5-6, Camden Broadway Conservation Area Appraisal and Management Strategy, 2009)

The immediate locale

“The conservation area’s core was part of the initial burst of development in the 1820s, built beside the newly laid out Camden Road - the new road from London to Tottenham - which passed over Regent’s Canal via a bridge completed in 1820. (...) Camden Road Railway station was opened in 1850; today’s Victorian building was constructed in 1870. ‘Camden Broadway’, a triangular area formed in the junction of Great College Street (as Royal College Street was then known) and Camden Road, is identified on a pre-railway map of 1849. (...)” (p.8, Camden Broadway Conservation Area Appraisal and Management Strategy, 2009)

Character appraisal:

Royal College Street

“Nos.180-184 (even) are a short row which are unified by height, building materials and design and can be read as a single composition. They were built in the 1840s. Taken as a whole, the row is a four-storey yellow stock brick building, nine windows wide, with a level parapet. Window openings align horizontally and alternate window openings are embellished with moulded stucco surrounds. The row consists of four properties: a single three window wide property between three two window wide properties. This row is particularly prominent in the streetscene because of its canted building line, scale and corner location. No. 180 appears to be vacant and is in a deteriorating condition. It is a substantial terrace of considerable historic interest which, though debased by insensitive shopfronts, alterations to windows and installation of satellite dishes, makes a significant contribution to the conservation area.” (p.11-12, Camden Broadway Conservation Area Appraisal and Management Strategy, 2009)

APPENDIX 2 – BUILDINGS WHICH MAKE A POSITIVE CONTRIBUTION

The building on Royal College Street (no 182) has been designated under "BUILDINGS WHICH MAKE A POSITIVE CONTRIBUTION" (p.18-19, Camden Broadway Conservation Area Appraisal and Management Strategy, 2009)

Management Strategy

New Development

“It is clear from the conservation area appraisal that a key element of the distinctive character and appearance of the Camden Broadway Conservation Area is the area’s broadly consistent architectural style, scale, form and materials.

High quality design, appropriate scale, form and materials and high quality execution will be required of all new development, including smaller alterations such as shop fronts, signage, and extensions which can harm the character and appearance of the area to an extent belied by their individual scale.” (p. 24, Camden Broadway Conservation Area Appraisal and Management Strategy, 2009)

New Development and work to existing buildings within the Conservation Area

“(…) Development proposals will be expected to preserve or enhance the character or appearance of the Camden Broadway Conservation Area. (…)

Urban design and landscape principles together with more detailed guidance on sustainable development and landscaping can be found in Camden’s Supplementary Planning Guidance. Some key points include:-

- (…)
- Shopfronts, canopies and shutters:

Shopfronts are an important element in the character of the commercial part of the Camden Broadway Conservation Area. The installation of a new shopfront, shutters or grilles or other

alterations to the shopfront will need planning permission. Poorly designed shopfronts detract from the character and appearance of the conservation area, and the Council expects the quality, design and materials of new shopfronts to respond sensitively to their historic setting. Detailed guidance on shopfronts can be found in section 43 of Camden's Supplementary Planning Guidance, which is available on the Council's website. " (p.26, Camden Broadway Conservation Area Appraisal and Management Strategy, 2009)

Proposal (as-built retrospective application)

"Retrospective application for works to the Front facade in relation to the conversion of the ground and basement from Class Use B1 to a 3 bedroom Class Use C3(a)." (p. 1, Design and Access Statement, 2016/1061/P)

Design and Access Statement

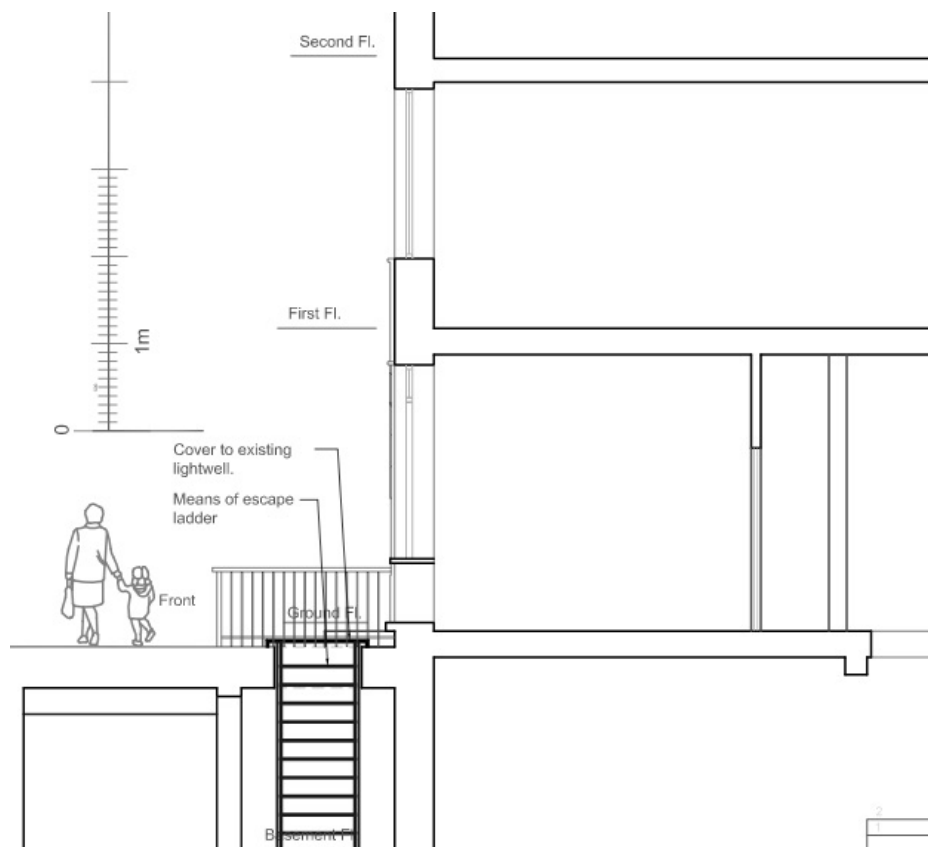
"The building is a 4 storey plus basement mid-terrace building situated to the West side of Camden Road. The building is of London Stock brick and single glazed timber sash windows. There are 3 residential dwellings to the upper parts of the building. This application relates to changes to the Front Elevation only." (p. 1, Design and Access Statement, 2016/1061/P)

1. The Design and Access Statement fails to acknowledge the building's location within a conservation area, and doesn't mention its prominent location fronting on Camden Broadway.
2. The document states that the application relates to changes in the Front Elevation only, however it fails to provide accurate drawings of the existing front elevation prior to any works taking place (pre 2013). The photo below (if poor quality) of the pre- 2013 state shows how the railing around the goods hatch to the front of the property had front-opening gates. These gates are not shown on the so-called "pre-existing elevations", and the proportions of the shopfront are incorrectly depicted.

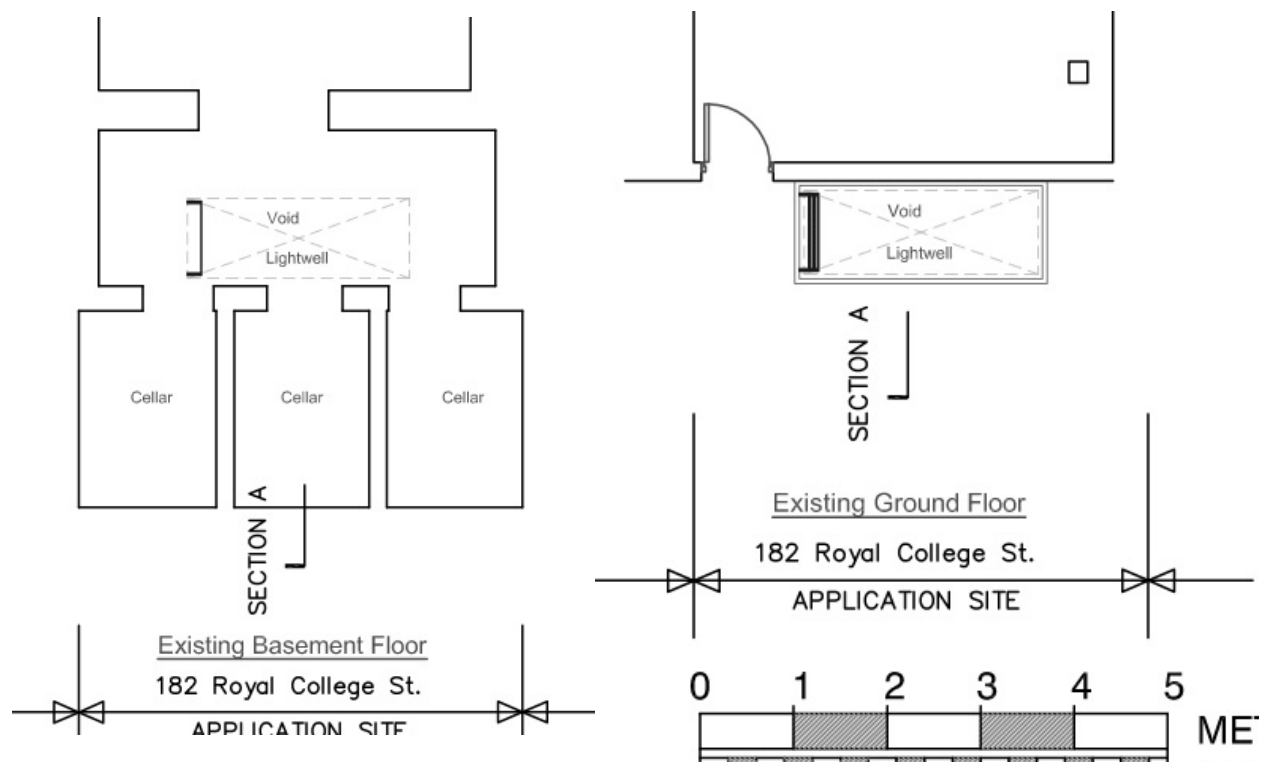




3. The failure to represent these gates in the application drawings further reveals, apart from demonstrating a failure in appreciating and responding to the building's existing condition, that the application in fact includes changes that are not limited to the front elevation, as stated in the application description. Both the pre-existing plans and sections show a 'Means of escape ladder' leading from the basement to the ground floor. However this ladder would have been implausible in this position, considering the front-opening gates depicted in the photograph.



Existing Section A - A



4. Considering that the as-built drawings show a ladder (labelled 'New compliant fire escape ladder replaced as required by Building Regs.') in this position, and no previous application for such a means of access has been approved, it has to be assumed that this new means of access forms part of this planning application, rendering its description incorrect. (The permitted development granted in 2013 (2013/4583/P) only relates to the change in use, and not to any associated works requiring planning permission such as alterations to a front elevation in a conservation area. Therefore the state depicted on the photograph above, with front-opening gates and no ladder access has to be used as the 'existing' state. In addition to that, the necessity for compliance with current building regulations doesn't warrant unauthorized changes, as indicated in the application documents.)

Given the significance of the building's elevation in the context of the Camden Broadway Conservation Area (as described above in the Camden Broadway Conservation Area Appraisal and Management Strategy, 2009), any alterations to the front elevation must respond sensitively to their historic setting (see above in the Camden Broadway Conservation Area Appraisal and Management Strategy, 2009). The application neither demonstrates an understanding of the historic setting, nor a sensitive response by failing to set out its original layout and design.

Appearance

The application states: "There is a subtle change to the Shopfront, necessitated with the replacement of a single glazed with double glazed frontage with opening parts for ventilation in line with the requirements of the Building Regulations. Overall, the facade as a shopfront, has largely been retained compared to other changes at 188, 241 and 245 Royal College Street." (p. 1, Design and Access Statement, 2016/1061/P)

The below comparison of the 'proposed as built' and the (incorrect) 'pre-existing' (post-2013) elevation, as well as the pre-2013 photograph illustrate that the changes are more than subtle:

1. The extent of the railing around the access hatch is increasing by a third of its size, converting a historic access hatch into a residential light well and point of access. The increase in railing obscures the front door to the property, rendering its appearance inconsistent with its neighbours.

Considering the Camden Broadway Conservation Area Appraisal and Management Strategy's description of the building, such a major change in its appearance has been considered undesirable in this prominent location.

2. The introduction of subdivisions in the shopfront's glazing and a sand-blasted glazing profile alter the proportions of the historic shopfront and further increase the inconsistency of the changes within the previously consistent terrace. Such changes are detrimental to the positive frontage of Camden Broadway that this building historically contributed to and have been considered undesirable.
3. The justification of changes to the front elevation of 182 Royal College Street by comparison with the scale of changes at other properties along the same street, but in a different setting (not facing Camden Broadway but fronting Royal College Street in a less prominent location) is inappropriate. Every application must be reasoned on its own merit, and not on the grounds that something else nearby is better or worse.



Proposed Front Elevation



Existing Front Elevation

**Context**

The application states: "The proposal has no impact contextually." (p. 1, Design and Access Statement, 2016/1061/P)

As quoted at the beginning of this commentary, the Camden Broadway Conservation Area Appraisal and Management Strategy clearly states the site's prominence within the Camden Broadway Conservation Area and its contextual impact. The above description demonstrates a lack of understanding of the existing and historic context of the property, undermining the applicant's judgement of the impact of the proposed (as built) works.

Consultation

No consultation with local residents or the Conservation Area Advisory Committee has taken place.

Summary

The Camden Broadway Conservation Area Advisory Committee objects to the application on grounds of incorrect and insufficient information provided and insensitive changes to a shopfront that detract from the character of the conservation area in prominent location. We suggest that any unauthorised work to the the front elevation as well as to the access hatch should be removed and the property returned to its original state as soon as possible.