

Our ref: J0023 – Bangor Wharf, Georgiana Street  
Your ref: Bangor Wharf Site LPA Ref; 2016/1117/P

Development Management  
Planning Solutions Team  
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Date 6<sup>th</sup> May 2016

Dear Mr McClue

**Planning Application for Full Planning Permission & Conservation Area Consent involving Demolition and Redevelopment of the Bangor Wharf Site, Georgiana Street, NW1 0QS (LPA Ref; 2016/117/P)**

### Introduction

We write on behalf of the Applicant in respect of the correspondence between ourselves following the formal submission of the above-mentioned planning application.

### Background

Following submission of the planning application you advised by way of e-mail dated 7<sup>th</sup> April 2016 that, *“the layout, scale and orientation of the proposed buildings are, in general terms, to be considered to be appropriate to the site and broadly supported.”* However, despite Officer support for these key, and indeed fundamental components of the scheme, as well as 12 months of pre-application discussions you explained that Officers had a number of concerns which meant the application should be refused. In response to the Applicant’s suggestion to engage with the Council to seek to address Officer concerns you subsequently advised that you were not willing to allow amendments to the scheme even though 7 weeks of the statutory period of determination remained. Following this feedback you will be aware that I am seeking to resolve this situation with Frances Wheat and Stuart Minty and I remain hopeful the scheme can be progressed to the satisfaction of the Council and Applicant importantly by way of a local level decision.

In view of the above and your e-mail dated April 13<sup>th</sup> 2016 whereby you helpfully confirmed that you were happy to work with me to *‘minimise any other issues associated with the development for the duration of the*

*application*', I have set out below those comments received by Officers in respect of the application and the Applicant's response. As part of this response you will note that I have referenced the fact that I have sought clarification from you (e-mail dated April 20<sup>th</sup> 2016) in respect of some of the matters raised by Officers, including for example the comment made that *'the front elevation on Georgiana Street is too aggressive'* which is arguably ambiguous. In the absence of any feedback to date, the Applicant has sought to try and respond where possible, as detailed below but would still appreciate these points being clarified.

## **Design-related comments**

### **Officer Comment No. 1**

*"The layout, scale and orientation of the proposed buildings are, in general terms, considered to be appropriate to the site and are broadly supported."*

### **Applicant Response**

The Applicant acknowledges support in general terms of layout, scale and orientation of the proposals and therefore assumes the following comments mainly apply to the detailed design elements of the Georgiana Street building's south-eastern and south-western elevations.

### **Officer Comment No. 2**

*"In a number of areas, the proposed plan of the larger residential buildings does not take full advantage of opportunities to provide a high standard of residential amenity to residents. We also note that there is no direct access from the affordable housing block to the main courtyard."*

### **Applicant Response**

Given that a number of policy tests have been met in respect of residential amenity, as summarised below, we are seeking clarification from Officers regarding this comment (e-mail dated 20<sup>th</sup> April 2016). Notwithstanding, the Applicant would offer the following response which in the opinion of the Applicant serves to illustrate how a high standard of residential amenity is achieved.

- All apartments in the building meet or exceed the minimum unit sizes as required by the latest London Plan.
- All apartments are dual aspect apart from four 1 beds, which are south-facing and not on a busy road.
- All apartments have a view of the canal.
- All apartments have a balcony or roof terrace at least the size required by the London Plan; and
- The apartments are designed to avoid overlooking to/from existing residential properties in Royal College Street.

With respect to affordable access from the main courtyard this has been designed deliberately due to management issues. It is the case that the maintenance, security, and ASB liability is reduced greatly by

providing one secure access point as opposed to two. The point to note here is that access to the courtyard is still easily achievable by all affordable residents.

**Officer Comment No. 3**

*“The design of the ground floor and arrangement of uses does not capitalise on the potential to create an active and visually interesting ground floor frontage to Georgiana Street.”*

**Applicant Response**

The ground floor of Georgiana Street has been specifically designed to provide the maximum opportunities for active and visually interesting frontages: over two-thirds of the frontage is given over to a residential entrance, glazed B1 office ‘shopfronts’ and the generous entrance into the courtyard with direct views to the canal. As a result, this frontage will be very animated and active. The treatment of the openings at ground floor is covered by Section 4.05, para 2 of the D&AS.

**Officer Comment No. 4**

*“The front elevation on Georgiana Street is too aggressive and flat.”*

**Applicant Response**

As per my e-mail dated 20<sup>th</sup> April we are seeking clarification from Officers regarding this comment but in any event would offer the following response. The elevation is designed to provide visual interest when seen on the oblique – the way the majority of people will view it, as they approach along Georgiana Street. The sense of rhythm of the composition and the ground floor’s deep reveals, which will reinforce same, will give it a unified appearance, enhanced by the use of multi stock brickwork which includes subtle detailing.

Notwithstanding the above, the Applicant has sought to amend the application (please see attached plan reference -194\_PL05\_P3)

**Officer Comment No. 5**

*“The entrance to the undercroft area that provides access to the internal courtyard should have a more open and inviting appearance.”*

**Applicant Response**

As per my e-mail dated 20<sup>th</sup> April we have asked that Officer define ‘inviting’ and look forward to a response on this issue. Notwithstanding, it is the case that the entrance to the courtyard is 5.5m wide to Georgiana street, splaying to 8m wide on the courtyard side. It is almost 4m high on the street side and 4.5m high on the courtyard side. This generously-proportioned entry is overlooked by the adjacent B1 office and the apartments opposite, making it feel safe and secure and the splayed arrangement allows views through to the courtyard and importantly the canal beyond which is currently not visible but would encouraged people to enter the courtyard space.

**Officer Comment No. 6**

*“The gating of the courtyard is unnecessary and not supported. The courtyard would benefit from passive surveillance by both employment uses and residents.”*

**Applicant Response**

The gating of the courtyard is restricted to certain times. During the day it is accessible for all. During the evening it will be locked for the purposes of safety and security. The canal does not provide access further afield and so there is no reason as to why people not associated with the development should be in the site in the evening and it is for this reason that access is restricted to certain times of the day.

**Officer Comment No. 7**

*“The stepping of the Georgiana Street building, although altered since pre-application discussions, still results in an elevation with a lop-sided and contrived appearance as a result of the unresolved scale relationship with surrounding buildings. This elevation of the building is still poorly resolved.”*

**Applicant Response**

We do not agree that the elevation appears lop-sided or contrived: the composition is not designed to be symmetrical. The single step at the western end of this elevation acts as a transition between the small two-storey building at no 54 Georgiana Street, and the taller proposed building. We felt that no step would result in too great a change in scale. We disagree that the elevation is poorly resolved and would refer again to the Section 4.05 of the D&AS for further explanation.

**Officer Comment No. 8**

*“The Design and Access Statement makes reference to this being a contemporary interpretation of Victorian canal side industrial and warehouse buildings but this is not borne out by the proportions of openings, the quality and robustness of detailing or the selection of materials.”*

**Applicant Response**

As per my e-mail dated 20<sup>th</sup> April we are seeking clarification from Officers regarding this comment. Notwithstanding, it is the case that the reference in the D&AS is made in relation to the canalside elevations, not the Georgiana Street one. These are quite obviously two different parts of the site insofar as the character and appearance is concerned and so have been designed in this context.

**Officer Comment No. 9**

*“The zinc-clad sixth storey lacks any design intent or visual interest and is prominent in views of the proposal in approaches from the north and south on St Pancras Way and from the east on Regents Canal.”*

The Applicant has considered this comment as whilst this was not raised as an issue during pre-application discussions has prepared and submits an alternative approach to this part of the proposal of which it is hoped will address Officer comments (Please see plan reference; 194\_PL14\_P3)

## Conservation-related comments

### Officer Comment No. 10

*“The proposal does not demonstrate how the design, particularly for the block located to the southeast of the site, has responded to the surrounding character and context, including that of the Regent’s Canal Conservation Area. It is not clear how the indirect and allusive references to the existing context are expressed within the building’s design.”*

### Applicant Response

This is a vague and imprecise comment that suggests a pastiche stylistic response rather than the more subtle contemporary and allusive approach that has been taken. It is clearly possible, as the Design & Access Statement and the Heritage Appraisal have done, to demonstrate how massing, scale, materials, site layout, etc, relate to the context. It is important to emphasise that the contemporary design approach - an approach that Camden would support in principle as an authority and is supported broadly by national policy and guidance - is not one that allows slavish, literal ‘references’. The conservation officer in question seems inclined towards this approach despite relevant planning policy.

It is also the case that the character of this part of the Regents Canal CA is incredibly varied and includes some older Victorian buildings such as Eagle Wharf (although this has been changed and has lost some of its original features and character as a result) and more contemporary buildings such as Reachview Close opposite, Star Wharf to the south and Lawfords Wharf. The latter is clearly a modern building which directly affects the settings of the listed buildings immediately behind. The proposal for Bangor Wharf has a contemporary design but makes a stronger reference to the historic context than the latter through the use of proportion and materials.

### Officer Comment No. 11

*“The application demonstrates little consideration of the visual impact of the proposed development from Royal College Street, both at the junction with Georgiana Street and at the canal bridge. As demonstrated in the visuals submitted by the applicant, the development would have an imposing presence in the streetscene and is not considered to preserve or enhance the setting of the terraces of the grade II listed buildings and locally listed buildings along Royal College Street nor mediate successfully between the contrasting townscape contexts of the canal frontage and the finer grain historic street layouts to the west.”*

This is a highly subjective opinion, belied by the reality illustrated in the application documents. It is not credible to suggest harm caused to the listed buildings on the western side of Royal College Street, and the Design & Access Statement, the Heritage Appraisal and scheme drawings show clearly that the relationship with the locally listed buildings will be a respectful one. Please also refer to the second paragraph of the Applicants response to Officer comment no. 10, above.

**Officer Comment No. 12**

*“An imposing blank wall is proposed to the flank (southwest) elevation of the block facing Georgiana Street; the proposed blank window recesses do not mitigate its negative impact. The southwest elevation of the other point block is more discreet within the streetscene, however its scale and massing can still be perceived from Royal College Street.”*

**Applicant Response**

It is again the case that this is a highly subjective opinion. The use of blank windows is a legitimate historical device for dealing with elevations that are of necessity blank. Many inner London streets have views of blank end walls; it is not, of itself, something harmful in urban or architectural terms.

Whilst the Applicant considers that the design response to this element of the scheme is appropriate it has considered and prepared an alternative approach to this part of the proposal of which it is hoped will address Officer comments (Please see plan reference; 194\_PL09\_P3).

**Officer Comment No. 13**

*“The additional setback storey to the southern corner reads as an afterthought, and does not relate positively to the rest of the proposed building, adding additional massing to the development.”*

**Applicant Response**

This point is contested insofar as the Applicant questions how, precisely, the set-back storey - again, a familiar design feature of development in urban settings, can be ‘read’ as an ‘afterthought’ and would therefore ask how this ‘afterthought’ appearance is evidenced?

**Officer Comment No. 14**

*There is limited historic interpretation included within the proposals, referencing the site’s historical development; this could be achieved through landscaping relative to the original wharf layout, or other creative design responses.*

**Applicant Response**

As previously stated, landscaping to the original wharf layout is not practical as the site boundary bisects the former wharf and is out of the public domain so will not be visible. The proposals maintain the location of the canal wall including a recess where the dock used to be, which will be visible from the opposite bank (towpath). Existing granite setts are to be salvaged and re-used in the hard landscape. The tunnel under the road is being retained and re-used for cycle storage. Most importantly the proposal opens up and facilitates access to the canal, a key reference to the site’s historic context, and area currently not available to the public.

## **Alternative Use Value**

### **Officer comment No. 15**

*“The revised AUV is again unacceptable. The Council would never grant planning permission for a scheme with only 21 dwellings (as this would not optimise housing potential) and no re-provision of employment space...Furthermore, as the site is subject to an up to date Site Allocations Local Plan, an AUV would only be acceptable if it complied with the Plan. The allocation stipulates replacement employment floorspace that is flexible for a range of employment uses, and states that development is expected to optimise housing potential”.*

### **Applicant Response**

The revised AUV scheme makes provision for employment floorspace (Officers subsequently confirmed this part of the AUV scheme had been misread – e-mail dated April 13th) and intensifies the remainder of the site to deliver residential use. Site-specific policy requires replacement employment floorspace and residential use. Importantly, it does not quantify the amount of floorspace required for respective uses and so the Applicant fails to understand why the Council could object the amount of residential and refuse on the basis of additional employment floorspace, particularly given the site’s lawful use for employment. It is also the case that the above-mentioned uses are provided within a scheme that has been accepted by Officers in terms of layout, scale and height.

Moreover it is noted that despite the Applicant confirming it will cover the cost of an independent viability consultant it is understood that the Council has chosen not to instruct this expert. Accordingly, and without prejudice to the current approach, the Applicant is currently investigating an alternative approach to the issue of viability and would welcome further dialogue with the Council.

### **Energy & Sustainability**

You will be aware that the Applicant responded to energy and sustainability issues by way of e-mail dated 26<sup>th</sup> April and look forward to your comments in due course.

### **Air Quality**

#### **Officer Comment No. 16**

*The proposed development will bring a high number of new receptors into an area of poor air quality. Defra background data and Camden’s own monitoring data show the development is highly likely to be located in an area exceeding the annual mean EU objective for NO<sub>2</sub>. This means that the developer should submit a detailed Air Quality Assessment as part of their application.*

**Applicant Response**

To follow under separate cover.

**Bat Survey****Officer Comment No. 17**

*"Request submission of a Phase 1 Bat Survey"*

**Applicant Response**

As part of the formal application submission a Preliminary Ecological Appraisal was issued to the Council which considered the presence of habitats generally and protected species. Notwithstanding, the Applicant has commissioned a Bat Survey and this will be submitted to the Council imminently.

**Lighting Impact Assessment****Officer comment No.18**

*"Should the scheme be permitted, we would expect to condition a lighting impact assessment given the proximity of the scheme to the canal (a known commuting and foraging route for bats, and habitat for birds and other wildlife)."*

**Applicant Response**

To confirm the Applicant accepts the inclusion of a condition dealing with this matter should the planning application be approved.

**Green and Brown Roofs****Officer comment No.19**

*"The application does not include a living roof. Camden Planning Policy (DP22) requires all schemes to incorporate green or brown roofs wherever possible. We would like to see inclusion of living roof(s) in the application, otherwise an explanation and evidence as to why this is not appropriate."*

**Applicant Response**

The Applicant has amended the scheme to incorporate a green roof – please see attached plan 194\_PL10\_P3.



## **Flooding**

### **Officer Comment No. 20**

*“Applicant to complete SuDS proforma and include full details on run-off volumes so that this can be adequately assessed, along with MicroDrainage calculations detailing that the attenuation is appropriately sized for all storm events. As well as ensuring that the drainage is appropriately sized, MicroDrainage simulations would provide details on the rainfall used within the calculations. Applicant also to include information on why some SuDS higher up in the drainage hierarchy have not been considered and to consider opportunities to minimise run-off rates further. Finally, to ensure that conditions outlined in Thames Water response are met. To complete assessment of the likelihood of surface water run-off going in to the canal.”*

### **Applicant Response**

To follow under separate cover.

### **Conclusion**

The above clearly illustrates that there are a relatively limited number of outstanding points that exist between the Council and Applicant. This is particularly evident given that Officers have confirmed that key design matters such as scale and distribution of the proposed buildings is acceptable. With this in mind it is suggested that with the cooperation of Officers the proposal can be progressed to a satisfactory outcome and importantly at the local level.

I look forward to your response at your earliest convenience. If there is anything I can do to assist in the meantime please do not hesitate to contact me.

Yours sincerely

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Planning Director Spenthorpe



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