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For the attention of: John Diver (Case Officer),
Planning and Built Environment, London Borough of Camden

Date: 28th August 2016

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Dear Sir/Madam,

**Letter of Objection – Ref: Planning Application no. 2016/4104/P at
1 Tranley Mews, London NW3 2DG – “Erection of single storey front extension
and new enclosed external stair (3 storey) to front elevation of existing office (B1a) to
facilitate creation of additional office space.”**

I am a Chartered Architect of 40 years' experience, which includes the design and construction of office buildings and housing in London and other parts of the UK, urban regeneration projects and work in Conservation Areas. I have extensive experience of preparing and submitting Planning Applications.

I have been engaged on a professional basis as advisor on this Planning Application by Barbara Hezelgrave, who is the freehold owner and residential occupier of the two storey /part three storey Victorian terraced house at **18 Constantine Road London NW3 2NG**.

The rear of 18 Constantine Road faces south, and its southern rear boundary and outlook are already substantially obscured by the existing office building at 1 Tranley Mews. The blank north elevation of 1 Tranley Mews is coincident with the southern boundaries of the small rear gardens of several houses in Constantine Road (including no. 18). Also, the west facing elevation of the office building is viewed openly (and obliquely) from all the habitable rooms at the rear of 18 Constantine Road, and the bathroom. (See attached photographs.)

Some of the houses in Constantine Road have been converted into flats. The existing four storey office building is very close to the houses and flats on the south side of Constantine Road, and it currently over-looks numerous habitable rooms of these long established residential properties (ie bedrooms and living rooms).

I have inspected the Application documents, as posted on LB Camden's application website. I have reviewed the Application form, the Application drawings, and the "Design and Access Statement". I also visited the site and inspected the buildings and the surrounding area on 23rd August 2016.

Also, I've inspected the Planning history of 1 Tranley Mews as published on LB Camden's website. The history is relevant to this Planning Application.

My first conclusions are that the Planning Application proposes additions to the existing building that are badly designed, inappropriate, and detrimental to the residential property at 18 Constantine Road, and to other residential properties nearby. In my opinion the Planning Application should be refused.

On the instructions of my client, I present my views and objections in more detail under several headings:

THE PLANNING APPLICATION

The Application drawings are of poor quality and do not illustrate or explain the detailed relationships between the proposals and surrounding properties.

The Design and Access Statement (D&A Statement) is of poor quality and is not prepared in accordance with Best Practice Guidance on this subject, published in 2006 by CABE (now the Design Council). The D&A Statement as submitted does not cover the topics it is supposed to cover. It makes no attempt to analyse the effects of the proposals on adjoining properties, or provide evidence to justify the proposals. Also, it makes no attempt to analyse the design regarding bulk, massing, location, or the effects on residential amenity of adjoining properties, or the loss of daylight and sunlight to adjoining properties.

Notably, the D&A Statement doesn't analyse or consider the proposals within the context of the Mansfield Conservation Area Appraisal and Management Strategy, which applies to this site and building, as adopted by LB Camden on 4th December 2008.

In my view the Application Drawings and D&A Statement are inadequate and poor quality.

PLANNING HISTORY

The history of the conversion and extension of this former 19th century workshop building since the 1980s is a rather sorry tale. There have been various attempts to extend and change the building since the early 1980s, for which a series of Planning Applications were made. Some were refused. Some were approved but not implemented. At least one was approved and built (details on next page), but to a very poor standard of design.

It is interesting to note that, in the case of Planning Applications that were refused, the Reasons for Refusal included topics that remain of concern about this building today; for example TP 8501372, refused 29th October 1985 due to:

- "Adverse effects on surrounding residents because of increased business activity and traffic movements"; and
- "The Council's daylighting standards are not complied with, and access of adequate natural light to adjoining premises would be prevented to the detriment of their amenities".

Looking back at the old maps on Camden's website for the Mansfield Conservation Area, it appears that the building at 1 Tranley Mews was originally part of the 19th century "North Terminal" tram station, which extended across a substantially wider area than the current site. The 19th century tram station was built between and close to the residential properties of similar age in Constantine Road, Agincourt Road and Fleet Road.

This form of "back-land development" was common in the Victorian era, but brought with it significant environmental problems.

It appears that this building and its current site became detached from the main part of the tram station in the early 20th century. From then until the 1980s, the building remained an awkwardly sited, stand-alone, two storey workshop with its own yard, for "Light Industrial" use. *NB: The building at that time was recorded in a set of "As Existing" drawings by John Winter and Partners (Architects), which formed part of a non-implemented Planning Permission dated 25 Feb 1986 (ref: TP 8600065). These drawings are on Camden's website.*

In line with statutory changes to Use Class Orders in the late 1980s and other Planning Applications, the building is now a four storey office building (B1a) with an ugly poorly designed 1980s office facade (facing west). The building's current floor area is **approximately double** what it was in the mid 1980s (now four storeys, not two storeys).

Notably, the doubling of the floor area within the same footprint was granted Planning Permission by LB Camden under a Planning Application described as: "**Alterations to the front elevation including vertical glazed features**". That was Planning Application ref: TP 8700520, with Notice of Approval dated 30th July 1987. On that basis the floor area was doubled, and the building was converted into a B1a office building, much as it is today.

LB Camden designated the Mansfield Conservation Area (which includes this site and building) on 11th September 1990. Suffice it to say that, in my opinion, the proposals which were approved in 1987 would not have been approved after the Conservation Area was designated in 1990. From a design perspective, the approved drawings from the 1987 Planning Permission are typical of the time and of poor quality.

Bringing the situation up to date, the intention of the current Planning Application, as reflected in the Applicant's own description of the development is "**....to facilitate the creation of additional B1 office space**". As described above, this building located in a dense residential area has already been extended to approximately twice its original floor area and, in my opinion, a further increase of floor area should be resisted.

DESIGN QUALITY

As described above, the existing building, much changed since the 1980s, is of poor design quality and inappropriate style; in its sensitive location in what is a dense residential area within the Mansfield Conservation Area. The current proposals do not address the shortcomings of the design of the existing office building. On the contrary, the proposals make the current situation significantly worse.

The proposed addition of a large bulky fully glazed staircase, plus extensions on the front (west side) of the building, will make the already ugly and inappropriate 1980s design even more awkward and inappropriate. This point covers both aesthetic and functional issues.

Further, the current proposals have not been designed by a process of critical design analysis of the existing building and its west facing façade; with a view to substantially improving its appearance and reducing the negative impacts. Especially with a view to reduced impacts on the adjacent residential properties.

By their own admission in the D&A Statement, the Applicant's approach to the design has been simply to add a new staircase and single storey additions to "...**increase the floor area of the building**". In my opinion, this approach to the design of the proposals is wholly inadequate in this location. It results in proposals that in my opinion are unacceptable.

LOSS OF RESIDENTIAL AMENITY

Concerning the proposed new staircase, the bulk, mass, and location of it are unacceptable and will result in the office building becoming larger and more dominant in an unacceptable manner, in relation to the residential houses and flats on the south side of Constantine Road. And especially regarding my client's house at no.18, which is the worst affected. The office building is already over-dominant in this location, and therefore any further increase in size and bulk of the building is unacceptable and should be resisted.

Further increase in size and bulk will cause harm to the existing character of the residential properties, and loss of residential amenity. One example concerns the existing rear south facing gardens of the residential properties. These are already over-shaded, over-looked and visually dominated by the office building. (See attached photograph.) In my opinion, any further extension or increase in size will cause additional direct harm to these small gardens, and the enjoyment of them by the residents as outdoor residential amenity space.

OVERLOOKING AND LOSS OF PRIVACY

There is already unacceptable over-looking through the large windows in the front (west facing) elevation of the existing office building. This over-looking is directly into the bedrooms, living rooms and gardens of the residential properties on the south side of Constantine Road, including my client's house at no.18.

In my opinion, the proposals make the current overlooking and loss of privacy much worse; for example by the proposed addition of the fully glazed staircase extension. And no attempt is made to reduce the size of the existing over-sized windows in the west elevation of the office building, to alleviate the current problems of over-looking and lack of privacy. This is unacceptable.

LOSS OF DAYLIGHT AND SUNLIGHT

If built, the proposals will have significant detrimental effects on 18 Constantine Road, due to loss of daylight and sunlight at the rear (south side) of the house. One only has to look at

the drawings briefly to see that the proposals are very obstructive and intrusive regarding daylight and sunlight to my client's property. In my opinion, the proposals will directly obstruct the view of the sky from the habitable rooms in the house (and from the garden); and the sky component of daylight and sunlight at the rear of 18 Constantine Road will be reduced by an unacceptable amount.

In summary, the proposals will cause significant and unacceptable loss of daylight and sunlight into my client's property.

OVER-DEVELOPMENT

The existing office building already represents a high density of office development on its physically restricted site, in very close proximity to adjoining residential properties. As mentioned above, this occurred due to Planning Application ref: TP 8700520, with Notice of Approval dated 30th July 1987. To reiterate, the floor area of the building was approximately doubled on that occasion, from two storeys to four storeys, within the same footprint.

As a result of previous enlargement, the building currently has direct negative impacts on adjacent residential properties and the surrounding area. Further enlargement will increase the negative impacts. Accordingly, the building should not be enlarged again. To do so would represent specific over-development in this sensitive location. For these reasons, any further extension of the envelope and/or floor area should be resisted.

In my opinion, if approved, further enlargement will not only cause over-development and harm to the residential properties close-by; but it will cause direct harm to the local area and the Mansfield Conservation Area.

CAR PARKING

The Application Drawings do not adequately explain the current car parking arrangements on the site. The site is an awkward shape with restricted access from Fleet Road via Tranley Mews.

In the D&A Statement, the Applicant states there are currently 12 car parking spaces on the site. It must also be assumed that cars turn around on the site and so enter and leave the site from/to Fleet Road via Tranley Mews moving in a forwards direction.

The proposed ground floor extension to the building (and the new staircase) will without doubt impinge on the current provision of 12 car parking spaces with a turning facility. In my opinion, the proposals will result in a significant reduction of car parking spaces on the site, with a resultant increase on parking pressure on-street, which is unacceptable.

PROPOSED INTERNAL ARRANGEMENT OF OFFICE BUILDING AND COMPLIANCE WITH DDA

The proposed new staircase is not just an escape stair, as referred to in the Application. It would be the only staircase of the office building. Therefore it would be the main access stair to all floors in the office building, to replace the existing internal stair, which is to be

removed. The proposals also include the removal of the existing internal lift and lift shaft in the building, without replacement. All these changes are proposed by the Applicant solely as a means to increase the internal floor area of B1a office space.

I have commented above on the unacceptable impacts of the new proposed staircase on the adjacent residential properties. In addition, with the removal of the existing lift shaft from within the existing office building, there will be no lift in the extended building. (The fact that the existing lift is non-functional should be ignored. The building currently has the facility of a lift, if the existing lift is restored and maintained in working order.)

In my view it is not reasonable in 2016 for a four storey office building not to have a lift serving all floors. Whilst I'm not an expert on the detailed requirements of the Disability Discrimination Act (DDA), I believe that both Part M of the Building Regulations and the DDA would require this building to be equipped with a lift serving all floors, for statutory compliance.

Therefore, subject to confirmation from LB Camden's Building Control, I think the proposed modifications to the office building are non-compliant with current legislation. And whilst the matter of Part M and DDA compliance are not of direct concern to the grant of Planning Permission, it is reasonable to point out that this Planning Application is based on the assumption that the floor area of office space in the building will increase pro rata with the removal of the existing staircase and lift shaft. However, this assumption is incorrect and, in my opinion, this central issue on which the Planning Application is based is flawed.

On the basis of my review of the Planning Application, as summarised above, and on behalf of my client, I formally request that the Council refuses the Planning Application at the earliest possible date.

Yours sincerely,

RICHARD FERRARO - BA(Hons) DipArch ARB RIBA FRSA

Consultant Architect

NB: I attach two photographs of views of 1 Tranley Mews from 18 Constantine Road, as follows:

- 1.)** An oblique view of the west elevation of 1 Tranley Mews, which is the outlook from the first floor rear bedroom in the main part of the house at 18 Constantine Road, to illustrate the very close proximity of the office building to the rear of 18 Constantine Road; and
- 2.)** An upwards view of 1 Tranley Mews from the rear of the back garden at 18 Constantine Road, illustrating the proximity of the office building and windows of 1 Tranley Mews to the rear boundary of 18 Constantine Road.



