

Camden Square Conservation Area Advisory Committee

Ashton Court
254-56 Camden Road

Date: 27 June 2017

Planning application Reference: 2017/2794/P

Proposal: Variation of Condition 3 (approved plans) to planning permission ref: 2015/4553/P granted 01/12/16 [reconfiguration, part demolition and extension of sheltered accommodation (Class C3), consisting of 36 units (29 x studios, 6 x 1 bedroom and 1 x 2 bedroom) to provide 24 x 1 bedroom units and 5 x 2 bedroom mews houses], to amend appearance and form of 5 x mews houses

Summary: We strongly **object** to the proposed variation: significant technical and practical issues – not least those around fire safety and the feasibility of the basement construction - require resolution and the design and bulk of the current proposal neither conserve nor enhance the Conservation Area.

Comments:

These comments follow on from my e-mail of 19 June and your response on the 20th in which you kindly agreed to accept further comments on this application.

1. Although you argue that the application is in fact a minor material amendment, we find this difficult to accommodate within our understanding of the meaning of the term as defined by the Planning Officers' Society guidance viz "*one whose scale and nature results in a development which is not substantially different from the one that has been approved*". This definition does not sit comfortably with a complete redesign of the terrace of five Mews houses following a change of architects. In particular
 - 1.1. The internal layouts, external appearance, overall massing and external spaces are all redesigned.
 - 1.2. Although a covering letter accompanies this application, no reference is made to the original Design and Access statement, which was developed through significant public consultation with local residents.
 - 1.3. Numerous elements of the new proposal go against the aims and arguments of that original statement.
 - 1.4. Moreover, to describe the complete replacement of drawings with a new design concept as seeking 'to vary Condition 3 attached to planning permission 2015/4553/P' is highly misleading, since 'Condition 3' is the basis of the approved scheme.

Camden Square Conservation Area Advisory Committee

2. Although the drawings are relatively clear and give useful comparison of floor plans with the approved scheme, we encountered a number of unhelpful omissions
 - 2.1. There is no scale bar included in the elevations (often grounds for planners to refuse to register an application as valid)
 - 2.2. There are no end elevations, thus making a direct comparison to the approved design more difficult.
 - 2.3. There is only one section, and certain elements are unlabelled
3. The height and volume of the proposal are inappropriate in relation to the neighbouring buildings.
 - 3.1. Most significantly this scheme has been revised to be taller and have a much more prominent second (top) floor than the approved design.
 - 3.1.1. The new proposal exceeds the height of 103 Camden Mews adjacent; the approved design does not.
 - 3.1.2. The entrance and part of the front elevation in the approved design is set back, and very small dormer windows are recessed about 1.5M from Camden Mews, behind a 900 high parapet. The new proposed front facade has no set-back elements and very large dormers set back only about 600mm, taking up about 70% of the width of the elevation, not at all concealed by the c.450 high front parapet.
 - 3.1.3. The resulting bulk at second floor level will be significantly more dominant than any other house in the Mews, and front mansards more prominent.
 - 3.2. The threat to the predominantly two- to two-and-a-half storey scale of the Mews providing smaller-scale intimacy in contrast to the larger houses in Camden Square and the other main streets adjacent has been repeatedly cited in our commentaries and relates to clear warnings in the Camden Square Statement and Management Strategy and the recent report on developments in Camden Mews
4. The rhythm of a generally conventional-looking flat-fronted terrace with five very large dormers will harm the intimate, small and varied scale of Camden Mews, especially positioned next to two of the blandest houses in the Mews.
 - 4.1. The architects for the approved design studied the houses opposite and created recesses and projecting bays to reflect their lively, small-scale facades.
 - 4.2. Not only does this proposal show no attempt to relate to precedents in Camden Mews, its covering letter states, '*This revised internal layout also lends itself to an external expression more in line with traditional mews designs.*' Whatever 'traditional mews designs' the writer had in mind, none of the many houses which make a positive contribution to Camden Mews could be thus described.
5. The proposal fails to maintain reasonable levels of privacy.

Camden Square Conservation Area Advisory Committee

- 5.1. What appears to be a Ground floor rear patio to the house at the corner of Camden Park Road 'Plot 1' is unidentified.
- 5.2. In the plans of House Type 2A, Plot 1 is described as having 'rear external access from stair landing'. As this unlabeled area is the only external space for the house, it must be assumed that it would be used as a garden. For this use to offer privacy and not intrude on Camden Park Road or the communal amenity space adjacent, it would need solid walls to head height, not the open railings shown.
6. Although the floor plans are more conventional than the approved scheme, providing generous accommodation and some comfortable spaces, numerous significant technical and practical issues give concern
 - 6.1. **Fire safety**, which must now be top of the agenda for all builders, developers and councils, appears ill considered
 - 6.1.1. All houses except 'Plot 1' would fail Building Regulations Part B1 (Fire Safety - Means of warning and escape), since there is no protected exit from the only staircase.
 - 6.1.2. An alternative provision of fire shutters, not shown in the indicative section, would be very problematic, since they would involve large bulkheads running diagonally across the living room.
 - 6.1.3. The further alternative of sprinkler systems would require large back-up water supply tanks at basement level, also not shown. We can only assume that these demanding alternatives were not considered.
 - 6.1.4. Provision of a corridor across the living room would require significant redesign.
 - 6.2. **External amenity space:**
 - 6.2.1. Whereas the approved design has second floor rear and first floor front terraces to all houses as well as ground floor rear terraces, this proposal includes only basement rear terraces to three of the five houses, an undefined and very public ground floor rear external space to 'Plot 1' and no outside space whatsoever to 'Plot 2'.
 - 6.2.2. Although some concerns were expressed about potential loss of privacy from front terraces in the approved design, this was shown to be a common arrangement in Camden Mews.
 - 6.2.3. Basement terraces in three of the houses are shown with a c.2.4M high retaining wall surmounted by what appears to be a solid fence at least 1.8M high. These would risk being dark, forbidding spaces.
 - 6.2.4. The house with no external space is likely to conflict with Camden's recommendations, and is unpardonable in comparison to its two higher level terraces in the approved design.

Camden Square Conservation Area Advisory Committee

- 6.2.5. The sole natural light in the ground floor and basement of that house would come from the front louvre-covered window, and mechanical ventilation would be a likely requirement.
- 6.3. **Rubbish / recycling:**
 - 6.3.1. What appear to be two bins (unlabelled) inside the front doors would be inaccessible by refuse collectors and smells would be likely to build up, unlike in the approved scheme. This would be a retrograde step.
- 6.4. **Cycle storage:**
 - 6.4.1. Good design would have cycle storage near bin storage in an intermediate space at the entrance. Indicating cycle storage in a cupboard some distance into the living room suggests this was not considered in the original design, and would be inappropriate.
- 6.5. **Basement design provisional:**
 - 6.5.1. All the house-type plans (K160423-A(2) 401-403) for the five Mews house plots are covered by the proviso that *'Basement area, layout and setting out of basement walls / lightwells in abeyance until further survey works are undertaken, method of construction agreed and approval from Highways and Utility companies has been granted.'* though such conditionality is not present on the basement drawing K160423-A(2) 200.
 - 6.5.2. Until such time as the issues raised in the proviso are resolved and the feasibility of the basement designs fully established, it would be totally inappropriate to offer comment on this aspect of the proposal. Indeed, the absence of a feasibility study must surely render the plans for the Mews houses as a whole redundant.
7. It is also noted that
 - 7.1. The Mews houses are described as having two bedrooms, despite clearly being designed as three-bedroom houses, in which the large first floor 'study' had its name changed from bedroom 'to client comments' as Revision 2 in the well-defined history of each drawing.
 - 7.2. The designer would appear unaware of the Camden Planning report included in the approved scheme, stating that there was a greater demand for two-bedroom than three-bedroom houses in this part of the borough.
8. Whilst Camden Square CAAC recognises the importance of improving sheltered accommodation and fully understands how the sale of the Mews houses will provide funds for these improvements we strongly object to the design and the bulk of the current proposal and are very disturbed by the failure on the part of Origin Housing to address key technical and practical issues listed in para 6

Camden Square Conservation Area Advisory Committee

9. We would argue that the proposed variations can in no way be considered a 'minor-material amendment' for the changes are almost all harmful and betray ignorance of Camden Mews and the Camden Square Conservation Area.
 - 9.1. The size of the houses appears to conflict with the aims of the market as presented by the planners,
 - 9.2. The resulting basement construction is likely to cause serious complications for other residents,
 - 9.3. The top storeys are too bulky and obtrusive,
 - 9.4. The lack of adequate external amenity space likely to make selling the properties more difficult.

If such a redesign on principles conflicting with the approved scheme is to be considered, it must be submitted as a new application, involving full community consultation and a new design and access statement. In the meantime we would urge that this proposal for a variation to condition 3 be rejected

Signed:

David Blagbrough
Chair
Camden Square CAAC

Date: