



Development Control  
Planning Services  
London Borough of Camden  
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Argyle Street  
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Susanna Salmela  
Neale & Norden Ltd  
34 Osnaburgh Street  
London  
NW1 3ND

Your Ref:  
My Ref: 2006/0776/P  
Contact: **Thomas Smith**  
Tel: 020 7974 5114

Date: 22 March 2006

Dear Ms Salmela

**Re. Planning Application 2006/0776/P  
159, 161, 163 & 165 Camden High Street, London**

I refer to the above application and have a number of concerns about the proposal as follows:

#### Design

Whilst it is acknowledged that the current scheme has made some key changes, particularly with respect to reducing the number of competing planes on the front elevation, there are still a number of outstanding design issues, which are detailed below (in no particular order):

- It is considered that clearer definition is required, across the front elevation, to better delineate between land uses, (ie. retail verses residential above), so as to reduce the over glazed ground floor, which still predominates. More particularly, there is a need for a stronger degree of delineation introduced at the parapet/facia level of the shopfronts addressing Camden High Street;
- On the upper floors of the front elevation, it is considered that the proportions of the narrowest windows proposed, need to be slightly widened, to better balance the overall scale of the front elevation. Similarly, all windows proposed for this elevation will need to be further recessed (ie. minimum of 10 cms - preferably somewhat greater), to add a subtle degree of depth to this elevation;



- Whilst a revision of the materials palette is welcomed, it is considered that the predominance of white render is not indicative of the High Street character and thus not appropriate to the local context. Similarly, I am not satisfied that this choice of facing material will weather well, especially given the high levels of pollution in this location and as such would soon compromise the appearance of the building, particularly given the prominent location on the High Street. A more durable material is therefore required, red or stock brick being an obvious choice, given the context;
- It is considered that the central 'spine' of the front elevation would benefit from a differentiation of materials, such as the use of glazed tiles. In relation to the two facade components flanking it, it is considered, that as an overall composition, a greater degree of definition is required through the introduction of a greater recess, between the three elements, but obviously not as much as was advocated in the original scheme;
- The enclosed balcony feature, proposed at third level, central to the front facade, is considered to be a token feature and again, not indicative of the High Street character. The frame, including the glazed panel balustrade, delineating this balcony feature, is considered too weak and would require revision, before it could be deemed acceptable;
- A stronger termination at parapet level is necessary. It is considered that the proposed roof profile at the third level, is visually weak and needs to be strengthened;
- It is considered that the fourth floor has not been recessed enough (currently setback by a minimum of 1.5 metres and a maximum of 3.3 metres – the latter of which, is effectively negated by a roof overhang) and as such is not subordinate to the overall building mass. In streetscape terms, it is considered that it renders the proposal too tall/bulky and as such would require that this upper floor be further setback;

The Crime Prevention Design Advisor has raised serious concerns about the communal entrance to the residential dwellings being located in the side alley. The area of Camden Town remains the 'hottest spot' for crime in the borough and this configuration could potentially increase the chance of criminal victimisation for future residents and visitors. On the grounds of reducing the potential for crime, he has suggested that the proposal be amended so that the entrance fronts the wider public realm of Camden High Street. Whilst I agree that this would be preferable, you may seek to address this objection by other means. However, please be aware that Members are likely to place significant weight on this objection when the scheme is referred to Committee.

### Energy

Replacement UDP policy SD9 was considered to have little weight at the time of the previous submission. It expected applicants to demonstrate the energy demand of their proposals and to demonstrate, where feasible, how they would generate a proportion of 10% of demand on-site from renewable sources.

The Council has received and responded to the Inspector's Report on the Replacement UDP, and this process gives significant weight to the objectives of this policy for applications submitted after 11 January 2006. The Inspector recommended that the Council should change the expectation to a requirement. This policy now needs to be addressed and guidance is given in the London Renewables toolkit "Integrating renewable energy into new developments" as to how this might be achieved.

### Open Space

Adopted policies HG13 and EN54 state that the Council will seek the provision of accessible garden space and public open space as part of new developments.

Emerging policy N4 requires the provision of 9sqm of open space per person. This replacement UDP policy was considered to have little weight at the time of the previous submission but now carries greater weight.

The consultation draft SPD "Provision of Public Open Space" (October 2004) has limited weight, but does give guidance on how to convert development size into the number of occupiers, and in turn to calculate open space requirements and costs.

There is limited opportunity to provide open space on site and as such a contribution will be sought instead for improvements to and maintenance of nearby open space and this will need to be included within the Section 106 agreement. I am in the process of identifying suitable open space and clarifying the level of contribution which would be required.

### Mobility

Replacement policy H7 now carries significant weight and requires that all new dwellings should be designed to lifetime homes standard. Generally 10% of homes should be designed as wheelchair housing or easily adaptable, but that may be inappropriate in this location due to the lack of potential to site a dedicated parking bay close to the entrance.

Biodiversity

Similarly, Emerging policy Nnew also needs to be addressed and this expects schemes to have considered conserving and enhancing biodiversity, including the creation of wildlife habitats. These measures include the use of green and brown roofs, the provision of nest spaces and boxes that meet the need of specific species and by planting species. The proposal may have potential to incorporate several of these measures, especially on terraces and roofs.

Whilst the 13-week expiry date is 16<sup>th</sup> May 2006, the application would need to be referred to Development Control Sub-Committee on 20<sup>th</sup> April as there is no Committee meeting in May, due to local elections. My report would need to be completed by 5<sup>th</sup> April 2006 to make this agenda and therefore you need to have satisfied the above concerns by 31<sup>st</sup> March 2006 in order to receive a favourable recommendation.

I appreciate that this is a tall order and it is probably sensible to withdraw this application and resubmit at a later date once the above matters have been satisfactorily addressed.

Please contact me on the above number should you wish to discuss any of these matters further.

Yours sincerely

**Thomas Smith**  
Senior Planner  
Development Control

For Director of Environment and Culture

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Ref: 2006/0776/P  
Contact: **Thomas Smith**  
Tel: 020 7974 5114

Date: 10 March 2006

Dear Ms Salmela,

**Re. Planning Application 2006/0776/P  
159, 161, 163 & 165 Camden High Street, London**

I refer to the above planning application.

Following a preliminary assessment, it has been identified as a case that if considered to be acceptable, is likely to be subject to a Section 106 Agreement covering the following matters:

- Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance;
- Car free development to ensure that occupiers would not be eligible for residents parking permits in the locality;
- Education contributions;
- Highways works to include the reinstatement of redundant crossovers;
- Contributions towards open space improvements and maintenance;
- Construction Management Plan;
- Servicing Management Plan

This list may not be inclusive and please note that other issues that need to be addressed through the Section 106 Agreement may arise before determination. If so, I will inform you of this in addition to the precise nature of the above matters.



These requirements are supported by relevant policies of the adopted UDP and supplementary planning guidance. Council policy in respect of these areas is available on the Councils website at [www.camden.gov.uk](http://www.camden.gov.uk) which explains in more detail the circumstances of why a planning obligation may be required.

The legal agreement under S.106 would be enforceable by the Council, and bind you and any successors in title. Your intention to agree to the heads of terms will be a matter that the Committee will take into account when considering your application. In order to correctly inform the Committee of your intentions, you will need to confirm agreement to the heads of terms and the Agreement itself will need to be prepared at risk prior to your application being presented to the Committee. The Committee's agreement will also be sought to require completion of the legal agreement within a the statutory 13 week period, or failing this for the application to be reviewed and possibly treated as withdrawn.

Any Section 106 Agreement must follow the Council's standard form of model agreement and the approach set out in the standard clauses contained in the Council's Supplementary Planning Guidance "Planning Obligations Information Pack." The model agreement / clauses are also available through the Councils website. The Council will not accept departures from these.

The Council's Development Control Sub-Committee will not normally consider an application recommended to be subject to a Section 106 Agreement unless the terms of the Agreement have already been confirmed and agreed in writing. Thus, the Council's usual approach is not to report an application to the Sub Committee until such time as any Section 106 Agreement has been agreed in draft and is in a form ready to be executed (subject to any further modification following committee resolution).

Consequently it is strongly advisable that you provide the Council's Legal Services department with the following information as soon as possible.

- Full postcode of the site (in order that relevant title information can be obtained);
- Details of your legal representative;
- A completed undertaking (see attached) that you will meet the Council's reasonable costs incurred in connection with the agreement, together with a one off payment for monitoring costs (equivalent to £300 per Head of term of the Agreement.) These costs will be payable whether or not the Agreement proceeds to completion.

Once this information has been provided, Legal Services will send your legal representative an initial draft Agreement.

Please also note that your application has been identified as a 'major application' in accordance with the Office of the Deputy Prime Minister's definitions. The LPA are required to determine the majority of major applications within a 13 week period from the date of validation.

In order to meet these targets and provide a focused service delivery, Camden Planning Service will be working to tight timescales. In particular please note that following the consultation period a further assessment will be made as to whether the application is likely to be recommended for approval or refusal. It may be possible to accept minor amendments at that stage in order to make the proposal acceptable. If significant amendments are required it may be suggested that you withdraw the application and resubmit an amended scheme following discussion with officers. Where a proposal is considered acceptable, preparation of legal agreements at risk in advance of a Committee resolution will be required.

Please note that this letter represents the Council's initial view of the proposals at this stage, based on the information available. It should not be interpreted as formal confirmation of the acceptability or otherwise of the proposal at this time and cannot be held to prejudice the formal determination of any planning application.

If you have any queries in relation to the above matters do not hesitate to contact me on the above number.

Yours sincerely

Thomas Smith

For Director of Environment Department

cc. Legal Services

As this is an application for a new building both the commercial and residential aspects of the design will need to meet Approve Document M.

**Commercial**

No details are provided regarding the entrance to the ground floor A1 unit although level entrance is indicated on the section. Internally a lift will be required and there may be issues with the design of the stairs and WC facilities however these should not have a significant effect on the planning application.

**Residential**

No design/access statement has been submitted indicating their intention to comply with policy H7 in respect of 100% lifetime homes and 10% wheelchair accessible housing. A level entrance is indicated with stair and lift access. There are some issue related to the internal layout of the flats however these should not have an effect on the application.

MB 10/3/06



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For Director of Environment Department

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